

FILED
SUPREME COURT
STATE OF WASHINGTON
5/23/2019 4:24 PM
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	
)	
Respondent,)	No. 96354-1
)	
v.)	STATEMENT OF
)	ADDITIONAL
A.M.,)	AUTHORITIES
)	
Petitioner.)	

Under RAP 10.8, A.M. submits the following additional authorities for this Court’s consideration on the issue of whether the drug possession statute must be read to have a knowledge element or be declared unconstitutional: State v. Brown, 389 So. 2d 48, 51 (La. 1980) (“The ‘unknowing’ possession of a dangerous drug cannot be made criminal.”); Kimoktoak v. State, 584 P.2d 25, 31 (Alaska 1978) (reading “hit and run” statute to have knowledge element in light of due process principles and to avoid declaring statute unconstitutional); State v. Martin, 73 Wn.2d 616, 625, 440 P.2d 429 (1968) (reading Washington’s “hit and run” statute to have knowledge element; “inconceivable that the legislature intended that punishment would be imposed . . . if the operator of the vehicle was ignorant of the happening of an accident”).

Respectfully submitted this 23rd day of May, 2019.

/s Richard W. Lechich
Richard W. Lechich – WSBA #43296
Washington Appellate Project – #91052
Attorney for Petitioner

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)
)
 Respondent,)
) NO. 96354-1
)
 A.M.,)
)
 Juvenile Petitioner.)

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 23RD DAY OF MAY, 2019, I CAUSED THE ORIGINAL **PETITIONER'S ADDITIONAL AUTHORITIES** TO BE FILED IN THE WASHINGTON STATE SUPREME COURT AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

[X] J. SCOTT HALLORAN, DPA () U.S. MAIL
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 [Diane.Kremenich@co.snohomish.wa.us] (X) E-SERVICE VIA PORTAL
 SNOHOMISH COUNTY PROSECUTOR'S OFFICE
 3000 ROCKEFELLER
 EVERETT, WA 98201

SIGNED IN SEATTLE, WASHINGTON, THIS 29TH DAY OF APRIL, 2019.



X _____

WASHINGTON APPELLATE PROJECT

May 23, 2019 - 4:24 PM

Transmittal Information

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Appellate Court Case Number: 96354-1
Appellate Court Case Title: State of Washington v. A.M.
Superior Court Case Number: 16-8-01007-5

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