NO. 98003-9

SUPREME COURT OF THE STATE OF WASHINGTON

In Re the Dependency of Z.J.G. and M.E.J.G., minor children,

STATE OF WASHINGTON,
Department of Children, Youth, and Families,

Respondent,

v.

S.G.,

Petitioner.

DCYF ANSWER IN OPPOSITION TO PETITION FOR REVIEW

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I. INTRODUCTION

This Court should deny review because the issues raised are moot. After the initial shelter care hearing giving rise to this appellate litigation concluded, the children's tribe intervened and the father entered an agreed dependency and dispositional order that contained complete protections under the federal and state Indian Child Welfare Acts. There is no effective remedy to provide in this case, and review should be denied for this reason.

In addition, review is not warranted because the opinion below does not conflict with any previously published decisions. The opinion does not conflict with *Matter of T.A.W.*, 186 Wn.2d 828, 383 P.3d 492 (2016). Instead, the opinion relied upon *T.A.W.* for the proposition that Washington's Indian Child Welfare Act's express intent was to clarify rather than expand the federal Indian Child Welfare Act (ICWA). The opinion also does not conflict with Division One's own decision in *In re Dependency of T.L.G.*, 126 Wn. App. 181, 108 P.3d 156 (2005). Instead, the opinion appropriately distinguishes *T.L.G.*, which did not address the subsequent passage of the Washington Indian Child Welfare Act (WICWA) in 2011 or the federal regulations promulgated in 2016.

Lastly, this case fails to present an issue of substantial public interest under RAP 13.4(b)(3) because the published opinion turns on the specific facts of this case. The dependency court's "reason to know" determination

properly was made based upon the narrow facts known at the time of the initial shelter care. For these reasons, the father fails to show that the criteria for review have been satisfied, and the petition for review should be denied.

II. ISSUE PRESENTED FOR REVIEW

When a federally recognized tribe informs the Department prior to the shelter care hearing the mother is not a member and the children are not members, does this information provide a "reason to know" a child is an Indian child for purposes of state and federal Indian Child Welfare Acts?

III. STATEMENT OF THE CASE

On June 29, 2018, the Department[1] filed a dependency petition alleging Z.J.G. and M.E.J.G. were dependent. CP 1. A contested shelter care hearing took place on July 2 and July 3, 2018. RP 1, 59. Before the hearing, the Department social worker called the Tlingit and Haida Indian Tribes of Alaska, and the tribe informed him that the children's maternal grandmother is an "enrolled member." RP 11. The tribe also informed the social worker that the children's mother was not enrolled, and the children were not

[1] On July 1, 2018, the Department of Children, Youth, and Families assumed all powers, duties, and functions of the Department of Social and Health Services pertaining to child welfare services. RCW 43.216.906.

enrolled.[2] RP 11. The father[3] told the social worker he may have some native heritage with Confederated Tribes of the Umatilla in Oregon. CP 2. RP 11-12. The Department's dependency petition stated the mother has Tlingit and Haida heritage and is eligible for membership in Klawock Cooperative Association, and it also stated she identified as having Cherokee heritage. CP 2. Prior to the shelter care hearing, the Department sent inquiry letters to all potential tribes, inquiring whether the children were members or were eligible for membership and the biological child of a member. Appendix A to Respondent's Supplemental Brief (filed on March 29, 2019) at 2. During the shelter care hearing, the children's mother testified she was not a member of Tlingit and Haida Tribes of Alaska, but that she was eligible for membership with that tribe, and she testified the children were also eligible for membership with Tlingit and Haida. RP 88, 90. The father testified that he has Native American heritage with the Confederated Tribes of Umatilla. RP 67. He did not testify he was a member, nor was any evidence presented that he was a member of or eligible for membership in a federally recognized tribe.

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[2] Tlingit and Haida appears to have used the term "enroll," as evidenced by the later filing of an affidavit in Division One of the Court of Appeals stating, "Z.G. and M.G., minors, are eligible for enrollment in both the Tribe and KCA." Tribe's Affidavit Pursuant to Rule 8(B)(6), filed on September 30, 2019. Thus, the social worker was repeating the terminology employed by Tlingit and Haida.

[3] At the time of the initial shelter care hearing, the Petitioner was an alleged father. CP 1. Because he subsequently established parentage for Z.J.G. and M.E.J.G., this pleading refers to him as the children's father.

After hearing testimony from the parents and the social worker, the juvenile court determined there was not a "reason to know" the children were Indian children. CP 10. The shelter care order noted the parents were not members in a federally recognized tribe, the grandmother was a member, the mother believed she was eligible to become a member, and the Department was continuing to investigate. CP 10.

After the initial shelter care hearing, in response to the Department's inquiry process to all of the tribes referenced during the shelter care hearing, written responses from the Confederated Tribes of Umatilla Indian Reservation, the Eastern Band of Cherokee Indians, and the United Keetoowah Band of Cherokee Indians in Oklahoma provided that the children were not members nor eligible for tribal membership. *See*, Notation Ruling dated January 9, 2019, granting the Department's Motion to Supplement the Record.[4] The Klawock Cooperative Association responded in writing to the inquiry process by stating the children were "eligible for tribal enrollment" and a "descendent of an enrolled tribal member." *Id.* Less than one month after the initial shelter care hearing, the dependency court granted the motion from the Tlingit and Haida to intervene. CP 19. The father sought discretionary review of the shelter care order. When the

[4] The Cherokee Nation also eventually responded to the Department's inquiries and reported that the children were not eligible for membership.

Washington State Court of Appeals granted review, the dependency fact-finding trial was pending in juvenile court. Subsequently, on March 27, 2019, the father entered an agreed upon dependency and dispositional order. Appendix A to Respondent's Supplemental Brief (filed on March 29, 2019) at 2-3. On September 3, 2019, a panel of judges in Division One of the Washington State Court of Appeals issued a published opinion affirming the juvenile court's shelter care order. *In the Dependency of Z.J.G. and M.E.J.G.*, __ Wn. App. __, 448 P.3d 175 (2019). The father now seeks review in this Court.

IV. REASONS WHY REVIEW SHOULD BE DENIED

A. The Issues Presented Are Moot

Instead of presenting a claim of substantial public interest, the father presents moot issues. Shortly after the initial shelter care hearing, Tlingit and Haida Tribes of Alaska intervened. CP 19. The father's dependency and dispositional order satisfies all of the ICWA and WICWA requirements for out of home placement for a dispositional order, including the requirement for formal legal notice under RCW 13.38.070 and 25 U.S.C. § 1912(a). Appendix A to Respondent's Supplemental Brief (filed on March 29, 2019) at 2-3. The father's agreed dependency order contains a finding stating that the "facts establish by clear and convincing evidence, including the testimony of a qualified expert witness that continued custody of the child

by the [parents] is likely to result in serious emotional or physical damage to the child." *Id.* at 2. The agreed order also has a finding stating the Department "made active efforts" by working with the parents to engage them in remedial services designed to prevent the breakup of the Indian family and that those efforts were unsuccessful. *Id.* All required WICWA and ICWA protections have been applied, and there is no effective remedy to provide in this case. This case presents moot issues, and review is not warranted.

B. **The Requirement for Review Under RAP 13.4(b)(1) Has Not Been Satisfied Because the Opinion Below Does Not Conflict with This Court's Decision in *T.A.W.***

Under RAP 13.4(b)(1), the consideration governing acceptance of review in this Court is whether the decision of the lower court is in conflict with a decision of the Washington State Supreme Court. Without specifically referencing RAP 13.4(b)(1), the father claims the opinion below conflicts with the ruling of this Court in *Matter of T.A.W.*, 186 Wn.2d 828, 383 P.3d 492 (2016). Petition at 14-15. This claim fails to support the request for review because the opinion below is consistent with *T.A.W.* The opinion relies upon *T.A.W.* for the proposition that "WICWA's express intent was to clarify rather than expand ICWA." *Z.J.G.* 448 P.3d at 183 n. 63. The reliance of the Court of Appeals on *T.A.W.* is appropriate, because this Court explained in *T.A.W.* that WICWA was enacted with the intention

of "clarifying existing laws and codifying existing policies and practices..." *T.A.W.*, 186 Wn.2d at 843. The Legislature's "desire to import much of the language of ICWA into WICWA, and WICWA's aim of clarifying existing law" leads to the conclusion that "the acts should be read as coextensive barring specific differences in their statutory language." *T.A.W.* at 844.

The opinion below is also consistent with *T.A.W.* because *T.A.W.* noted that "WICWA's definition of 'Indian child' is nearly identical to ICWA's definition." *T.A.W.*, 186 Wn.2d at 845, citing RCW 13.38.040(7). RCW 13.38.040(7) defines an "Indian child" as

> an unmarried and emancipated Indian person who is under eighteen years of age and is either: (a) A member of an Indian tribe; or (b) eligible for membership in an Indian tribe and is the biological child of a member of an Indian tribe.

Federal law does not further define the term, "member." 25 U.S.C. § 1903. WICWA does not contain a "reason to know" definition in its definition section at RCW 13.38.040, so there is no specific difference in language to support anything but a coextensive "reason to know" determination under WICWA and ICWA's definition of an Indian child. The claim that the opinion below somehow conflicts with *T.A.W.* is without merit.

C. Review is Not Warranted Under RAP 13.4(b)(2) Because the Court of Appeals Properly Distinguished Its Own Earlier Ruling in *T.L.G.*

Under RAP 13.4(b)(2), the consideration governing acceptance of

review is whether the decision of the lower court is in conflict with a decision of the Court of Appeals. Without specifically referencing RAP 13.4(b)(2), the father claims the ruling below conflicts with *In re Dependency of T.L.G.*, 126 Wn. App. 181, 108 P.3d 156 (2005). Petition at 18. The father's argument fails because he misinterprets the Court of Appeals' treatment of *T.L.G.*

Under state and federal law, if the court has reason to know a child is an Indian child, then legal notice to the child's Indian tribe is required. 25 U.S.C. § 1912(a); 25 C.F.R. § 23.111; RCW 13.38.070(1). In addition, under WICWA, when a claim of Indian American ancestry is made, the Department makes a "good faith effort to determine whether the child is an Indian child." RCW 13.38.050.

The formal legal notice procedure (required by RCW 13.38.070(1) and 25 U.S.C. § 1912(a)) and good faith preliminary efforts process (required by RCW 13.38.050) are two complementary processes, and, when combined, result in earlier and more robust identification of Indian children. Nothing in the opinion below suggests the preliminary inquiry process is being used as a "substitute" for the need for formal legal notice, as claimed. *See* Petition at 16-17. The father attempts to misread the opinion's treatment of *T.L.G.* in an effort to provide a false choice between formal legal notice and the preliminary inquiry process required under WICWA. This choice

need not be made at all, and the Court of Appeals here clearly required formal notice when there is reason to know a child is an Indian child.

Moreover, neither WICWA's notice provision at RCW 13.38.070(1) nor ICWA's notice provision at 25 U.S.C. § 1912(a) bears on any issue presented during an emergency placement hearing where formal legal notice is not required. Under the ICWA, there are two types of out-of-home placements: "emergency placements" and "foster care placements." An "emergency placement" of an Indian child requires a finding that the placement is necessary to "prevent imminent physical damage or harm to the child." 25 C.F.R. § 23.113(b)(1). *See* 25 U.S.C. § 1922 and RCW 13.38.140(1). The commentary accompanying the federal regulations explains that emergency hearings are "known in various States as 72-hour hearings, detention hearings, shelter care hearings, and other terms." 81 Fed. Reg. 38819 (June 14, 2016). The commentary also explains that the "final rule does not require that the section 1912(a) notice provisions and waiting periods for notices apply to emergency proceedings." 81 Fed. Reg. 38819 (June 14, 2016). Accordingly, the Court of Appeals properly held that shelter care hearings qualify as an emergency proceeding, and the 10-day formal notice requirement did not apply at initial shelter care hearings. *Z.J.G.* 448 P.3d at 178.

Although formal legal notice is not required at the initial shelter care

hearing, the Court of Appeals also recognized that formal legal notice is required after shelter care in cases when there is "reason to know" the child is an Indian child. *Z.J.G.* at 185.

The opinion below is consistent with *T.L.G.*, and only differed because of the different facts in each case and subsequent changes in the law. For example, the Court of Appeals reinforced its own earlier holding in *T.L.G.* regarding the importance of legal notice requirements under ICWA. *Z.J.G.* at 185. It also reiterated that, in *T.L.G.,* the trial court erred in failing to ensure legal notice of the termination proceedings was given. *Z.J.G.* at 185, n 89 (citing *T.L.G.* at 192).

The Court of Appeals also properly determined *T.L.G.* was "factually distinguishable." *Z.J.G.* at 185. *T.L.G.* did not address the subsequent passage of the WICWA in 2011. And, unlike the lack of investigation into the mother's asserted Indian heritage in the termination of parental rights trial at issue in *T.LG.*, in the present case the "Department started to investigate before the [shelter care] hearing." *Id.* The Court also found the 2016 federal regulations and guidelines limited *T.L.G.*'s applicability:

> The applicability of *T.L.G.* is further limited because this court issued its opinion before the BIA updated the federal regulations and guidelines. A review of the updated regulations and guidelines counsels against reading *T.L.G.* as undercutting the precise definitions of an Indian child

from ICWA and WICWA.

Id. at 186.

Because the opinion below adhered to *T.L.G.*'s holding regarding the importance of providing legal notice while distinguishing *T.L.G.* as to the guidance provided by WICWA, the 2016 regulations, and guidelines, the treatment of *T.L.G.* by the Court of Appeals does not merit review by this Court.

D. Review is Not Warranted Under RAP 13.4(b)(3) Because the Opinion Below Turns on The Specific Facts of the Case and Is Correct

Under RAP 13.4(b)(3), one of the considerations governing acceptance of review in this Court is whether "the petition involves an issue of substantial public interest that should be determined by the Supreme Court." The father fails to cite to RAP 13.4(b)(3) and fails to address the legal standard for substantial public interest.

Review under RAP 13.4(b)(3) is not warranted for three reasons. First, the opinion below correctly applied the "reason to know" factors in relation to the definition of an Indian child. Second, the opinion below appropriately rejected various claims for a much more expansive "reason to know" determination. Third, the lower court opinion properly recognized that preliminary contacts required under WICWA ensure that tribes are aware of dependency litigation and that the initial "reason to know"

determination is not final.

1. The "reason to know" factors do not operate independently from the definitions of Indian child under both state and federal law

ICWA and WICWA define an Indian child in substantially the same manner. An "Indian child" is "any unmarried person who is under age eighteen and is either (a) a member of an Indian tribe or (b) is eligible for membership in an Indian tribe and is the biological child of a member of an Indian tribe." 25 U.S.C. § 1903(4); *see also* RCW 13.38.040(7). Under federal law, when the court has "reason to know" that the child is an Indian child, but it does not have sufficient information to determine whether the child is or is not an Indian child, the court must treat the child as an Indian child, unless and until it is determined on the record that the child is not an Indian child. 25 C.F.R. § 23.107(b)(2). Thus, ICWA's requirements apply when there is "reason to know" a child is an Indian child.

Under federal law, the occasions when there is uncertainty and yet a "reason to know" that a child is an Indian child are listed at 25 C.F.R. § 23.107(c). According to the Bureau of Indian Affairs, the regulations provide "clear guidance regarding when a court has 'reason to know' the child is an 'Indian child.'" 81 Fed. Reg. 38,804 (June 14, 2016) (commentary explaining the deletion of the proposed rule's terminology "could be an Indian child" and responding to comments suggesting that the

inquiry requirement include "may be an Indian child"). The existence of the following factors establish there is a "reason to know" a child is an Indian child:

> (1) Any participant in the proceeding, officer of the court involved in the proceeding, Indian Tribe, Indian organization, or agency informs the court that the child is an Indian child;
> (2) Any participant in the proceeding, officer of the court involved in the proceeding, Indian Tribe, Indian organization, or agency informs the court that it has discovered information indicating that the child is an Indian child;
> (3) The child who is the subject of the proceeding gives the court reason to know he or she is an Indian child;
> (4) The court is informed that the domicile or residence of the child, the child's parent, or the child's Indian custodian is on a reservation or in an Alaska Native village;
> (5) The court is informed that the child is or has been a ward of a Tribal court; or
> (6) The court is informed that either parent or the child possesses an identification card indicating membership in an Indian Tribe.

25 C.F.R. § 23.107(c). "Indian child" means "any unmarried person who is under age 18 and either: (1) is a member or citizen of an Indian tribe; or (2) is eligible for membership or citizenship in an Indian tribe and is the biological child of a member/citizen of an Indian tribe." 25 C.F.R. § 23.2; *see also* 25 U.S.C. § 1903(4) and RCW 13.38.040(7) (similar definitions).

The father incorrectly argues the Court of Appeals conflated "reason to know" with actual knowledge that a child is an Indian child. Petition at 8. His arguments ignore both the legal term "Indian child," repeatedly

referenced in the "reason to know" factors, and the narrow facts of this case.

Here, at the time of the original shelter care hearing, the juvenile court was not presented with information that provided a "reason to know" under any of the factors. Contrary to the father's argument, factor (2)—that a participant "has discovered information indicating that the child is an Indian child"—was not satisfied because information from the tribe itself contradicted the legal definition of Indian child, as the tribe reported the mother was not a member and the children were not members. RP 11; *see* Petition at 10. Similarly, the mother testified she was not a tribal member, the father testified only as to tribal "heritage," and neither parent (nor anyone else for that matter) testified that the children were members. RP 90, 67.

The Court of Appeals properly refused to allow the "reason to know" factors to operate in a manner unrelated to the definitions of "Indian child" under both state and federal law. The interpretation requested by the father focuses solely on whether the child "may be" an Indian child. Petition at 14. Such an interpretation, operating wholly independently from the actual definitions of an Indian child, would render the definitions themselves superfluous. The dependency court's "reason to know" determination was a correct application of the reason to know factors, based upon the narrow facts known at the time of the initial shelter care hearing.

2. The lower court appropriately rejected a greatly expanded reason to know determination under federal and state ICWA

The father argues in favor of an expansive interpretation of the "reason to know" determination, and he has argued that his own report of heritage with a federally recognized tribe constitutes a "reason to know." Supp. Br. Petitioner at 39 (filed February 22, 2019). Yet, none of the factors contained in 25 C.F.R. § 23.107(c) refer to a report of Native American ancestry or heritage. Congress crafted ICWA's definition of "Indian child" so that ICWA's application relates to tribal membership. 25 U.S.C. § 1903(4). This focused definition—dependent on the child's tribal membership or eligibility for membership where a biological parent is also a member—only triggers ICWA's application when a child's tribe has a sovereign, political interest in that child. "ICWA does not apply simply based on a child or parent's Indian ancestry. Instead, there must be a political relationship to the Tribe." Bureau of Indian Affairs, U.S. Dep't of Interior, Guidelines for Implementing the Indian Child Welfare Act 10 (Dec. 2016)(Guidelines).[5] The opinion below is consistent with the federal regulations promulgated in 2016 and with other rulings from courts in other

[5] These Guidelines are located at https://www.indianaffairs.gov/bia/ois/dhs/icwa (last accessed on February 3, 2020).

states having addressed 25 C.F.R. § 23.107(c).[6] The Court of Appeals properly rejected the father's argument for an expansive "may be" determination as contrary to federal regulations and guidelines. *Z.J.G.* at 185.

The father's remaining argument, that WICWA amends the definition of Indian child, is an issue the father attempted to raise for the first time in his motion for reconsideration filed after the Court of Appeal's issuance of its opinion. *See,* Combined Response of Department to Motion to Reconsider at pages 13-14. Even if one were to set aside the lack of timeliness related to this issue, the issue itself is not a proper subject of review for two reasons. First, the father's previous position in this case at the trial and appellate level endorsed a definition of Indian child under state law that was coextensive with the federal definition. *Id.* at pages 17-18. Second, the circumstances of the father's case do not present this issue. WICWA defines the term, "member" and "membership" in the following manner:

> "Member" and "membership" means a determination *by an Indian tribe* that a person is a member or eligible for membership in that Indian tribe.

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[6] For an explanation as to how rulings from other states' courts are consistent with the opinion below, the Department refers this Court to its Combined Response of Department to Motion to Reconsider and Briefs of Amici Curiae (filed on November 12, 2019) at pages 4-8.

RCW 13.38.040(12) (Emphasis added). Under WICWA, the definition of "member" is limited to circumstances in which a federally recognized Indian tribe has made a "determination" that a person is a "member or eligible for membership in that Indian tribe." RCW 13.38.040(12). This requirement - for the tribe to be the source of information - must be viewed in light of the facts that existed at the time of the initial shelter care hearing. The Tlingit & Haida Tribe reported to the Department social worker only that the children and mother were "not enrolled," and that the maternal grandmother was an "enrolled member." RP 11. When the initial shelter care hearing took place, the information provided from the Tlingit & Haida did not satisfy the definition of "member" at RCW 13.38.040(12), because there was no information from the tribe (either directly or indirectly via the social worker) that either the mother or the children were "eligible" for membership.

Later, after the initial shelter care hearing, the Department received a written determination from the Klawock Cooperative Association stating the children's current status was "eligible for enrollment." *See*, Department's Motion to Supplement the Record (filed December 18, 2018) App. at 9-10. As this written determination from the Klawock Cooperative Association was not available for consideration by the juvenile court at the initial shelter care hearing, the circumstances required to trigger application

of RCW 13.38.040(12) did not factor into the juvenile court's decision-making process and are not raised by this case.

3. The dependency court's "reason to know" determination at an initial shelter care hearing is not final

The father appears to argue that once information is provided at the initial shelter care hearing, this means "the inquiry ends" and ICWA requirements either apply or do not apply for the life of the case. Petition at 11. The claim that the initial "reason to know" determination constitutes an end to the inquiry process is contrary to law, the Department's own policy, and the facts in this case.

The Legislature has stated its intent that the Department's policy manual on Indian child welfare should serve as one of the "persuasive guides in the interpretation and implementation" of WICWA. RCW 13.38.030. The Department's Indian Child Welfare Practices and Procedures, which were developed with participation from Washington State tribes, require the Department to send inquiry letters and ancestry charts three times to tribes located within Washington and twice to all other tribes. ICW Practices and Procedures, Ch. 3, Policy 4.[7] Afterwards, the social workers are instructed to continue ongoing efforts to obtain responses

[7] The Department's policy manual on Indian child welfare is available at https://www.dcyf.wa.gov/indian-child-welfare-policies-and-procedures (last viewed January 28, 2020).

from the tribes, in situations where potential tribes fail to respond. ICW Practices and Procedures, Ch. 3, Policy 6. If, while making its good faith effort, the Department subsequently receives information that provides a "reason to know" the child is an Indian child, the Department is required to inform the court. 25 C.F.R. § 23.107(a); *see also* ICW Practices and Procedures, Ch. 3, Policy 8.

The Department's good faith efforts under RCW 13.38.050 are often at the beginning stage when the initial shelter care hearing takes place. The commentary to the BIA regulations recognizes "that facts change during the course of a child-custody proceeding." 81 Fed. Reg. 38803 (June 14, 2016). For example, here, after the initial shelter care hearing, the children's maternal grandmother began working on enrollment paperwork for her grandchildren to become members of Tlingit & Haida. CP 47. "[I]f the State subsequently discovers that the child is an Indian child, for example, or if a parent enrolls the child in an Indian Tribe, they will need to inform the court so that the proceeding can move forward in compliance with the requirements of ICWA." 81 Fed. Reg. 38803 (June 14, 2016). The juvenile court's "reason to know" determination at an initial shelter care hearing is not a final decision on ICWA and WICWA's application.

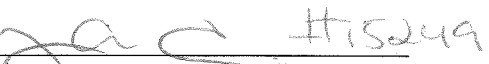
V. CONCLUSION

The father has failed to establish that the opinion from the Court of

Appeals raises any issues requiring resolution by this Court. The Respondent therefore respectfully requests that this Court deny the Petition for Review.

RESPECTFULLY SUBMITTED this 4th day of February, 2020

ROBERT W. FERGUSON
Attorney General



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CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that on the below date, the original documents to which this Declaration is affixed/attached, was filed in the Supreme Court of the State of Washington, under Case No. 98003-9, and a true copy was e-mailed or otherwise caused to be delivered to the following attorneys or party/parties of record at the e-mail addresses as listed below:

1. Tara Urs, The Defender Association, dependency.tdadocket@kingcounty.gov, and tara.urs@kingcounty.gov;

2. Kathleen Martin, Dependency CASA Program, casa.group@kingcounty.gov, and kathleen.martin@kingcounty.gov; and

3. Jennifer Masako Yogi and Sarracina Littlebird, Northwest Justice Project, Jennifery@nwjustice.org; and cina.littlebird@nwjustice.org.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 4th day of February, 2020, at Seattle, WA.

Patricia A. Prosser

PATRICIA A. PROSSER
Legal Assistant

ATTORNEY GENERAL'S OFFICE, SHS, SEATTLE

February 04, 2020 - 11:00 AM

Transmittal Information

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