June 29, 2012

OFFICE OF THE HEARING EXAMINER
KING COUNTY, WASHINGTON
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REPORT AND DECISION

SUBJECT: Department of Development and Environmental Services File No. **E0900926**

ROBERT MARSHALL
Civil Penalty Appeal

Location: 46036 SE Edgewick Road

Appellant: **Robert Marshall**
32916 NE 138th Street
Duvall, WA 98019
Email: rmarshall@snocasino.com

King County: Department of Development and Environmental Services
represented by **Jeri Breazeal**
900 Oakesdale Avenue SW
Renton, WA 98057
Telephone: (206) 296-7264
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SUMMARY OF RECOMMENDATIONS/DECISION:

Department's Preliminary Recommendation:	Deny appeal
Department's Final Recommendation:	Deny appeal
Examiner's Decision:	Grant appeal, in part

EXAMINER PROCEEDINGS

Hearing Opened:	June 19, 2012
Hearing Closed:	June 19, 2012

Participants at the public hearing and the exhibits offered and entered are listed in the attached minutes. A verbatim recording of the hearing is available in the Hearing Examiner's Office.

FINDINGS, CONCLUSIONS, AND DECISION: Having reviewed the record in this matter, the Examiner now makes and enters the following:

FINDINGS:

1. On November 15, 2011, the King County Department of Development and Environmental Services (DDES) issued a notice of King County code violation (Notice and Order) to Robert D. Marshall. The property subject to the Notice and Order is located at 46036 SE Edgewick Road in unincorporated King County. Mr. Marshall is the owner.

2. The Notice and Order alleged the following violations of the King County Code:

   A. Occupancy of a substandard dwelling (cabin without electrical power and possible failing septic);

   B. Occupancy of a substandard dwelling (recreational vehicle);

   C. Accumulation of inoperable vehicles and vehicle parts and parking storage on non-impervious surfaces; and

   D. Accumulation of assorted rubbish, salvage and debris.

3. For the first two violations, the Notice and Order required that occupancy of the cabin and recreation vehicle (RV) cease immediately. For the latter two, the Notice and Order required removal of cited materials by December 16. The Notice and Order that penalties that Mr. Marshall would incur for failure to bring the property into compliance. The Notice and Order was not appealed.

4. Based on a February 7, 2012, site visit, Officer Breazeal determined that while the RV and cabin were no longer occupied, the other two violations had not been sufficiently resolved. On February 13, Officer Breazeal requested that DDES's Finance Department bill for the then-to-date penalties. On March 12, DDES dated (though the actual mailing date is not before us) an invoice for civil penalties in the amount of $2,320. This initial penalty invoice was not appealed.

5. On March 15, Officer Breazeal inspected again, and found debris, including a fridge, and some vehicle parts. She concluded that Mr. Marshall had satisfactorily resolved the first two counts (cabin and RV) and a portion of the third (removal of inoperable vehicles and impervious surface parking). She decided to bill Mr. Marshall solely for the last violation (rubbish, salvage and debris), though this included vehicle parts originally listed as part of the vehicle violation. She explained that she consolidated the vehicle parts into the fourth violation to avoid having to bill Mr. Marshall for two separate violations.

6. That same day, she requested that DDES's Finance Department assess civil penalties. On April 16, DDES dated the second penalty invoice (though the actual mailing date is again not before us), this time for $1,280. On April 30, Mr. Marshall filed a timely appeal to this second invoice. This case went to hearing on June 19.

7. Mr. Marshall explained the "nightmare" that occurred after his stable renter disappeared and, unbeknownst to Mr. Marshall, undesirable elements moved in and "trashed the

place," leaving the subject property looking like a "nuclear bomb went off." He testified that he provided the squatters notice to quit the premises, paid to start the eviction process, and involved the Sheriff. He had the electricity re-connected, had the septic checked, paid four-figures worth of dumpster fees, and carted off vehicles.

8. We find that Mr. Marshall affirmatively demonstrated that the actions which resulted in the violation were taken without his knowledge or consent by someone other than the owner or someone acting on the owner's behalf. Not only was Mr. Marshall not the perpetrator, the perpetrators were trespassers, not even his legal tenants with whom he had a contractual or some other arrangement.

9. The big sticking point was the RV the interlopers left when they quit the premises. First, Mr. Marshall and Officer Breazeal explained at the hearing how, unlike the junk vehicles that could be carted off, the RV legally could not. This meant that Mr. Marshall needed to empty the trash-filled RV, cut apart and disassemble the RV by hand onsite, and eventually take all the debris to the dump. Second, as we understand the testimony and pictures, the bulk of the debris Ms. Breazeal catalogued on the site, at least as of the date of the appealed penalty, was *not* debris strewn about the property on the date of the Notice and Order, but rather the remnants of the RV and its contents. This included at least the air conditioning unit, tanks, and rims, along with other junk.

10. In addition to his testimony, Mr. Marshall documented his efforts to achieve compliance. As to the cabin and RV, he produced bills he incurred re-establishing electricity, verifying the septic system, and trying to get the troublesome trespassers out. As to the violation for which he was billed, Mr. Marshall presented invoices from Allied Waste showing over a thousand dollars in waste disposal fees. We provisionally accepted those documents – and now formally accept them – into evidence.

11. This is not a case involving a clash of personalities, philosophical differences, or a he-said/she-said factual dispute. Mr. Marshall had no complaint about Officer Breazeal (describing her as "super nice" and a "help"), nor with the neighbors who turned him in, or with the code enforcement process (saying he "felt horrible" for the neighbors that a place in the community had become such an eyesore). He did not refute any of Officer Breazeal's testimony. For her part, Officer Breazeal agreed that Mr. Marshall had "worked hard" to bring the property into compliance.

12. We find that, as of the date of the second penalty, Mr. Marshall had expended significant efforts to comply with the Notice and Order, but that he had not fully complied. We further find that, had the cleanup not required dissembling and carting off the RV, Mr. Marshall would more likely than not have come into compliance by at least the date of the penalty invoice under appeal.

13. Though not entered as exhibits, the parties agreed that the violations had, by the date of the hearing, been sufficiently cured such that the property has already been issued its compliance certificate. Ms. Breazeal did not object to Mr. Marshall's assessment that the property now "looks like a park" and that the neighbors are "extremely happy." In addition, Mr. Marshall has already paid the penalties in full, making this appeal one seeking a refund instead of one seeking to void a pending bill.

CONCLUSIONS:

1. *Post v. City of Tacoma*, 167 Wn.2d 300, 312, 315, 217 P.3d 1179 (2009), struck down as a violation of "fundamental due process rights" the portion of Tacoma's code enforcement system which afforded citizens no opportunity to appeal certain violations or penalties. Because the government's "determination to assess additional penalties is based on property conditions at the time of each determination," *Post* requires that citizens be afforded an opportunity to appeal each determination. *Id.* at 314. As King County's then-current Title 23 was potentially analogous to Tacoma's in terms of a lack of opportunity to administratively appeal penalties, the Metropolitan King County Council amended Title 23 to create an opportunity for citizens to appeal penalties imposed following issuance of DDES enforcement orders. KCC 23.32.100-.120 (hereinafter, the "2011 Amendments").

2. There are three county decisions impacting Mr. Marshall. The first is DDES's November 15, 2011, Notice and Order. The second is DDES's March 12, 2012, civil penalty invoice for $2,320. Page three of each of these documents explained Mr. Marshall's ability to appeal these decisions; he elected not to. Thus, under the 2011 Amendments (as well as under KCC 23.36.010), we lack jurisdiction to consider the correctness of those decisions. We are compelled to accept the Notice and Order and the March civil penalty invoice as givens in this appeal. We focus solely on DDES's April civil penalty invoice of $1,280.

3. Limiting our jurisdiction to the second penalty invoice raises no constitutional issue. *Post* explicitly notes that property owners who fails to timely exercise a clearly available appeal right are not entitled to later attempt to litigate the issue. *Id.* at 314.

4. However, other aspects, not of Ms. Breazeal's efforts, but of the intersection of *Post*, the 2011 Amendments, our internal Rules of Procedure, and DDES's internal procedures, give us pause. Especially as this is a case of first impression for our office (the first penalty appeal to go to a decision on the merits) and may provide guidance for future such appeals, we expound on four issues.

5. First, while most appeal periods are pegged to the date a determination is served on the party,[1] civil penalty invoice appeals are "pegged to fourteen days from the date of the invoice." KCC 23.32.100(B). Unfortunately, invoices are not necessarily served promptly after Code Enforcement determines that a penalty is warranted. A gap between the date Code Enforcement decides a property condition warrants a penalty and the date of the invoice, and a gap between the date of the invoice and the date the invoice is actually served on the responsible party, each create problems, one less serious, one moreso.

6. A gap between the date Code Enforcement decides a property condition warrants a penalty and the date of the invoice creates an evidentiary problem. For example, in this case Officer Breazeal inspected the premises on March 15, found a continuing violation, and that same day requested that DDES's Finance Department assess civil penalties. However, DDES did not issue the penalty invoice until April 16. That leaves a significant

[1] *See, e.g.*, KCC 23.36.010(A)(2) ("The notice of appeal shall be filed within fourteen days of the service of the citation, notice and order, stop work order or notice of decision not to issue a citation or order.")

gap between the determination that the property is in such a condition that fines are warranted and the actual assessment of those fines.

7. This initial gap does not create a due process issue; it actually cuts in an appellant's favor. For example, here it gave Mr. Marshall an extra month to come into compliance. However, in an environment of ongoing compliance efforts, it may create an evidentiary snafu – pictures from March 15 here could have been substantially out-of-date. This problem would seem to have a simple work around. DDES could process the invoices promptly. Or, if that is not feasible for the over-stretched Finance Department staff, the invoice could clearly state the dates for which the penalty applies. If the April 16 invoice had noted (under "Billing Period Ending") that the penalty was for the period ending March 15 (instead of, as the actual invoice stated, April 16), there would be no confusion.

8. The latter gap, the one between the date of the invoice and the date the invoice is actually served, does create a due process issue. Here Mr. Marshall stated that he received the second invoice two days after it was dated, and he timely filed his notice of appeal. But in at least two other penalty appeals, this latter gap has created havoc.

9. In *Hoverter*, E0901014, the invoice was dated December 21 but not mailed until December 27, giving the Hoverters only six calendar days (three business days). This office ruled that such a timeframe was sufficient to respond, and dismissed the appeal as untimely. That certainly pushed the due process envelope. Worse, in *Webber-Veldwyk*, E1100118, the invoice was dated January 19 but not mailed until February 16, two weeks after the appeal deadline. This office ruled that dismissing the appeal for untimeliness would be wholly unreasonable and a manifest injustice and set the appeal for a hearing on its merits later this summer.

10. To save all the parties from needlessly having to brief and argue (and for this office to have to decide) motions to dismiss based on an untimely appeal following a belatedly-served invoice, we strongly encourage DDES to serve the invoices the same day the invoice is dated, or by at least the following day, and to keep a record of this service.

11. The second major issue is a burden of proof. The 2011 Amendments place the "burden…on the appellant to demonstrate by a preponderance of the evidence that civil penalties were assessed after achieving compliance." KCC 23.32.110. That appears to reverse the typical burden; as our Rules of Procedure state, in "a proceeding to consider an appeal…to a King County agencies' imposition of a penalty…the agency shall be required to present a *prima facie* case based upon competent evidence demonstrating that the legal standard for imposing such…penalty has been met."

12. That reversal is not necessarily problematic, and the burden issue is not dispositive here anyway. Even assuming DDES had the responsibility to present a *prima facie* case, Officer Breazeal's submission easily met that here. Her brief but thorough report gave background, cut-and-pastes from her case notes showing what she did, when, and why, along with photographs and other exhibits providing sufficient documentary evidence. And having provided this ahead of time to Mr. Marshall, there is no question that he was sufficiently apprised of what he needed to challenge at the hearing.

13. However, we will be faced with a much different question if a future appeal comes to us with, for instance, nothing but an invoice and an appellant's statement of appeal. We do not want to cabin ourselves or answer a hypothetical, but it would be best for all parties if we were not placed in a corner, the results of which DDES might not appreciate. We encourage DDES to treat future cases as Ms. Breazeal has here and make a *prima facie* showing of the correctness of the penalty. We understand the burden this places on an already overstretched Code Enforcement staff, but given Ms. Breazeal's report here (at a page and a quarter) and exhibits (in the single-digits), we are not exactly requesting that DDES complete the Twelve Labors of Hercules.

14. The third issue involves the 2011 Amendment's limitation of appeals to a "closed record hearing." Strictly interpreting the 2011 Amendments, we presumably should have rejected Mr. Marshall's exhibits (documenting his efforts to achieve compliance), as they were not in the record prior to the hearing. Yet if the "closed record" restriction prevents an appellant from presenting a meaningful appeal, it may be a problem.

15. The "closed record" issue is not dispositive here. Our findings and conclusions would be identical whether or not we accepted the documents Mr. Marshall submitted at the hearing.

16. However, we could certainly envision scenarios where a truly "closed" record would create a sticky wicket, depriving an appellant of a real and necessary opportunity to appeal potential errors regarding government findings or penalties, an opportunity *Post* indicates is necessary to assure due process. 167 Wn.2d at 313. This concern is heightened by the 2011 Amendment's having placed the burden on the appellants to prove error. In determining what an appellant is allowed to submit in challenging a timely-appealed penalty, we will attempt to harmonize the "closed record" mandate, the responsible party's duty to notify DDES of compliance,[2] and the potential due process issue lurking in the background.

17. Fourth and finally, a penalty appeal appears limited to analyzing whether "penalties assessed for any time period after achieving compliance." The appellant may "only challenge whether civil penalties were assessed for any time period after achieving compliance." And the "hearing examiner's determination is limited to finding whether civil penalties were assessed for any time period after achieving compliance and to establishing the properly penalty dates if the appeal is granted."

18. Applying that strictly to Mr. Marshall's case would run afoul of the very *Post*, due process problem the 2011 Amendments were designed to ameliorate.

19. It is not that *Post* requires an appeal of unlimited scope. Our Supreme Court explicitly approved Tacoma limiting the scope of a hearing to the conditions of the property at the

[2] KCC 23.32.030(A) places on persons responsible for code compliance the "duty to notify [DDES] of any actions taken to achieve compliance with the notice and order." The Notice and Order here informed Mr. Marshall that he had "the DUTY TO NOTIFY [DDES] of ANY ACTIONS TAKEN TO ACHIEVE COMPLIANCE WITH THE NOTICE AND ORDER." Notifying DDES is different from submitting evidence, but at least it may be logical that if an appellant had a reasonable opportunity to bring such information regarding compliance to DDES attention, but failed to, barring (or at least discounting) such later-disclosed evidence might be a reasonable sanction.

time the of the appended decision, preventing relitigation of the underlying violation. 167 Wn.2d at 314. We cannot allow a party to later raise an issue (such as some finding or requirement in a Notice and Order or earlier penalty) that should have been challenged during an earlier appeal period.

20. Mr. Marshall's appeal attempts no such end-around. At the hearing, Mr. Marshall made clear that he was not challenging the Notice and Order nor the initial, $2,320 penalty. His appeal is explicitly limited solely to the second, timely-appealed $1,280 penalty.

21. Similarly, Mr. Marshall's argument about timing is not that the time frame the Notice and Order required for full compliance – one-month, minus a few days for mailing – was unreasonable. Such a challenge would have needed to be raised at the time of the Notice and Order. Instead, as found above, at least the bulk of the debris Ms. Breazeal catalogued on the site as of the date of the appealed penalty invoice were traceable to the interloper's RV that Mr. Marshall later discovered, after back-and-forth with Officer Breazeal, could not be carted off like the junk vehicles but instead had to be dissembled onsite. That greatly complicated his cleanup efforts and is not a fact we believe Mr. Marshall reasonably should have predicted in time to challenge the Notice and Order's deadline for compliance.

22. But Mr. Marshall has not challenged Ms. Breazeal's central findings that, by the date of the second penalty, he had not achieved full compliance in removing all the debris and vehicle parts, as required by the Notice and Order. Even if he had, we still would have found that Mr. Marshall was not in compliance at the time of the second penalty. Instead Mr. Marshall catalogued his significant efforts to clean-up the property and asserted that he was doing all that he could, as fast as he could, given his economic means.

23. Strictly interpreting the 2011 Amendments, we should dismiss Mr. Marshall's appeal as not stating a claim on which relief could be granted. His arguments go beyond "only challeng[ing] whether civil penalties were assessed for any time period after achieving compliance." If our determination must always be "limited to finding whether the civil penalties were assessed for any time period after achieving compliance," our determination would have ended with our finding that, as of the date of the second penalty, Mr. Marshall's significant efforts to comply with the Notice and Order had not been fully successful.

24. But, re-reading *Post* with a more careful eye, we conclude that restricting the record and scope of appeal to the strict terms of the 2011 Amendments would create the very due process problem the 2011 Amendments were explicitly designed to avoid. Where jurisdictions issue penalties there "must be some express procedure available by which citizens may bring errors to the attention of their government and thereby guard against the erroneous deprivation of their interests." *Post*, 167 Wn.2d at 315. *Post* used the example of a party needing the opportunity to contend that his repair efforts had brought the property into compliance, but made it clear that this was only a "notable illustration" of the required need for an appeal process. *Id.* at 315. There are other ways, beyond a dispute about whether actual compliance was achieved on a certain date, that a penalty can be "erroneous or excessive." *Cf. id.* at 313. The citizen must have the opportunity to "bring potential error to [the government's] attention with regard to any…penalties." In some cases due process will undoubtedly mean more than simply asking whether the

property was actually in full compliance as of the date of the penalty invoice. Mr. Marshall's is one of those cases.

25. Title 23 contains an (for lack of a better wording) "innocent owner" defense. Under KCC 23.02.130(B), obligations of persons responsible for code compliance:

> Persons determined to be responsible for code compliance...shall be liable for the payment of any...penalties...provided, however, that if a property owner affirmatively demonstrates that the action which resulted in the violation was taken without the owner's knowledge or consent by someone other than the owner or someone acting on the owner's behalf, that owner shall be responsible only for bringing the property into compliance to the extent reasonably feasible under the circumstances. .... No civil fines or penalties shall be assessed against such an owner or his or her property interest.

26. Similarly, under KCC 23.36.030, administrative appeal - final order:

> If an owner of property where a violation has occurred has affirmatively demonstrated that the violation was caused by another person or entity not the agent of the property owner and without the property owner's knowledge or consent, the property owner shall be responsible only for abatement of the violation.

27. We found above that Mr. Marshall met this affirmative burden and that Mr. Marshall had already (by the time of hearing) abated the violation. We thus would have concluded that Mr. Marshall had a complete defense to a penalty. However the time to have raised the innocent owner defense would have been following the Notice and Order (which laid out the civil penalties) or at the latest after the first invoice (which actually penalized him for those violations). The identical facts have prevailed throughout – Mr. Marshall had had no knowledge of nor given consent to the violations, and the trespassers were not acting on his behalf nor were they his agents. No new facts related to the innocent owner issue became knowable after the time to challenge the Notice and Order and the first invoice passed.

28. We still conclude that some, though not all, of the $1,280 penalty should be refunded. To reach this, we turn to Title 23, specifically KCC 23.32.050. Most pertinent here is the provision that fines and civil penalties can be waived where "the code violations which formed the basis for the civil penalties have been cured, and the director finds that compelling reasons justify waiver of all or part of the outstanding civil penalties." That provision is directed at DDES, but we find the standard informative of a scenario warranting property owner relief.

29. There is no dispute that Mr. Marshall had, by the date of hearing, cured the code violations, and we find the totality of the circumstances here extremely compelling. Although we cannot ignore the fact that as of the date of the appealed invoice Mr. Marshall was not in full compliance, his substantial efforts, the enormity of the tasks he had to tackle, the unanticipated wildcard the RV cleanup provided, his timely payment of

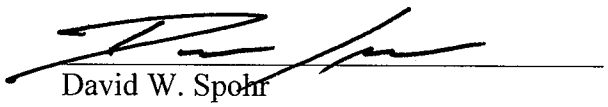
the penalties ($2,320 of which are permanent), the fact that Mr. Marshall had no knowledge that the violations would occur, gave no consent, and had no relationship with the violators, as well as his having (by the time of hearing) come into compliance, all tip the scales strongly in his favor. We conclude that Mr. Marshall is entitled to a refund of $1,000 of that $1,280 total.

30. In the future, and as we have done here, we anticipate limiting these penalty appeals to only the propriety of the timely-appealed invoice and not allowing any second bites at the apple for issues that should have been raised during an earlier appeal period. But in determining what an appellant is allowed to submit or argue in challenging a timely-appealed penalty, we will stay mindful of the Court's due process requirements.

DECISION:

For the foregoing reasons, Mr. Marshall's appeal to the $1,280 penalty invoice is PARTIALLY SUSTAINED. He is entitled to a refund of $1,000.

ORDERED June 29, 2012.



David W. Spohr
Interim Deputy King County Hearing Examiner

NOTICE OF APPEAL

Pursuant to King County Code Chapter 20.24, the King County Council has directed that the Examiner make the final decision on behalf of the county regarding code enforcement appeals. The Examiner's decision shall be final and conclusive unless proceedings for review of the decision are property commenced in King County Superior Court within 21 days of issuance of the Examiner's decision. (The Land Use Petition Act defines the date on which a land use decision is issued by the Hearing Examiner as three days after a written decision is mailed.)

SLS/vsm

MINUTES OF THE JUNE 19, 2012, PUBLIC HEARING ON DEVELOPMENT AND ENVIRONMENTAL SERVICES FILE NO. E0900926.

David Spohr was the Hearing Examiner in this matter. Participating in the hearing were Jeri Breazeal, representing the department, and Robert Marshall, the Appellant.

The following Exhibits were offered and entered into the record:

Exhibit no. 1	DDES staff report to the Hearing Examiner for file no. E0900926.
Exhibit no. 2	Civil Penalty Invoice dated March 12, 2012
Exhibit no. 3	DDES administrative form to request penalty billing, filled out by Jeri Breazeal for the instant case
Exhibit no. 4	Civil Penalty Invoice dated April 16, 2012
Exhibit no. 5	Statement of appeal filed April 30, 2012
Exhibit no. 6	Notice and Order issued November 15, 2011
Exhibit no. 7	Photographs of subject property taken by Jeri Breazeal on February 7, 2012
Exhibit no. 8	Photographs of subject property taken by Jeri Breazeal on March 15, 2012
Exhibit no. 9	Photographs of subject property taken by Jeri Breazeal on May 1, 2012
Exhibit no. 10	Receipt of Appellant's payment to Tanner Electric Cooperative, dated December 7, 2012
Exhibit no. 11	Receipt of Appellant's payment to A & A Septic Designs and Pumping, Inc., dated January 3, 2012
Exhibit no. 12	Appellant's hand-written receipt of payment to Landlord Solutions Inc. for eviction services
Exhibit no. 13	Invoice from Allied Waste dated November 30, 2011
Exhibit no. 14	Invoice from Allied Waste dated December 31, 2011
Exhibit no. 15	Invoice from Allied Waste dated January 31, 2012
Exhibit no. 16	Invoice from Allied Waste dated February 29, 2012
Exhibit no. 17	Receipt for payment to Republic Services, dated January 11, 2012

June 29, 2012

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CERTIFICATE OF SERVICE

SUBJECT: Department of Development and Environmental Services File No. **E0900926**

ROBERT MARSHALL
Civil Penalty Appeal

I, Vonetta Mangaoang, certify under penalty of perjury under the laws of the State of Washington that on June 29, 2012, I transmitted the **REPORT AND DECISION** to the parties of record and interested persons as listed on the attached document as follows:

☒ EMAILED to all County staff listed as parties of record/interested persons and primary parties with e-mail addresses on record.

☒ caused to be placed with the United States Postal Service, with sufficient postage, as FIRST CLASS MAIL in an envelope addressed to the non-County employee parties of record/interested persons at the addresses indicated on the list attached to the original Certificate of Service.

☒ caused to be placed with the United States Postal Service, with sufficient postage, as CERTIFIED MAIL with a return receipt requested in an envelope addressed to the primary parties.

DATED June 29, 2012.

Vonetta Mangaoang
Legislative Secretary

\vsm

All Parties of Record

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