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Subject: FW: Proposed Amendment to APR 11
Date: Friday, April 30, 2021 4:36:04 PM

From: Amber Haslett-Kern [mailto:amberhaslett@waprosecutors.org]
Sent: Friday, April 30, 2021 4:35 PM
To: OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>
Subject: Proposed Amendment to APR 11

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Good afternoon,

On behalf of our association, I'd like to thank you for the opportunity to comment on the proposed amendment to the APR 11. Our association is in opposition of this proposed amendment.

- *As a Sponsor, we host anywhere from 8-15 programs annually.*
 - *COVID has increased the frequency of these programs*
- *We train in upwards of 1200 attorneys/members per year.*
- *These attorneys/members are in various departments within their respective offices.*

With each of our programs

- *We offer at least 15 CLE's, with a minimum of 2 Ethics credits, and*
- *Our Ethics topics address prosecutor specific issues and generally include content in equity, inclusion and antibias*
- *In addition, our non-Ethics topics regularly incorporate these issues*

If the Supreme Court voted for the proposed amendment, it would require our Association to then

- *Implement the additional Ethics topic at every program in order for our members to stay in compliance with the requirement*
- *This would fundamentally limit our ability to focus or address other prosecutor-specific issues that also impact these areas*

We are also required by the State to conduct training, however,

- *We have limited training funds,*
 - *Which will be cut drastically with our current pandemic*
 - *We are a non-profit organization*
 - *Having these proposed amendments for the required Ethics credits would be a financial burden to our Association.*

We acknowledge the value and timing of these topics. We would like to suggest that these proposed amendments only be considered as “permitted accreditable topics.”

*Respectfully,
Amber*

Amber Haslett-Kern, Training Coordinator
Washington Association of Prosecuting Attorneys
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