

NO. 49050-1

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**COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON**

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JOHN WORTHINGTON,

Appellant,

v.

WASHINGTON STATE LIQUOR AND CANNABIS BOARD, CHRIS  
MARR, RUTHANN KUROSE, SHARON FOSTER, RICK GARZA,  
STATE OF WASHINGTON,

Cross-Appellants and Respondents.

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**REPLY BRIEF OF CROSS-APPELLANTS AND RESPONDENTS**

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ROBERT W. FERGUSON  
*Attorney General*

R. JULY SIMPSON  
WSBA # 45869  
APRIL S. BENSON  
WSBA # 40766  
*Assistant Attorneys General*  
Attorneys for Washington State  
Liquor and Cannabis Board  
1125 Washington Street SE  
PO Box 40110  
Olympia, WA 98504  
Phone: (360) 534-4850

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## I. INTRODUCTION

John Worthington petitioned the Liquor and Cannabis Board (the Board) to repeal an entire chapter of rules adopted over three years based on conspiracy theories, incorrect legal conclusions, and an inapplicable legal doctrine. The Board properly denied the petition, and the explanation for that denial met the requirements of RCW 34.05.330 and *Squaxin Island Tribe v. Washington State Department of Ecology*, 177 Wn. App. 734 (2013). Worthington concurs that this is the correct standard, Appellant's Resp. and Reply Br. 8, but nonetheless insists this case is something more than a challenge to agency action: a judicial review of agency rulemaking procedures that he did not inject into this case until the reply brief he filed in the superior court. The Court should reject Worthington's attempt to expand the scope of judicial review that Worthington clearly set forth in his Petition for Review and his superior court opening brief. The Court should reverse the superior court's remand order and affirm the Board's denial of the petition to repeal the rules.

## II. ARGUMENT IN REPLY

### A. Restatement of the Standard of Review and Scope of Review

The Administrative Procedure Act (APA), chapter 34.05 RCW. RCW 34.05.510 governs the review of agency action. When a party asserts that agency action is invalid that party bears the burden of

demonstrating the invalidity. RCW 34.05.570(1). Thus, contrary to Worthington's arguments, it is Worthington's burden to demonstrate that the Board's action was improper under the APA. Worthington is incorrect that a failure to "rebut" an issue makes that issue a verity in the petitioner's favor. Appellant's Resp. and Reply Br. 4. He must satisfy his burden.

When this Court reviews agency action, including the denial of a rulemaking petition, this Court sits in the same position as the superior court and applies the standards of the APA directly to the agency's administrative record. *Squaxin Island Tribe v. Washington State Dep't of Ecology*, 177 Wn. App. 734, 740, 312 P.3d 766 (2013), citing *Wash. Indep. Tel. Ass'n v. Wash. Utils. & Transp. Comm'n*, 149 Wn.2d 17, 24, 65 P.3d 319 (2003). This review is governed by RCW 34.05.570(4), review of "other agency action." Any remand to the Board would be to review the agency action at issue—the denial of the rulemaking petition. It would not be for the Board to review its own rules under RCW 34.05.570(2). Worthington confuses these two types of review, even arguing that he brought a judicial challenge to the rules directly to the Board under RCW 34.05.570(2). Appellant's Resp. and Reply Br. 13.

In any event, Worthington's Petition for Judicial Review and Petitioner's Opening Brief in superior court unmistakably challenged the

Board's denial of his rulemaking petition.<sup>1</sup> CP 649-690 (First Amended Petition for Judicial Review) and CP 7-37 (Petitioner's Opening Brief); *see* Response Br. and Cross Appellant's Opening Br. 16, n.5 (citations showing that the Petitioner's Opening Brief confined judicial review to review of the denial of the rulemaking petition.)

This Court has rejected attempts to challenge the validity of rules when the trial court did not reach such a challenge. *Squaxin Island Tribe*, 177 Wn. App. at 738. This Court should also decline to reach a challenge not brought before the superior court and confine its review to the denial of the petition to repeal all of the rules implementing I-502.

**B. No Remand to the Board is Necessary Because the Court Should Affirm the Board's Denial of the Petition to Repeal When the Denial Was Neither Arbitrary Nor Capricious**

The Board's denial of Worthington's rulemaking petition was neither arbitrary nor capricious. Worthington did not demonstrate that the

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<sup>1</sup> *See* CP 649-690 (First Amended Petition for Judicial Review); CP 649, at ¶ 1.1 (petitioning court to review the Board's decision to deny the rulemaking petition); CP 654-55 at ¶ 3.1 (identifying the "Agency Action at Issue" as the denial of the rulemaking petition); CP 655 (stating that the relevant facts are that the Board's explanation for the denial of the rulemaking petition is insufficient); CP 656 at ¶ 4.5 (arguing the Board's decision to deny the rulemaking petition was arbitrary and capricious because it did not substantially comply with the APA rulemaking procedures under RCW 34.05.370); CP 656-660 (arguing he had provided proof to the Board of its noncompliance with the APA, making the denial of the rulemaking petition arbitrary and capricious); CP 661 at ¶ 4.17 (same); CP 661 at ¶ 4.17 (same); CP 662 at ¶ 4.20 (same); CP 664 at ¶ 6.1 (arguing standing based on the denial of the rulemaking petition); CP 664-665 at ¶ 6.2 (arguing the Board did not address each APA statute he listed when it denied his rulemaking petition); CP 665 at ¶ 6.3 (same); CP 667 at ¶¶ 9.1-2 (arguing the rules are invalid under the APA but specifically tying that claim to the previously stated paragraphs which all relate to the denial of the rulemaking petition); CP 671 at ¶ 10.1 (stating the Request for Relief as vacating the Board's denial of the rulemaking petition).

Board should have undone years of careful rulemaking when his petition was based on inapplicable legal theories and unexplained legal conclusions. Nor has he met his burden on judicial review to establish that the Board's denial was arbitrary or capricious.

Agency action is arbitrary and capricious when the decision was a "willful and unreasonable action" taken without consideration and with a disregard of facts or circumstances. *Citizens for a Safe Neighborhood v. City of Seattle*, 67 Wn. App. 436, 439, 836 P.2d 235 (1992) (quoting *Buell v. City of Bremerton*, 80 Wn.2d 518, 495 P.2d 1358 (1972)). Action is not arbitrary or capricious if there is room for two opinions, even if the court believes the decision is erroneous. *Id.*

The record before this Court when determining whether the agency action was arbitrary or capricious contains only the documents, records, and arguments which Worthington provided to the Board in support of his petition. *See* RCW 34.05.566(1). Before the Board, and in the record before this Court, Worthington's primary argument for repealing all marijuana rules was that the Board held "17 secret meetings," which violated the Appearance of Fairness doctrine. AR 8-12. Worthington now appears to abandon this inapplicable doctrine. *See* Appellant's Resp. and Reply Br. But that does not change that this was the only basis he gave the Board for undoing the rules that was developed and explained. AR 5-235.

The remainder of the rulemaking petition consisted of undeveloped legal conclusions and unexplained attachments, which appeared to point toward two general categories of agency actions Worthington found faulty: (1) the Board's meetings with stakeholders that did not meet all the technical notice requirements of the Open Public Meetings Act (OPMA), and (2) the Board's process for maintaining its rulemaking file and its authority to decide what should be placed in the file. *Id.*

The first category of Worthington's alleged errors in the rulemaking process was that violations of notice requirements in the OPMA, chapter 42.30 RCW, automatically constitute violations of various provisions of the APA rulemaking requirements. Worthington did not develop this argument. Instead he simply claimed, without explanation, that "17 secret meetings" violated various provisions. AR 58-64. These conclusory assertions do not meet the heavy burden to show an agency acted in an arbitrary, capricious, or unreasoning manner in refusing to repeal an entire chapter of rules developed over three years.

This is particularly true given that there were no "secret" Board meetings. What Worthington complains of are meetings held when two members of a three person Board attended a meeting with stakeholders. AR 93-105. No issues with these meetings could have been raised if: (1) the agency was run by a Director, *Salmon For All v. Dep't of Fisheries*,

118 Wn.2d 270, 277, 821 P.2d 1211 (1992) (holding the OPMA does not apply to agencies run by a single agency director), (2) the agency was comprised of a board with more members so that a quorum could not be created so easily, or (3) if one less board member had attended. Regardless, the issue of “secret meetings” was litigated in *Arthur West v. Washington State Liquor Control Board, Sharon Foster, Chris Marr, Ruthann Kurose*, Thurston County Superior Court Cause No. 13-2-01603-3, where a written order was entered establishing that no action was taken at the meetings so the technical violations of the OPMA would not invalidate the rules. AR 93-95, 99-100. Nor has Worthington met his burden of establishing that these meetings were problematic under APA rulemaking requirements. *See* RCW 34.05.570(1)(a).

The second category of Worthington’s alleged errors in the rulemaking process was that the Board did not comply with Worthington’s interpretations of certain APA rulemaking requirements. This allegation, in particular the argument about the rulemaking file, has been the focus of Worthington’s briefing on judicial review. But based on the record before the Board it was neither arbitrary nor capricious to deny Worthington’s rulemaking petition because the Board believed it complied with APA rulemaking processes and a remand is not necessary.

In determining whether the Board's denial of the rulemaking petition was arbitrary or capricious the Court should consider the same record that the Board did: only those records that Worthington provided to the Board in support of his petition. *See* RCW 34.05.566(1). To support his rulemaking petition Worthington provided copies of emails sent to him by Board staff in connection with public records requests. AR 120-24. The only explanation appended to these emails was an assertion that Worthington did not believe that an agency could promulgate a final version of a rulemaking file. AR 118. But Worthington's conclusion was provided without citation to binding legal authority. *Id.* Moreover, no Washington appellate decision has ever concluded that an agency has so little authority over the contents of its rulemaking files. Thus, Worthington did not meet his burden to demonstrate error to the Board, and the Board properly denied the rulemaking petition.

Under these circumstances, the Board's decision was not a "willful and unreasonable action, without consideration and a disregard of facts or circumstances." *Citizens for a Safe Neighborhood v. City of Seattle*, 67 Wn. App. 436, 439, 836 P.2d 235 (1992) (quoting *Buell v. City of Bremerton*, 80 Wn.2d 518, 495 P.2d 1358 (1972)). This Court should affirm the Board's decision to deny the rulemaking petition.

**C. The Board’s Explanation of the Denial of the Petition to Repeal Rules Met the Standard Set Forth in RCW 34.05.330 and Relevant Case Law**

The Board’s explanation for the denial of a rulemaking petition that requested the Board to repeal all of its marijuana rules met the standard set forth in RCW 34.05.330 and the case law interpreting that statute because it put Worthington on notice for the reason for denial and it did not frustrate judicial review. The purpose of the explanation for the denial of a petition for rulemaking required by RCW 34.05.330(1) is to facilitate judicial review of the agency’s decision. *Squaxin Island Tribe*, 177 Wn. App. at 741. “[A]n agency has wide discretion in deciding to forgo rulemaking”). *Id.* at 742 (citing *Rios v. Dep’t of Labor and Indus.*, 145 Wn.2d 483, 507, 39 P.3d 961 (2002)). Petitioners should not be allowed to “transform the agency’s mandatory requirement to explain its denial into a mechanism to review the substance of the agency’s discretionary decision.” *Id.* at 741. The test requires the explanation to (1) put the petitioner on notice of the reasons for denial and (2) not frustrate judicial review. *Id.* Worthington agrees with the Board that *Squaxin Island Tribe* governs the standard of judicial review for this case. Appellant’s Resp. and Reply Br. 8.

Worthington’s petition raised objections to the process the Board took to adopt the rules, rather than objecting to the contents of any specific

rule. AR 3. The Board explained that it believed it had followed proper rulemaking procedures under the law. AR 3. In the context of Worthington's petition, with its numerous, conclusory allegations that the Board had violated rulemaking procedures, the Board's response and explanation were appropriate, put Worthington on notice that the Board disagreed with his legal conclusions, and did not frustrate judicial review of the decision. There is no further requirement that the explanation be "thoughtful" or redress the specific merits of the concerns raised. RCW 34.05.330, *Squaxin Island Tribe*, 177 Wn. App. at 741. In fact, this Court has specifically rejected the argument that RCW 34.05.330 imposes such a requirement. *Squaxin Island Tribe*, 177 Wn. App. at 740-41.

In *Squaxin Island Tribe*, the Tribe wanted the Department of Ecology to redo a water management rule to withdraw Johns Creek basin from inclusion in the rule due to concerns that the rule was affecting surface water rights. *Id.* at 738. Ecology's denial did not respond to this concern, nor did it fully address the Tribe's specific concerns about their water rights. *Id.* at 739. Rather, Ecology's explanation cited staff shortages that limited the ability to do comprehensive work in this area and noted that additional information was needed before the rule could be amended. *Id.* This Court held that this explanation put the Tribe on notice and facilitated judicial review. *Id.* at 741.

Worthington attempts to distinguish the *Squaxin Island* case by arguing that Ecology was able to explain its denial of the petition “through process of reason” and the Board cannot. *Id.* Worthington points out that Ecology held multiple meetings and devised options before issuing its denial, *Squaxin Island Tribe* at 742-43, and the Board considered Worthington’s petition at one meeting, as if to suggest that the number of meetings is determinative. AR 3. But Worthington’s rulemaking petition was of a completely different nature than that of the Tribe, and arose from significantly different factual circumstances. The Tribe’s request raised complex concerns about Johns Creek, and the agency agreed that further studies were required to understand the creek’s instream flows. *Id.* at 737, 743. Here, Worthington made undeveloped and unsupported accusations that the Board was conspiring to prevent access to marijuana in contravention of its duty to make recreational marijuana accessible. AR 9-10.

Furthermore, Worthington’s argument conflates the *explanation* of the denial with the *merits* of the denial, which is not the standard as set forth in *Squaxin Island Tribe*. *Squaxin Island Tribe*, 177 Wn. App. at 741 (“The Tribe cannot transform the agency’s mandatory requirement to explain its denial into a mechanism to review the substance of the agency’s discretionary decision.”) Worthington also complains that the

Board's explanation was insufficient because part of the denial stated that "Worthington did not object to any particular rule," AR 3, when Worthington claims he did by objecting to *all* of the recreational marijuana rules. Appellant's Resp. and Reply Br. 7, AR 6-7. But this misses the point. Worthington sought judicial review of the Board's decision to deny his petition to repeal all the rules; he did not seek judicial review of the validity of any rule. Worthington did not object to the substance of any or all of the rules, but rather to the process by which they were adopted. And even if attaching the entire WAC chapter to his petition could be read as an objection to particular rules, the Board nonetheless reasonably denied the petition because it was not unreasoning or taken without due regard to the facts and circumstances.

This Court should affirm the Board's denial of the rulemaking petition because the denial was neither arbitrary nor capricious, and the explanation was sufficient under *Squaxin Island Tribe*.

**D. Worthington Was Not Substantially Prejudiced by the Board's Denial**

A court may grant relief "only if it determines that a person seeking relief has been substantially prejudiced by the action complained of." RCW 34.05.570(1)(d). A court looks at the circumstances at the time the action was taken. RCW 34.05.570(1)(b). When looking at the

circumstances when Worthington's petition was denied, it cannot be said that Worthington was substantially prejudiced by the denial of his rulemaking petition.

Worthington sought repeal of the rules because he thought the Board failed to comply with rulemaking procedures. But Worthington was already litigating this very question, challenging the same rules, based on the same alleged facts, in a petition for judicial review in the superior court at the same time he petitioned the Board to repeal the rules. AR 3, 49-50, 56-57. That case was *John Worthington v. Washington State Liquor Control Board, Chris Marr, Ruthann Kurose, Sharon Foster, Rick Garza, and Washington State*, Thurston County Superior Court No. 15-2-00069-9. CP 197-210, 408-451 (records from this parallel litigation that Worthington submitted to the superior court as attachments to declarations). There, he challenged the rules based on the same "secret meetings" allegation, and he asserted that the rulemaking file was inadequate. *See* CP 408-51 (responses to interrogatories propounded by Worthington in that lawsuit), CP 408-416, 423-28, 434-39 (responses related to meetings where a quorum of the Board was present and meeting with the external team), CP 416-17, 428-29, 439-40 (responses related to compilation of the rulemaking file and creation of final rulemaking file from working file). Because the same arguments he raised in his petition

to repeal were already pending before the superior court in this other case, Worthington was not substantially prejudiced by the Board's denial of his petition.

Furthermore, this parallel lawsuit demonstrates Worthington understands how to directly challenge agency rules. This belies Worthington's attempts to confuse this Court about the nature of his appeal and his attempt to blend his appeal of other agency action with a rulemaking challenge before this Court.

**E. The Board Did Not Act Unethically, and Worthington's New Claims Exceed the Scope of What He Previously Argued**

Worthington concedes that he raises new arguments before this Court when he argues that the Board has acted unethically in two ways. Appellant's Resp. and Reply Br. 25. For this reason, the Court should not consider the arguments. RAP 2.5(a); *Darkenwald v. State, Emp't Sec. Dep't*, 183 Wn.2d 237, 245 n.3, 350 P.3d 647 (2015) (on judicial review, court will not consider issues not raised before the agency); *Talps v. Arreola*, 83 Wn.2d 655, 658, 521 P.2d 206, 208 (1974) (appellate court will not consider arguments not first presented to trial court). But even if the Court considers the arguments, both claims are baseless.

First, the Board had good reason not to file the agency record until after Worthington filed his Amended Petition for Judicial Review.

Worthington's first Petition for Review did not clearly explain what the issues were and what record the Board needed to file with the superior court. CP 628-639 (Petition for Review). The Board therefore filed a Motion for More Definite Statement because it was unsure whether Worthington was filing a review of rulemaking under RCW 34.05.570(2) or whether he was appealing other agency action—the denial of his petition to repeal the rules—under RCW 34.05.570(4). CP 640-45 (Motion for More Definite Statement). Worthington's Amended Petition for Judicial Review stated he was appealing the denial of his rulemaking petition to the Board. CP 649-690 (Amended Petition for Judicial Review). The Board subsequently filed the agency record for review, which consisted of the documents the Board considered in ruling on the petition. CP 708-710. Thus, the Board did not act "unethically" when it waited until after Worthington amended his petition for judicial review that clarified the relief he sought.

Second, the Board did not act unethically by allowing federally funded agencies bound by anti-lobbying laws to comment on the rules. *Id.* at 25-26. Worthington fails to support his assertion that any "comments" on the rules were actually made or, even if "comments" were received, that simply *receiving* those comments in a meeting that violates the OPMA is otherwise prohibited, unlawful, or unethical. Worthington fails

to cite any authority suggesting that sharing information between agencies or groups during rulemaking is prohibited, unlawful, or unethical. *Talps*, 83 Wn.2d at 657 (contentions not supported by argument or authority are not considered).

Additionally, Worthington fails to support his assertion that any of the agencies were engaged in “lobbying” with the Board that would require them to file a report with the Public Disclosure Commission.<sup>2</sup> RCW 42.17A.635. As the record shows, there was nothing hidden about the meetings or communications at the meetings. AR 13-46 (attachments to Worthington’s rulemaking petition showing the scheduling for the meetings, communications about the meetings released pursuant to public records requests, and minutes taken at the meetings). Worthington’s unsupported claims are baseless.

Finally, it is unclear how these new arguments relate to the relief Worthington seeks or the issues in this case. Thus, because these issues are newly raised, baseless, and irrelevant to this case, this Court should decline to address them.

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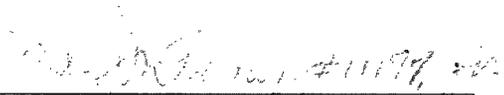
<sup>2</sup> “Lobbying” is defined to include attempting to influence the adoption or rejection of an agency rule. RCW 42.17A.005(30). It specifically exempts the “act of communicating” with members of an association or organization. *Id.* Additionally, it is the responsibility of the agency engaged in the lobbying to file an L5 report. RCW 42.17A.635. Even if an L5 disclosure report were necessary, it is not the Board who would need to file a report of lobbying for its own rulemaking.

### III. CONCLUSION

The Board's denial of Worthington's petition to repeal all of the marijuana rules was not arbitrary or capricious, and its explanation was adequate under the applicable legal standards. This Court should reverse the superior court's remand order and affirm the Board's denial of Worthington's rulemaking petition all the marijuana rules.

RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of March, 2017.

ROBERT W. FERGUSON  
Attorney General

  
R. JULY SIMPSON, WSBA # 45869  
APRIL S. BENSON, WSBA #40766  
Assistant Attorneys General  
Attorneys for Respondent  
OID #91020  
1125 Washington Street SE  
PO Box 40110, Olympia, WA 98504  
Phone: (360) 534-4850-Fax: (360) 664-0174  
E-mails: RJulyS@atg.wa.gov  
Aprilb1@atg.wa.gov

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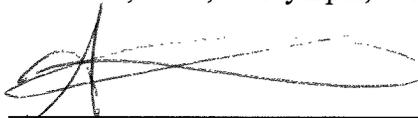
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Renton, WA 98059

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DATED this 17<sup>th</sup> day of March, 2017, at Olympia, Washington.



\_\_\_\_\_  
AMY PHIPPS, Legal Assistant

**WASHINGTON STATE ATTORNEY GENERAL**  
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