SUPREME COURT NO. 97766-6

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Plaintiff,

v.

TIMOTHY HAAG,

Defendant.

SUPPLEMENTAL MEMORANDUM IN SUPPORT OF PETITION FOR REVIEW

Court of Appeals No. 51409-5-II
Appeal from the Superior Court of Cowlitz County,
Cause No. 94-1-00411-2
The Honorable Michael Evans, Presiding Judge

Mary K. High, WSBA No. 20123
Jennifer Freeman, WSBA No. 35612
Attorney for Petitioner/Appellant
Department of Assigned Counsel
949 Market Street, Suite 334
Tacoma, Washington 98402
(253) 798-6969

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I. IDENTITY OF PETITIONER

Petitioner Timothy Haag asks this Court to accept review of the Court of Appeals decision terminating review. Petitioner submits this supplemental briefing at the request of the Court addressing *State v. Delbosque*, Supreme Court No. 96709-1.

II. THE COURT HAS REQUESTED ADDITIONAL BRIEFING TO ADDRESS *STATE V. DELBOSQUE*

The Court has requested additional briefing regarding the effect of its decision in *State v. Delbosque*, 195 Wn.2d 106, 456 P.3d 806 (2020) on the issues presented in this case. While *Delbosque*, 195 Wn.2d 106 is instructive it does not address all the issues presented by Haag because of the differences in the underlying findings and reasons for the sentences imposed by the respective courts.

III. ISSUES PRESENTED FOR SUPPLEMENATL BRIEFING

1. The *Delboaque* decision reversing a 48-year minimum sentence and remanding for a new sentencing hearing because the trial court abused its discretion when its decision was based on findings of irretrievable depravity that were not supported by substantial evidence does not address the issues presented by Haag's 46-year minimum sentence despite supported findings of diminished culpability, significant rehabilitation, and sincere remorse

2. By granting Haag's petition this Court affords him the same opportunity for a resentencing hearing at which the trial court has the benefit of *Bassett* and the *Delbosque* opinion's clarification of the *Ramos* Court's discussion of what constitutes a de facto life sentence.

3. Unlike *Delbosque* or *Ramos*, Haag squarely presents the question of whether a 46-year minimum sentence amounts to a de facto life sentence that deprives Timothy Haag of the chance to return to a life in society.

IV. STATEMENT OF THE CASE

On August 17, 2018, Timothy Haag filed a brief alleging that the trial court erred when it invoked retribution as the basis to override the supported findings of diminished culpability and extensive rehabilitation and sentenced Timothy Haag to a 46-year minimum to life sentence. Haag also argued that state and federal precedent require sentencing judges to meaningfully consider how children are different and how these differences counsel against irrevocably sentencing them to a lifetime in prison. Finally, Haag argued a 46-year sentence was a de facto life sentence that deprives him of the opportunity to reenter society.

The Court of Appeals, in an unpublished opinion, denied his request for relief. Haag timely filed his Petition for Review. Subsequently, this court requested additional briefing addressing *State v. Washington v. Christian Delbosque, Supreme Court 96709-1*. Below are the facts pertaining to the issues for which the court has requested additional briefing. For a more comprehensive review, the opening appellate brief and Petition for Review set out facts and law relevant to

this supplemental briefing in support of his Petition and is hereby incorporated herein by reference.

1. The *Miller* Re-Sentencing

After spending 24 years in prison, more than half his life, for a crime he committed when he was less than two months past his 17th birthday (CP 47), Timothy Haag was given hope for a new lease on life in January 2018. As part of the "*Miller* fix" statute passed in 2014, Haag was automatically entitled to a new sentencing hearing where the judge would be obligated to "take into account mitigating factors that account for the diminished culpability of youth as provided in *Miller v. Alabama*, 567 U.S. 460, 132 S. Ct. 2455, 183 L. Ed. 2d 407 (2012). *See also* RCW 10.95.030, 035.

He had reason to hope; Haag was no longer the same person he was back in 1994 and proved it daily in prison through his performance in his work and participation in various programs. CP 54-55, 61. At the hearing, two experts spoke at length about the trauma and deep emotional issues that preceded the murder and were unequivocal about his readiness to return to the outside world. RPII 6-91, CP 61-95. Even the judge agreed that Haag "has reached a significant level of rehabilitation" and "has exhibited a stellar track record in prison and has been assessed as a low risk for violently re-offending." RPI 27. The court, even while

discounting the uncontroverted expert testimony, found that Haag was "not irretrievably depraved nor irreparably corrupt." RPI 25. Unfortunately, this hope proved false when he was sentenced to an additional 22 years purely for retribution. RPI 25.

At the *Miller* re-sentencing hearing, Haag presented the testimony of Kenneth Pierson, Dorcy Lang, and his mother, along with the expert testimony of Dr. Ronald Roesch and Dr. Marty Beyer. Both psychologists concluded that, had Haag been assessed in 1994 using the SAVRY (Structured Assessment of Violence Risk in Youth), he would have been given a low risk score. CP 77, 92.

Dr. Marty Beyer detailed in her report how Haag "was traumatized by the combination of losing his father, living in poverty, being picked on for years at school, psychological maltreatment by his stepfather, the sudden loss of his best friend and his fears about the rejection he would experience if his sexual orientation was revealed." CP 62. He functioned younger than his chronological age emotionally, and "[h]is tragic offense was the result of an unexpected explosion of his untreated grief, anger, and shame. His offense was an anomaly." *Id.*

Dr. Ronald Roesch also used the HCR-20 to assess Haag's current risk of violence and recidivism. CP 92. Consistent with the results of the

SAVRY, the PREA (Prison Rape Elimination Act) assessment,[1] and the Level of Service Inventory (LSI),[2] Dr. Roesch scored Haag as having a low risk of reoffending. CP 93. Like Dr. Beyer, he concluded that,

> [H]is offense appears to have been a highly impulsive one, made in response to anger toward the victim's family that had been building up for some time. In his adolescent mind, this was a way to take revenge for what he perceived as abusive treatment of his friend Alex, with whom he was strongly attracted but had never spoken to him about his feelings toward him. He did not consider alternative ways to cope with his feelings, in large part because he was embarrassed about his homosexuality and was unable to disclose it to anyone.

CP 94. He concluded that Haag "has matured and has become a responsible adult" who "does not have any mental health issues or anger problems that would place him at risk for future offending." *Id.*

The prosecution did not introduce any contravening witnesses or evidence, but instead focused on the nature of the crime. RP1 113-22.

2. Judge Evans

At sentencing, the Judge expressed sympathy for the victim's family. RPI 16. He expressed concern that Haag had not had counseling, RPI 22, although he completed anger management in prison, RPI 89, and both experts said that he did not have any anger or mental health issues that that would put him at risk of offending. *Id.* at 62, 94. The Judge

[1] Administered by the prison. CP 89.
[2] Also administered by the prison. CP 89.

expressed concern that the stability prong of the HCR-20 was not administered, *Id.* at 23, although Dr. Roesch, stated that the relationship stability factor is only one of ten factors of the Historical prong of the assessment which is itself only one-third of the entire assessment and it's omission did not affect the doctor's confidence in the result. CP 92-94. Judge Evans also relied on a statement by the victim's brother, Alex Anderson regarding Haag's interest in death. RP1 24. These allegations were never substantiated or presented in any other context and related to statements allegedly made decades ago when Haag was a teenager.

Further, despite the uncontested and unquestioned reports of actual trauma when he was a child, Judge Evans generically described Haag's young life as a "mixed bag of positive and challenging circumstances, not unlike others" and made a point of rhetorically aging Haag. CP 62, RP1 20. He twice called Haag a "man" at the time of the murder and made repeated references to Haag's weight at the time and the difference in ages between Haag and the victim. RP1 18, 27.

Judge Evans accepted that Haag "has reached a significant level of rehabilitation," "has likely aged out of what is called adolescent-limited delinquency," and "is not irretrievably depraved nor irreparably corrupt." RP1 25. He also noted that "Haag has expressed what I judge to be sincere remorse and sorrow for his actions." RPI 25. Nevertheless, he went on to

say that "rehabilitation is not the sole measure in sentencing. Retribution holds that punishment is a necessary and deserved consequence for one's criminal act. Under the retributive theory, severity of the punishment is calculated by the gravity of the wrong committed." RPI 25. In this case the wrong was the murder of a young, white girl.

Although he concluded by listing the factors he had to "weigh," his earlier statements about the rehabilitation of Haag and the retributive nature of sentencing made it clear that the only consideration was how much more to punish a person who, by all accounts, has been rehabilitated. RPI 27.

The court sentenced Timothy Haag to a minimum sentence of 46 years to life. RP1 27, CP 756-766. With his current sentence, Haag will only be eligible for parole at the age of 63 at which point he'll have lived almost three-quarters of his life in prison. Life expectancy in the prison system makes this sentence another life sentence.

V. SUPPLMEMENTAL ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

The issues raised by this petition should be addressed by this Court because *State v. Delbosque* does not answer significant questions presented by Haag concerning the constitutionality of his sentence and the abuse of the trial court's discretion in failing to meaningfully consider the

Miller sentencing factors that counsel against irrevocably sentencing youthful offenses to a lifetime in prison. Haag also squarely presents this court with the question of whether a 46-year minimum sentence is a de facto life sentence that deprives Timothy Haag from having the chance to reenter society. Additionally, the need for guidance to resentencing courts on the application of the *Miller* mitigating factors and the proper application of *State v. Ramos*, 187 Wn.2d 420, 387 P.3d 650 (2017), *as amended* (Feb. 22, 2017) and *State v. Bassett*, 192 Wn.2d 67, 428 P.3d 343 (2018) raises a continuing issue of substantial public interest, as set forth in RAP 13.4(b)(3) and (4).

1. The *Delbosque* Decision Reversing a 48-year Minimum Sentence and Remanding for a New Sentencing Hearing Because the Trial Court Abused Its Discretion When Its Decision was Based on Findings of Irretrievable Depravity That Were Not Supported by Substantial Evidence Does Not Address the Issues Presented by Haag's 46-year Minimum Sentence Despite Supported Findings of Diminished Culpability, Significant Rehabilitation, and Sincere Remorse.

Delbosque asked the court to decide a different question, whether a 48-year minimum sentence imposed for an offense committed by Delbosque when he was 17 years old, after the trial court erroneously found him to be irredeemably corrupt, was an abuse of discretion. Haag presents the court with the question of whether the resentencing court abused its discretion when it imposed a 46-year sentence after finding

Haag was not permanently incorrigible, acted with diminished culpability due to his youth, and demonstrated significant rehabilitation.

Of grave concern here is the trial court's and the court of appeals misapplication of governing law resulting in upholding a cruel sentence imposed on an individual whom the trial court acknowledged was both less culpable due to youth and largely rehabilitated since the commission of the crime. Such a sentence is inconsistent with Wa. Const. art. I, § 14.; *Bassett*, 192 Wn.2d 67; *Miller*, 567 U.S. 460; *Ramos*, 187 Wn.2d at 434–35 (need to give meaningful consideration to the mitigating factors of youth), and *United States v. Briones*, 929 F.3d 1957, 1067 (9th Cir. 2019) (need to reorient the sentencing analysis to a forward looking assessment of defendant's capacity for change ... rather than a backward focused review of the defendant's criminal history.) This issue is not addressed by the *Delbosque* decision.

In *Delbosque*, this Court held that the sentencing court abused its discretion by entering findings that were not supported by substantial evidence, thus, the court's sentence of a presumptively de facto life sentence of 48 years predicated on the finding that Delbosque was permanently incorrigible and irretrievably corrupt, "did not adequately consider mitigation evidence that would support a finding of diminished culpability, rather than irretrievable depravity" and did not reconcile the

finding with the evidence demonstrating Delbosque's capacity for change. *Delbosque*, 456 P.3d at 814

In contrast, the Haag resentencing court found mitigating factors accounting for the diminished culpability of youth, however, it still imposed a similarly long 46-year sentence, finding retribution overrode the unchallenged findings of diminished culpability, demonstrated capacity for change, rehabilitation, and the directives of RCW 10.95.035 and 10.95.030(3)(a)(ii) and (b) to re-sentencing courts to apply the "mitigating factors that account for the diminished culpability of youth as provided in *Miller*, 567 U.S. 460. Thus, the rationale underpinning the *Delbosque* remand do not address all the issues presented by Timothy Haag.

The *Delbosque* sentencing court consistently mischaracterized the factual evidence and entered unsupported findings to justify setting a minimum sentence of 48 years. 456 P.3d at 813-14. Compare Delbosque's sentence based on unsupported findings to the sentence imposed on Haag. Despite the Haag sentencing court's similar mischaracterization of the evidence to the detriment of Haag, the Haag sentencing court found that Haag had diminished culpability due to youth and had demonstrated his remorse and rehabilitation. RP I 25, 27. Moreover, the resentencing court conceded Timothy Haag had a stellar

track record while incarcerated and was at a low risk to re-offend. RP I 27. Even with these findings, the court imposed a 46-year sentence.

Thus, *Delbosque*, 195 Wn.2d 106 does not address the issue of whether the Haag trial court imposed an unconstitutionally cruel sentence when it imposed a similarly long sentence after finding Haag was not "irredeemably depraved nor irreparably corrupt". By granting the Haag's petition, the court can address this issue which has not been addressed by the *Delbosque* decision.

As well, by granting Haag's petition this Court affords him the same opportunity for a resentencing hearing at which the trial court has the benefit of *Bassett* and the *Delbosque* opinion's clarification of the *Ramos* court's discussion of what constitutes a de facto life sentence. On this issue *Delbosque* is instructive and supports granting the petition and remanding for consideration of the *Bassett* and *Ramos* decisions.

2. By Granting Haag's Petition This Court Affords Him the Same Opportunity for a Resentencing Hearing at Which the Trial Court has the Benefit of *Bassett* and the *Delbosque* Opinion's Clarification of the *Ramos* Court's Discussion of What Constitutes a De Facto Life Sentence.

Delbosque's sentence was reversed as an abuse of discretion and remanded for a new sentencing hearing, in determining the appropriate remedy for the resentencing court's error, this Court noted that the sentencing court did not have the benefit of the Court's decisions in *State*

v. Ramos, 187 Wn.2d 420 (2017) and *State v. Bassett*, 192 Wn.2d 67 (2018) at the time of the *Miller* hearing, and consequently, did not apply the relevant reasoning in determining a proportionate sentence for Delbosque. 456 P.3d at 814-15. *Delbosque* was remanded for resentencing to allow the trial court to apply the apply precedent from both of those cases, *id.* at 819, and to "*meaningfully* consider how juveniles are different from adults. *Id.* at 814. On this issue, *Delbosque* also supports granting Haag's Petition and remanding for consideration of the *Bassett* and *Ramos* decisions.

The Haag resentencing court did not have the benefit of *Bassett* and its exposition of juvenile sentencing considerations. Moreover, the Court of Appeals did not have the guidance from this court on interpreting *Ramos*'s discussion concerning de facto life sentences. By granting Haag's petition this Court affords him the same opportunity for a resentencing hearing at which the trial court has the benefit of *Bassett* and the *Delbosque* opinion's clarification of the *Ramos* court's discussion of what constitutes a meaningful consideration of mitigating circumstances and how to define a de facto life sentence

Although *Miller* did not categorically bar a sentence of life in prison for a juvenile convicted of homicide, it came close, and our Court, in *State v. Bassett*, 192 Wn.2d 67, 428 P.3d 343 (2018), did so outright,

finding Wa. Const. art. I, § 14 is more protective than the 8th amendment to the U.S. constitution. 192 Wn.2d at 91. *Miller* held that such a severe sentence, even for a horrible crime, is constitutionally permissible only in the rarest of circumstances where there is proof of "irreparable corruption." *Miller*, 567 U.S. at 478–79; *see also Montgomery v. Louisiana*, 136 S. Ct. 718, 193 L. Ed. 2d 599 (2016). "[P]risoners . . . must be given the opportunity to show their crime did not reflect irreparable corruption; and, if it did not, their hope for some years of life outside prison walls must be restored." *Id* at 736. Significantly, this Court held that the Washington constitution provides greater protections and requires special consideration be given to youthful offenders, *Bassett*, 192 Wn.2d at 90, including meaningful consideration of how juveniles are different from adults. *Delbosque*, 456 P.3d at 814-15; *Ramos*, 187 Wn.2d at 434-35.

In *Bassett*, this court addressed article 1, section 14 in the context of juvenile life without the possibility of parole sentencing. *Bassett*, 192 Wn.2d 67 The *Bassett* court reiterated that children are less criminally culpable than adults due to their lack of maturity and an underdeveloped sense of responsibility and, thus, are less deserving of the most severe punishments. 192 Wn.2d at 87. Courts around the nation, as well as this Court, recognize the harsh nature of sentencing a juvenile to die in prison.

Such a sentence is especially harsh for children who will, on average, serve more years and greater percentage of their lives in prison than adult offenders. *Bassett*, 192 Wn.2d at 87–88. Under *Bassett's* proportionality analysis, life sentences for 16 and 17-year-old children are extreme, even considering the seriousness of the crime; accordingly, the *Bassett* court found RCW 10.95.030(a)(ii), which permitted the imposition of life without the possibility of parole, to be unconstitutional. 192 Wn.2d at 91.

Haag requested a 25-year sentence, as permitted by RCW 10.95.030(a)(ii), and produced compelling evidence of diminished culpability due to his youth at the time of the offense, as well as growth, maturity, and rehabilitation since his days as a teenager. He produced evidence comparable to that produced by Bassett, including courses taken at DOC, his GED, mentoring to other inmates, evidence that he was a conscientious worker, and he presented more compelling evidence concerning his stellar record while incarcerated.

Judge Evans accepted that Timothy Haag "has reached a significant level of rehabilitation," "has likely aged out of what is called adolescent-limited delinquency," and "is not irretrievably depraved nor irreparably corrupt." RP1 at 25. He also noted that "Haag has expressed what I judge to be sincere remorse and sorrow for his actions." RPI 25. The Haag sentencing court found that Timothy Haag had diminished

culpability due to his youthful characteristics and an under-developed brain. *State v. Haag*, 10 Wn. App.2d 2014, *3 (2019). It also recognized that Haag had significantly rehabilitated himself while in prison. *Id.* at *4. Based on these uncontroverted findings, the resentencing court found that Haag was "not irretrievably depraved nor irreparably corrupt." *Id.* However, the court then determined it must consider the gravity of the crime in addition to the mitigating circumstances, and, like what occurred during the *Bassett* resentencing hearing, the court rejected the uncontroverted mitigation and determined that retribution justified a 46-year sentence. The 46-year minimum sentence was imposed without the benefit of *Bassett's* admonition that "children warrant special protections" in sentencing and the holding that in the context of juvenile sentencing, Wa. Const. art. I, § 14 provides greater protection than the Eighth Amendment. *Bassett*, 192 Wn.2d at 81–82. *"*Bassett is correct that the direction of change is mistakenly and steadily moving towards abandoning the practice of putting children offenders in prison for their entire lives.*"* *Bassett*, 192 Wn.2d at 85. Considering these findings, the Haag Petition poses the unanswered question of whether the trial court abused its discretion when it then sentenced Haag to 46 years, essentially precluding Timothy Haag from the chance to return to a life in society and whether

such a sentence is unconstitutional because it is disproportionate under Wa. Const. art. I, § 14.

Because juveniles effectively sentenced to spend their life in prison must have a meaningful opportunity for a resentencing hearing that comports with *Miller*, the principles underlying adult sentences – retribution, incapacitation, and deterrence – do not extend to juveniles in the same way. *Graham v. Florida*, 560 U.S. 48, 71, 130 S. Ct. 2011, 2029, 176 L. Ed. 2d 825 (2010), RCW 10.95.030(3)(b), *Bassett*, 192 Wn.2d at 88. The case for retribution is at its weakest for children, because the heart of the retribution rationale relates to an offender's blameworthiness and children have diminished culpability. *Basset,* 192 Wn.2d at 88. Because the case for retribution is at its weakest for children, the imposition of a 46-year sentence on Timothy Haag does not serve legitimate penological goals and his case should be remanded for resentencing.

Potential release in a persons' late sixties is insufficient to address the concerns in *Basset, Graham*, or *Miller*, as it does "not provide a 'meaningful opportunity' to demonstrate the 'maturity and rehabilitation' required to obtain release and reenter society as required by *Graham." Iowa v. Null*, 836 N.W.2d 41, 71 (Iowa 2013). Our case is similar, the

prospect of geriatric release does not provide a meaningful opportunity for Haag to reenter society.

Ramos was decided before Timothy Haag was resentenced; however, both the trial court and the Court of Appeals failed to properly apply the guidance contained in the opinion. The value and necessity of fairly applying the precedent is evident. *Ramos* requires sentencing courts to meaningfully consider how juveniles are different from adults and instructed courts that they "must do far more than simply recite the differences between juveniles and adults and make conclusory statements that the offender has not shown an exceptional downward sentence is justified." *Ramos.* 187 Wn.2d at 443. Instead, the court must "receive and consider relevant mitigation evidence bearing on the circumstances of the offense and the culpability of the offender, including both expert and lay testimony as appropriate." *Delbosque*, 456 P.3d at 814–15.

Here, the uncontroverted evidence of change and maturity produced by Haag was impermissibly discounted by the court in its focus on the crime and the role of retribution. As discussed in *Delbosque*, courts continue to reassess their review of *Miller* hearings. "**In clarifying what is required in a *Miller* hearing, the Ninth Circuit declared that sentencing courts "must reorient the sentencing analysis to a forward-looking assessment of the defendant's capacity for change or**

propensity for incorrigibility, rather than a backward-focused review of the defendant's criminal history." *United States* v. *Briones,* 929 F.3d 1057, 1066, 1067 (9th Cir. 2019). **"The key question is whether the defendant is capable of change. If subsequent events effectively show that the defendant *has* changed or *is* capable of changing,** LWOP is not an option." *Id.* at 1067 (citation omitted, emphasis added). *Delbosque*, 456 P.3d at 815. These observations are highly relevant considering the evidence Delbosque presented at his resentencing hearing and pertinent to Haag's request that his petition for review be granted to allow a resentencing court to fairly apply these precepts to his *Miller* resentencing. Haag presented lay and expert evidence of not only his capacity for change but his actual rehabilitation, growth, and maturity.

Compounding the error, the court of appeals in Haag mistakenly interpreted *Ramos* as holding that a de facto life sentence was one where the term of imprisonment exceeded the average life span of an individual. *State v. Haag*, COA No. 51409-5-II p. 15. By misinterpreting *Ramos*, the Court of Appeals found that Haag failed to demonstrate his 46-year sentence was a de facto life sentence. COA No. 51409-5-II p. 15. On remand, the sentencing court will have the benefit of the *Delbosque* decision, which makes clear this is not a correct understanding of the law.

3. Unlike Delbosque or Ramos, Haag Squarely Presents the Question of Whether a 46-year Minimum Sentence Amounts to a De Facto Life Sentence That Deprives Him of the Chance to Return to a Life in Society.

In his Petition, Haag asks this court to squarely address what amount of time is a life sentence. The *Delbosque* court clarified that the *Ramos* opinion did "not define a de facto life sentence as a total prison term exceeding the average human life-span." 456 P.3d at 815. Accordingly, Timothy Haag's petition should be granted to address this error. The Court of Appeals, in denying Haag's requested relief, mistakenly interpreted *Ramos* as precluding his claim, believing *Ramos* limited de facto life sentences to those that exceeded an average person's life span. And, while both the *Ramos* and the *Delbosque* courts intentionally imposed sentences they believed to be de facto life sentences, neither case presented the question to this Court of what is a life sentence and what hope for some life outside of a prison is afforded a defendant who committed their crime while still a child. "The United States Supreme Court viewed the concept of "life" in *Miller* and *Graham* more broadly than biological survival; it implicitly endorsed the notion that an individual is effectively incarcerated for "life" if he will have no opportunity to truly reenter society or have any meaningful life outside of

prison." *Casiano v. Comm'r of Correction*, 317 Conn. 52, 115 A.3d 1031, 1047 (2015).

Haag presented argument and studies demonstrating that such a sentence is a life sentence when imposed on a juvenile offender and that this sentence is cruel and disproportionate, requiring a remand. *See, Bassett*, 192 Wn.2d 67.

VI. CONCLUSION

Haag presents the question of whether a 46-year minimum sentence imposed on an offender who demonstrated diminished culpability at the time of the offense and subsequent rehabilitation is an abuse of discretion and cruel punishment. Additionally, Haag squarely presents the question of whether a 46-year sentence is a life sentence. This Court should accept review because the Court of Appeals decision is contrary to law, as argued above, and raises significant issues of due process and public interest.

RESPECTFULLY SUBMITTED this 13th day of April 2020.

/s/ Mary K. High
MARY K. HIGH, WSBA No. 20123
JENNIFER FREEMAN, WSBA No. 35612
Attorneys for Timothy Haag

CERTIFICATE OF SERVICE

The undersigned certifies that on this day correct copies of this petition for review were delivered electronically to the following:

Clerk, Washington State Supreme Court

David Phelan, Deputy Prosecuting Attorney
Ryan Jurvakainen, Deputy Prosecuting Attorney
Cowlitz County Prosecutor's Office
PO Box 397
Cathlamet WA 98612
pheland@co.cowlitz.wa.us
jurvakainen.ryan@co.cowlitz.wa.us
appeals@co.cowlitz.wa.us

Robert S. Chang, Esq. (changro@seattleu.edu)
Melissa R. Lee, Esq. (leeme@seattleu.edu)
Jessica Levin, , Esq. (levinje@seattleu.edu)
Ronald A. Peterson Law Clinic
Seattle University School of Law
Counsel for Amicus Curiae
Fred T. Korematsu Center For Law And Equality

The undersigned certifies that on this day correct copies of this petition for review were delivered by U.S. mail to the following:

Timothy Haag, DOC #731136
Stafford Creek Corrections Center
191 Constantine Way
Aberdeen, WA 98520

This statement is certified to be true and correct under penalty of perjury of the laws of the state of Washington.

Dated this 13th day of April 2020 at Tacoma, Washington.

Lissa Flannigan

Lissa Flannigan, Legal Assistant

PIERCE COUNTY ASSIGNED COUNSEL

April 13, 2020 - 4:30 PM

Transmittal Information

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- leeme@seattleu.edu
- levinje@seattleu.edu
- mary.benton@piercecountywa.gov
- pheland@co.cowlitz.wa.us

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Filing on Behalf of: Mary Katherine Young High - Email: mhigh@co.pierce.wa.us (Alternate Email:)

Address:
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Tacoma, WA, 98402
Phone: (253) 798-6062

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