



February 7, 2020

VIA EMAIL AND 1ST CLASS US MAIL

Susan L. Carlson  
Clerk of the Washington State Supreme Court  
P.O. Box 40929  
Olympia, WA 98504-0929

**Re: Proposed General Rule 38 and Proposed Amendment to RPC 4.4**

Dear Madam Clerk:

On behalf of the Center for Children & Youth Justice (CCYJ), I submit the following comments in support of the Proposed New Washington State Court Rule GR 38 and the proposed amendment to comment 4 of RPC 4.4.

CCYJ is a non-profit dedicated to improving the lives of children and youth in or at risk of becoming involved in child welfare, juvenile justice, and related systems of care. We work collaboratively with hundreds of stakeholders in juvenile courts, the Department of Children, Youth, and Families (DCYF), local law enforcement, prosecutors' offices, homeless youth providers, domestic violence/sexual assault agencies, and advocacy groups. Of particular relevance is CCYJ's work on behalf of commercially sexually exploited children (CSEC). Since 2011, CCYJ has been working to build and sustain a coordinated, and victim-centered response in Washington to commercially sexually exploited children (CSEC).

Children and youth involved in our state systems need to access courts without risk or fear, and they need their family members and guardians to be able to access courts without risk or fear. Our courts are at the heart of these systems of care, and we cannot expect children, youth, and families to unless we provide courthouses that are safe and mitigate--not exacerbate--trauma. We are especially concerned that exploited youth are discouraged from pursuing investigations and prosecutions of their traffickers.

In light of these concerns, CCYJ respectfully urges the Supreme Court to adopt proposed GR 38 and the proposed amendment to comment 4 of RPC 4.4.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Rachel Sottile". The signature is written in a cursive, flowing style.

Rachel Sottile  
President & CEO

Cc: Associate Chief Justice Charles W. Johnson, Chair, Rules Committee

**From:** [Carlson, Susan](#)  
**To:** [Tracy, Mary](#)  
**Cc:** [Hinchcliffe, Shannon](#); [Jennings, Cindy](#)  
**Subject:** FW: Proposed General Rule 38 and Proposed Amendment to RPC 4.4  
**Date:** Monday, February 10, 2020 8:13:03 AM  
**Attachments:** [Outlook-https\\_\\_lh.png](#)  
[Outlook-UD New Twi.png](#)  
[Outlook-UD New Fac.png](#)  
[Outlook-UD New Lin.png](#)  
[Outlook-UD New Ins.png](#)  
[2020-02-07-CCYJ-Letter-in-Support-GR 38 \(1\).pdf](#)  
**Importance:** High

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Rule comments.

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**From:** Rachel Sottile [mailto:RSottile@ccyj.org]  
**Sent:** Friday, February 7, 2020 11:06 PM  
**To:** Carlson, Susan <Susan.Carlson@courts.wa.gov>  
**Cc:** Johnson, Justice Charles W. <Charles.Johnson@courts.wa.gov>  
**Subject:** Proposed General Rule 38 and Proposed Amendment to RPC 4.4  
**Importance:** High

Good evening, Madam Clerk, and Associate Chief Justice Johnson,

Please see the attached letter on behalf of the Center for Children and Youth Justice (CCYJ), in support of the Proposed Amendment to CR 38 and RPC 4.4.

Kind regards,  
Rachel

***[\\*Register for CCYJ's 2020 Maleng Breakfast!](#)***

**Rachel Sottile, MS**  
pronouns: she/her/hers  
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