



MUP 18-001 and SDCI project #3028431

From: "David Moehring" <dmoehring@consultant.com>
To: hearing.examiner@Seattle.gov
Cc: ""Alayna.Johnson@seattle.gov"" <Alayna.Johnson@seattle.gov>, ""Joseph.hurley@seattle.gov"" <joseph.hurley@seattle.gov>, "Gribben, Brandon S." <BGribben@helsell.com>, ""soundequitiesinc@gmail.com"" <soundequitiesinc@gmail.com>, PRC <PRC@seattle.gov>
Bcc: "Bill Bradburd" <bill@grandscheme.com>, "Cindi Barker" <cindilbarker@gmail.com>, "Toby Thaler" <toby@loupploup.net>
Date: Jan 17, 2018 8:00:39 AM

Dear Office of the Hearing Examiner,

(This message will be subsequently uploaded / appended to the Hearing Examiner's case file).

The response from the applicant's attorney would be contrary to the Office of Hearing Examiner's prior actions relative to the proposed Pro Tem (as indicated in the original motion). However, before I respond to the Applicant's Response in Opposition to Appellant's Motion for Reassignment of the Hearing Examiner, we need to know if we have all the authorized entities at the table. Is it possible for the Office of the Hearing Examiner and the SDCI to verify and confirm that (1) Helsell Fetterman LLP represents the owner of subject property; and (2) the declared financially responsible actually owns the property or is legally acting as the agent to the owner.

IDENTIFY the PROPERTY OWNER with AUTHORITY:

There is no record that Sound Equities owns the property nor is their record that Sound Equities represents the property owner's interests. From what record is available on King County and Seattle Dept of Construction Inspections, this property at 3641 22nd Ave W is owned by Debra Wood and has been since May 28, 2015 (and also prior ownership before the Quit Claim Deed). Refer to the attached pdf file "Detail_2770601..." property record from King County**. If indeed Debra Wood is the owner of record, then the June 16, 2017 submitted 'Statement of Financial Responsibility / Agent Authorization' which indicated that Sound Equities Inc is the 'Property Owner' would be incorrect. As far as indicated on record, the actual owner of the subject property has not signed any documents authorizing Sound Equities to act with her interests. If fact, the application for subdivision would also be incomplete and invalid.

NOTICE OF APPEARANCE without APPLICANT BEING SERVED:

In addition to lack of property ownership by the Applicant, there is no record that Sound Equities was served the attorney's Notice of Appearance as required by Hearing Examiner Rule 3.08. Please request that the authorized Applicant be served the Notice of Appearance from Helsell Fetterman LLP.

Thank you,
David Moehring AIA NCARB

* Questionable declaration of ownership on the SDCI project site:
<http://web6.seattle.gov/dpd/edms/GetDocument.aspx?src=WorkingDocs&id=861518>

**Ownership per King County:

<http://blue.kingcounty.com/Assessor/eRealProperty/Detail.aspx?ParcelNbr=2770601655>

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Re
2735288	20150608001128	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Oth
1524335	199701171161	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	Not
1524336	199701171162	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Pro Set

3.07 PARTY REPRESENTATIVE REQUIRED

When a party consists of more than one person, or is an organization or other entity, the party shall designate an individual or firm to be its representative and provide written notification to the Hearing Examiner and the other parties of contact information for the representative. (See HER 3.01(d)(5).) The rights of such a party shall be exercised by the party representative. Notice or other communication to the party representative is notice or communication to the party. (See also HER 3.01(d)(5), and HER 3.08.)

3.08 NOTICE OF APPEARANCE

When a party is represented by an attorney, the attorney shall file a notice of appearance with the Hearing Examiner and serve a copy of the notice on the other parties at the earliest possible time in the proceedings. (See HER 3.07.)

Sent: Tuesday, January 16, 2018 at 11:10 AM

From: "Gonzalez, Kyna D." <kgonzalez@helsell.com>

To: "'Alayna.Johnson@seattle.gov'" <Alayna.Johnson@seattle.gov>, "'dmoehring@consultant.com'" <dmoehring@consultant.com>, "'joseph.hurley@seattle.gov'" <joseph.hurley@seattle.gov>

Cc: "Gribben, Brandon S." <BGribben@helsell.com>, "'soundequitiesinc@gmail.com'" <soundequitiesinc@gmail.com>

Subject: Moehring - MUP 18-001

Good morning:

Please see attached Applicant's Response in Opposition to Appellant's Motion for Reassignment of the Hearing Examiner. If you have any questions, please contact our office.

Kyna D. Gonzalez
Legal Assistant
Helsell Fetterman LLP
1001 Fourth Avenue, Suite 4200
Seattle, WA 98154
(206) 689-2480

Attachments

- Detail_2770601655_01-17-2018.pdf
- Financial Responsibility Form.pdf

**City of Seattle**

Department of Construction and Inspections
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
(206) 684-8850

Seattle DCI Project Number

3028431**Statement of Financial Responsibility/ Agent Authorization**

Project Address	<u>3641 22nd AVE WEST</u>
-----------------	---------------------------

NAME AND ADDRESS OF FINANCIALLY RESPONSIBLE PARTY (Required)

A. Name of Individual or Entity (Company, Partnership, etc.) Assuming Financial Responsibility	<u>SOUND EQUITIES INC</u>
B. Name of Individual Signing on Behalf of an Entity (Company, Partnership, etc.)	<u>LOREN LANDERHOLM PRESIDENT of SEI</u>
C. Financially Responsible Party Relationship to Property	<input checked="" type="checkbox"/> Property Owner <input type="checkbox"/> Property Lessee <input type="checkbox"/> Property Contract Purchaser <input type="checkbox"/> Public Agency <input type="checkbox"/> Service Requestor (check only if request does not directly relate to the development of real property i.e. request for interpretation, legal building site letter)
D. Mailing Address (of individual signing statement)	<u>P.O. Box 99173</u> <u>Seattle WA 98139</u>
E. Telephone (of individual signing statement)	<u>206-669-2711</u>
F. Email (of individual signing statement)	<u>soundequitiesinc@gmail.com</u>

Individual Declaration of Financial Responsibility (must match the individual's name listed in "A" above)

I _____ (printed name) declare that I am the _____ (relationship to project or service request) and that I am responsible for payment of all fees associated with this project or other request to DPD requiring payment of fees, including all hourly or other fees which may accrue during the review and/or post-issuance whether the permit is issued or whether the application is canceled or denied before the permit is issued.

Signature

Date

Entity Declaration of Financial Responsibility (must match the individual name in "B" above and have authority to bind entity named in "A" above)

I LOREN LANDERHOLM (printed name) declare that in my capacity as PRESIDENT (position within entity - ie manager, CFO, etc) for SONO EQUITIES INC (financially responsible entity named in "A" above) I have the authority to bind the Financially Responsible party named above to payment of all fees associated with this project or other request to DPD requiring payment of fees, including all hourly or other fees which may accrue during the review and/or post-issuance whether the permit is issued or whether the application is canceled or denied before the permit is issued.

LOREN LANDERHOLM PRESIDENT SET
Signature Date

AGENT AUTHORIZATION (Optional):

I hereby authorize the individual named below to act as the primary contact (aka primary applicant) for this project. This individual is not responsible for the payment of fees.

Primary Applicant Name: _____

Primary Applicant Phone: _____

Primary Applicant Email: _____

Primary Applicant Address: _____

King County Department of Assessments

Fair, Equitable, and Understandable Property Valuations

You're In: [Assessor](#) >> [Look up Property Info](#) >> [eReal Property](#)Department
of
Assessments500 Fourth
Avenue,
Suite ADM-
AS-0708,
Seattle, WA
98104Office Hours:
Mon - Fri
8:30 a.m. to
4:30 p.m.TEL: 206-
296-7300
FAX: 206-
296-5107
TTY: 206-
296-7888[Send us
mail](#)

ADVERTISEMENT

[New Search](#) [Property Tax Bill](#) [Map This Property](#) [Glossary of Terms](#) [Area Report](#) [Print Property Detail](#) 

PARCEL DATA

Parcel	277060-1655	Jurisdiction	SEATTLE
Name	WOOD DEBRA A	Levy Code	0010
Site Address	3641 22ND AVE W 98199	Property Type	R
Residential Area	011-003 (WC Appraisal District)	Plat Block / Building Number	12
Property Name		Plat Lot / Unit Number	21
		Quarter-Section-Township-Range	SE-14-25-3

Legal Description

GILMANS ADD
PLat Block: 12
PLat Lot: 21

LAND DATA

Highest & Best Use As If Vacant	SINGLE FAMILY
Highest & Best Use As Improved	PRESENT USE
Present Use	Single Family(Res Use/Zone)
Land SqFt	6,000
Acres	0.14

Percentage Unusable	
Unbuildable	NO
Restrictive Size Shape	NO
Zoning	LR1
Water	WATER DISTRICT
Sewer/Septic	PUBLIC
Road Access	PUBLIC
Parking	
Street Surface	PAVED

Views

Rainier	
Territorial	
Olympics	
Cascades	
Seattle Skyline	
Puget Sound	
Lake Washington	
Lake Sammamish	
Lake/River/Creek	
Other View	

Waterfront

Waterfront Location	
Waterfront Footage	0
Lot Depth Factor	0
Waterfront Bank	
Tide/Shore	
Waterfront Restricted Access	
Waterfront Access Rights	NO
Poor Quality	NO
Proximity Influence	NO

Designations

Historic Site	
Current Use	(none)
Nbr Bldg Sites	
Adjacent to Golf Fairway	NO
Adjacent to Greenbelt	NO
Other Designation	NO
Deed Restrictions	NO
Development Rights Purchased	NO
Easements	NO
Native Growth Protection Easement	NO
DNR Lease	NO

Nuisances

Topography	
Traffic Noise	
Airport Noise	
Power Lines	NO
Other Nuisances	NO

Problems

Water Problems	NO
Transportation Concurrency	NO
Other Problems	NO

Environmental

Environmental	NO
---------------	----

BUILDING

Building Number	1
Year Built	1904
Year Renovated	0
Stories	1.5
Living Units	1
Grade	6 Low Average
Grade Variant	0
Condition	Very Good
Basement Grade	
1st Floor	910
1/2 Floor	260
2nd Floor	0
Upper Floor	0

Picture of Building 1

Reference
Links:

- [King County Tax Links](#)
- [Property Tax Advisor](#)
- [Washington State Department of Revenue \(External link\)](#)
- [Washington State Board of Tax Appeals \(External link\)](#)
- [Board of Appeals/Equalization](#)
- [Districts Report](#)
- [iMap](#)
- [Recorder's Office](#)

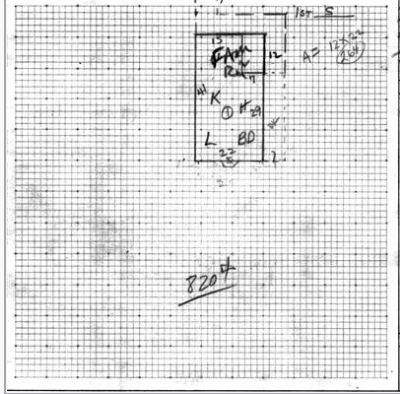
[Scanned images of
surveys and other
map documents](#)[Scanned images of
plats](#)Notice mailing date:
05/25/2017

ADVERTISEMENT

Finished Basement	0
Total Finished Area	1,170
Total Basement	0
Basement Garage	0
Unfinished 1/2	0
Unfinished Full	0
AGLA	1,170
Attached Garage	0
Bedrooms	3
Full Baths	1
3/4 Baths	0
1/2 Baths	0
Heat Source	Oil
Heat System	Forced Air
Deck Area SqFt	540
Open Porch SqFt	0
Enclosed Porch SqFt	0
Brick/Stone	0
Fireplace Single Story	0
Fireplace Multi Story	0
Fireplace Free Standing	1
Fireplace Additional	0
AddnlCost	0
Obsolescence	0
Net Condition	0
Percentage Complete	0
Daylight Basement	
View Utilization	



Floor plan of Building 1



Accessory Of Building Number: 1

Accessory Type	Picture	Description	SqFt	Grade	Eff Year	%	Value	Date Valued
PRK-DET GAR			410	6 Low Average	1988			

TAX ROLL HISTORY

Account	Valued Year	Tax Year	Omit Year	Levy Code	Appraised Land Value (\$)	Appraised Imps Value (\$)	Appraised Total Value (\$)	New Dollars (\$)	Taxable Land Value (\$)	Taxable Imps Value (\$)	Taxable Total Value (\$)	Tax Value Reason
277060165507	2017	2018		0010	375,000	198,000	573,000	0	375,000	198,000	573,000	
277060165507	2016	2017		0010	342,000	180,000	522,000	0	342,000	180,000	522,000	
277060165507	2015	2016		0010	311,000	160,000	471,000	0	311,000	160,000	471,000	
277060165507	2014	2015		0010	266,000	138,000	404,000	0	266,000	138,000	404,000	
277060165507	2013	2014		0010	257,000	110,000	367,000	0	257,000	110,000	367,000	
277060165507	2012	2013		0010	234,000	74,000	308,000	0	234,000	74,000	308,000	
277060165507	2011	2012		0010	394,000	2,000	396,000	0	394,000	2,000	396,000	
277060165507	2010	2011		0010	405,000	2,000	407,000	0	405,000	2,000	407,000	
277060165507	2009	2010		0010	405,000	15,000	420,000	0	405,000	15,000	420,000	
277060165507	2008	2009		0010	436,000	73,000	509,000	0	436,000	73,000	509,000	
277060165507	2007	2008		0010	399,000	66,000	465,000	0	399,000	66,000	465,000	
277060165507	2006	2007		0010	363,000	36,000	399,000	0	363,000	36,000	399,000	
277060165507	2005	2006		0010	126,000	164,000	290,000	0	126,000	164,000	290,000	
277060165507	2004	2005		0010	117,000	151,000	268,000	0	117,000	151,000	268,000	
277060165507	2003	2004		0010	113,000	145,000	258,000	0	113,000	145,000	258,000	
277060165507	2002	2003		0010	107,000	136,000	243,000	0	107,000	136,000	243,000	
277060165507	2001	2002		0010	98,000	135,000	233,000	0	98,000	135,000	233,000	
277060165507	2000	2001		0010	89,000	110,000	199,000	0	89,000	110,000	199,000	
277060165507	1999	2000		0010	97,000	81,000	178,000	0	97,000	81,000	178,000	
277060165507	1998	1999		0010	89,000	59,000	148,000	0	89,000	59,000	148,000	
277060165507	1997	1998		0010	0	0	0	0	77,000	51,000	128,000	
277060165507	1996	1997		0010	0	0	0	0	70,000	47,700	117,700	
277060165507	1994	1995		0010	0	0	0	0	70,000	47,700	117,700	
277060165507	1992	1993		0010	0	0	0	0	66,900	45,200	112,100	
277060165507	1990	1991		0010	0	0	0	0	59,200	40,000	99,200	
277060165507	1988	1989		0010	0	0	0	0	35,000	29,800	64,800	
277060165507	1986	1987		0010	0	0	0	0	46,000	31,500	77,500	
277060165507	1984	1985		0010	0	0	0	0	37,000	21,700	58,700	
277060165507	1982	1983		0010	0	0	0	0	37,000	17,800	54,800	

SALES HISTORY

Excise Number	Recording Number	Document Date	Sale Price	Seller Name	Buyer Name	Instrument	Sale Reason
2735288	20150608001128	5/28/2015	\$0.00	DUGUERRE DEBRA A	WOOD DEBRA A	Quit Claim Deed	Other
1524335	199701171161	1/16/1997	\$147,000.00	PALMER MARK R+KALONI H	WOOD WILLIAM J+DEBRA A DUGUERRE	Statutory Warranty Deed	None
1524336	199701171162	12/10/1996	\$0.00	DUGUERRE DAVID D	DUGUERRE DEBRA A	Quit Claim Deed	Property Settlement

REVIEW HISTORY

