

NO. 93786-9

SUPREME COURT OF THE STATE OF WASHINGTON

ANDREW PILLOUD,

Appellant,

v.

KING COUNTY REPUBLICAN CENTRAL COMMITTEE and LORI
SOTELO, Chair of the King County Republican Central Committee,

Respondents.

AMICUS CURIAE BRIEF OF THE STATE OF WASHINGTON

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I. INTRODUCTION

States exercise broad authority to establish the rules under which elections are conducted. U.S. Const. art. I, § 2, cl. 1 (providing state authority to determine the time, place, and manner of elections). “Moreover, as a practical matter, there must be a substantial regulation of elections if they are to be fair and honest and if some sort of order, rather than chaos, is to accompany the democratic processes.” *Storer v. Brown*, 415 U.S. 724, 730, 94 S. Ct. 1274, 39 L. Ed. 2d 714 (1974). Courts therefore usually uphold election laws from constitutional challenge. *Id.*

Here, the lower court concluded that RCW 29A.80.061 violates a political party’s right to free association under the First Amendment. This decision followed a line of superior court decisions since the 1960’s striking down prior versions of this statute as unconstitutional. Because of that long line of decisions, the State has long understood this statute to be unenforceable. And subsequent decisions of the U.S. Supreme Court have only made clearer the First Amendment challenges with this statute. The State therefore acknowledges that RCW 29A.80.061 cannot ultimately survive a First Amendment challenge. But the Court should adhere to a narrow and careful constitutional analysis that avoids sweeping too broadly. This Court should limit its analysis to the basis on which the superior court invalidated RCW 29A.80.061, avoiding other arguments.

The Court need not, and should not, consider Defendants' alternative arguments because this case can be fully resolved based on this first argument. If the Court nonetheless considers further arguments, those theories would not support a broader ruling than the one the superior court reached. In particular, the argument that the legislature enacted RCW 29A.80.061 as part of an act that failed to comply with article II, section 19 of the Washington Constitution would not alter the relief available through Defendant's First Amendment argument. Most of the statutes in that act have been amended, repealed, or recodified since it was first enacted, curing any defect even if the Court applied a single subject analysis. And this argument is most accurately considered as an argument based on the subject-in-title rule, rather than the single subject rule. If that argument prevailed it would merely invalidate the single statute at issue, not the whole act, something that a First Amendment analysis already accomplishes. King County Republican Central Committee's equal protection argument similarly would not add to this Court's analysis.

II. IDENTITY AND INTEREST OF AMICUS

The State of Washington has a substantial and continuing interest in the conduct of federal, state, and local elections to fill public offices. The State offers this brief as amicus curiae by prior approval of the Court in

order to assist the Court in resolving this case, mindful of the broader interests of the State and its electorate.

III. ISSUES ADDRESSED BY AMICUS

1. Does RCW 29A.80.061 violate the First Amendment by specifying the manner in which an internal party office is filled?
2. Should this Court decline to consider other grounds on which the constitutionality of RCW 29A.80.061 is challenged?

IV. STATEMENT OF THE CASE

Appellant Andrew Pilloud seeks to enforce RCW 29A.80.061 to compel Respondent King County Republican Central Committee (KCRCC) to hold elections among precinct committee officers to elect legislative district chairs. KCRCC, a private political organization, has long chosen to fill the internal party office of legislative district chair by appointment of the chair of the county central committee. Br. of Resp'ts at 3.

A statute like RCW 29A.80.061 has been on the books since 1967. Laws of 1967, Ex. Sess., ch. 32, § 1 (enacting former RCW 29.42.070). The King County Superior Court promptly ruled it unconstitutional shortly after its enactment. CP at 28-29. The statute has remained on the books since then, although without enforcement. The legislature reenacted it in its current form in 2004, as part of broader legislation relating to how the state conducts primaries, and without apparent consideration of prior superior

court decisions ruling it unconstitutional. Laws of 2004, ch. 271, § 150; *see also Washington State Grange v. Locke*, 153 Wn.2d 475, 480-86, 105 P.3d 9 (2005) (reciting the history of the Act containing RCW 29A.80.061).

Mr. Pilloud seeks to enforce RCW 29A.80.061 as a precinct committee officer (PCO), an internal office of the party. He sought a writ of mandamus compelling the KCRCC to hold an election for legislative district chair, also an internal party office. The KCRCC defended by challenging the constitutionality of RCW 29A.80.061. The superior court granted judgment in favor of the KCRCC, concluding that the First Amendment protects the party's freedom of association to determine the manner of selecting its own internal party officers. The superior court determined that it was unnecessary to reach any of the other issues raised. RT at 29:7-11. This Court granted direct review .

V. ARGUMENT

A. **This Court Should Resolve This Case Based Upon the KCRCC's Argument That RCW 29A.80.061 Violates the Party's First Amendment Right to Free Association**

The KCRCC offered several legal theories for contending that RCW 29A.80.061 is unconstitutional. The superior court ruled in favor of the KCRCC based on only one of those theories, finding that the statute denied the party its First Amendment freedom of association. This conclusion provides a sufficient basis for resolving this appeal, and the

Court need not look beyond that analysis to consider the KCRCC's alternative arguments. This Court generally avoids reaching issues when resolving them is not necessary to dispose of the case. *See Coppernoll v. Reed*, 155 Wn.2d 290, 298, 119 P.3d 318 (2005). The KCRCC's associational argument is the narrowest basis on which this Court could resolve this case, and after doing so the analysis should end. *See Klem v. Washington Mut. Bank*, 176 Wn.2d 771, 807, 295 P.3d 1179 (2013) (Fairhurst, J., concurring) (“this court has long avoided analysis of constitutional issues when it can avoid doing so”).

RCW 29A.80.061 reads, in its entirety:

Within forty-five days after the statewide general election in even-numbered years, the county chair of each major political party shall call separate meetings of all elected precinct committee officers in each legislative district for the purpose of electing a legislative district chair in such district. The district chair shall hold office until the next legislative district reorganizational meeting two years later, or until a successor is elected.

The legislative district chair may be removed only by the majority vote of the elected precinct committee officers in the chair's district.

Mr. Pilloud is correct that RCW 29A.80.061 by its own terms requires that precinct committee officers elect legislative district chairs, and does not allow the party to select them by appointment. But as the KCRCC explains, superior courts have long held that the statute is

unconstitutional. This has long been the State's understanding, and the State has never attempted to enforce the statute.

The Attorney General, of course, normally defends the constitutionality of state statutes. *See, e.g., Ford Motor Co. v. Barrett*, 115 Wn.2d 556, 560, 800 P.2d 367 (1990) (observing that the Attorney General had intervened to defend a statute from constitutional challenge). This case presents the unusual circumstance of a statute that lower courts have repeatedly held unconstitutional and which the State has therefore long understood it cannot enforce, a conclusion that—as explained below—the case law compels. This is the case, however, *only* because the office at issue is an internal position within a private political party; the State's position would be different if elections to fill public office were at issue. *See, e.g., Washington State Grange v. Washington State Republican Party*, 552 U.S. 442, 458-59, 128 S. Ct. 1184, 170 L. Ed. 2d 151 (2008) (State successfully defended its Top Two Primary from First Amendment challenge by political parties).

States have broad power to regulate the conduct of elections through which public officials are chosen. *Id.* at 451. In contrast, the Supreme Court has held that those state laws that regulate the election of individuals to positions related to a party's internal governance do not implicate compelling state interests and are unconstitutional under the First

Amendment right to freedom of association. *See, e.g., Eu v. San Francisco County Democratic Cent. Comm.*, 489 U.S. 214, 233, 109 S. Ct. 1013, 103 L. Ed. 2d 271 (1989) (holding that California’s regulation of the party’s internal structure without a showing that such regulation is necessary to ensure that elections are fair and orderly violates the party’s associational rights); *Democratic Party of the United States v. Wisconsin ex rel. La Follette*, 450 U.S. 107, 126, 101 S. Ct. 1010, 67 L. Ed 2d 82 (1981) (holding that the system of selecting delegates imposed by Wisconsin’s open primary laws unconstitutionally infringed on the Democrat’s freedom of association); *Cousins v. Wigoda*, 419 U.S. 477, 491, 95 S. Ct. 541, 42 L. Ed. 2d 595 (1975) (holding that the state did not have a compelling reason for exercising control over the Illinois Democratic Party’s delegate selection process).

This case is not about a public election; it concerns an internal process for filling an office within a political party’s organization. Holding RCW 29A.80.061 unconstitutional because it attempts to dictate the parties’ internal governance is an appropriately narrow basis for deciding this case.¹

This conclusion fully resolves this case and this Court should proceed no further.

¹ While RCW 29A.80.061 was enacted as part of a comprehensive 2004 act that also addressed other topics related to elections, the 2004 act contains a severability clause. Laws of 2004, ch. 271, §§ 150, 204. The KCRCC does not argue that the First Amendment unconstitutionality of RCW 29A.80.061 calls into question the validity of any other portion of the 2004 act.

B. Reaching the KCRCC’s Alternative Argument Based on Article II, Section 19 of the Washington Constitution Would Unduly Complicate Analysis Without Altering the Disposition of This Case

The KCRCC argues in the alternative that the legislature enacted the current form of RCW 29A.80.061 in violation of article II, section 19 of the Washington Constitution. This Court need not consider this argument because the case can be fully resolved based upon the First Amendment, as discussed above.

“There are two distinct prohibitions in article II, section 19: (1) the single-subject rule and (2) the subject-in-title rule.” *Washington Ass’n for Substance Abuse & Violence Prevention v. State*, 174 Wn.2d 642, 654, 278 P.3d 632 (2012) (*WASAVP*). The KCRCC says that the 2004 act containing RCW 29A.80.061 violated both rules. This argument adds nothing to disposition of this case, however, for several reasons. First, as explained above, the Court can already invalidate the statute based on the First Amendment. Second, most—but not all—of the statutes enacted or amended in the 2004 act have been subsequently amended, repealed, or recodified, thereby superseding and curing any defects in the 2004 act. Moreover, although the KCRCC says that it invokes both the single-subject and subject-in-title rules, its argument in substance addresses only the subject-in-title rule. The remedy for a subject-in-title violation is simply to

invalidate the challenged section of the act. Thus, addressing these arguments could not lead to a different result than the Court would reach by resolving this case on First Amendment grounds alone. If this Court holds that RCW 29A.80.061 violates the parties' First Amendment rights, then there is no reason to address an alternative argument for striking down this section. *See supra* Part V (A).

1. The Article II, Section 19 argument does not affect the result of this case

Later amendments to a statute supersede earlier ones. *Pierce County v. State*, 159 Wn.2d 16, 40, 148 P.3d 1002 (2006). “[W]hen a statute is challenged on the basis that its title violates article II, section 19, a later amendment to or reenactment of the statute supersedes and therefore ‘cure[s] any defect’ in the earlier legislation.” *Morin v. Harrell*, 161 Wn.2d 226, 231, 164 P.3d 495 (2007) (second alteration added by *Morin*) (quoting *Pierce County*, 159 Wn.2d at 39-41).

The legislature enacted RCW 29A.80.061 as section 150 of Laws of 2004, ch. 271. Since 2004, the legislature has amended, repealed, or recodified most of the statutes that formed part of that 2004 act.² No argument is offered that any of those subsequent acts contained any problem

² Just a few of the numerous acts that amend or repeal statutes originally enacted by Laws of 2004, ch. 271 include: Laws of 2016, ch. 83; Laws of 2013, ch. 11; Laws of 2012, ch. 89; Laws of 2011, ch. 349; Laws of 2009, ch. 106; and Laws of 2006, ch. 344.

relating to their titles, and therefore they are presumed valid. *Pierce County*, 159 Wn.2d at 40-41.

It therefore follows that even if this Court considered the KCRCC's article II, section 19 argument, that argument would not broadly call into question the vast majority of the statutes originally enacted in Laws of 2004, ch. 271. Admittedly, the legislature has not subsequently amended, repealed, or recodified a few sections, including RCW 29A.80.061, the statute at issue in this case. But we already know that this statute is vulnerable on freedom of association grounds, as discussed above. The validity of no other sections of the 2004 Act are at issue in this case, and so consideration of single-subject or subject-in-title issues in this case could, at most, lead to a duplicate remedy. Addressing these issues is therefore unnecessary. This Court avoids needlessly addressing constitutional issues. *Coppemoll*, 155 Wn.2d at 298. Moreover, a holding that the 2004 act contained more than one subject could inadvertently and unnecessarily call into question the validity of the few sections that have not been amended or reenacted since 2004.

2. The KCRCC presents only a subject-in-title challenge to RCW 29A.80.061, and not a single subject challenge

The KCRCC's argument based on article II, section 19 is, in substance, a subject-in-title argument and not a single subject

argument. This Court has explained the difference between those two rules in terms of the purposes they serve. “The single-subject rule aims to prevent the grouping of incompatible measures and to prevent ‘logrolling,’ which occurs when a measure is drafted such that a legislator or voter may be required to vote for something of which he or she disapproves in order to secure approval of an unrelated law.” *WASAVP*, 174 Wn.2d at 655. In contrast, “[t]he purpose of the subject-in-title rule is to notify members of the legislature and the public of the subject matter of the measure.” *Id.* at 660. “[A] title complies with the constitution if it gives notice that would lead to an inquiry into the body of the act, or indicate to an inquiring mind the scope and purpose of the law.’” *Id.* (alteration added by *WASAVP*) (quoting *Washington Fed’n of State Emps. v. State*, 127 Wn. 2d 544, 555, 901 P.2d 1028 (1995)). Thus, the single-subject rule amounts to an argument that legislation combines two incompatible measures into a single bill, while the subject-in-title rule protects against adding into legislation a provision not revealed by its title.

The KCRCC’s arguments in this case are of the second kind. They quote the title of the 2004 act, “An Act Relating to a qualifying primary.” Br. of Resp’ts at 12 (quoting Laws of 2004, ch. 271). They then argue that the “title gives no clue that buried nearly fifty pages deep are provisions unconnected to primary elections, but which, instead, mandate the internal

structure and governance of some major party organizations in the state.” Br. of Resp’ts at 12. They argue that RCW 29A.80.061 “deals with events long after the August primary election.” Br. of Resp’ts at 13. This is, in substance, a subject-in-title argument. *WASAVP*, 174 Wn.2d at 655.

At no point does KCRCC argue that the 2004 act combined two distinct subjects. It merely attacks RCW 29A.80.061 as an outlying provision not disclosed in the title. “Parties raising constitutional issues must present considered arguments to this court.” *State v. Johnson*, 119 Wn.2d 167, 171, 829 P.2d 1082 (1992), *quoted in Health Ins. Pool v. Health Care Auth.*, 129 Wn.2d 504, 511, 919 P.2d 62 (1996). Even if this Court considers the KCRCC’s argument based on article II, section 19, it follows that only a subject-in-title argument is presented.

3. The remedy for a successful subject-in-title argument is to invalidate only the challenged section

When this Court finds a violation of the subject-in-title rule, it then applies severability analysis to determine whether the invalid section can be severed from the remainder of the act. *Amalgamated Transit Union Local 587 v. State*, 142 Wn.2d 183, 227-28, 11 P.3d 762, 27 P.3d 608 (2000). “A legislative act is not unconstitutional in its entirety unless invalid provisions are unseverable[.]” *Id.* at 227. Sections are severable unless, “it cannot be reasonably . . . believed that the legislative body would have passed one

without the other, or unless elimination of the invalid part would render the remaining part useless to accomplish the legislative purposes.” *Amalgamated Transit*, 142 Wn.2d at 227-28.

The 2004 Act contained a severability clause. Laws of 2004, ch. 271, § 204. This provides the Court with an assurance that the legislature would have enacted the rest of the bill without RCW 29A.80.061. *Gerberding v. Munro*, 134 Wn.2d 188, 197, 949 P.2d 1366 (1998). Moreover, the nature of a subject-in-title challenge is simply that the title of the bill does not suggest the presence of the challenged section, and so inherently the remedy is merely to invalidate that section. *Amalgamated Transit*, 142 Wn.2d at 228 (“Where an act contains provisions not fairly encompassed within the title, such provisions are void.”).

Consideration of the KCRCC’s subject-in-title challenge therefore adds nothing to this case. This Court should therefore avoid needlessly addressing this constitutional question. *Coppernoll*, 155 Wn.2d at 298.

C. RCW 29A.80.061 Does Not Violate Equal Protection

The final argument that the KCRCC offers is that RCW 29A.80.061 violates equal protection because it has a different effect in some counties than in others. But RCW 29A.80.061 addresses political party organizations in all counties. It directs “the county chair of each major political party [to] call separate meetings of all elected precinct committee officers in each

legislative district for the purpose of electing a legislative district chair in each district.” RCW 29A.80.061.

The KCRCC observes that not all Washington counties contain multiple legislative districts. This is true. But the statute does not violate equal protection merely because different facts exist in some counties compared to others. And the impact of a statute varies depending upon the facts on which they operate.

In order to state an equal protection claim, the KCRCC must establish that RCW 29A.80.061 treats different classes of political parties differently without a rational basis. *Brown v. Dep’t of Commerce*, 184 Wn.2d 509, 545, 359 P.3d 771 (2015). The KCRCC includes no argument on this point, merely asserting the statute results in political party organizations that include legislative district chairs only in counties that have more than one legislative district. The KCRCC offers no argument as to why that distinction would be irrational, given that it arises only based on whether a county has more than one legislative district. Far from suggesting the absence of a rational basis, this argument is so sparse and conclusory that the Court need not consider it. *See Cowiche Canyon Conservancy v. Bosley*, 118 Wn.2d 801, 809, 828 P.2d 549 (1992) (an assignment of error as to which no argument is offered is waived); *see also Riley v. Iron Gate Self Storage*, 198 Wn. App. 692, 713, 395 P.3d 1059 (2017) (“We need not

consider arguments that are not developed in the briefs and for which a party has not cited authority.”).

Finally, as with the KCRCC’s article II, section 19 arguments, it is unnecessary for this Court to reach this issue, and it should not do so. This case can be fully resolved on the narrow freedom of association analysis adopted by the superior court. This Court should avoid additional constitutional issues that would not change the result of this case. *Coppernoll*, 155 Wn.2d at 298.

VI. CONCLUSION

For these reasons, this Court should limit its analysis to the KCRCC’s challenge to RCW 29A.80.061 based upon freedom of association under the First Amendment.

RESPECTFULLY SUBMITTED this 17th day of July 2017.

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CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the laws of the state of Washington, that on this date I have caused a true and correct copy of the foregoing Amicus Curiae Brief Of The State Of Washington to be served via electronic mail on the following:

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