

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
4/16/2018 9:04 AM  
BY SUSAN L. CARLSON  
CLERK

SUPREME COURT NO. 95083-1

COA NO. 75441-6-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

---

STATE OF WASHINGTON,

Respondent,

v.

EDGAR DENNIS, III,

Appellant.

---

STATEMENT OF ADDITIONAL AUTHORITIES

---

Lauren D. McLane  
Lawand L. Anderson  
Attorneys for Appellant

22030 7th Ave S. Ste. 103  
Des Moines, WA, 98198-6219  
(206) 817-0577  
mclanel@uw.edu | lawand@lalaw.legal

**Appellant submits the following additional authorities pursuant to RAP 10.8:**

Issue: Did Division One err when, after engaging in statutory interpretation, it held that RCW 9.41.040(4)(a)(ii)(A) required that Mr. Dennis's "five or more consecutive years" without a conviction must occur *immediately preceding* the petition for restoration of his firearms right?

*State v. Anaya*, 95 Wn. App. 751, 760, 976 P.2d 1251 (1999) (A strongly stated general policy that domestic violence is a serious crime and victims must be protected did not justify reading into the criminal statute provisions that were not there; "[c]reating statutory law is purely a legislative function.").

*State v. Alvarez*, 74 Wn. App. 250, 258, 872 P.2d 1123 (1994), *affi'd* 128 Wn.2d 1, 904 P.2d 754 (1995), citing *State v. Taylor*, 97 Wn.2d 724, 728 (1982) (Reliance on a statement of legislative intent is not permitted to override the unambiguous text of a statute or to add an element not there. "Indeed, we are advised that it is safer not to add to or subtract from the language of a statute unless this is imperatively required to make the statute rational.").

I certify that on April 16, 2018, I sent this document to the King County prosecuting attorney (at paoappellateunitmail@kingcounty.gov) and Laura Petregal (at laura.petregal@kingcounty.gov) through the Supreme Court's online filing system.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed and respectfully submitted April 16, 2018 in Seattle, Washington.



Lauren McLane, WSBA No. 40945  
Attorney for Appellant

**April 16, 2018 - 9:04 AM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 95083-1  
**Appellate Court Case Title:** State of Washington v. Edgar Dennis III  
**Superior Court Case Number:** 16-2-08936-4

**The following documents have been uploaded:**

- 950831\_State\_of\_Add\_Authorities\_20180416090156SC156750\_3470.pdf

This File Contains:

Statement of Additional Authorities

*The Original File Name was Appellant Dennis\_Statement of Additional Authorities.pdf*

**A copy of the uploaded files will be sent to:**

- laura.petregal@kingcounty.gov
- lawand@lalaw.legal
- paoappellateunitmail@kingcounty.gov

**Comments:**

Appellant's Statement of Additional Authorities pursuant to RAP 10.8.

---

Sender Name: Lauren McLane - Email: mclanel@uw.edu

Address:

PO BOX 85110

SEATTLE, WA, 98145-1110

Phone: 206-616-8009

**Note: The Filing Id is 20180416090156SC156750**