

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
10/26/2022 12:43 PM  
BY ERIN L. LENNON  
CLERK

No. 101231-4

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IN THE SUPREME COURT  
OF THE STATE OF WASHINGTON

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AMIR SIROUS NAJAFABADI,

*Appellant,*

v.

HOUSING AUTHORITY OF SNOHOMISH COUNTY

*Respondent.*

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**ANSWER TO PETITION FOR REVIEW**

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*Attorneys for Respondent HASCO*

## ANSWER TO PETITION

This case concerns a housing authority’s termination of a Section 8 rental voucher that a tenant obtained based on false certifications for use on a second home. In its detailed and well-reasoned opinion, the Court of Appeals correctly affirmed dismissal of this suit against Respondent Housing Authority of Snohomish County (“HASCO”) both because Petitioner did not support his “vague assignments of error,” and because the record shows “there was no error” and thus a writ of review was unwarranted, as the superior court also determined. *Najafabadi v. HASCO*, No. 82656-5-I, 2022 WL 3153984, at \*4 (Wash. Ct. App. Aug. 8, 2022).

In petitioning this Court for discretionary review, Petitioner fails to identify or support any ground for such review as required. *See* RAP 13.4(b). He does not identify a conflict with a prior Washington appellate decision. RAP 13.4(b)(1)-(2). He cites two cases without meaningful explanation or argument, only one of which has any

relationship to this case—regarding the applicable standard of review. *See Nichols v. Seattle Housing Auth.*, 171 Wn. App. 897, 903, 288 P.3d 403 (2012) (housing authority decision subject to the “extraordinary remedy” of writ of review).

Petitioner likewise identifies no significant question of law or public interest for this Court to determine. RAP 13.4(b)(3)-(4).

Petitioner instead makes various assertions on discrete issues that are unsupported and do not warrant discretionary review regardless. The Court of Appeals already addressed and rejected Petitioner’s arguments regarding his admitted failure to appear at his administrative hearing and supposed translation issues. *Najafabadi*, 2022 WL 3153984, at \*4-6. Petitioner also complains for the first time about not having an attorney. In addition to being untimely, this argument ignores that Petitioner was allowed to and did retain counsel—all of whom withdrew. *Id.* at \*2. Petitioner had no further right to counsel, *see* 24 C.F.R. § 982.555(e)(3), and the issue is immaterial regardless, including because Petitioner ultimately failed to appear.

Petitioner also has filed multiple separate documents in support of his petition. These documents are beyond the record on review and thus are not properly before this Court. *See* RAP 9.1, 13.4(c)(6) (petition must be based on “appropriate references to the record”). The documents also lack context, are not meaningfully addressed in the petition, and are substantively immaterial to the proper resolution of this case.

In conclusion, no ground for discretionary review has been briefed much less satisfied. Multiple courts have already resolved Petitioners’ arguments. HASCO respectfully requests that further review be denied.

RESPECTFULLY SUBMITTED this 26th day of  
October, 2022.

PACIFICA LAW GROUP LLP

By *s/ Taki V. Flevaris*  
Taki V. Flevaris, WSBA# 42555  
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*Attorneys for Respondent*

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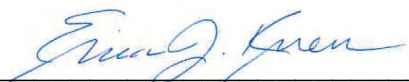
I, Erica Knerr, certify that I caused to be served a copy of ANSWER TO PETITION FOR REVIEW on all parties or their counsel of record on the date below as follows:

E-served via Washington State Appellate Courts' Portal:

Amir Sirous Najafabadi, Plaintiff [siroususa@gmail.com](mailto:siroususa@gmail.com)

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

DATED this 26<sup>th</sup> day of October, 2022 in Seattle,  
Washington.

  
Erica Knerr, Legal Assistant

**PACIFICA LAW GROUP**

**October 26, 2022 - 12:43 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 101,231-4  
**Appellate Court Case Title:** Amir Sirous Najafabadi v. Housing Authority of Snohomish County  
**Superior Court Case Number:** 21-2-00299-9

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- 1012314\_Answer\_Reply\_20221026124201SC809521\_0220.pdf  
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