

IN THE SUPREME COURT OF THE  
STATE OF WASHINGTON

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	)	No. 103785-6
STATE OF WASHINGTON,	)	
Respondent,	)	
	)	STATEMENT OF
v.	)	ADDITIONAL
	)	AUTHORITIES
RYLEND FARRIS,	)	
Petitioner.	)	

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Pursuant to RAP 10.8, Rylend Farris, the Petitioner, cites as additional authority: *State v. Solomon Gibson*, \_\_\_ Wn. App. 2d \_\_\_, 2025 WL 543804 (2025). This authority relates to Mr. Farris’s argument that RCW 9.94A.525 requires the court to calculate a person’s offender score at the time of sentencing. Petition for Review at 3-14.

*Solomon Gibson* involves the same relevant facts as Mr. Farris’s case: both defendants committed their offenses prior to HB 1324’s effective date, but both were sentenced after it went into effect. The trial court in *Solomon Gibson* applied the revised statute and excluded the defendant’s juvenile

convictions from his offender score. 2025 WL 543804 at \*1.

The State appealed, and the Court of Appeals reversed in a split, published decision. *Id.* at \*3.

The dissenting judge relied on this Court’s prior decision in *Jenks*,<sup>1</sup> which addressed the triggering event for prospective application of a different statutory amendment. *Id.* Judge Maxa then pointed to other decisions holding that “[t]he triggering event” for calculating offender score is sentencing. *Id.* at \*4 (citing *Troutman*,<sup>2</sup> *Tester*<sup>3</sup>). Judge Maxa noted the majority opinion “disregards” those decisions and renders the analysis in *Jenks* meaningless. *Id.*

As Judge Maxa recognized in *Solomon Gibson*, because offender score calculation occurs at sentencing, HB 1324 applies prospectively to all sentencings occurring after its effective date. Because HB 1324 was in effect at the time of

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<sup>1</sup> *State v. Jenks*, 197 Wn.2d 708, 487 P.3d 482 (2021).

<sup>2</sup> *State v. Troutman*, 30 Wn. App. 2d 592, 546 P.3d 458 (2024).

<sup>3</sup> *State v. Tester*, 30 Wn. App. 2d 650, 546 P.3d 94 (2024).

Mr. Farris's sentencing, it should apply to his case. This additional authority supports this Court accepting review of this important issue. *See* RAP 13.4(b).

I certify this document contains 254 words and complies with RAP 18.17.

Dated this 21st day of February 2025.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "BTsai", is positioned above a horizontal line.

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# WASHINGTON APPELLATE PROJECT

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## Transmittal Information

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 103,785-6  
**Appellate Court Case Title:** State of Washington v. Rylend Farris  
**Superior Court Case Number:** 23-1-00107-3

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