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SUPREME COURT
STATE OF WASHINGTON
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,	)	
	)	NO. 90815-0
Respondent,	)	
	)	
v.	)	
	)	STATEMENT OF
KANE BOYLE,	)	ADDITIONAL
	)	AUTHORITY
Petitioner.	)	

The petitioner, Kane Boyle, through his attorney, Elaine Winters, refers this Court to the following authority regarding Argument Why Review Should be Accepted No. 2:

> United States v. Heineman, 767 F.3d 970 (2014) (holding that the First Amendment, as interpreted by Virginia v. Black, 538 U.S. 343 (2003), requires the government to prove in a true-threat prosecution that the defendant intended the recipient to feel threatened).

DATED this 31st day of October 2014.

Respectfully submitted,

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