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STATE OF WASHINGTON

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BY RONALD R. CARPENTER

To be argued by
ADAM P. KARP

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Washington Supreme Court

Supreme Court Docket No. 81295-1

Ct. of Appeals Div. III Docket No. 264122

Spokane Cy. Sup. Ct. Cause No. 07-1-01318-1

Spokane Cy. Dist. Ct. Cause Nos. CC1 & CC2

IN RE THE APPLICATION FOR A CITIZEN COMPLAINT,
CHRIS ANDERLIK

Petitioner

**PETITIONER'S SECOND STATEMENT OF ADDITIONAL
AUTHORITIES**

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COMES NOW Petitioner Chris Anderlik, through her attorney Adam P. Karp, and respectfully requests that the Court consider the following additional authority pursuant to RAP 10.8:

1. Wash. Const., Art. I, § 35 (Victims of Crimes – Rights):

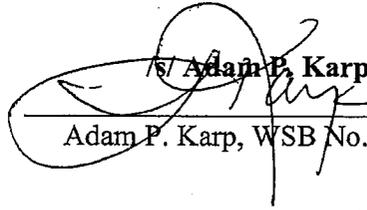
Effective law enforcement depends on cooperation from victims of crime. To ensure victims a meaningful role in the criminal justice system and to accord them due dignity and respect, victims of crime are hereby granted the following basic and fundamental rights. Upon notifying the prosecuting attorney, a victim of a crime charged as a felony shall have the right to be informed of and, subject to the discretion of the individual presiding over the trial or court proceedings, attend trial and all other court proceedings the defendant has the right to attend, and to make a statement at sentencing and at any proceeding where the defendant's release is considered, subject to the same rules of procedure which govern the defendant's rights. In the event the victim is deceased, incompetent, a minor, or otherwise unavailable, the prosecuting attorney may identify a representative to appear to exercise the victim's rights. This provision shall not constitute a basis for error in favor of a defendant in a criminal proceeding nor a basis for providing a victim or the victim's representative with court appointed counsel. [AMENDMENT 84, 1989 Senate Joint Resolution No. 8200, p 2999. Approved November 7, 1989.

Issue: Standing to initiate citizen criminal complaint or appeal denial of citizen criminal complaint where “victim” of crime, in addition to society as a whole, is a nonhuman animal who may be regarded as a juridically incompetent person or artificial person in whose name and on whose behalf a claim may be brought.

Dated this February 6, 2009

ANIMAL LAW OFFICES

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/s/ Adam P. Karp
Adam P. Karp, WSB No. 28622

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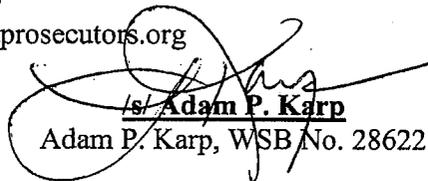
CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 5, 2009, after 5 p.m., I caused a true and correct copy of the foregoing to be served upon the following person(s) in the following manner:

Email (stipulated)

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