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**Subject:** FW: Support for proposed changes to IRLJs 1.2, 2.1, 2.4, 2.5, 2.6, 3.2, 3.3, 3.4, 3.6, and 5.1, proposed new rules  
**Date:** Tuesday, June 14, 2022 9:35:52 AM

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**From:** Bruce Adsero [mailto:badsero@feldmanlee.com]  
**Sent:** Tuesday, June 14, 2022 9:34 AM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** Support for proposed changes to IRLJs 1.2, 2.1, 2.4, 2.5, 2.6, 3.2, 3.3, 3.4, 3.6, and 5.1, proposed new rules

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My name is Bruce Adsero. I am a criminal defense attorney, and 95 percent of my case load is devoted to indigent defense. DWLS3, DWLS2, and DWLS1 are very common offenses that I provide representation on.

In addition to the persuasive reasoning provided in comments by other proponents, I would ask the court to consider the important safeguards this rule would provide for individuals before they are trapped in the cycle of endless suspensions.

Currently, a DWLS 3 charge, which is often a crime of poverty, not only carries a risk of jail or fine, but is a predicate charge for purposes of a DWLS 2 suspension pursuant to RCW 46.20.291(3) and WAC 308-104-025. Preventing unnecessary DWLS 3 suspensions will help protect indigent defendants from the greater jeopardy of more serious suspensions. As it stands, very few procedural safeguards exist for indigent individuals before they are locked into this cycle.

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