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STATE OF WASHINGTON  
6/2/2020  
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COURT OF APPEALS  
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STATE OF WASHINGTON  
BY \_\_\_\_\_

No. 98615-1  
COA No. 53790-7-II

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON, Respondent,

v.

FORREST EUGENE AMOS, Appellant.

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PETITION FOR REVIEW (RAP 13.4)

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Presented by:

Forrest Eugene Amos DOC# 809903  
Clallam Bay Corrections Center  
1830 Eagle Crest Way  
Clallam Bay, Wa 98326

Petitioner, pro se.

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**A. IDENTITY OF MOVING PARTY**

Forrest Eugene Amos, pro se, asks this Court to accept review of the Court of Appeals decision terminating review designated in Part B of this petition.

**B. COURT OF APPEALS DECISION**

On April 28, 2020, the Court of Appeals filed a decision, holding that (1) there is no good faith argument that RCW 9.94A.535 and RCW 9.94A.506(3) prohibits a consecutive sentence for multiple convictions that exceeds the maximum set forth in RCW 9A.21.020 for a single conviction, and (2) RCW 9.94A.535 is not ambiguous regarding its "subject to the limitations" language.

A copy of the decision is attached. See Appendix A.

**C. ISSUES PRESENTED FOR REVIEW**

1. Is RCW 9.94A.535 ambiguous regarding its "subject to the limitations in this section" language?
  - a. What are the limitations in RCW 9.94A.535?
  - b. Do those limitations also include a limitation on the particular sentence which may be imposed under RCW 9.94A.535? If so, are they the same sentencing limitations which already apply throughout the Sentencing Reform Act (SRA)?
  - c. Did the Court of Appeals err by narrowly interpreting the language "subject to the limitations in this section" to apply solely to the reasons that justify an exceptional sentence, rather than, other limitations such as those that apply to sentences under the SRA?
  - d. Is an exceptional sentence considered a single determinate sentence even though multiple convictions were used to fashion the particular exceptional sentence in this case?
  - e. Did the Court of Appeals err by failing to apply the rule of lenity to resolve the ambiguity caused by the "subject to the limitations in this section" language?

2. Is a 116 month exceptional sentence for four counts of Forgery clearly excessive even though the sentence is within the "stacked" statutory maximum of 20 years?
  - a. Did the Court of Appeals err by failing to properly review whether Amos's exceptional sentence was clearly excessive?
  - b. Did the trial court err by failing to consider, and include in their written findings of fact and conclusions of law, the purpose of the Sentencing Reform Act (SRA) before imposing an exceptional sentence in this case?
  - c. Can an exceptional sentence be clearly excessive even though it is within the statutory maximum?
  - d. Is the language "clearly excessive" ambiguous?

D. STATEMENT OF THE CASE

In this case, the trial court imposed a 116 month exceptional sentence after Amos was found guilty of four counts of Forgery and First Degree Criminal Impersonation. The exceptional sentence was fashioned by deviating from the standards in RCW 9.94A.589(1) and running each 29 month standard range sentence consecutive to each other, totaling 116 months. The exceptional sentence was justified under the "free crime" aggravator due to Amos's high offender score. The purpose of the SRA were not considered by the trial court before the exceptional sentence was imposed, nor were those purposes included in the written findings of fact and conclusions of law. The purpose of the SRA is outlined under RCW 9.94A.010, which outlines seven different policy factors.

Although Amos was convicted of Forgery, it is extremely important to point out the following factors which were not considered by the Appellate Court when reviewing whether Amos's exceptional sentence is "clearly excessive."

Factor No. 1: None of the victims suffered any monetary loss as a result of the forged documents.

Factor No. 2: None of the victims were ever at risk losing any money under the legal liability theory as a result of the forged documents.

Factor No. 3: Although the documents formed the foundation of legal liability in this case, none of those documents formed any further legal liability than what was already form under the law; therefore, the forged documents were meaningless.

Ultimately, none of the victims were ever held to answer any complaint for damages stemming from the forged documents, nor did the victims ever suffer a monetary loss. The whole case was based solely on the theory of the forged documents creating a foundation of legal liability and not actual losses to those individuals.

The facts of the case as set forth in the original briefing and motion are incorporated herein.

**E. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED**

This Court should accept review of the issues presented in Part C of this petition because those issues are of a substantial public interest. It is this Courts duty to ensure ambiguity does not exist within the law so the common person understands when a particular act is criminal, while also understanding the punishment involved. The common person, i.e., the public, is entitled to this most basic form of notice under the Due Process clauses of the State and Federal Constitutions. See Wash. Const. Art. 1, § 3; U.S. Const. Amend. 14.

Herein, Amos raises a novel issue that the Court of Appeals failed

to adequately resolve. It is clear that RCW 9.94A.535 has more than one set of limitations that must be adhered to when the trial court chooses to deviate from the standards in RCW 9.94A.589(1) as an exceptional sentence. The Court of Appeals turned a blind eye to the sentencing limitations recognized throughout the SRA and chose to narrowly interpret the "subject to the limitations in this section" language to apply solely to the reasons set forth within the statute that justify an exceptional sentence.

By failing to leave out the sentencing limitations that are recognized throughout the SRA when interpreting the limitations of RCW 9.94A.535, the Court of Appeals essentially gives the trial court unlimited authority when tasked with imposing an exceptional sentence that involves multiple crimes. Since there is more than one limitation that is involved under RCW 9.94A.535, this Court has the duty to interpret the meaning of the language "subject to the limitations in this section" as it applies to the trial courts ability to deviate from the standards in RCW 9.94A.589(1) as an exceptional sentence.

When taking RCW 9.94A.535's sentencing limitations into consideration, this Court should equally apply the same sentencing limitations to both forms of an exceptional sentence, i.e., a lengthened concurrent sentence or a consecutive sentence. This is because both forms of an exceptional sentence are considered a "determinate sentence" regardless the number of convictions which are used to fashion the particular exceptional sentence. See RCW 9.94A.030(18)(A "determinate sentence" means a sentence that states with exactitude the number of actual years, months, or days of total confinement....)

Now the question becomes "how do we determine the proper statutory maximum that applies to the particular determinate sentence being imposed under RCW 9.94A.535 when multiple convictions are involved?" The Court of Appeals believes the answer is to "stack" the statutory maximums which are applicable to each crime that is run consecutive to each other as an exceptional sentence. Amos believes the rule of lenity should apply and the trial court should use the offense that has the highest statutory maximum as its limitation when imposing an exceptional sentence.

First off, the Court of Appeals interpretation is contrary to the plain reading of the language in the statute itself. This is because the legislature makes absolutely no mention of "stacking" the applicable statutory maximums to make a new statutory maximum that applies when the trial court chooses to deviate from the standard in RCW 9.94A.589(1). The plain language specifically references the "limitations in this section" with simply refers to the those limitations that apply when the trial court imposes a sentence outside the standard sentencing range as an exceptional sentence.

When the trial court imposes an exceptional sentence in this particular form, the statutory maximum that limits the trial courts sentencing authority are provided in RCW 9A.20.021. See also RCW 9.94A.506(3). Therefore, once the trial court reaches the statutory maximum that applies to each crime involved in creating the exceptional sentence under RCW 9.94A.535, the trial court has reached its limitation and their authority to further deviate from the standards in RCW 9.94A.589(1) to run each of the statutory maximum sentences consecutive

to each other is not authorized under RCW 9.94A.535. "Stacking" them, is clearly limited by the plain reading of the language itself. To hold otherwise would be completely absurd and undermine the entire scheme of the SRA, which was put in place to prevent exactly this sort of practice by both prosecutors and sentencing judges.

Secondly, the Court of Appeals "stacked" statutory maximum interpretation does not take into consideration the purpose of the SRA as outlined in RCW 9.94A.010. In viewing these purposes, the "stacked" statutory maximum interpretation completely undermines the requirement that sentences must "promote respect for the law by providing punishment which is just;" and "[b]e commensurate with the punishment imposed on others committing similar offense[.]" See RCW 9.94A.010(3)(4). By stacking the statutory maximum for each crime when imposing an exceptional sentence, it disrespects the existing statutory maximums under RCW 9A.20.021, is not considered "just" in the slightest, and is not commensurate with those maximum sentences imposed on others committing similar crimes. Just because someone may have a longer criminal history than someone else, it does not justify being able to sentence one to a statutory maximum sentence and the other one to a series of statutory maximum sentences stacked on top of each other to create a new arbitrary statutory maximum for the same crimes.

Under the statutory maximums that already exist, the trial court can still carry out the legislative intent of RCW 9.94A.535 to ensure aggravating factors are punished. The current statutory maximums need not be perverted in a way that is contrary to legislative intent and the SRA's sentencing scheme. There is nothing that would suggest such an



absurd practice like "stacking" statutory maximums is proper under the SRA.

Lastly, none of the caselaw relied upon by the Court of Appeals when interpreting RCW 9.94A.535 considered the "subject to the limitations in this section" language. Plus, review is de novo on this issue, therefore, this Court should not be persuaded by those prior decisions. This Court should remember that the legislature clearly intended for the purposes of the SRA to be considered when imposing an exceptional sentence under RCW 9.94A.535. Those purposes should be used as a guide when interpreting the language in question.

Next, the Court of Appeals seemed to believe that Amos's exceptional sentence was not clearly excessive because the sentence was authorized under their "stacking" interpretation. Therefore, Amos was denied a proper review of whether his exceptional sentence was clearly excessive. Just because an exceptional sentence may have been imposed within the law, it does not negate a challenge to determine whether such a sentence is clearly excessive. By failing to properly review a clearly excessive sentence, the Court of Appeals violated Amos's right to appeal under the statute and the State and Federal Constitutions. See RCW 9.94A.585; Wash. Const. Art. I, § 22; U.S. Const. Amend. 6.

While the aggravating factor was justified in this case, the 116 month exceptional sentence for four counts of Forgery is clearly excessive even if it was within the "stacked" statutory maximum of 20 years. This case did not involve any monetary loss for the victims, nor did it place the victims in jeopardy of being liable. In fact, the forged documents did nothing more than what the law already made the

victims liable for. See RCW 42.08.010-.080.

These factors warrant leniency despite the aggravating factor involved. This particular exceptional sentence for crimes that score a seriousness Level I offense under the SRA, completely shocks the conscious. See RCW 9.94A.515-.520.

Amos also believes the term "clearly excessive" is ambiguous because it is not defined under the SRA and there are no standards to weigh such a sentence against. How do we consider whether a sentence is clearly excessive? What factors, besides the purpose of the SRA, are used to determine whether an exceptional sentence is clearly excessive? This Court should take this opportunity to provide a standard and guideline to determine whether a sentence is clearly excessive because a sentence can be clearly excessive even if it is within the statutory maximum allowed by law.

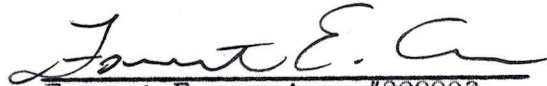
In conclusion, the SRA provides a sentence limitation for each crime being sentenced under the SRA. See RCW 9.94A.506(3). Those limitations reference the statutory maximums outlined in RCW 9A.20.021. When that maximum is reached under RCW 9.94A.535, the trial courts ability to further deviate from the standards in RCW 9.94A.589(1) as an exceptional sentence is limited by the language "subject to the limitations in this section." This is because the entire purpose of the SRA must be consider when imposing an exceptional sentence. This is a reasonable interpretation that does not have absurd results. In fact, it upholds the purpose of the SRA which must always be considered when imposing and exceptional sentence under RCW 9.94A.535.

F. CONCLUSION

Based upon these reasons, Amos's sentence is clearly excessive and RCW 9.94A.535 is ambiguous as it applies to the "subject to the limitations in this section" language. The rule of lenity should apply. Amos's 116 month sentence exceeds the 5 year statutory maximum that applies to the Forgery convictions. He should be remanded for resentencing.

Dated: May 28, 2020

Respectfully submitted,



Forrest Eugene Amos #809903  
Clallam Bay Corrections Center  
1830 Eagle Crest Way  
Clallam Bay, Wa 98326

APPENDIX A

(COURT OF APPEALS UNPUBLISHED OPINION)

April 28, 2020

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION II

STATE OF WASHINGTON,

Respondent,

v.

FORREST EUGENE AMOS,

Appellant.

No. 53790-7-II

UNPUBLISHED OPINION

WORSWICK, J. — Forrest Amos appeals from the denial of his CrR 7.8(b)(1) motion to modify his judgment and sentence. Amos's court appointed counsel on appeal has filed an *Anders*<sup>1</sup> brief, seeking to withdraw as counsel.

Amos's appellate counsel suggests two potential issues: (1) RCW 9.94A.535 and RCW 9.94A.506(3) prohibit a consecutive sentence that exceeds the maximum set forth in RCW 9A.20.021 and (2) RCW 9.94A.535 is ambiguous. Amos has filed a statement of additional grounds (SAG) for review in which he also argues that RCW 9.94A.535 cannot exceed the statutory maximum set forth in RCW 9A.20.021 as it relates to determinate sentences and also that his sentence is clearly excessive. We grant counsel's motion to withdraw and dismiss Amos's appeal.

FACTS

Amos was convicted of four counts of forgery and four counts of first degree criminal impersonation. The trial court ruled that the four convictions for first degree criminal

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<sup>1</sup> *Anders v. California*, 386 U.S. 738, 87 S. Ct. 1396, 18 L. Ed. 2d 493 (1967).

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impersonation were the same criminal conduct as the forgery convictions. Forgery is a class C felony. RCW 9A.60.020(3).

At sentencing, Amos's offender score was over nine points. The State sought an exceptional sentence under RCW 9.94A.535(2)(c), arguing that because of Amos's high offender score and multiple current offenses, some convictions would go unpunished. The trial court agreed and imposed consecutive sentences for the crimes as an exceptional sentence. The court sentenced Amos to 29 months for each forgery, to be served consecutively for a total of 116 months. The trial court's finding to support the exceptional sentence under RCW 9.94A.535(2)(c) stated, "The exceptional sentence is justified by the following aggravating circumstances: (a) Multiple Current Offenses RCW 9.94A.535(2)(c)." Clerk's Papers (CP) at 113. Amos filed a direct appeal of his convictions and sentence.

Amos, acting pro se, then filed a CrR 7.8(b)(1) motion to modify his judgment and sentence. Amos did not challenge the sentencing court's reason for imposing an exceptional sentence, recognizing that it was justified under RCW 9.94A.535(2)(c). Instead, he argued that certain statutes were ambiguous and that his exceptional sentence violated the sentencing limitations set forth in RCW 9A.20.021. The trial court appointed counsel, who filed a supplemental memorandum to support the motion. Following a hearing, the trial court denied Amos's motion, ruling that "Amos provided no authority that showed his sentence was illegal, therefore, Amos did not meet his burden pursuant to CrR 7.8(b)(1) to show the court made a mistake." CP at 121.

Amos appeals the denial of his CrR 7.8(b)(1) motion, and Amos's court appointed counsel on appeal moves to withdraw.

ANALYSIS

I. MOTION TO WITHDRAW

RAP 15.2(i) provides that court appointed counsel should file a motion to withdraw “[i]f counsel can find no basis for a good faith argument on review.” Pursuant to *Anders v. California*, 386 U.S. 738, 744, 87 S. Ct. 1396, 18 L. Ed. 2d 493 (1967), and *State v. Theobald*, 78 Wn.2d 184, 185, 470 P.2d 188 (1970), counsel’s motion to withdraw must

be accompanied by a brief referring to anything in the record that might arguably support the appeal. A copy of counsel’s brief should be furnished the indigent and time allowed him to raise any points that he chooses; *the court—not counsel—then proceeds, after a full examination of all the proceedings, to decide whether the case is wholly frivolous.*

*State v. Hairston*, 133 Wn.2d 534, 538, 946 P.2d 397 (1997) (quoting *Anders*, 386 U.S. at 744); RAP 18.3(a)(2). In accordance with this procedure, Amos’s counsel on appeal filed a brief with the withdrawal motion. Amos was served with a copy of the brief and informed of his right to file a SAG. Amos filed a SAG.

The material facts are accurately set forth in counsel’s brief in support of the motion to withdraw. We have reviewed the briefs and the record. We specifically consider the following potential issues raised by counsel:

[1.] When sentencing for multiple crimes under the “free crime aggravator,” do RCW 9.94A.506(3) and RCW 9.94A.535 prohibit the sentencing court from imposing a consecutive sentence that exceeds the statutory maximum designated in RCW 9A.20.021?

[2.] Is the language of RCW 9.94A.535 ambiguous and therefore, subject to the rule of lenity where the statute provides: “A departure from the standards in RCW 9.94A.589(1) and (2) governing whether sentences are to be served consecutively or concurrently is an exceptional sentence *subject to the limitations* in this section and may be appealed by the offender or the state as set forth in RCW 9.94A.585(2) thru (6)”?

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Motion To Withdraw at 2-3.

We hold that (1) there is no good faith argument that RCW 9.94A.535 and RCW 9.94A.506(3) prohibit a consecutive sentence for multiple convictions that exceeds the maximum set forth in RCW 9A.20.021 for a single conviction, and (2) RCW 9.94A.535 is not ambiguous regarding its “subject to the limitations” language.

Appellate review here is limited to whether the trial court abused its discretion when it denied the CrR 7.8 motion. *State v. Larranaga*, 126 Wn. App. 505, 509, 108 P.3d 833 (2005). The trial court abuses its discretion if its decision is manifestly unreasonable or based on untenable grounds or reasons. *State v. Robinson*, 193 Wn. App. 215, 217-18, 374 P.3d 175 (2016). A trial court also abuses its discretion if it makes an error of law. *State v. Tobin*, 161 Wn.2d 517, 523, 166 P.3d 1167 (2007).

A. *RCW 9.94A.535 and RCW 9.94A.506 Do Not Prohibit Amos’s Sentence*

We hold that there is no good faith argument that RCW 9.94A.535, RCW 9.94A.506(3), or RCW 9A.20.021 limit a consecutive sentence for multiple convictions to the statutory maximum for a single conviction.

Forgery is a class C felony. RCW 9A.60.020(3). “Unless a different maximum sentence for a classified felony is specifically established by a statute” the maximum allowable sentence for a class C felony is “confinement in a state correctional institution for five years.” RCW 9A.20.021(1)(c). If a sentencing court imposes consecutive sentences, the sentencing court may stack each individual crime’s statutory maximum to determine a defendant’s total statutory maximum allowable sentence. *State v. Weller*, 197 Wn. App. 731, 734-35, 391 P.3d 527 (2017).



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RCW 9.94.535 allows a sentencing court to impose an exceptional sentence, including when the “defendant has committed multiple current offenses and the defendant’s high offender score results in some of the current offenses going unpunished.” RCW 9.94A.535(2)(c).

RCW 9.94A.589 sets forth standards for consecutive and concurrent sentences, and a departure from these standards is an exceptional sentence. RCW 9.94A.535. RCW 9.94A.535 states:

A departure from the standards in RCW 9.94A.589(1) and (2) governing whether sentences are to be served consecutively or concurrently is an exceptional sentence *subject to the limitations in this section*, and may be appealed by the offender or the state as set forth in RCW 9.94A.585(2) through (6).

(Emphasis added.)

We hold that there is no good faith argument that RCW 9.94A.535 and RCW 9.94A.506(3) prohibit a consecutive sentence for multiple convictions that exceeds the maximum set forth in RCW 9A.20.021 for a single conviction. Amos’s motion argued that his maximum sentence for the forgery convictions was 5 years in total because a conviction for 1 forgery conviction was 5 years. Thus, when the trial court imposes an exceptional sentence of consecutive sentences for forgery, this exceptional consecutive sentence is confined by the 5-year maximum. But when convictions are imposed consecutively, the statutory maximum for the convictions are stacked. *Weller*, 197 Wn. App. at 734-35. Amos’s statutory maximum for the 4 forgery convictions was a total maximum of 20 years, or 240 months. RCW 9A.20.021(1)(c); *Weller*, 197 Wn. App. at 734-35. As a result, Amos’s 116 month-sentence was within the total statutory maximum.

Amos’s motion cited RCW 9.94A.506(3) to support his argument. But, RCW 9.94A.506(3) addresses standard range sentences and is inapplicable here because Amos’s sentence was an exceptional sentence. There is no good faith argument that RCW 9.94A.535,

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RCW 9.94A.506(3), or RCW 9A.20.021 limits a consecutive sentence for multiple convictions to the statutory maximum for a single conviction.

B. *RCW 9.94A.535 Is Unambiguous*

We hold that there is no good faith argument that RCW 9.94A.535 is ambiguous.

Statutory interpretation is a question of law we review de novo. *State v. Dennis*, 191 Wn.2d 169, 172, 421 P.3d 944 (2018). The purpose of statutory interpretation is to ascertain legislative intent. *Dennis*, 191 Wn.2d at 172. We first look to the statute’s plain language. *State v. Velasquez*, 176 Wn.2d 333, 336, 292 P.3d 92 (2013). If the plain language is unambiguous, subject only to one reasonable interpretation, this court’s inquiry ends. *Velasquez*, 176 Wn.2d at 336. A statute is not ambiguous merely because multiple interpretations are conceivable. *Velasquez*, 176 Wn.2d at 336. Related statutory provisions must be harmonized to effectuate a consistent statutory scheme. *Velasquez*, 176 Wn.2d at 336. If, however, the statute is ambiguous, we apply the rule of lenity, which construes ambiguity in favor of the defendant. *State v. Barbee*, 187 Wn.2d 375, 383, 386 P.3d 729 (2017).

Amos’s brief raises the issue that the phrase “subject to the limitations in this section” in RCW 9.94A.535 is ambiguous. The contested provision of RCW 9.94A.535 states:

A departure from the standards in RCW 9.94A.589(1) and (2) governing whether sentences are to be served consecutively or concurrently is an exceptional sentence *subject to the limitations in this section*, and may be appealed by the offender or the state as set forth in RCW 9.94A.585(2) through (6).

(Emphasis added.)

The plain language of RCW 9.94A.535 states that a sentencing court cannot deviate from the standards in RCW 9.94A.589(1)-(2) unless that departure is enumerated in RCW 9.94A.535. Accordingly, that deviation is “subject to the limitations” in RCW 9.94A.535. In other words,

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when a sentencing court imposes an exceptional sentence that deviates from RCW 9.94A.589(1) and .589(2) standards for consecutive and concurrent sentences, that deviation must be set forth in RCW 9.94A.535. Here, the enumerated reason was RCW 9.94A.535(2)(c), multiple current offenses. The phrase “subject to the limitations in this section” in RCW 9.94A.535 is unambiguous. Because the statute is unambiguous, the rule of lenity does not apply. *Barbee*, 187 Wn.2d at 383.

We hold that there are no good faith arguments. We grant counsel’s motion to withdraw.

## II. STATEMENT OF ADDITIONAL GROUNDS

In his SAG, Amos argues that RCW 9.94A.535 cannot exceed the statutory maximum set forth in RCW 9A.20.021 as it relates to determinate sentences and, as a result, his sentence is clearly excessive. We hold that Amos fails to raise reversible grounds in his SAG.

Amos argues that his sentence imposed under RCW 9.94A.535 is subject to the limitations in RCW 9A.20.021 because it is a determinate sentence. A determinate sentence is a sentence that “states with exactitude the number of actual years, months, or days of total confinement.” RCW 9.94A.030(18). Amos’s sentence was indeed a determinate sentence of 116 months. However, as set forth above, Amos’s sentence did not exceed the limitations in RCW 9A.20.021. The maximum sentence for each forgery count was stacked, and Amos was sentenced to less than the stacked maximum. Amos’s argument fails.

Amos also argues that his sentence was clearly excessive “because it exceeds the applicable five year [statute of limitations] maximum.” SAG at 9. This was a potential issue raised by counsel that is addressed above. Having determined that there is no good faith

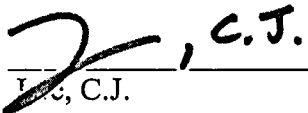
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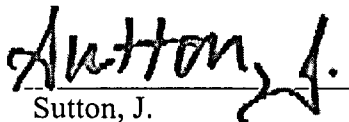
argument supporting this claim, we do not further address it. We hold that Amos fails to raise reversible grounds in his SAG.

Following this court's review of potential issues raised by counsel and the issues raised in Amos's SAG, we conclude that the issues do not present a good faith argument for review. This court's independent review of the record does not reveal any potential nonfrivolous issues that may be raised in this appeal. Accordingly, we grant counsel's motion to withdraw and dismiss Amos's appeal.

A majority of the panel having determined that this opinion will not be printed in the Washington Appellate Reports, but will be filed for public record in accordance with RCW 2.06.040, it is so ordered.

  
\_\_\_\_\_  
Worswick, J.

  
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Loe, C.J.

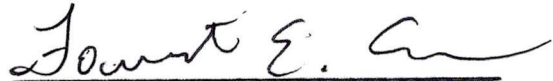
  
\_\_\_\_\_  
Sutton, J.

DECLARATION OF SERVICE (GR 3.1)

I, Forrest Eugene Amos, declares under the penalty of perjury that I mailed a true copy of the Petition For Review to the Lewis County Prosecutor, 345 W. Main St., 2nd Fl., Chehalis, Wa 98532, by placing in in the legal mail system at CBCC on May 28, 2020.

Dated: May 28, 2020, at Clallam Bay, Washington.

Respectfully submitted,

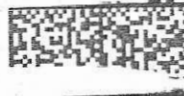


Forrest Eugene Amos #809903  
Clallam Bay Corrections Center  
1830 Eagle Crest Way  
Clallam Bay, Wa 98326

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Forrest Amas

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