No. 95795-9

In the Supreme Court
of the State of Washington

Arthur West,

Appellant,

v.

TESC TRUSTEES, STATE OF WASHINGTON, et al

Respondents.

AMENDED

Petition for Review

Arthur West
120 State Avenue NE #1497
Olympia, WA 98501
360-593 4588

TABLE OF CONTENTS

TABLE OF AUTHORITIES

STATUTES AND CONSTITUTIONAL PROVISIONS

ARTICLES

A. IDENTITY OF PETITIONER

Comes now Appellant West and respectfully moves for relief designated in Part B of this petition.

B. RELIEF REQUESTED

West requests review of the decision of the Washington State Court of Appeals for Division II in Case No. 49207-5-II filed February 28, 2017, along with the final Order Denying Reconsiderion of April 3, 2018. (See Appendices I and II)

These decisions meet the criteria for RAP 13.4 (b), and the Washington State Supreme Court should accept review, reverse and establish that FERPA, when properly applied, has no greater reach than existing state exemptions for a narrow class of educational records.

The February 28 2018 decision of the Court of Appeals is appended as Appendix A, and a Copy of the April 3 decision denying reconsideration is attached as Exhibit B.

C. WHY REVIEW SHOULD BE ACCEPTED

This case presents the unique central issue of whether the *Family Educational Rights and Privacy Act of 1974* (FERPA), as federal Spending Clause legislation that provides funding "*essential to (the) financial viability and stability*" of state educational institutions, can, subject to the the strict requirements for an "other statute" exemption, and the

constitutional limitations of Owasso and Sebelius, be broadly construed to justify the withholding of campus law enforcement records.

As interpreted by Division II of the Court of Appeals, FERPA compels the manner in which state educational and law enforcement institutions maintain and disclose records and creates a speccially favored class of campus criminals, under a coercive funding-for-secrecy scheme which individual institutions such as TESC are not at liberty to decline.

In short, appelant maintains that FERPA either lacks the imperative force to qualify as an overbroad "other statute" exemption under the PRA, or else it contains coercive imperatives violative of sovereign state rights under the 10th Amendment which create a specially favored class of campus criminals in violation of the Privileges and Immunities clause of the Washington State Constitution set forth in Article 1 section 12.

RAP 13.4 (b) 1-4 sets forth the following grounds for review, by the Sureme Court, of decisions of the Courts of Appeals:

The issues posed by this case are properly subject to review under sections one, three and four of this Rule.

RAP 13.4(b) Section 1 - The ruling of the Court of Appeals conflicts with decisions of the Supreme Court of Washington and the Supreme Court of the United States

The ruling of the Court of Appeals conflicts with the rulings in *State ex Rel Doe v. Washington State Patrol,* 374 P.3d 63, 185 Wash.2d 363 (2016), *Gonzaga University v. Doe,* 536 U.S. 273 (2002), *Owasso Independent School District v. Falvo*, 534 U.S. 426 (2002), *Lindeman v.*

Kelso School District, 162 Wn.2d 196, 172 P.3d 329 (2007), *Grant County Fire Prot. Dist. No. 5 v. City of Moses Lake*, 150 Wn. 2d 791, 83 P.3d 419 (2004), and *National Federation of Independent Business v. Sebelius*, 567 U.S. 519, (2012).

In Doe, this Court recently set forth the requirements for a statute to qualify as an "other statute" under the PRA:

> ...if the exemption is not found within the PRA itself, we will find an "other statute" exemption only when the legislature has made it explicitly clear that a specific record, or portions of it, is exempt or otherwise prohibited from production in response to a public records request. *State ex Rel Doe v. Washington State Patrol*, 374 P.3d 63, 185 Wash. 2D 363, (2016)

However, in regard to FERPA, this language cannot be reconciled with the ruling of the Supreme Court in Gonzaga v. Doe:

> FERPA's nondisclosure provisions contain no rights-creating language, they have an aggregate, not individual, focus, and they serve primarily to direct the Secretary of Education's distribution of public funds to educational institutions. *Gonzaga University v. Doe*, 536 U.S. 273 (2002)

In addition, even if FERPA might be applied properly to a limited class of centrally located education records, the decision of the Court of Appeals confilcts with the very limited definition of "Education Records" of both this Court in *Lindeman* and the Supreme Court of the United States, in *Owasso Independent School District v. Falvo*:

> Also FERPA requires "a record" of access for each pupil. This single record must be kept "with the education records." This suggests Congress contemplated that education records would be kept in one place with a single record of access. By describing a "school official" and "his assistants" as the personnel responsible for the custody of the records, FERPA implies that education records are institutional records kept by a single central custodian, such as a registrar,...*Owasso Independent School District v. Falvo*, 534 U.S. 426 (2002)

Further, as the Supreme Court observed in Falvo:

> The Court of Appeals' logic does not withstand scrutiny. Its interpretation, furthermore, would effect a drastic alteration of the existing allocation of responsibilities between States and the National Government in the operation of the Nation's schools. We would hesitate before interpreting the statute to effect such a substantial change in the balance of federalism unless that is the manifest purpose of the legislation. *Owasso Independent School District v. Falvo*, 534 U.S. 426 (2002)

As the U.S. District Court for the Western District of Missouri ruled in *Bauer v. Kincaid*, 759 F.Supp. 575 (1991):

> Nothing in the legislative history of FERPA refers to a policy or intent to protect campus law enforcement unit records which contain student names or other personally identifiable information....
> ...an individual's enrollment at a state university should not entitle him or her to any greater privacy rights than members of the general public when the privacy interest relates to criminal investigation and incident reports. Nor could the federal government have reasonably intended to make university students a specially protected class of criminal suspects.

Under this logic, the interpretation of FERPA by the Court of Appeals in this case also conflicts with *Grant County Fire Protection District No. 5 v. City of Moses Lake*, 150 Wn.2d 791, 83 P.3d 419 (2004), where this Court found that the Washington State Constitution provided additional protection against laws which improperly grant special privileges and immunities to a favored class, as FERPA does in regard to the a specially favored class of campus criminals who have greater immunity from disclosure of their criminal acts than non-campus criminals.

Finally, the coercive requirements of FERPA set forth in the decision of the Court of Appeals violate the *10th Amendment* anti-coercion principles recognized in *NFIB v. Sebelius*.

RAP 13.4(b) Section 3 - The integrity and independence of sovereign State interests in education, law enforcement, and disclosure present a significant question of law under the Constitution of the State of Washington and the United States.

Education and Law enforcement are traditional areas subject to state regulation without overt federal control. *The Constitution of the State of Washington, in Article IX*, states that it is "the paramount duty of the State" to make ample provisions for education. Needless to say, the federal government has no such role.

It is a significant question of law whether the sovereign activities of the State in both education and law enforcement, and the implementation of a State Sunshine Law should be subject to the coercive commandeering control of federal spending clause legislation in the manner contemplated by the Court of Appeals.

The Attorney General of this State has recently challenged federal overreaching on over 20 occasions, yet in the present matter they remain silent while the federal government mandates how schools are administered, and the manner in which administative and law enforcement records are withheld under a State Law, radically altering the balance of federalism in exactly the manner that the Owasso Court denounced.

This Court should accept review of this decision of Division II of the Court of Appeals, as it did previously in *Lindeman*.

RAP 13.4(b) Section 4 – The issue of whether FERPA may compel the suppression of campus law enforcement records implicates substantial public interests

There is substantial public interest in public disclosure, in the Scope of the FERPA exemption and in the independence and integrity of State regulation in areas traditionally left to State control, such as education and law enforcement.

This Court should accept review, as it previously did in *Lindeman,* and reinforce the limited scope of the "exemption" contained in *FERPA*.

D. ISSUES PRESENTED FOR REVIEW

1. Can federal Spending Clause legislation such as FERPA, which has an aggregate focus, does not expressly prohibit anything, acts upon the Secretary of Education, and has implementing regulations requiring notification if an there is a conflict with state law[1], qualify as an "other statute" under the PRA, and justify a broad protean exemption that includes campus law enforcement records in light of the rulings of the Courts in Doe, Lindeman, Gonzaga and Sebelius?

2. If FERPA, as federal Spending Clause legislation operating on individual institutions, has the coercive and imperative effect sufficient to meet the requirements of an "other statute" under the PRA, can it meet the test of Sebelius and Dole that declares such coercive laws unconstitutional?

3. May the federal government, in conformity with the 10th Amendment, compel the manner in which state educational and law enforcement institutions maintain records and compel the State to create a speccially favored class of campus criminals in violation of the Privileges and Immunities Clause of the Constitution of the State of Washington?

[1] See *34 CFR 99.61*: If an educational agency or institution determines that it cannot comply with the Act or this part due to a conflict with State or local law, it must notify the Office within 45 days, giving the text and citation of the conflicting law.

E. STATEMENT OF THE CASE

This case involves a public records request of October 28, 2014, plaintiff submitted a request under the Public Records Act to TESC for records relating to the enforcement of the TESC Trespass Policy. (CP 6)

May 12, 2015 the Complaint was filed. (CP 4-29)

On October 23, 2015 a hearing was held on defendant's Motion for Summary Judgment. (CP 54-56)

The issues were defined in a Sheduling Order of January 22 to include 1, Whether the defendants violated the PRA by improperly applying FERPA redactions... (CP 290-291)

Plaintiff repeatedly requested in camera review (CP 260, 280-281, Transcript of Oct. 23, Page 7, lines 10-11, Page 8, lines 14-15, Page 15, lines 11-12) Plaintiff identified specific records and groups of records that were improperly redacted under FERPA. (Verbatim Transcript of October 23, Page 9 line 10 through Page 10, line 14)

At that time the Court ruled that FERPA qualified as an “other statute” under the PRA. (CP 54-56)

On May 27, 2016, a further hearing was held on cross motions for Summary Judgment. (CP 99-100)

The defendants argued that FERPA provides students with broad protection of their education records (CP 303, lines 18-19) and that the redacted records fell within "FERPA's broad definition of education records" (CP 304, line 18-19)

The defendants also certified that ***"Federal funding is a significant funding source for the college and essential to its financial viability and stability"*** and that the college was required to abide by FERPA in order to remain eligible for such funds. (approximately $64,000,000 in fiscal year 2015 (CP 261-262)

Plaintiff argued that...If you're looking at criminal trespass notices, if you're looking at police reports, if you're looking at disciplinary files shared with law enforcement, they are used as a basis for applying the criminal law. Those aren't held in a central repository. They're not educational records. They're not maintained for an educational purpose. Transcript of May 27, page12, lines 14-21

Defendant argued that...in FERPA, education records are "broadly defined" (Transcript, page 16-17, CP 293-296), that..."the narrow construction that he is urging is not found. It's not even consistent in the context of the plain language of FERPA"(Transcript, page 16, lines 4-6), and that...**"were the courts in Washington to conclude that FERPA could not be complied with... – all public institutions in Washington**

would be unable to function because federal money is so significant in the context of education." Transcript of May 27, page 17-18)

The Court ruled that despite the circumstance that all of the records were related to law enforcement, the redactions resulting from the extremely broad provisions of FERPA were in accord with the PRA. (CP 99-101)

On June 27, 2016, Plaintiff filed a notice of appeal (CP 105-111)

On February 27, 2018, the Court of Appeals denied review, holding that FERPA qualified as an "other statute" under the PRA.

On April 3, 2018, the Court denied Plaintiff's Motion for Reconsideration and granted the parties' motions to publish.

F. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

The question of whether *FERPA*, as federal spending clause legislation, can qualify as an "other statute" under the PRA to selectively exempt campus law enforcement records from disclosure involves unique and far reaching issues that this Court should conclusively resolve.

This Court, in *Doe v. Washington State Patrol,* 374 P.3d 63, 185 Wash.2d 363 (2016), explicitly set forth the requirements for a law to qualify as an "other statute" under the PRA:

> The legislature did not intend to entrust to ... judges the [power to imply] extremely broad and protean exemptions ….Therefore, if the exemption is not

> found within the PRA itself, we will find an "other statute" exemption only when the legislature has made it explicitly clear that a specific record, or portions of it, is exempt or otherwise prohibited from production in response to a public records request. *Doe v. Washington State Patrol,* 374 P.3d 63, 185 Wash.2d 363 (2016)

By contrast, as the Supreme Court recognized in *Gonzaga v. Doe*, the *Family Educational Rights and Privacy Act* ("FERPA"), contains a funding provision that acts upon the Secretary of Education, creates no substantive rights, and, instead of requiring nondisclosure of specific records, has an aggregate focus that encourages schools to enact and enforce adminstrative policies to safeguard the confidentiality of students' "education records."

Further, the view of federal powers and the broad definition of "educational records" the State adopted under *FERPA* in order to justify non-disclosure of law enforcement records is in direct contrast to the principles of federalism recognized by the Court in *Owasso*:

> The Court of Appeals' logic does not withstand scrutiny. Its interpretation, furthermore, would effect a drastic alteration of the existing allocation of responsibilities between States and the National Government in the operation of the Nation's schools. We would hesitate before interpreting the statute to effect such a substantial change in the balance of federalism unless that is the manifest purpose of the legislation.

This ruling was based upon the principle that, under the *10th Amendment*, federal power to regulate is limited, especially in areas like criminal law enforcement and education where States historically have been sovereign and independant. See *United States v. Lopez*, 514 U.S. 549, 564 (1995).

In *National Federation of Independent Business v. Sebelius*, 567 U.S. 519, (2012), 183 L. Ed. 2d 450, 132 S.Ct. 2566 (2012), the Supreme Court for the first time deemed a federal spending program unconstitutionally coercive. This decision transformed the coercion principle from a mere rhetorical device into a legitimate restraint[2] on federal conditional spending.

The coercion principle addresses the risk that Congress will use its spending power to subvert state regulation in areas in which states have a reserved right to regulate. As this principle has developed over recent decades, federal spending for elementary and secondary education has steadily increased.

In *NFIB*, Justice Roberts described the Medicaid expansion legislation at issue as *"economic dragooning that leaves the States with no real option but to acquiesce."*

[2]See *Coercion by the Numbers: Conditional Spending Doctrine and the Future of Federal. Education Spending,* Case Western Law Review, Volume 64, Issue 2.

Significantly, the *NFIB* Court did not set a minimum threshold for coercion. The dissenting justices specifically referred to education funding as the second greatest source of conditional funding after Medicaid. Education funding in relation to overall state expenditures places its coerciveness between Dole's 0.19% and NFIB's 10.0%.

Thus, by applying NFIB's budgetary analysis to federal conditional spending for education, an argument emerges: conditional spending for education as it exists under *FERPA* today may be unconstitutionally coercive[3].

Although the amounts of money are less in this case than in Sebelius, this is counterbalanced by the unique individual impact of *FERPA*, which acts not on an entire state budget, but on vastly more limited institutional budgets.

As TESC certified, and the Court of Appeals explicitly recognized, TESC and other such institutions are not free to renounce this federal funding if they seek to continue to operate. This is the very essence of improper coercion and commandeering.

---

[3]The defendants certified to the trial court that **"*Federal funding is a significant funding source for the college and essential to its financial viability and stability*",** that the college was required to abide by FERPA in order to remain eligible for such funds. (approximately $64,000,000 in fiscal year 2015 (CP 261-262) and argued that **"*were the courts in Washington to conclude that FERPA could not be complied with – all public institutions in Washington would be unable to function because federal money is so significant in the context of education*."** Verbatim Transcript of May 27, page 17-18.

However, if the FERPA exemption is afforded the limited definition of the Supreme Court in *Owasso*, it could be harmonized with this Court's decision in *Lindeman* narrowly defining educational records.

The Supreme Court of the United States, in one of the few cases it has considered *FERPA*, adopted a very limited definition of "Education Records"

> Also FERPA requires "a record" of access for each pupil. This single record must be kept "with the education records." This suggests Congress contemplated that education records would be kept in one place with a single record of access. By describing a "school official" and "his assistants" as the personnel responsible for the custody of the records, FERPA implies that education records are institutional records kept by a single central custodian, such as a registrar,...*Owasso Independent School District v. Falvo*, 534 U.S. 426 (2002)

This very limited scope of Education Records should be adopted by the Court if it finds that *FERPA* applies as an "other statute" at all, in order to harmonize *FERPA* with the decision of this Court in *Lindeman v. Kelso School District*, 162 Wn.2d 196, 172 P.3d 329 (2007).

In the *Lindeman* case, this Court implicitly interpreted both *FERPA* and the State Education Records Exemption narrowly, equating them to "the protection of material in a... student's permanent file, such as a student's grades, standardized test results, assessments, psychological or physical evaluations, class schedule, address..."

A number of other states with public disclosure laws similar to that of Washington that have been asked to define "education records" under *FERPA* have applied a limited and common sense understanding of the term, like this definition by a Maryland appeals court:

> [FERPA] was not intended to preclude the release of any record simply because the record contained the name of a student. The federal statute was obviously intended to keep private those aspects of a student's educational life that relate to academic matters or status as a student. *Kirwan v. The Diamondback*, 721 A.2d 196, 204 (Md. Ct. App. 1998).

Or, as one North Carolina Judge memorably declared in an April 2011 memorandum:

> "FERPA does not provide a student with an invisible cloak so that the student can remain hidden from public view while enrolled at (college)." *News & Observer Publ'g Co. v. Baddour, No. 10CVS1941*, Memorandum Ruling of Hon. Howard E. Manning, Jr. at 2 (N.C. Super. Ct. April 19, 2011)

Nevertheless, schools and colleges, (and TESC) persistently cite *FERPA* to deny requests for public records, even when the records have little relation to a student's "educational life".

Significantly, Congress amended *FERPA* in 1992 expressly to remove privacy protection for records created by a police or campus security agency "for the purpose of law enforcement." As a result of this

change, it is illegitimate for a police or public safety department to cite *FERPA* in refusing to release an arrest record, an incident report, or the identities of students named in those documents.

The Department of Education reemphasized in a June 2011 memo to educational institutions that FERPA does not prohibit the release of records gathered by a campus safety agency: "[S]chools that do not have specific law enforcement units may designate a particular office or school official to be responsible for referring potential or alleged violations of law to local police authorities. Some smaller school districts and colleges employ off-duty police officers to serve as school security officers. Investigative reports and other records created and maintained by these law enforcement units are not considered 'education records' subject to *FERPA*.

Accordingly, schools may disclose information from law enforcement unit records to anyone ... without consent from parents or eligible students." See *U.S. Department of Education, "Addressing Emergencies on Campus"* at 5, (June 2011), available at http://www2.ed.gov/policy/gen/guid/ fpco/pdf/emergency-guidance.

In *Kirwan v. The Diamondback*, the Maryland Court of Appeals directly addressed – and rejected – the argument that FERPA prohibited a college from releasing copies of students' parking tickets. The case was

brought by the University of Maryland student newspaper, whose reporters had been tipped off that athletes and coaches were being granted special forgiveness for parking violations. The court stated that *FERPA* was "obviously intended to keep private those aspects of a student's educational life that relate to academic matters," and therefore did not cover parking tickets.

More recently, a North Carolina state court followed the reasoning of Kirwan and granted media organizations' requests for parking tickets issued to student athletes at the University of North Carolina- Chapel Hill, rejecting UNC's argument that the tickets were "education records" just because disciplinary sanctions were among the possible punishments. (The court also ordered disclosure of coaches' cell-phone records, finding that the phone numbers of student athletes also are not "education records.")

Since all of the requested records in the present case involved law enforcement, they were not "education records" and should have been disclosed under the *Public Records Act*.

In addition, *Article 1, Section 12 of the State Constitution* requires that an individual's enrollment at a state university should not entitle him or her to any greater privacy rights than members of the general public, especially when the privacy interest relates to criminal investigation and incident reports. For federal spending clause legislation to coercively

mandate a violation of constitutional law violates the requirements of permissible encouragement set forth in *South Dakota v. Dole*, 483 U.S. 203, 211 (1987)

Article I, section 12 of the Washington State Constitution prohibits special privileges and immunities. It provides: “No law shall be passed granting to any citizen, class of citizens, or corporation other than municipal, privileges or immunities which upon the same terms shall not equally belong to all citizens, or corporations.” (see generally, *Independence for Washington's Privileges and Immunities Clause,* Andrew Rorholm Zellers, WLR 87, at 331-367)

In conformity with these principles, in *Bauer v. Kincaid,* 759 F. Supp. 575, (1991) the U.S. District Court for the Western District of Missouri ruled as follows:

> *Rios v. Read,* 73 F.R.D. 589, 598 (E.D.N.Y.1977) stated that it is "obvious that the 1974 Act (FERPA) does not provide a privilege against disclosure of student records.... Rather by threatening financial institutions, it seeks to deter schools from adopting policies of releasing student records." *Id...*
> FERPA is not a law which prohibits disclosure of educational records. It is a provision which imposes a penalty for the disclosure of educational records. *Student Bar Ass'n v. Byrd,* 293 N.C. 594, 239 S.E.2d 415, 419 (N.C.1977) stated that the Buckley amendment (FERPA) does not forbid disclosure of information concerning a student. FERPA provides for the withholding of federal

> funds otherwise available to an educational institution which has a policy or practice of permitting the release of educational records...
>
> The limited legislative history available demonstrates that FERPA seeks to deter schools from indiscriminately releasing student educational records. Nothing in the legislative history of FERPA refers to a policy or intent to protect campus law enforcement unit records which contain student names or other personally identifiable information....
>
> Furthermore, an individual's enrollment at a state university should not entitle him or her to any greater privacy rights than members of the general public when the privacy interest relates to criminal investigation and incident reports. Nor could the federal government have reasonably intended to make university students a specially protected class of criminal suspects. This Court concludes that the records sought by plaintiff are not educational records

Similarly, this Court cannot uphold a federally mandated selective law enforcement records exemption for a favored class of campus criminals wthout violating the privileges and immunities clause of the State Constitution and effecting a substantial change in the balance of federalism incompatible with the 10th Amendment.

G. CONCLUSION

The express intent of the people in enacting public records act was that the people, (not the federal government) retain control of the (state)

instruments they have created. (See *RCW 42.56.030*). The ruling of the Court of Appeals does not conform to this stated intent.

Where the Federal Government compels States to regulate by means of coercive spending clause legislation, the accountability of both state and federal officials is diminished in a manner at varience with the intent of the PRA that the people retain control of the institutions thet have created, as well as accepted principles of federal and state comity..

Under coercive federal mandates like *FERPA*, it is state officials who will bear the brunt of public disapproval, while the federal officials who devised and mandated the regulatory program remain insulated from the electoral ramifications of their decision.

Accountability is thus diminished when, due to federal coercion, elected state officials cannot regulate in accordance with the views of the local electorate in matters not pre-empted by federal regulation[4].

Thus, *FERPA* simply cannot be seen to have the effects set forth in the decision of the Court of Appeals without violating not only the letter and intent of the PRA, but both the federal and State Constitutions in a manner at variance with the spending power, the entire system of dual sovereignty protected by *the 10th Amendment*, Equal Protection of Law as

[4] See Merritt, *The Guarantee Clause and State Autonomy: Federalism for a Third Century*, Colum. L. Rev. 88, no. 1 (1988)
.

it is recognized under *the 14th Amendment*, and, more particularly, in the Privileges and Immunities Clause of the Constitution of this sovereign State.

In addition, the broad construction of "education records" adopted by the Court of Appeals is contrary not only to the PRA but also the rulings of this Court in *Lindeman* and the Surpeme Court in *Owasso*, and allows information of legitimate interest to the public to be supressed.

As one author has noted, "The goal is nondisclosure, the chorus is student privacy, the tool, the FERPA defense.[5]" Similarly, another commentator observed, "It is sadly ironic that institutions whose reason for being is a search for the truth are home to at best a myth, at worst a lie, shielded by the Buckley Amendment.[6]"

This Court should accept review of the ruling of the Court of Appeals and, (at the very least) enter a determination harmonizing the *FERPA* exemption with the narrowly defined class of educational records previously recognized as exempt under *FERPA* in *Lindeman*.

Done this 10th Day of May, 2018.

`

s/Arthur West
ARTHUR WEST

---

[5] See: *Tattoos, Tickets, and Other Tawdry Behavior: How Universities Use Federal Laws to Hide Their Scandals*, Mary Margaret Penrose, 33 Cardozo L. Rev. 1555 (2011-2012)
[6] See: *The Strange Case of College Student Disciplinary Records Under F.E.R.P.A.*, 149 Educ. L. Rep. 283, (2001).

CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the laws of the State of Washington, that on May 10, 2018, I caused the foregoing document to be served on counsel of record for the State of Washington, by email at their email address of record:

`

s/Arthur West
ARTHUR WEST

ARTHUR WEST - FILING PRO SE

May 11, 2018 - 1:40 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	95795-9
Appellate Court Case Title:	Arthur West v. TESC Trustees, et al.
Superior Court Case Number:	15-2-00943-2

The following documents have been uploaded:

- 957959_Motion_20180511133328SC524313_4325.pdf
  This File Contains:
  Motion 1 - Amended Brief
  The Original File Name was TESC MAY 11 MOTION AMEND .pdf
- 957959_Petition_for_Review_20180511133328SC524313_7006.pdf
  This File Contains:
  Petition for Review
  The Original File Name was TESC PETITION REVIEW FINAL.pdf

A copy of the uploaded files will be sent to:

- EduLitigation@ATG.WA.GOV
- aileenm@atg.wa.gov

Comments:

Sender Name: Arthur West - Email: Awestaa@Gmail.com
Address:
120 State Ave NE # 1497
Olympia, WA, 98501
Phone: (360) 593-4588

Note: The Filing Id is 20180511133328SC524313