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NO. 102144-5

SUPREME COURT OF THE STATE OF WASHINGTON

FREEDOM FOUNDATION,

Petitioner,

v.

WASHINGTON STATE PUBLIC DISCLOSURE
COMMISSION, a State of Washington government agency,
and WASHINGTON FEDERATION OF STATE
EMPLOYEES, a Washington labor union,

Respondent.

ANSWER TO PETITION FOR REVIEW

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TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	COUNTERSTATEMENT OF THE ISSUES.....	2
III.	COUNTERSTATEMENT OF THE CASE.....	2
	A. Factual Statement.....	2
	B. Procedural History	4
IV.	FREEDOM FOUNDATION FAILS TO ESTABLISH A BASIS FOR REVIEW.....	4
	A. Dismissal of Freedom Foundation’s APA Petition Was Proper Because Freedom Foundation Failed to Establish Injury-in-Fact.....	5
	1. Freedom Foundation failed to establish a specific and perceptible injury to itself, and so cannot establish standing under the APA	6
	2. Freedom Foundation failed to establish how the Commission’s decision not to enforce the FCPA caused it to change its behavior, and so does not have organizational standing	10
	B. The Court of Appeals Decision with Regard to the APA Standing Requirement Does Not Involve an Issue of Substantial Public Interest.....	16
V.	CONCLUSION	22

TABLE OF AUTHORITIES

Cases

<i>Allan v. Univ. of Wash.</i> 140 Wn.2d 323, 997 P.2d 360 (2000).....	6
<i>Comite de Jornaleros de Redondo Beach v. City of Redondo Beach</i> 657 F.3d 936 (9th Cir. 2011)	11
<i>East Bay Sanctuary Covenant v. Trump</i> 932 F.3d 742 (9th Cir. 2018)	11, 14
<i>El Rescate Legal Servs., Inc. v. Exec. Office of Immigr. Rev.</i> 959 F.2d 742 (9th Cir. 1991)	11
<i>Freedom Found. v. Bethel Sch. Dist.</i> 14 Wn. App. 2d 75, 469 P.3d 364 (2020), <i>review denied</i> , 196 Wn.2d 1033, 478 P.3d 83 (2021).....	passim
<i>Freedom Found. v. SEIU PEAFF</i> 16 Wn. App. 2d 1037, 2021 WL 463364 (2021) (unpublished)	8
<i>Freedom Found. v. Wash State Pub. Disclosure Comm’n and Amalgamated Transit Union Legis. Council of Wash. State (ATULC)</i> 20 Wn. App. 2d 1080, 2022 WL 455389 (2022) (unpublished)	8
<i>Freedom Found. v. Washington State Pub. Disclosure Comm’n</i> 26 Wn. App. 2d 1009, No. 84640-0-I, 2023 WL 2756240 (Wash. Ct. App. Apr. 3, 2023) (unpublished)	4, 5, 12, 16

<i>Newman v. Veterinary Bd. of Governors</i> 156 Wn. App. 132, 231 P.3d 840 (2010).....	21
<i>Sierra Club v. Morton</i> 405 U.S. 727, 92 S. Ct. 1361, 31 L. Ed. 2d 636 (1972)	9
<i>Snohomish Cnty. Pub. Trans. Benefit Area v. Pub. Emp. Rel. Comm'n</i> 173 Wn. App. 504, 294 P.3d 803 (2013).....	7
<i>Trepanier v. City of Everett</i> 64 Wn. App. 380, 824 P.2d 524 (1992).....	7, 9
<i>Walker v. City of Lakewood</i> 272 F.3d 1114 (9th Cir. 2001)	14

Statutes

RCW 34.05	1
RCW 34.05.530	5, 6
RCW 34.05.542(2)	20
RCW 42.17A	passim
RCW 42.17A.005(41)	3
RCW 42.17A.105(8)	19
RCW 42.17A.755(1)(a)	7
RCW 42.17A.775	20
RCW 42.17A.775(2)(a)	20

Rules

RAP 13.4(b)..... 2, 4, 22
RAP 13.4(b)(4)..... 16, 21

Regulations

WAC 390-37-030(1) 18

I. INTRODUCTION

The Washington State Public Disclosure Commission (Commission) properly exercised its discretion when it dismissed an unfounded complaint filed by Appellant Freedom Foundation against the Washington Federation of State Employees (WFSE). Dissatisfied with this result, Freedom Foundation sought judicial review of the Commission's decision under the Administrative Procedure Act (APA), RCW 34.05. This action was correctly dismissed by the superior court, which found that Freedom Foundation failed to establish it suffered an injury-in-fact and so lacked standing to seek judicial review.

Freedom Foundation seeks this Court's review by reasserting arguments already considered and rejected by the Court of Appeals. That Court applied well-settled legal principles, and its decision does not conflict with precedent or present an issue of substantial public interest. Because Freedom

Foundation's Petition for Discretionary Review does not meet the criteria in RAP 13.4(b), review should be denied.

II. COUNTERSTATEMENT OF THE ISSUES

Did the superior court properly dismiss Freedom Foundation's petition for judicial review because Freedom Foundation lacks standing under the APA, having suffered no injury-in-fact?

III. COUNTERSTATEMENT OF THE CASE

A. Factual Statement

The Commission received a complaint from Freedom Foundation concerning WFSE in April 2021, along with documentation supporting the complaint. AR 00001-00016.¹ The complaint alleged a potential violation of the Fair Campaign Practices Act (FCPA) by WFSE for failing to register as a political committee, and failing to file contribution and expenditure reports with the Commission. *Id.* The

¹ "AR" refers to the Certified Administrative Record. "CP" refers to the Thurston County Superior Court's Clerk's Papers.

Commission later received WFSE's response to the complaint (AR 00725-00728), as well as supplemental information from both Freedom Foundation (AR 00729-01130) and WFSE (AR 01131-01136). The Commission carefully reviewed the documents submitted, assessed the factual and legal arguments, and determined that Freedom Foundation's complaint was without merit because: (1) a \$200,000 grant WFSE received from the American Federation of State, County, and Municipal Employees (AFSCME) did not make WFSE a political committee as a receiver of contributions; and (2) WFSE's payment of \$15,000 to the Retired Public Employees Council of Washington (RPEC) did not make WFSE a political committee under the primary purpose test applied to expenditures. AR 01137-01142. *See also* RCW 42.17A.005(41). On July 21, 2021, the Commission issued an Amended Complaint Return Letter dismissing Freedom Foundation's complaint. *Id.*

B. Procedural History

Following the Commission's decision, Freedom Foundation filed a petition for judicial review in Thurston County Superior Court contesting the Commission's dismissal of its complaint. CP 7-16. Freedom Foundation named both the Commission and WFSE as parties to the lawsuit. *Id.* The Commission moved to dismiss under CR 12(b)(6) for lack of standing under the APA, which the superior court granted. CP 19-34; 69-70. The Court of Appeals affirmed the dismissal on April 3, 2023, finding that Freedom Foundation failed to establish injury-in-fact and so did not have standing. *See Freedom Found. v. Washington State Pub. Disclosure Comm'n*, 26 Wn. App. 2d 1009, No. 84640-0-I, 2023 WL 2756240 (Wash. Ct. App. Apr. 3, 2023) (unpublished).

IV. FREEDOM FOUNDATION FAILS TO ESTABLISH A BASIS FOR REVIEW

Because Freedom Foundation has failed to meet the standards set forth in RAP 13.4(b), there is no basis for reviewing the Court of Appeals decision. The decision in this

case does not conflict with established Court of Appeals or Supreme Court precedent, and does not raise an issue of substantial public interest. Accordingly, this Court should deny review.

A. Dismissal of Freedom Foundation’s APA Petition Was Proper Because Freedom Foundation Failed to Establish Injury-in-Fact

The Court of Appeals correctly held that Freedom Foundation lacks standing to pursue an administrative appeal of the Commission’s dismissal of its FCPA complaint. *Freedom Found. v. Washington State Pub. Disclosure Comm’n*, 26 Wn. App. 2d 1009, No. 84640-0-I, 2023 WL 2756240, at *11-13 (Wash. Ct. App. Apr. 3, 2023) (unpublished). To establish standing under the APA, a person must be “aggrieved or adversely affected by the agency action.” RCW 34.05.530. A person is aggrieved or adversely affected only when the following conditions are present:

- (1) The agency action has prejudiced or is likely to prejudice that person;
- (2) That person’s asserted interests are among those that the agency was required to consider

when it engaged in the agency action challenged;
and

(3) A judgment in favor of that person would substantially eliminate or redress the prejudice to that person caused or likely to be caused by the agency action.

RCW 34.05.530.

The first and third prongs are generally called “injury-in-fact” requirements, while the second is called the “zone of interest” prong. *Allan v. Univ. of Wash.*, 140 Wn.2d 323, 327, 997 P.2d 360 (2000). All three conditions must be met to establish standing. Because the Court concluded that Freedom Foundation failed to meet the injury-in-fact requirement, it declined to consider the zone of interest arguments in this case.

1. Freedom Foundation failed to establish a specific and perceptible injury to itself, and so cannot establish standing under the APA

To meet the injury-in-fact test, Freedom Foundation was required to put forth material issues of fact showing that the Commission’s decision prejudices or is likely to prejudice it. RCW 34.05.530; *Allan*, 140 Wn.2d at 327. This required Freedom Foundation to allege that it was “specifically and

perceptibly harmed” by the Commission’s decision. *Trepanier v. City of Everett*, 64 Wn. App. 380, 382, 824 P.2d 524 (1992). When a person alleges a threatened injury, as opposed to an existing injury, “they must show an immediate, concrete, and specific injury to *themselves*.” *Trepanier*, 64 Wn. App. at 383, 824 P.2d 524 (emphasis added). Conjectural or hypothetical injuries are insufficient to confer standing. *Freedom Found. v. Bethel Sch. Dist.*, 14 Wn. App. 2d 75, 86, 469 P.3d 364 (2020), *review denied*, 196 Wn.2d 1033, 478 P.3d 83 (2021). Freedom Foundation must instead show an invasion of a legally protected interest. *Snohomish Cnty. Pub. Trans. Benefit Area v. Pub. Emp. Rel. Comm’n*, 173 Wn. App. 504, 513, 294 P.3d 803 (2013).

By law, the Commission is authorized to dismiss complaints “as appropriate under the circumstances, after conducting a preliminary review.” RCW 42.17A.755(1)(a). It is therefore squarely within the Commission’s discretion to determine what circumstances justify dismissal of a complaint.

Freedom Foundation claims an “injury” based simply on its *disagreement* with the Commission’s discretionary decision not to enforce the FCPA against WFSE in this case. This supposed “injury” cannot establish injury-in-fact, because Freedom Foundation does not distinguish itself from any other citizen who may have an interest in seeing the FCPA enforced according to their wishes. As Division II held in *Freedom Foundation v. Bethel School District*, *Freedom Foundation v. SEIU PEA*, and *Freedom Foundation v. ATULC*,² a general interest in having the Commission enforce the FCPA in a particular manner fails to show specific and perceptible injury. Because Freedom Foundation fails to allege any injury establishing an “immediate, concrete, and specific” harm *to itself*, it has not established standing under the APA. *See*

²*Bethel Sch. Dist.*, 14 Wn. App. 2d at 85; *Freedom Found. v. SEIU PEA*, 16 Wn. App. 2d 1037, 2021 WL 463364 (2021) (unpublished); *Freedom Found. v. Wash State Pub. Disclosure Comm’n and Amalgamated Transit Union Legis. Council of Wash. State (ATULC)*, 20 Wn. App. 2d 1080, 2022 WL 455389 (2022) (unpublished).

Trepanier, 64 Wn. App. at 383, 824 P.2d 524. Indeed, in its opening brief filed with the Court of Appeals, Freedom Foundation conceded that the Commission’s decision not to enforce the FCPA in this case supposedly injures the *public*—not Freedom Foundation specifically. Opening Br. at 37.

Moreover, under *Bethel School District* and associated cases, organizational advocacy is insufficient to establish standing absent a showing of particularized injury or harm to the organization itself. As explained by the United States Supreme Court in *Sierra Club v. Morton*, “[m]ere interest in a problem, no matter how longstanding the interest and no matter how qualified the organization is in evaluating the problem, is not sufficient by itself to render the organization ‘adversely affected’ or ‘aggrieved’ within the meaning of the APA.” *Sierra Club v. Morton*, 405 U.S. 727, 739, 92 S. Ct. 1361, 1368, 31 L. Ed. 2d 636 (1972).

If the alleged harm asserted by Freedom Foundation—dissatisfaction with the disposition of its complaint—were

considered an “injury,” any person whose complaint was dismissed by the Commission as unsubstantiated would be aggrieved for the purposes of seeking judicial review. That would render meaningless the APA’s injury-in-fact requirement. For these reasons, Freedom Foundation’s so-called “injury” rings hollow, and should be rejected by this Court.

2. Freedom Foundation failed to establish how the Commission’s decision not to enforce the FCPA caused it to change its behavior, and so does not have organizational standing

Freedom Foundation seemingly recognizes that it has not established a specific and perceptible injury sufficient to confer APA standing, acknowledging “actual harm is difficult to prove.” Petition at 19. Nevertheless, Freedom Foundation argues that it may challenge the Commission’s discretionary enforcement decisions under the FCPA because it purports to have standing under what it terms the “diversion of resources” doctrine. Petition at 20.

In referencing the “diversion of resources” doctrine, Freedom Foundation is apparently alluding to the well-settled principle of organizational standing, where an organization may establish injury-in-fact by “showing that the challenged ‘practices have perceptibly impaired [its] ability to provide the services [it was] formed to provide.’” *East Bay Sanctuary Covenant v. Trump*, 932 F.3d 742, 765 (9th Cir. 2018) (quoting *El Rescate Legal Servs., Inc. v. Exec. Office of Immigr. Rev.*, 959 F.2d 742, 748 (9th Cir. 1991)). One way an organization can show organizational standing is to show that “independent of the litigation,” the challenged decision or policy “frustrates the organization’s goals and requires the organization to expend resources in representing clients they otherwise would spend in other ways.” *Id.* (internal quotation marks omitted) (quoting *Comite de Jornaleros de Redondo Beach v. City of Redondo Beach*, 657 F.3d 936, 943 (9th Cir. 2011) (en banc)). The Court of Appeals properly found that Freedom Foundation failed to establish injury-in-fact sufficient to confer organizational

standing because it failed to allege that it “change[d] its behavior related to its mission in a specific way because of a government action or inaction.” *Freedom Found. v. Washington State Pub. Disclosure Comm'n*, 2023 WL 2756240, at *11.

Freedom Foundation asserts that its alleged expenditure of “additional resources by engaging in costly, cumbersome, and time-consuming research methods to discover WFSE’s political activity, and . . . preparing and filing a PDC complaint” constitutes a “change in behavior” precipitated by the Commission’s decision not to enforce the FCPA against WFSE. Petition at 5. This claim is without merit for several reasons. First, in each of the organizational standing cases cited by Freedom Foundation and the Court of Appeals, the plaintiff organizations sought to protect a community of individuals directly impacted by a policy, practice, or law threatening to injure them. In stark contrast, Freedom Foundation cannot identify any policy, practice, or law enforced by the Commission affecting any community it claims to represent.

Indeed, as found by the superior court, Freedom Foundation has no identified clients or “community of people” it represents or seeks to protect. Verbatim Report of Proceedings (VRP) at 23.³

Second, nothing in the record supports Freedom Foundation’s claim that it expended or will expend “additional resources” as a result of the Commission’s action or inaction. In fact, the declaration provided by Freedom Foundation in support of its Petition for Judicial Review is *silent* on what resources it was expending on its organizational mission prior to the time it filed a complaint against WFSE. CP at 62-67. Significantly, the expenditures referenced in Freedom Foundation’s declaration were incurred either: (1) in the preparation and filing of an FCPA complaint, which occurred *before* the Commission dismissed its complaint against WFSE; or (2) through litigation costs such as by filing a petition for

³ It is also noteworthy that none of the organizational standing cases cited by Freedom Foundation or the Court of Appeals analyzed the doctrine in the context of a petition for review under the state or federal APA.

reconsideration, which cannot confer organizational standing. CP 66 -67; *see East Bay*, 932 F.3d at 765; *Walker v. City of Lakewood*, 272 F.3d 1114, 1124 n.3 (9th Cir. 2001) (To confer organizational standing, economic harm must be “independent of the litigation.”). Thus, Freedom Foundation’s assertion that the Commission’s discretionary decision will force it to spend “additional resources” it would not otherwise spend is without foundation.

Third, it is disingenuous for Freedom Foundation to claim that it “would not make these additional expenditures *but for* the PDC’s inaction of failing to enforce the FCPA against WFSE.” Petition at 28. A simple public search of the Commission’s online enforcement database reveals that, since December 2014, Freedom Foundation has filed at least *eighty-eight* FCPA complaints,⁴ the vast majority of which were filed

⁴ This search includes complaints filed by Freedom Foundation’s Labor Policy Director Maxford Nelsen.

against or otherwise involved public unions (like WFSE).⁵ Thus, Freedom Foundation cannot credibly argue that filing FCPA complaints is somehow outside of its organizational mission of “battering the entrenched power of left-wing government union bosses [...].”⁶ Nor can it claim that this specific FCPA complaint against WFSE somehow qualifies as a change in behavior that caused it to “expend additional resources” on “costly, cumbersome and time-consuming research to discover union political activity.” Petition at 5. Rather, the Court of Appeals correctly found that “[Freedom Foundation’s] mission includes acting as a watchdog to ensure public unions such as the WFSE comply with the FCPA,” and that, while Freedom Foundation’s organizational mission might be *easier* when the Commission requires certain entities to register as political committees, “that does not mean the

⁵ <https://www.pdc.wa.gov/rules-enforcement/enforcement/enforcement-cases> (enter “Freedom Foundation” or “Maxford Nelsen” as the complainant.)

⁶ <https://www.freedomfoundation.com/about-freedom-foundation/> (last visited 8/28/2023).

Foundation is injured by a non-action by the PDC when it endeavors into the same types of research both before and after the PDC's decision." *Freedom Found. v. Washington State Pub. Disclosure Comm'n*, 2023 WL 2756240, at *12.

Because there is no evidence that Freedom Foundation changed its behavior as a result of the Commission's decision not to enforce the FCPA against WFSE, it fails to establish organizational standing. This Court should deny discretionary review.

B. The Court of Appeals Decision with Regard to the APA Standing Requirement Does Not Involve an Issue of Substantial Public Interest

This case involves none of the far reaching issues that typically signify a matter of substantial public interest under RAP 13.4(b)(4). Nonetheless, Freedom Foundation offers two reasons why this case purportedly involves such issues. First, according to Freedom Foundation, "the COA's misapplication of the diversion of resources standing doctrine makes it virtually impossible for an aggrieved party to prove an injury in

fact caused by a PDC decision to decline enforcement of the FCPA.” Petition at 11. Second, Freedom Foundation asserts that the Court’s opinion “empowers the PDC with unreviewable discretion to apply the FCPA in a partisan manner” in a way that creates an issue of substantial public interest. *Id.*

Freedom Foundation’s repeated reference to itself as an “aggrieved party” to an APA proceeding as a basis for establishing discretionary review is deeply misleading. *See, e.g.* Petition at 2, 11, 20, 21, 22, 26. Freedom Foundation was never designated as a party by the Commission. Further, as established by the Commission’s rules and confirmed by Division II in the published *Bethel School District* opinion, FCPA complainants are *not* parties to an FCPA enforcement

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action with standing under the APA. *See* WAC 390-37-030(1);⁷ *Bethel Sch. Dist.*, 14 Wn. App. 2d 75, 469 P.3d at 370-71 (2020). To the extent Freedom Foundation feels aggrieved, its grievance does not stem from its status as a party to an enforcement decision by the Commission. Moreover, for all the reasons discussed in section IV.A.2., *supra*, the Court of Appeals properly found that Freedom Foundation failed to allege a specific harm to itself and also failed to establish how the Commission’s decision caused it to change its behavior in a way that implicates organizational standing. Therefore, Freedom Foundation cannot demonstrate that this case presents an issue of substantial public interest requiring review by this Court.

⁷ WAC 390-37-030(1) states, in relevant part, “when a complaint is filed with the PDC . . . neither the complainant nor any other person shall have special standing to participate or intervene in any investigation or consideration of the complaint by the commission or its staff. However, the staff shall give notice to the complainant of any commission hearings on the matter and the complainant may be called as a witness in any enforcement hearing or investigative proceeding.”

Freedom Foundation's repetitive insistence that the Commission's decision not to enforce the FCPA against WFSE was based on some sort of partisan motivation is also entirely without foundation. The Commission reviews alleged violations of the FCPA irrespective of the ideological viewpoint of the complainant or respondent, and Freedom Foundation can point to no evidentiary support demonstrating otherwise. The Commission is not required to adopt the legal reasoning of Freedom Foundation's complaint simply because doing so might make it easier for Freedom Foundation to investigate unions, as the FCPA does not authorize any individual or organization to direct the Commission's decision regarding what action, if any, it will take on a complaint.

The Legislature intentionally vested the Commission with broad statutory authority to enforce the FCPA, including the discretion to determine what groups must register as political committees. RCW 42.17A.105(8). While citizens and organizations may file FCPA complaints with the Commission,

their ability to enforce those complaints through a court action is limited and must be pursued in the name of the state as a “citizen action.” RCW 42.17A.775. The Legislature precluded such citizen actions where the Commission has timely considered and acted on a complaint, which is what occurred in this case. *See* RCW 42.17A.775(2)(a); *see also Bethel Sch. Dist.*, 14 Wn. App. 2d at 83-84. Freedom Foundation’s APA petition appears to be a misguided effort to circumvent the statutorily-limited citizen action process by claiming an “injury” based solely on the dismissal of its complaint.

The Commission recognizes that it is authorized to make decisions that may be subject to judicial review under the APA by respondents with standing. For example, those subject to enforcement action by the Commission—actual *parties* to the enforcement action—have a right to seek judicial review following the issuance of a final order by the Commission. *See* RCW 34.05.542(2). But there is no basis in statute, rule, or case law to extend that right to complainants. Rather, as discussed

above, the *Bethel School District* court specifically found that non-party complainants lack standing to seek judicial review under the APA. *See also Newman v. Veterinary Bd. of Governors*, 156 Wn. App. 132, 143-44, 231 P.3d 840 (2010) (no standing to compel action against a veterinarian's license by virtue of having filed a complaint, as that discretionary decision was vested in the Veterinary Board).

Because the Court of Appeals' opinion creates no matter of substantial public interest, this case does not warrant this Court's review under RAP 13.4(b)(4).

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V. CONCLUSION

Freedom Foundation's Petition for Review does not satisfy the criteria for accepting review established by RAP 13.4(b). Because Freedom Foundation presents no issue that satisfies the standard for this Court's review, the Petition should be denied.

This document contains 3,237 words, excluding the parts of the document exempted from the word count by RAP 18.17.

RESPECTFULLY SUBMITTED this 28th day of August, 2023.

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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 28th day of August, 2023, at Olympia, WA.



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