

FILED
SUPREME COURT
STATE OF WASHINGTON
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IN THE WASHINGTON SUPREME COURT

STATE OF WASHINGTON,)	
)	
Respondent,)	No. 96873-0
)	
v.)	STATEMENT OF
)	ADDITIONAL
SHANNON BLAKE,)	AUTHORITIES
)	
Petitioner.)	

Under RAP 10.8, Shannon Blake submits the following additional authorities for this Court’s consideration:

Smith v. California, 361 U.S. 147, 150-55, 80 S. Ct. 215, 4 L. Ed. 2d 205 (1959) (state law that imposed strict liability on bookseller who possessed an obscene book was unconstitutional; unreasonable to demand that bookseller investigate the contents of every book in his store);

State v. Hennings, 3 Wn. App. 483, 488–89, 475 P.2d 926 (1970) (“disagree[ing] with the conclusion in [State v. Henker, 50 Wn.2d 809, 314 P.2d 645 (1957)] that the legislative objective was to eliminate scienter (willful guilty knowledge) as an essential ingredient of the crime of trafficking in narcotics”);

State v. Boyer, 91 Wn.2d 342, 344, 588 P.2d 1151 (1979) (although language of delivery of a controlled substance statute did not explicitly require proof of any mental element, “guilty knowledge is intrinsic in the definition of the crime itself”)

Respectfully submitted this 8th day of June, 2020.



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

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Washington State Supreme Court** under **Case No. 96873-0**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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Date: June 8, 2020

WASHINGTON APPELLATE PROJECT

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