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September 14, 2018

Washington Supreme Court  
415 12<sup>th</sup> Street W  
Olympia, WA 98504

**RE: Proposed Expansion of LLLT Program**

Dear Honorable Justices,

As we are all well aware the typical lawyer answer is, "it depends". However, the pending issue before the Court is easy. The answer is no. It is disappointing to know the Washington State Bar Association is attacking their own. It is equally frustrating to know that the Bar Association would be so willing to abdicate its responsibility to its members and the public. The inevitable result of the decision to expand the LLLT scope would be disastrous for the following reasons:

1. LLLTs are only required to have an associate's degree. There is a reason why attorneys attend law school. It provides a rigorous and demanding curriculum designed to rewire an individual's brain, so they know how to properly analyze the law and identify important issues; among other important skills. The minimal education that LLLTs have received is no substitute for the education of an attorney. It is a disservice to the public to enable less qualified individuals to assist them in important legal matters that will have serious ramifications upon their lives.
2. Other state bar associations have already rejected similar proposals. The primary reasoning is that more information is needed to determine the efficacy of the LLLT program. That is the situation in Washington. Rather than jump right into expanding the LLLT scope, more data should be required to determine the impact to the public and attorneys in the state.
3. If the concern is improved access to the legal system for low income individuals, there are better options beyond giving LLLTs de facto attorney status. Compulsory pro bono work may be an option, as would increasing funding for legal aid associations.

The WSBA should be an organization that supports attorneys while protecting the public through licensing and discipline, versus an association that protects the public from attorneys. The bottom line is that this is a half-baked idea that will have potentially disastrous consequences for the public and licensed attorneys in this state.

Sincerely,

Amanda N. Gamble  
WSBA #52982

**Tracy, Mary**

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**Sent:** Friday, September 14, 2018 4:47 PM  
**To:** Hinchcliffe, Shannon  
**Cc:** Jennings, Cindy; Tracy, Mary  
**Subject:** FW: Expansion of LLLT Program  
**Attachments:** Signed LLLT Letter .pdf

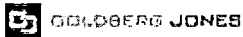
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**Subject:** Expansion of LLLT Program

Honorable Justices,

Please see my attached letter in response to the comment period for the expansion of the LLLT program.

Thank you.

**Amanda N. Gamble**  
*ATTORNEY AT LAW*



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