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**To:** [Farino, Amber](#)  
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**Subject:** FW: Comments re: CrR 3.2 /CrRLJ 3.2  
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**From:** Megan Allen <mallen@kcsarc.org>  
**Sent:** Wednesday, April 30, 2025 5:45 PM  
**To:** OFFICE RECEPTIONIST, CLERK <SUPREME@COURTS.WA.GOV>  
**Subject:** Comments re: CrR 3.2 /CrRLJ 3.2

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Good afternoon,

As an advocate for victims of sexual assault and abuse for the last 25yrs I am deeply concerned that the proposed change to CrR 3.2 /CrRLJ. 3.2 is not trauma- informed and may further deter victims from participating in the criminal justice process. I've witnessed firsthand the courage it takes for victims to come forward and the harm they experience when the legal system fails to protect them.

By narrowing the definition of "interference with the administration of justice," it strips judges of the discretion they need to fully assess risk. This is especially dangerous in cases of sexual assault and abuse, where the harm extends beyond the horrific acts of sexual violence to include the abuse of trust, the grooming and manipulation of the victim and the community.

Survivors of sexual assault and child sexual abuse often endure indirect yet profoundly harmful tactics from their offenders. These covert behaviors are things such as third-party harassment, public shaming, manipulation, online harassment, stalking, and abusive litigation. These are common tactics of grooming and control but under the proposed change, courts would no longer be able to consider them unless they meet the narrow threshold of an "unlawful threat" or "evidence tampering." This change would leave victims vulnerable to re-traumatization and undermines their trust in the system's ability to truly recognize the profound harm they have experience. This rule change will leave survivors vulnerable to ongoing abuse and further discourage victims to come forward or stay involved in the long and arduous legal process.

The proposed language is too limited in scope, and the narrow view risks emboldening offenders by failing to capture the full extent of the tactics used to silence victims. The language proposed misses the more insidious patterns of sexual violence. We can and must do better as our understanding of the dynamics of crimes like sexual assault, and child sexual abuse has evolved, and the law must reflect the knowledge we now have.

Sincerely,

*Megan Allen*

**Megan Allen**

**Director of Advocacy Services** | Pronouns: She/Her

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