NO. 94277-3

SUPREME COURT OF THE STATE OF WASHINGTON

WASHINGTON STATE DEPARTMENT OF CORRECTIONS,

Appellant,

v.

CHRISTOPHER COOK, KEVIN EVANS, JOSEPH JONES AND CHRISTOPHER ROBINSON,

Appellees.

ANSWER TO PETITION FOR REVIEW

ROBERT W. FERGUSON
Attorney General

Timothy J. Feulner, WSBA #45396
Cassie B. vanRoojen, WSBA #44049
Assistant Attorneys General
Corrections Division; OID #91025
PO Box 40116
Olympia WA 98504-0116
360-586-1445
TimF1@atg.wa.gov
CassieV@atg.wa.gov

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Rules

I. INTRODUCTION

Appellees, four inmates in the Department of Corrections ("Department") custody, submitted public records requests for logs of phone calls that show the calls made by inmates in the Department's custody. At the time of the request, the Department believed that these phone logs were not public records because they were maintained by a third party contractor and reflected phone calls made between private citizens. After other litigation on the issue, the Department changed its practice and began providing phone logs. When the Department received the lawsuits at issue here, it promptly made the records available to Appellees in accordance with its new practice. The trial court found that the Department's conclusion that the phone logs were not public records was objectively reasonable. However, the court held that the Department acted in bad faith and nonetheless awarded penalties because the Department did not search in a place that the records could not be found and because the Department did not provide a full explanation of its policy regarding phone logs.

The Department appealed. On appeal, all of the parties agreed that the appropriate definition of bad faith was articulated in *Faulkner v. Department of Corrections,* 183 Wn. App. 93, 332 P.3d 1136 (2014). In an unpublished opinion, Division One of the Court of Appeals reversed the

trial court because it concluded that the Department's actions did not constitute bad faith. The Department requests that the Court deny Appellees' petition for discretionary review of that unpublished decision.

II. STATEMENT OF ISSUES PRESENTED FOR REVIEW

This Court should deny review because the decision below does not meet any of the RAP 13.4(b) criteria. However, if the Court were to accept review, the following issue would be presented: Whether an agency acts in bad faith in denying an opportunity to inspect or copy a record when it denies a request based on a reasonable conclusion that the identified records are not public records.

III. STATEMENT OF FACTS

A. The Department's Determination That Logs of Phone Calls Made by Inmates to Members of the Outside Community and Maintained and Possessed by a Private Company Were Not Public Records

The Department contracts with a private company, Global Tel-Link (GTL), to run and maintain its inmate phone system. Cook CP 26; Evans CP 27; Jones CP 31; Robinson CP 214[1]. In 2013, the Department became aware of a significant security incident where an offender obtained through a public records request a log of all calls made by

[1] The appeals were consolidated after the designation of clerk's papers. As such, each of the four cases has their own Clerks Papers and Reports of Proceedings. For clarity sake, the Department's citations to the trial court record identify the trial court record by case name.

another offender. Cook CP 26, 31; Evans CP 28, 33; Jones CP 32, 37; Robinson CP 212, 221. The requester was a member of a Security Threat Group[2] and the inmate whose call logs were requested was a confidential informant. Cook CP 26, 31; Evans CP 28, 33; Jones CP 32, 37; Robinson CP 212, 221. At the time of this 2013 request, the Department had been providing phone logs in response to public record requests by obtaining the records from the GTL system to provide to the requester. Cook CP 31; Evans CP 33; Jones CP 37; Robinson CP 221. Specifically, when the Department would receive a request for phone logs, the request would be forwarded to the Department's investigative staff who would obtain the records from GTL and forward them to the Department's Public Disclosure Unit. Cook CP 31; Evans CP 33; Jones CP 37; Robinson CP 221.

In light of the significant security concerns and potential for violence that could come from inmates obtaining copies of inmate phone logs, the Department evaluated whether such logs were subject to public disclosure under the PRA. Cook CP 24-25, 27, 31; Evans CP 26-27, 29, 33; Jones CP 33-31, 33, 37; Robinson CP 213-14, 216-17, 221. The Department considered that it had no role in the operation, maintenance, or charging for phone services. Cook CP 25-26; Evans CP 27-28; Jones

[2] A Security Threat Group is the term that the Department uses for prison gangs.

CP 31-32; Robinson CP 214-216. Additionally, although the Department investigators may access phone records or monitor phone calls for possible criminal activity or other malfeasance, the Department does not retrieve call logs from the GTL servers or otherwise use or maintain the logs, except in narrow investigative circumstances. Cook CP 26, 31; Evans CP 28, 33; Jones CP 32, 37; Robinson CP 216, 221. In fact, the majority of the Department's over 16,000 offenders are never part of any investigation, and of those offenders who are the subject of an investigation, only a minority would ever have their phone logs pulled and accessed by the Department's investigators. Evans CP 266; Jones CP 421; Robinson CP 334.

After considering the nature of the requested records, the definition of a public record and the applicable case law, as well as consulting with counsel in the Attorney General's Office, the Department determined that inmate phone logs maintained and possessed by GTL were generally not public records. Cook CP 31; Evans CP 33; Jones CP 37; Robinson CP 221. As such, the Department took the position that such logs did not need to be produced in response to public records requests. Cook CP 31; Evans CP 33; Jones CP 37; Robinson CP 221.

In June 2013, the Department issued Newsbrief[3] 13-01 to provide guidance to its staff regarding how to process public record requests for phone logs. Cook CP 30, 34, 36, 168-169; Evans CP 32, 36, 38, 262-263; Jones CP 36, 40, 42, 418; Robinson CP 220, 224, 226, 330-331. Because phone logs were maintained within the GTL system, Newsbrief 13-01 directed staff to notify requesters that the Department did not consider inmate phone logs to be public records. Cook CP 30, 34, 36, 168-169; Evans CP 32, 36, 38, 262-263; Jones CP 36, 40, 42, 418; Robinson CP 220, 224, 226, 330-331. The Newsbrief recognized that records pulled from the GTL system and used in agency business might be public records. Cook CP 30, 34, 36, 168-169; Evans CP 32, 36, 38, 262-263; Jones CP 36, 40, 42, 418; Robinson CP 220, 224, 226, 330-331. The Newsbrief, however, did not direct staff to search for these records, but rather was intended to assist staff in handling phone logs which had already been retrieved from the third party phone system for use in agency business and may turn up in other record searches. Cook CP 168-168; Evans CP 262-263; Jones CP 418; Robinson CP 330-331. However, if staff had a specific reason to believe the requested records were pulled and

[3] Newsbriefs are internal memoranda issued by the Department's Public Records Officer containing written guidelines to provide public disclosure staff guidance on specific public disclosure issues. Cook CP 30; Evans CP 32; Jones CP 36; Robinson CP 220.

used as part of an investigation, staff would be expected to search for these records. Cook CP 169; Evans CP 263; Jones CP 418; Robinson CP 331.

B. The Phone Log Requests at Issue in This Case

In September 2013 and February 2014, the Department's position on phone logs was the subject of two lawsuits in Franklin County Superior Court brought by inmate Joseph Jones and former inmate Karl Tobey. Cook CP 32; Evans CP 34; Jones CP 38; Robinson CP 222. The trial court held that phone logs were public records but denied Jones and Tobey penalties because it found that the Department did not act in bad faith in denying the records because its position was reasonable. Cook CP 32, 55-63; Evans CP 34, 53-61; Jones CP 38, 58-67; Robinson CP 222, 242-254.

During the Franklin County litigation, the Department received numerous additional inmate requests for inmate phone logs. The Department received the four requests at issue in this appeal over a period of four months.[4] Cook CP 43; Evans CP 45; Jones CP 49; Robinson CP 233. Three of these four requests were received before the Franklin County judge's oral ruling that inmate phone logs are public records. Cook CP 43; Evans CP 45, 282; Jones CP 49; Robinson CP 233. The last of the four requests, from Evans, was received eleven business days after the Franklin County judge's oral ruling on June 25, 2014, and prior to the

[4] The Department received Cook's request on April 3, 2014, Jones's request on May 1, 2014, Robinson's request on May 5, 2014, and Evans's request on July 11, 2014.

entry of the court's written order. Evans CP 282. Each of these requesters was housed at Coyote Ridge Corrections Center. Cook CP 43; Evans CP 45; Jones CP 49; Robinson CP 233. All of the requesters in this appeal, except for Joseph Jones, sought their own phone logs. Cook CP 43; Evans CP 45; Jones CP 49; Robinson CP 233. Jones sought the phone logs of Karl Tobey, the other plaintiff in the 2013 Franklin County lawsuits. Jones CP 49. In response to each of these requests, the Department timely notified the requesters that phone logs are not public records because the phone system is run and maintained by an outside vendor. Cook CP 45; Evans CP 47; Jones CP 51; Robinson CP 235.

In response to the rulings in Franklin County, the Department evaluated its options, including appealing the Franklin County decisions and requesting legislation to address the issue. After weighing its options, the Department ultimately decided in February 2015 to begin producing phone logs again in response to public record requests. In doing so, the Department began obtaining the records from the GTL system and providing the records to the requester. Cook CP 32, 40; Evans CP 34, 42; Jones CP 38, 46; Robinson CP 222, 230. Meanwhile, the four plaintiffs in this case filed lawsuits in Thurston County challenging the Department's

response to their public records requests and seeking monetary penalties.[5] Cook CP 1-4; Evans CP 1-4; Jones CP 4-7; Robinson CP 5-8. Upon receiving notice of the four lawsuits at issue in this matter, the Department promptly made the requested phone logs available to the requesters. Cook CP 41, 51; Evans CP 43, 49; Jones CP 46, 53-54; Robinson CP 231, 237.

In total, inmates filed nine separate actions in Thurston County Superior Court over inmate phone logs in 2015. Four of those cases are consolidated here. Two cases before Division Two of the Court of Appeals are stayed pending resolution of this appeal. *See Larry Givens v. DOC*, Ct. Apps. No. 48768-3-II; *Sean Lancaster v. DOC*, Ct. Apps. No. 48707-0-II. Another two cases were either voluntarily dismissed or settled in superior court. *See Kevin Evans v. DOC*, Ct. Apps. No. 48764-1-II; *Joseph Henry v. DOC*, Thurston Cnty. Superior Ct. No. 15-2-00045-1. The final, ninth case is stayed in the superior court pending resolution of this appeal. *Brady Lewis v. DOC*, Thurston Cnty. Superior Ct. No. 15-2-01279-4.

C. The Trial Judge Concluded the Department's Policy Was Objectively Reasonable But Its Failure to Conduct a Search Was Bad Faith Regardless of Whether It Would Have Resulted in the Production of Records Under the Department's Policy

In each of these four cases, the Department ultimately conceded that inmate phone logs were public records. The Department argued,

[5] Jones filed his lawsuit on January 7, 2015, Robinson filed his lawsuit on January 8, 2016, Evans filed his lawsuit on February 5, 2015, and Cook filed his lawsuit on March 12, 2015. Cook CP 1-4; Evans CP 1-4; Jones CP 4-7; Robinson CP 5-8.

however, that the requesters were not entitled to penalties under RCW 42.56.565(1) because the Department did not deny records in bad faith. Cook CP 5-16; Evans CP 8-22; Jones CP 11-26; Robinson CP 189-209. The Department contended it had initially denied the requested records in good faith because it reasonably believed the phone logs were not public records. Cook CP 5-16; Evans CP 8-22; Jones CP 11-26; Robinson CP 189-209. The Department also argued that because no responsive records would have been found had it searched for the specific phone logs in any location except on the GTL servers, the absence of a search was not bad faith. Cook CP 156-164; Evans CP 250-258; Jones CP 406-413; Robinson CP 319-327.

The trial court agreed with the Department and found that the Department did not act in bad faith when the Department determined inmate phone logs possessed only by GTL were not public records. The court concluded the Department's position was objectively reasonable and not bad faith. Cook CP 141-149; Evans CP 242-249; Jones CP 366-375; Robinson CP 309-318. However, the trial court found that the Department acted in bad faith because the Department failed to search its files to see if the specific phone logs had ever been accessed for agency business and failed to inform the requester that inmate phone logs could be public

records if they had been accessed for use in agency business. Cook CP 141-149; Evans CP 242-249; Jones CP 366-375; Robinson CP 309-318.

Despite uncontested evidence that the Department had never accessed the requested phone logs for agency business and had never used the particular phone logs, the trial court found the absence of a search constituted bad faith. Cook CP 171-172, 188-214; Evans CP 265-280; Jones CP 420-429; Robinson CP 333-349. The trial court reached this conclusion despite the evidence that the denial of records resulted from the objectively reasonable policy and a search would not have changed the outcome of the request based on the policy at the time. In reaching this conclusion, the trial court rejected the argument that there is a causation requirement in RCW 42.56.565, i.e. that the failure to search must cause the denial of records. Cook CP 236-237; Evans CP 293; Jones CP 460-461; Robinson CP 374; Cook RP October 9, 2015, p. 13. Based on its finding of bad faith, the trial court awarded each of the requesters penalties in the amount of $25 per day. Cook CP 236-237; Evans CP 293; Jones CP 460-461; Robinson CP 374.

D. The Department's Appeal and Division One's Decision

On appeal, the Department argued that the trial court erred in awarding penalties because it did not act in bad faith in denying Appellees an opportunity to inspect or copy a record. Division One of the Court of

Appeals agreed and reversed. In an unpublished opinion, Division One applied the bad faith standard articulated in *Francis v. Wash. State Dep't of Corr.*, 178 Wn. App. 42, 313 P.3d 457 (2013), and *Faulkner v. Wash. Dep't of Corr.*, 183 Wn. App. 93, 332 P.3d 1136 (2014). The court concluded that the Department did not act in bad faith because it reasonably complied with its then-existing objectively reasonable belief that phone logs were not public records. As such, the court reversed the award of penalties and remanded for the award of costs and attorney's fees, consistent with its opinion.

IV. REASONS WHY REVIEW SHOULD BE DENIED

Appellees urge this Court to take review contending that the Court of Appeals' opinion conflicts with prior case law and raises issues of public importance. Appellees specifically request that this Court accept review to (1) provide guidance on the definition of a public record and agency responsibility for records of third-party vendors, and (2) define the contours of policies courts can consider when making a penalty determination. However, neither of these issues meets the requirements set out in RAP 13.4(b). This Court should deny review.

/ / /

A. The Court of Appeals Did Not Address the Definition of a Public Record and Its Opinion Does Not Conflict with Prior Case Law on That Issue

The Court of Appeals decision does not address the definition of a public record, and no party is arguing that the requested phone logs are not a public record. Accordingly, there is no disputed definition requiring clarification or guidance from the Court. Appellees' argument regarding the definition of a public record ignores the procedural posture of these cases. The issue before the trial court and the Court of Appeals was whether the Department acted in bad faith in denying the opportunity to inspect or copy records under RCW 42.56.565. Indeed, for the purposes of these cases, the Department conceded in the trial court that the requested records were public records and that it violated the PRA in failing to provide such records. Therefore, neither the trial court nor the appellate court squarely addressed the definition of a public record. Rather, in reaching its decision, the trial court considered the Department's policy regarding phone logs and determined that it was based on a reasonable interpretation of the definition of a public record, but did not decide whether the records were or were not public records. The trial court's conclusion on that issue was unchallenged by Appellees on appeal. Division One of the Court of Appeals similarly relied upon this uncontested conclusion that the Department's policy was reasonable and

likewise did not decide whether the requested records met the definition of a public record. As such, refining the definition of a public record is not a ripe issue for review in this case.

Appellees argue that Division One's decision here conflicts with *Concerned Ratepayers*, 138 Wn.2d 950, 983 P.2d 635 (1999). *Concerned Ratepayers*, however, dealt with the definition of a public record and the *Concerned Ratepayers* court concluded nothing about penalties. Moreover, *Concerned Ratepayers* was decided over a decade before the limitation on penalties to incarcerated individuals in RCW 42.56.565(1) was enacted. Division One's decision was based on its interpretation of RCW 42.56.565(1) and nothing in the decision conflicts with *Concerned Ratepayers*' definition of a public record.

Nor does Division One's decision here conflict with *Concerned Ratepayers* for the other reason Appellees argue—that it opens the door for an agency to "argue it did not have a policy governing disclosure and thus it is not required to pay any penalties." Petition for Review, at p. 6. *Concerned Ratepayers* did not discuss any internal policy, so there is no conflict. Regardless, Appellees' argument is based on a misunderstanding of Division One's decision. Rather Division One decided that an agency does not act in bad faith when its actions are based on a policy that is

objectively reasonable. That proposition appears uncontroversial as the Court of Appeals has consistently said as much, as discussed below.

Because Division One's opinion did not address the issue of whether requested records were public records based on the Department's concession, its opinion does not conflict with *Concerned Ratepayers*. This Court should decline review.

B. The Court of Appeals Decision Was Based on a Standard of Bad Faith That All the Parties Agreed Applied; That Decision Does Not Conflict with Prior Case Law

RCW 42.56.565(1) allows for the award of penalties to incarcerated individuals only if the court finds that the agency acted in bad faith in denying the individual the opportunity to inspect or copy a record. In order to show bad faith, an incarcerated requester must show that the agency engaged in willful and wanton conduct that defeats the purpose of the PRA. *See Faulkner v. Wash. Dep't of Corrections*, 183 Wn. App. 93, 332 P.3d 1136 (2014). In the Court of Appeals, Appellees conceded that this standard was the appropriate standard under the law. *See* Oral Argument, *Cook, et al., v. Dep't of Corrections*, No. 48186-2-I (Jan. 6, 2016), at 8:15-8:36.[6]

[6] Court: And you agree that the standard for bad faith is willful or wanton conduct utterly disregarding the purpose of the Public Records Act?

Appellees' Counsel: I think that we all agree that *Faulkner* as put together is willful or wanton conduct, your Honor.

Applying this standard, the Court of Appeals concluded that the Department's actions did not constitute bad faith. Specifically, the Court of Appeals concluded "[t]he Department reasonably complied with its then-existing objectively reasonable belief that phone logs were not public records." Appendix to Petition for Review, at p. 8. Under the circumstances as a whole, the Court of Appeals concluded the Department did not act in bad faith because the failure to search or to disclose to inmates that exhibits to investigations may be public records did not jeopardize the sovereignty of the people or government accountability.

Appellees argue that the Court's analysis conflicts with *Francis v. Department of Corrections*, 178 Wn. App. 42, 313 P.3d 457 (2013). As an initial matter, *Faulkner* clarified the standard articulated in *Francis* and Appellees do not argue that the Court of Appeals erroneously applied *Faulkner*. Indeed, as noted above, they conceded that *Faulkner* is the appropriate standard. Regardless, Appellees overstate the *Francis* case. In *Francis*, the Court of Appeals concluded that an agency's failure to search could constitute bad faith but that the search and response is to be considered under the "broad canopy of reasonableness." *Id*. at 63. The *Francis* court further limited this conclusion when it stated "[t]his is not to

---

Court: And *Faulkner* also recognizes that we are going to look at the total circumstances in making that decision.

Counsel: I understand that too, your Honor.

say that the failure to conduct a reasonable search or the failure to follow policies in a search by themselves necessarily constitutes bad faith." *Francis*, 178 Wn. App. at 63 n.5. As such, *Francis* does not stand for the proposition that an inadequate search requires a finding of bad faith as Appellees argue. Instead, *Francis* illustrates that courts look at the entire circumstance of the agency's conduct, including any search, to determine bad faith. Here, consistent with *Francis*, Division One considered all of the circumstances of the case and held that the Department did not act in bad faith in denying Appellees the opportunity to inspect or copy a record.

Appellees' Petition for Discretionary Review is largely premised on the idea that the Department acted in bad faith because it did not search to see if the requested records were contained in any investigation file. But as the Court of Appeals correctly concluded, this fact by itself does not establish bad faith. Additionally, Appellees' argument ignores the uncontested fact that Appellees' records were never accessed for any investigation or Department purpose. Appellees' argument is essentially that the Department acted in bad faith because it failed to search in places that the records in question could never have been found. Although the trial court adopted this erroneous logic, the Court of Appeals correctly decided that the bad faith inquiry is conducted as a whole and the Department's actions under the circumstances did not amount to bad faith.

Again, nothing in this conclusion conflicts with pre-existing case law on bad faith. Therefore, the Court of Appeals decision does not conflict with *Francis* and there is no conflict providing a basis for review under RAP 13.4(b)(2).

C. Division One's Decision Was Correct and It Does Not Otherwise Meet the Criteria for Discretionary Review

RCW 42.56.565(1)'s limitation on penalties to incarcerated requesters identifies two interrelated prerequisites to the award of penalties: 1) the requisite degree of culpability, i.e., bad faith and 2) the actions that the agency must have taken in bad faith, i.e. the denial of an opportunity to inspect or copy a record.[7] As discussed above, the Court of Appeals' decision was premised on the first limitation and Appellees' agreed that the first limitation was governed by *Faulkner*. Under *Faulkner* and related cases, even when an agency violates the PRA by not disclosing a record, reliance on an invalid basis for nondisclosure does not result in a finding of bad faith, so long as the basis is not farfetched or asserted with knowledge of its invalidity. *See King County v. Sheehan*, 114 Wn. App. 325, 356-57, 57 P.3d 307 (2002)(finding no bad faith because the agency's argument was not farfetched). Here, the trial court and the Court of

[7] RCW 42.56.565(1) provides: "A court shall not award penalties under RCW 42.56.550(4) to a person who was serving a criminal sentence in a state, local, or privately operated correctional facility on the date the request for public records was made, unless the court finds that the agency acted in bad faith in denying the person the opportunity to inspect or copy a public record."

Appeals concluded that the Department's decision to decline to produce phone logs in response to Appellees' requests was based on a reasonable interpretation of the PRA. Based on this conclusion, the Department did not act in bad faith and the Court of Appeals correctly concluded as much.

In addition to the arguments addressed above, Appellees' brief makes passing reference to a number of factors that they argue support review. Specifically, Appellees argue that this case is a matter of public importance because agencies need guidance for handling third party records or because agencies need clarification about what is considered a policy in the PRA context. However, neither of these arguments applies to this case or the Court of Appeals decision. In this case, the Department had provided Appellees with the requested records and changed its policy regarding inmate phone logs. The only issue was whether these particular incarcerated requesters should be entitled to penalties on these facts. That is not an issue of substantial public importance under RAP 13.4(b)(4).

With respect to the question of the definition of "policy," this issue likewise is not presented in this case. The Court of Appeals did not determine that the Newsbrief was not a policy; rather it held that the Department's policy was reasonable and the Department acted based on a reasonable interpretation of that policy. The Department has never argued that the Newsbrief was not a policy or used that as a basis for a finding of

no bad faith. Rather, the Department has argued that the Department's policy, as properly interpreted, was a reasonable policy and therefore applying it was not bad faith. Because the definition of a policy is not an issue in this case, it does not provide a basis for review under any subpart of RAP 13.4(b).

V. CONCLUSION

The Court of Appeals decision is carefully reasoned, consistent with other appellate court decisions interpreting bad faith, and correctly interprets and applies RCW 42.56.565(1). None of the criteria for review under RAP 13.4(b) are satisfied. The Court should deny review.

VI. COSTS

In the event that the Court denies review, the Department requests costs pursuant to RAP 14.2.

RESPECTFULLY SUBMITTED this 10th day of April, 2017.

ROBERT W. FERGUSON
Attorney General

s/ Timothy J. Feulner
TIMOTHY J. FEULNER, WSBA #45396
CASSIE B. vanROOJEN, WSBA #44049
Assistant Attorneys General
Corrections Division OID #91025
PO Box 40116
Olympia WA 98504-0116
(360) 586-1445
TimF1@atg.wa.gov
CassieV@atg.wa.gov

CERTIFICATE OF SERVICE

I certify that on the date below I caused to be electronically filed the ANSWER TO PETITION FOR REVIEW with the Clerk of the Court using the electronic filing system and I hereby certify that I have mailed by United States Postal Service the document to the following participant:

MICHAEL KAHRS
KAHRS LAW FIRM, P.S.
5215 BALLARD AVENUE NW SUITE 2
SEATTLE WA 98107-4838

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

EXECUTED this 10th day of April, 2017, at Olympia, WA.

s/ Amy Jones
AMY JONES
Legal Assistant
Corrections Division OID#91025
PO Box 40116
Olympia WA 98504-0116
AmyJ@atg.wa.gov

CORRECTIONS DIVISION ATTORNEY GENERAL'S OFFICE

April 10, 2017 - 3:45 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	94277-3
Appellate Court Case Title:	Christopher Cook, et al. v. Department of Corrections
Superior Court Case Number:	15-2-00479-1

The following documents have been uploaded:

- 942773_20170410154441SC694705_7641_Answer_Reply.pdf
  This File Contains:
  Answer/Reply - Answer to Petition for Review
  The Original File Name was 00004-Response-MDR.pdf

A copy of the uploaded files will be sent to:

- TimF1@atg.wa.gov
- cassiev@atg.wa.gov
- mike@kahrslawfirm.com

Comments:

Sender Name: Amy Jones - Email: amyj@atg.wa.gov
Filing on Behalf of: Cassie B Vanroojen - Email: cassiev@atg.wa.gov (Alternate Email:)

Address:
Corrections Division
PO Box 40116
Olympia, WA, 98104-0116
Phone: (360) 586-1445

Note: The Filing Id is 20170410154441SC694705