NO. 100098-7

SUPREME COURT OF THE STATE OF WASHINGTON

U4IK GARDENS, LLP, a Washington limited liability partnership,

Petitioner,

v.

STATE OF WASHINGTON, THE WASHINGTON STATE LIQUOR CONTROL BOARD, et al.,

Respondent.

ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

When recreational use of marijuana by adults in Washington became legalized, it was the express intent of the people that the marijuana industry be controlled by a "tightly regulated, state-licensed system . . . ." Laws of 2013, ch. 3, § 1. It is undisputed that Petitioner U4IK Gardens, LLP, (U4IK) as a licensed marijuana producer and processer, was required to comply with the rules and regulations governing Washington State's marijuana industry as set out in RCW 69.50 and WAC 314-55. It is also undisputed that U4IK cultivated hundreds of marijuana plants in violation of the statutes and regulations.

WAC 314-55-083(4) is clear: "To prevent diversion and to promote public safety, marijuana licensees must track marijuana from seed to sale." That requirement includes seedlings, plants, and even marijuana waste that "must be traceable from production through processing . . . ." *Id.* An essential part of traceability includes not just inventory tracking on a computer system, but also the mandate that marijuana plants eight or more inches in height or

width be individually physically tagged. WAC 314-55-083(4)(f). Violations of those requirements "create a direct or immediate *threat to public health, safety, or both*" and renders a producer's marijuana unsuitable for further processing or retail sale. WAC 314-55-521 (emphasis added).

U4IK has not sought to have the statute or regulations declared invalid – either at the trial court, Court of Appeals, or here.[1] Neither has it alleged that Division II's decision implicates a substantial public interest or is in conflict with a decision of this Court or a published opinion of the Court of Appeals. Rather, its sole request for relief continues to be monetary damages for illegally cultivated marijuana. This Court should decline the invitation to create such a remedy and deny review.

[1] "As the trial court astutely recognized below, U4IK did not argue that the statute or Board regulations are unconstitutional on their face or as applied. Nor does U4IK argue on appeal that any applicable statute or regulation is invalid." *U4IK Gardens, LLP v. State*, No. 54492-0-II, 2021 WL 3057064, at *n.1 (July 20, 2021) (unpublished).

II. COUNTERSTATEMENT OF ISSUES FOR REVIEW[2]

1. Pursuant to RCW 69.50, did Respondents have authority to seize, summarily forfeit, and destroy marijuana plants removed from U4IK's premises when it is undisputed that U4IK failed to attach traceability identifiers required by WAC 314-55-083(4)?

2. Were U4IK's claims for monetary damages under the Washington Constitution properly dismissed when (a) as expressly provided by statute, U4IK did not have a property right in the illegally cultivated marijuana plants, and (b) Washington does not recognize private causes of action for damages based upon alleged constitutional violations?

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[2] Other than a reference in a single footnote, U4IK has failed to brief its dismissed claims of trespass and conversion. Pet. for Review at 13. Neither are those causes of action included in U4IK's "Issues Presented for Review." Pet. for Review at 1. Accordingly, they are abandoned on appeal. *See Seattle-First Nat. Bank v. Shoreline Concrete Co.*, 91 Wn.2d 230, 243, 588 P.2d 1308 (1978). The Court of Appeals also found that U4IK abandoned its equal protection or takings claims on appeal. *U4IK Gardens*, 2021 WL 3057064, at *n.4.

III. COUNTERSTATEMENT OF THE CASE

A. Public Safety Requires Strict Regulation of the Marijuana Industry

The Legislature tasked the Washington State Liquor and Cannabis Board to adopt rules to regulate and control marijuana at each stage from production through retail sales. RCW 69.50.342(1). Protection of public health and safety are the Board's priority. *See* Laws of 2015, ch. 70, § 2. To accomplish that goal, the Board maintains strict control over growth, processing, and sale of marijuana. WAC 314-55. This requires compliance with license requirements so marijuana products produced in Washington are trackable from seed to sale. WAC 314-55-083(4).

RCW 69.50.401 makes it illegal to possess controlled substances with the intent to manufacture or deliver except as authorized by chapter 69.50. And, RCW 69.50.401(3) provides that the production of marijuana is not a crime *so long as* done "in compliance with the terms set forth in RCW 69.50.366 "or any other provision of Washington state law." In turn, RCW 69.50.366 requires licensed marijuana producers to

comply with rules adopted by the Board; noncompliant conduct amounts to criminal and civil offenses. *See also* WAC 314-55-110 (responsibility to maintain license includes "compliance with the marijuana laws and rules of the WSLCB, chapters 69.50 and 69.51A RCW, 314-55 WAC, and any other applicable state laws and rules").

Finally, RCW 69.50.500(a) provides, "It is hereby made the duty of . . . the [Board], and [its] officers, agents, inspectors and representatives, and all law enforcement officers within the state, and of all prosecuting attorneys, to enforce all provisions of this chapter."

B. The Board Issued a Marijuana Producer and Processor License to U4IK in 2015

The Board approved U4IK's application for a Marijuana Producer and Marijuana Processor license in 2015. CP 131. To maintain a valid license, U4IK was required to remain in compliance with the rules and regulations applicable to marijuana producers and processors. *Id.*; *see also* RCW 69.50.363-.366. This

included compliance with important security (identification badges, alarms, and video surveillance) and traceability requirements. CP 131; WAC 314-55-083(4).

The traceability requirement has multiple components "[t]o prevent diversion and to promote public safety" including the following: (1) an up-to-date system specified by the Board to provide information about key "events" such as moving a plant from seedling to production; (2) point-of-sale, tax, and inventory records; (3) and physical tagging. WAC 314-55-083(4). Notably, tracking and records are *not* enough; WAC 314-55-083(4)(f) specifically requires that "[a]ll marijuana plants eight or more inches in height or width must be physically tagged . . . ."

Failure to comply with the WAC's traceability requirements creates serious public health and safety risks because (a) the source and quality of a licensee's marijuana cannot be verified,[3] (b) pesticides or other contaminants

[3] CP 133; *see also* WAC 314-55-083(4).

identified on an untagged plant or product cannot be traced to identify other potentially impacted plants or products,[4] and (c) missing tracking information creates an opportunity for introduction of black market marijuana into the regulated retail stream or vice versa.[5]

Marijuana is a Schedule I drug under RCW 69.50.204(c)(22), and RCW 69.50.505(1) provides that all controlled substances and all raw materials used to manufacture any controlled substance in violation of chapter 69.50 "are subject to seizure and forfeiture and no property right exists in them . . . ."

C. Inspection of U4IK's Facility Revealed Numerous Violations

In response to several complaints about conduct occurring at U4IK's production facility, and as authorized by statute, the Board planned an unannounced inspection of U4IK's premises. CP 131-33, 137-41; RCW 69.50.500, .505; WAC 314-55-210(1).

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[4] CP 133.

[5] CP 133; *see also* WAC 314-55-083(4).

On July 11, 2018, a Board enforcement officer and members of the Vancouver Police Department arrived at U4IK and inspected its premises, marijuana plants and products, paperwork, and video surveillance footage. CP 131-32, 137-41. Officers identified several violations including the following:

a. Bags of cannabis flower that did not display the 16-digit traceability numbers required by WAC 314-55-083(4);

b. The labelled weight displayed on bags of cannabis product did not match the *actual* weight when measured on a scale which indicated unaccounted cannabis product in violation of WAC 314-55-083(4);

c. The time displayed on U4IK's surveillance camera was inaccurate in violation of WAC 314-55-083(3);

d. Over 400 live marijuana plants that did not display the 16-digit traceability numbers on the individual plants in violation of WAC 314-55-083(4); and,

e. Two unmarked totes and multiple tier drying hoops containing dried unmarked marijuana leaves/stems and five plastic bottles containing kief did not display required traceability numbers.

CP 132-33.

Officers inventoried and seized 411 marijuana plants not tagged with traceability identifiers and the other untagged marijuana products. CP 134, 143. "[S]ome of the plants were as much as 4 to 5 feet tall, and some were full grown plants with buds . . . ." *U4IK Gardens*, 2021 WL 3057064, at *2. Both the height and development of these plants showed the failure to comply with the regulations had been going on for an extended period of time. Officers cut the main stalk of each untagged plant at its base near the growing medium so they could confiscate the plants without taking possession of U4IK's containers, watering lines, or other equipment. The Board later destroyed the plants by incineration. CP 55, 134, 143.

Although officers also identified numerous smaller plants not individually tagged, they only seized plants eight inches or taller. CP 134; *see also* WAC 314-55-083(4)(f). Additionally, a number of potted plants had traceability numbers attached to their containers, but not the plants themselves. Although a

regulatory violation, officers did not seize any plants that had traceability identifiers attached to their containers. *Id*.

As a result of U4IK's failure to comply with licensing requirements, it was charged with and sanctioned for violation of WAC 314-55-083(4). CP 81-82. Ultimately, U4IK stipulated to the traceability violation and agreed to pay the fine. CP 85.

IV. WHY REVIEW SHOULD BE DENIED

The decision of the Court of Appeals does not conflict with a decision of this Court or a published decision of the Court of Appeals, and U4IK does not allege otherwise. U4IK has not challenged the constitutionality of the statutes or regulations at issue. Further, the only substantial public interest involved in this case is ensuring that the marijuana industry remains safe for Washington consumers – *not* providing a private right of action for a producer admittedly cultivating marijuana in violation of the laws and regulations intended to protect the public. Accordingly, pursuant to RAP 13.4(b), review should be denied.

A. The Board Has Authority to Seize and Destroy Plants Cultivated in Violation of RCW 69.50 and WAC 314-55

It is undisputed that U4IK violated licensing requirements, specifically WAC 314-55-083(4). Those requirements are not just procedural red tape; they are "[t]o prevent diversion and to promote public safety." The Legislature mandated that the Board "enforce all provisions" of RCW 69.50. RCW 69.50.500(a). U4IK's admitted violation of traceability regulations means "it also necessarily failed to comply with RCW 69.50.366, the statute that requires licensed marijuana producers to comply with all Board regulations." *U4IK Gardens*, 2021 WL 3057064, at *8.[6]

As the Court of Appeals noted, RCW 69.50.505(2)(c) authorizes the Board to seize property *without process* if "[a] board

[6] U4IK continues to argue it violated just a Board rule and not RCW 69.50; however, it ignores the plain language of the statute. Pet. for Review at 10. RCW 69.50.366 provides: "The following acts, when performed by a validly licensed marijuana producer . . . *in compliance with rules adopted by the* [*Board*] to implement and enforce this chapter, do not constitute criminal or civil offenses under Washington state law . . . ." (Emphasis added.)

inspector or law enforcement officer has probable cause to believe that the property is directly or indirectly dangerous to health or safety." *U4IK Gardens*, 2021 WL 3057064, at *6. The regulations themselves state that violations of traceability requirements, which include physically tagging each plant, create a threat to public health and safety. WAC 314-55-083(4), -521. Nonetheless, U4IK argues the Board did not have the authority to destroy the untagged plants. It is wrong.

RCW 69.50.505(12) provides that marijuana plants that "have been planted or cultivated in violation of this chapter . . . may be seized and summarily forfeited" to the Board. WAC 314-55-210(5) *explicitly* authorizes the destruction of untagged plants. In dispensing with the same arguments U4IK makes here, the Court of Appeals found that, although the other sub-sections of the regulation provide "other avenues to destruction, involving an administrative hold or case adjudication for example, the plain language of WAC 314-55-210(5) provides for the destruction of *plants* not

identifiable through the Board's tracing system, without reference to any delay or predestruction proceeding." *U4IK Gardens*, 2021 WL 3057064, at *9 (emphasis added).

As it did below, U4IK relies on WAC 314-55-210(6) for the proposition that an administrative hold of the illegally cultivated plants was required. Pet. for Review at 7.[7] However, it again ignores the plain language that "allows for, but does not require, an administrative hold." *U4IK*, 2021 WL 3057064, at *9.[8]

The Court of Appeals' interpretation is consistent with this Court's ruling that "the term 'may' in a statute generally confers discretion." *Freeman v. Freeman*, 169 Wn.2d 664, 671, 239 P.3d 557 (2010); *Nat'l Elec. Contractors Ass'n, Cascade Chapter v.*

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[7] U4IK weaves a dramatic hypothetical where an enforcement officer acts as "investigator, prosecutor, judge, and executioner" and improperly "deem[s] [marijuana] to not be identifiable;" however, U4IK *conceded* that it violated the traceability requirements of WAC 314-55-083(4)(f). Pet. for Review at 8.

[8] "WSLCB officers *may* order an administrative hold of marijuana . . . ." WAC 314-55-210(6).

Riveland, 138 Wn.2d 9, 28, 978 P.2d 481 (1999) (statute's use of the term "may" was permissive and did not create duty); *Yakima Cnty. Fire Prot. Dist. No. 12 v. City of Yakima*, 122 Wn.2d 371, 381, 858 P.2d 245 (1993) (same).[9]

Tellingly, U4IK does not argue or cite any authority supporting a conclusion that the Court of Appeals interpreted the relevant statute or regulations incorrectly or its decision conflicts with case law from this Court or any published decision of the Court of Appeals. It is axiomatic that if a statute, or in this case a regulation, is plain and unambiguous, its meaning must be derived from wording of the regulation itself. *Berger v. Sonneland*, 144 Wn.2d 91, 105, 26 P.3d 257 (2001). Ambiguity does not arise simply because there are conceivably different interpretations of a regulation. "The courts are not obliged to discern an ambiguity by imagining a variety of alternative

[9] The rules of statutory construction also apply to regulations. *Whatcom Cnty. v. Hirst*, 186 Wn.2d 648, 667, 381 P.3d 1 (2016).

interpretations." *Id.* (internal quotations omitted). Yet, that is precisely what U4IK has argued, i.e., that the regulations "need not be construed" in the manner in which both the trial court and the Court of Appeals interpreted them. Pet. for Review at 6, 9. The plain language of the statute and regulations allowed the Board to destroy marijuana plants "that were not maintained in compliance with chapter 69.50 or Board regulations." *U4IK Gardens*, 2021 WL 3057064, at 7-8.

As acknowledged by U4IK, there is a "longstanding rule that courts should generally construe a legislative enactment 'in a way that is consistent with its underlying purpose and avoids constitutional deficiencies.'" Pet. for Review at 8 (citing *State v. Crediford* 130 Wn.2d 747, 755, 927 P.2d 1129 (1996)). However, U4IK ignores the express intent of the people of Washington, the Legislature, and the Board in legalizing and regulating marijuana. "The surest indication of legislative intent is the language enacted by the legislature, so if the meaning of a statute is plain on its face, [courts] give effect to that plain

meaning." *State v. Ervin*, 169 Wn.2d 815, 820, 239 P.3d 354 (2010) (internal quotation marks and citations omitted).

This Court does not have to look far to find the intent of RCW 69.50 or WAC 314-55: *public health and safety*. *See, e.g.*, RCW 69.50.500(a), .342 note ("This act is necessary for the immediate preservation of the public peace, health, or safety, or support of the state government and its existing public institutions, and takes effect immediately [March 25, 2020]."); WAC 314-55-083(4) (to promote public safety); WAC 314-55-050 (license can be denied/cancelled/suspended where "in the best interest of the welfare, health, or safety of the people of the state"); WAC 314-55-521 (violations create threat to public health and safety).

The Court of Appeals correctly held that the Board has the authority to seize and destroy plants cultivated in violation of RCW 69.50 and WAC 314-55. Its decision does not conflict with case law from this Court or a published decision of the Court of

Appeals. And, importantly, it effectuates the express intent of the rules and regulations to protect public health and safety.

B. The Washington Constitution Does Not Provide a Private Right of Action

Despite its illegal cultivation of marijuana plants; the intent of the people of Washington to create a tightly regulated, state-licensed system for marijuana production; and the express direction of the Legislature to protect public health and safety, U4IK invites this Court to create a private right of action for monetary damages under the Washington State Constitution. However, U4IK had no property rights to the untagged plants that were seized, Washington does not provide a private right of action for alleged constitutional violations, and this Court should decline U4IK's invitation to create one.

1. U4IK has no property right in illegally cultivated marijuana

U4IK's claims that the Board is not guided by any standards and that U4IK has a right to illegally cultivated

marijuana are both factually and legally inaccurate. *See* Pet. for Review at 14.

The marijuana industry is highly regulated – as the people of Washington intended it should be. As a licensed marijuana producer and processor, U4IK agreed to comply with the laws and regulations. *See* RCW 69.50.366; WAC 314-55-110. Only compliance protects growing and processing marijuana from being considered a felony. RCW 69.50.401.

The laws and rules are designed to ensure against product being diverted to the black market and, more importantly, to protect the health and safety of marijuana consumers. As part of the Board's statutory duty to enforce all the provisions of RCW 69.50, the Legislature explicitly authorized the Board to seize property *without process* if "[a] board inspector or law enforcement officer has probable cause to believe that the property is directly or indirectly dangerous to health or safety." RCW 69.50.500(a), .505(2)(c). Rather than leave this determination up to each inspector's discretion, as U4IK seems

to argue, the Board promulgated rules to define when violations may be dangerous to health or safety. Tagging violations "create a direct or immediate threat to public health, safety, or both." WAC 314-55-521. The regulations further warn manufacturers that the Board may seize, confiscate, and destroy "[a]ny . . . untraceable product required to be in the traceability system" or "that is not identifiable through the Washington marijuana traceability system." WAC 314-55-210(2), (5).

Furthermore, by voluntarily engaging in the tightly regulated marijuana industry, U4IK agreed to permit the Board to conduct unannounced inspections. RCW 69.50.562-.563; WAC 314-55-185-540;[10] *see also Dodge City Saloon, Inc., v. Liquor Control Bd*., 168 Wn. App. 388, 396, 288 P.3d 343 (2012) (rejecting nightclub's allegation that a warrantless underage

[10] Further, it is uncontested that U4IK's owner gave express permission for the officers to enter. CP 131-32. *See United States v. Bramble*, 103 F.3d 1475, 1478 (9th Cir. 1996) ("Once consent has been obtained from one with authority to give it, any expectation of privacy is lost.").

compliance check violated constitutional protections against unreasonable searches and seizures).

The untagged marijuana plants that were seized and forfeited were not property U4IK had a right to possess. The Legislature made clear distinctions between "property" and controlled substances as evidenced by its lengthy detail of what property may be seized and the procedures to follow set out in RCW 69.50.505(1)-(8), (14)-(17). And it expressly stated that "no property rights exist" in both controlled substances and the raw materials used to manufacture controlled substances in violation of RCW 69.50. RCW 69.50.505(1)(a), (b).

Even in *City of Everett v. Slade*, 83 Wn.2d 80, 515 P.2d 1295 (1973), cited by U4IK, while there was a dispute over the vehicle that was seized, there was never any contention that the plaintiff had a property interest in the controlled substances he was selling, as U4IK claims it has here. Further, the *City of Everett* Court noted that a prior hearing is not required if seizure is "necessary to secure an important governmental or general public

interest . . . ." 83 Wn.2d at 83-84 (quoting *Fuentes v. Shevin*, 407 U.S. 67, 90, 92 S. Ct. 1983, 1999, 32 L. Ed. 2d 556 (1972)).

U4IK was growing marijuana plants in violation of the rules and regulations it was mandated to follow, and RCW 69.50.505(12) separately and succinctly authorizes the Board to seize and *summarily* forfeit marijuana plants that were illegally cultivated. There is an obvious governmental interest in seizing untagged marijuana plants because, pursuant to WAC 314-55-521, they "create a direct or immediate threat to public health, safety, or both." *See also* WAC 314-55-210(5), -083(4).[11]

2. No private right of action exists and none should be created here

Even assuming arguendo that U4IK had some property interest in the illegally cultivated marijuana plants, its request for

[11] While the Court of Appeals did not decide the issue of whether illegally cultivated marijuana plants constituted contraband, *U4IK Gardens*, 2021 WL 3057064, at *n.6, it remains the Board's position that, because marijuana is a Schedule I drug under RCW 69.50.204(c)(22), untagged plants are contraband and therefore both RCW 69.50.505(11) and (12) apply. *See also* CP 133.

relief for a claimed due process violation and alleged unlawful seizure under the Washington Constitution fails as a matter of law. "Washington courts have consistently rejected invitations to establish a cause of action for damages based upon constitutional violations 'without the aid of augmentative legislation [.]'" *Blinka v. Wash. State Bar Ass'n*, 109 Wn. App. 575, 591, 36 P.3d 1094 (2001), *review denied*, 146 Wn.2d 1021, 52 P.3d 520 (2002) (quoting *Sys. Amusement, Inc. v. State*, 7 Wn. App. 516, 517, 500 P.2d 1253 (1972); also citing *Spurrell v. Bloch*, 40 Wn. App. 854, 860-61, 701 P.2d 529 (1985); *Reid v. Pierce Cnty.*, 136 Wn.2d 195, 961 P.2d 333 (1998)). U4IK's claims of due process violations and purportedly unlawful seizures were properly dismissed because the Washington State Constitution does not provide a private right of action.

Likewise, this Court should reject U4IK's invitation to create a cause of action for damages under the Washington Constitution. Pet. for Review at 18. First, not only is there no supportive "augmentative legislation," but instead, the

Legislature has expressly stated that licensees out of compliance with the statutes and regulations do not have any protected property interest in either controlled substances or the raw materials to produce controlled substances. RCW 69.50.505(1).

Second, U4IK admits it failed to comply with tagging requirements; thus, it was out of compliance with the applicable statutes and regulations. Pet. for Review at 2. Only marijuana produced in compliance with the applicable statutes is legal to possess. RCW 69.50.401(3). U4IK is therefore asking this Court for a constitutional remedy that somehow ignores that, at the time of forfeiture, it was in violation of the criminal code. *See* RCW 69.50.401(d). U4IK's unabashed request for money damages from its failure to follow the law should be rejected.

V. CONCLUSION

Pursuant to RCW 69.50, the Board had authority to seize, summarily forfeit, and destroy marijuana plants removed from U4IK's premises when it is undisputed that U4IK failed to attach traceability identifiers required by WAC 314-55-083(4). Further,

U4IK's claims for monetary damages under the Washington Constitution were properly dismissed when it did not have a property right in the illegally cultivated marijuana plants and Washington does not recognize private causes of action for damages based upon alleged constitutional violations. Accordingly, this Court should decline U4IK's petition for review.

This document contains 3,869 words, excluding the parts of the document exempted from the word count by RAP 18.17.

RESPECTFULLY SUBMITTED this 15h day of September, 2021.

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CERTIFICATE OF SERVICE

I certify under penalty of perjury in accordance with the laws of the State of Washington that I arranged for the original of the preceding "ANSWER TO PETITION FOR REVIEW" to be electronically filed in the Washington State Supreme Court, and electronically served on the following parties, according to the Court's protocols for electronic filing and service.

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DATED this 15th day of September, 2021 at Spokane, Washington.

/s/ Heidi S. Holland
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