

FILED
SUPREME COURT
STATE OF WASHINGTON
8/13/2021 11:42 AM
BY ERIN L. LENNON
CLERK

No. 99407-2

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

GROCERY MANUFACTURERS ASSOCIATION,

Petitioner.

BRIEF OF *AMICUS CURIAE* THE INSTITUTE FOR FREE SPEECH

Alan Gura
Owen Yeates
INSTITUTE FOR FREE SPEECH
1150 Connecticut Ave., NW
Suite 801
Washington, DC 20036
Phone: 202-301-3300
agura@ifs.org
oyeates@ifs.org

Ryan P. McBride
WSBA No. 33280
LANE POWELL PC
1420 Fifth Ave. Ste. 4200
P.O. Box 91302
Seattle, WA 98111-9402
Phone: 206-223-7000
mcbrider@lanepowell.com

Attorneys for Amicus Curiae

TABLE OF CONTENTS

Table of Authorities iii

Interest of Amicus Curiae 1

Introduction..... 1

Statement of the Case..... 2

Argument 3

 I. The massive fine imposed here must satisfy the stringent
 demands of First Amendment exacting scrutiny 3

 II. The fine is neither substantially related nor narrowly tailored to
 the informational interest 6

 III. The fine is not substantially related to punishing reprehensible
 conduct..... 9

Conclusion 12

TABLE OF AUTHORITIES

Cases

<i>Ams. for Prosperity Found. v. Bonta</i> , 141 S. Ct. 2373, 210 L. Ed. 2d 716 (2021).....	1, 4, 5, 8
<i>Buckley v. Valeo</i> , 424 U.S. 1 (1976).....	5, 6
<i>Citizens United v. Fed. Election Comm’n</i> , 558 U.S. 310 (2010).....	4, 6
<i>Citizens United v. Gessler</i> , 773 F.3d 200 (10th Cir. 2014)	9
<i>Cooper Indus. v. Leatherman Tool Grp., Inc.</i> , 532 U.S. 424 (2001).....	6, 9
<i>Fed. Election Comm’n v. Wis. Right to Life, Inc.</i> , 551 U.S. 449 (2007).....	5
Findings of Fact, Conclusions of Law and Order on Trial, <i>State v. Grocery Mfrs. Ass’n</i> , No. 13-2-02156-8 (Thurston Cty. Super. Ct. Nov. 2, 2016).....	10, 11
<i>First Nat’l Bank v. Bellotti</i> , 435 U.S. 765 (1978).....	4
<i>Indep. Inst. v. Fed. Election Comm’n</i> , 216 F. Supp. 3d 176 (D.D.C. 2016).....	7
<i>Indep. Inst. v. Williams</i> , 812 F.3d 787 (10th Cir. 2016)	7
Letter Opinion, <i>State v. Grocery Mfrs. Ass’n</i> , No. 13-2-02156-8 (Thurston Cty. Super. Ct. Mar. 9, 2016).....	2
<i>Republican Party v. King</i> , 741 F.3d 1089 (10th Cir. 2013)	6

<i>Sampson v. Buescher</i> , 625 F.3d 1247 (10th Cir. 2010)	6
<i>State v. Catlett</i> , 133 Wn.2d 355, 945 P.2d 700 (1997).....	9
<i>State v. Clark</i> , 124 Wn.2d 90, 875 P.2d 613 (1994).....	9
<i>State v. Grocery Mfrs. Ass’n</i> , 15 Wn. App. 2d 290, 475 P.3d 1062 (2020).....	3
<i>State v. Grocery Mfrs. Ass’n</i> , 195 Wn.2d 442, 461 P.3d 334 (2020).....	2, 3
<i>State v. Grocery Mfrs. Ass’n</i> , 5 Wn. App. 2d 169, 425 P.3d 927 (2018).....	3, 7
<i>Timbs v. Indiana</i> , 139 S. Ct. 682 (2019).....	3, 9
<i>Van Hollen v. Fed. Election Comm’n</i> , 811 F.3d 486 (D.C. Cir. 2016).....	7
<i>Williams-Yulee v. Fla. Bar</i> , 575 U.S. 433 (2015).....	2
Statutes	
RCW 42.17A.....	2
RCW 42.17A.775(1).....	4
Other Authorities	
Brad Sylvester, <i>Fact Check: Did Obama’s 2008 Campaign Pay the Largest FEC Fine Ever</i> (Dec. 24, 2018), https://checkyourfact.com/2018/12/24/fact-check-obama-2008-largest-campaign-fec-fine/	10
Commission Letter, Federal Election Commission, AF 2512 (May 24, 2012), https://eqs.fec.gov/eqsdocsAF/13092681857.pdf	11

Conciliation Agreement, MUR 5390 (April 17, 2006),
<https://eqs.fec.gov/eqsdocsMUR/000051B2.pdf> 10

Federal Election Commission, *MUR 5390: Chartered corporation pays record \$3.8M civil penalty* (June 1, 2006),
<https://www.fec.gov/updates/mur-5390-chartered-corporation-pays-record-38m-civil-penalty/> 10

GMA Pet. for Review, *State v. Grocery Mfrs. Ass’n*, No. 96604-4 (Wash. Dec. 7, 2018)..... 11

Washington State Attorney General, *Grocery Manufacturers Assoc. To Pay \$18M, Largest Campaign Finance Penalty In US History* (Nov. 2, 2016), <https://www.atg.wa.gov/news/news-releases/ag-grocery-manufacturers-assoc-pay-18m-largest-campaign-finance-penalty-us..> 10

INTEREST OF AMICUS CURIAE

The Institute for Free Speech is a nonpartisan, nonprofit § 501(c)(3) organization that promotes and protects the First Amendment political rights of speech, press, assembly, and petition. In addition to scholarly and educational work, the Institute represents individuals and civil society organizations, *pro bono*, in cases raising First Amendment objections to the regulation of political activity. First as the Center for Competitive Politics and later as the Institute for Free Speech, the Institute has served as *amicus curiae* to this Court and the Court of Appeals in this litigation.

INTRODUCTION

The Court of Appeals affirmed an unprecedented \$18 million fine on the Grocery Manufacturers Association (“GMA”) for technical violations of the state’s campaign registration and finance laws. The United States Supreme Court recently held, however, “that compelled disclosure of affiliation with groups engaged in advocacy [is an] effective . . . restraint on freedom of association.” *Ams. for Prosperity Found. v. Bonta*, 141 S. Ct. 2373, 210 L. Ed. 2d 716, 727 (2021) (“*AFP*”) (internal quotation marks omitted). The chilling effect in *AFP* pales in comparison to this massive fine.

Even though *No on I-522* reported GMA contributions, voters knew GMA’s interests, and the contributions were themselves legal, the State hit

GMA with a fine tantamount to a death sentence for most groups. Fearing the effects of similar complaints by their ideological opponents, other groups will silence themselves rather than face fines that would finish their organizations. Because such fines will silence “speech about public issues,” which speech “commands the highest level of First Amendment protection,” *Williams-Yulee v. Fla. Bar*, 575 U.S. 433, 443 (2015), such fines must meet the exacting scrutiny required under the First Amendment. As applied in this case, an \$18 million fine for technical reporting violations fails First Amendment scrutiny.

STATEMENT OF THE CASE

The Superior Court held that GMA failed to meet its deadline to register as a political committee under Washington’s Fair Campaign Practices Act (FCPA). Letter Opinion at 5, *State v. Grocery Mfrs. Ass’n*, No. 13-2-02156-8 (Thurston Cty. Super. Ct. Mar. 9, 2016); *see also* FCPA (RCW 42.17A *et seq.*). The trial court also held that GMA violated the FCPA by failing to disclose the identities of individual contributors or submit reports required of political committees, even though GMA had reported its contribution. *Id.* Nevertheless, the trial court ruled that GMA intentionally violated state law, and ordered a base \$6 million civil penalty, trebled to \$18 million. *State v. Grocery Mfrs. Ass’n (“GMA II”)*, 195 Wn.2d 442, 452, 461 P.3d 334, 341 (2020).

The Court of Appeals reversed the trial court’s treble damages award on statutory grounds, *State v. Grocery Mfrs. Ass’n (GMA I)*, 5 Wn. App. 2d 169, 207-09, 425 P.3d 927, 945-47 (2018), but this Court disagreed, holding that the trial court had applied the correct standard to determine intent. *GMA II*, 195 Wn.2d at 475. This Court remanded the matter, however, to determine whether the treble damages penalty was unconstitutionally excessive. *Id.* at 475-77.

On remand, the Court of Appeals ruled that the treble damages award was constitutional under the Eighth Amendment. But it refused to apply the First Amendment’s exacting scrutiny analysis because it believed that GMA’s speech was not at issue. *State v. Grocery Mfrs. Ass’n (“GMA III”)*, 15 Wn. App. 2d 290, 306, 475 P.3d 1062, 1071 (2020).

ARGUMENT

I. THE MASSIVE FINE IMPOSED HERE MUST SATISFY THE STRINGENT DEMANDS OF FIRST AMENDMENT EXACTING SCRUTINY

In multiple ways, the United States Constitution protects against the propensity to punish disfavored speech. The Eighth Amendment originated to guard from excessive fines used “to retaliate against or chill the speech of political enemies.” *Timbs v. Indiana*, 139 S. Ct. 682, 689 (2019). And the First Amendment directly protects the right to voice contrary ideas, requiring strict scrutiny whenever a law “burden[s],” or silences, political speech. *Citizens United v. Fed. Election Comm’n*, 558

U.S. 310, 340 (2010). Massive fines like those here will certainly silence speech. But even when they do not silence speech, all “compelled disclosure requirements” must at the minimum satisfy the still stringent standard of exacting scrutiny. *AFP*, 210 L. Ed. 2d at 728 (Roberts, C.J., opinion) (requiring exacting scrutiny); *id.* at 735-36 (Thomas, J., concurring) (urging strict scrutiny); *id.* at 737-38 (Alito, J., concurring) (noting that strict or exacting scrutiny applies).

The First Amendment’s heightened scrutiny applies here because fear of an exorbitant fine—especially fines triggered by mistakes made in complying with a complex, counterintuitive campaign finance disclosure regime—will chill protected speech. *See Citizens United*, 558 U.S. at 324 (“The First Amendment does not permit laws that force speakers to retain a campaign finance attorney . . . before discussing the most salient political issues of our day.”). This chilling effect is especially well-founded here because the FCPA allows private enforcement actions, RCW 42.17A.775(1), thereby encouraging political opponents to pursue marginal and hyper-technical claims to silence their opposition.

That this case involves a fine rather than a direct prohibition on speech does not reduce GMA’s First Amendment protection. *See First Nat’l Bank v. Bellotti*, 435 U.S. 765, 786 n.23 (1978) (noting that dependence of speech on money does not “reduce the exacting scrutiny required by the

First Amendment” (quoting *Buckley v. Valeo*, 424 U.S. 1, 16 (1976))). Nor can the state claim that it is sufficient that the statute in general may meet exacting scrutiny, as heightened scrutiny requires that “*each application of a statute restricting speech*” be sufficiently related to the required governmental interest. *Fed. Election Comm’n v. Wis. Right to Life, Inc.*, 551 U.S. 449, 478 (2007) (Roberts, C.J., controlling op.) (emphasis in original).

At a minimum, exacting scrutiny applies to the fine imposed here, and that requires both that the fine directly serve an important interest and that it be properly tailored to that interest. That is, the State must demonstrate “a substantial relation between the disclosure requirement and a sufficiently important governmental interest.” *APF*, 210 L. Ed. 2d at 730 (internal quotation marks omitted). And, because “fit matters,” the State must demonstrate that the burdens it imposes are “narrowly tailored to the government’s asserted interest.” *Id.* at 728-29 (internal quotation marks omitted).

The State must show here that its massive punitive fine substantially serves and is narrowly tailored to two governmental interests, the informational interest and an interest in punishing reprehensible conduct. The point of punitive damages is to express “moral condemnation” for “reprehensible conduct.” *Cooper Indus. v. Leatherman Tool Grp., Inc.*,

532 U.S. 424, 432 (2001) (internal quotation marks omitted). And, while the U.S. Supreme Court has noted three interests that generally support disclosure—fighting actual or apparent corruption, combatting circumvention of contribution limits, and the informational interest, *Buckley*, 424 U.S. at 66-68—only the informational interest can apply here. *See Citizens United*, 558 U.S. at 357 (anticorruption interest does not apply to expenditures made independent of candidates); *Republican Party v. King*, 741 F.3d 1089, 1102 (10th Cir. 2013) (anti-circumvention interest cannot exist apart from the anticorruption interest). The State’s exorbitant fine falls short of promoting either interest.

II. THE FINE IS NEITHER SUBSTANTIALLY RELATED NOR NARROWLY TAILORED TO THE INFORMATIONAL INTEREST

Disclosure laws justified under the government’s informational interest must inform voters “concerning those who support” a candidate, *Buckley*, 424 U.S. at 81, and courts “must . . . analyze the public interest in knowing who is spending and receiving money to support or oppose a ballot issue.” *Sampson v. Buescher*, 625 F.3d 1247, 1256 (10th Cir. 2010). And it is not an interest in knowing who supports the speaker, but in knowing who through the speaker financially supports a candidate or ballot measure. *See Buckley*, 424 U.S. at 66 (noting interest in “where political campaign money comes from” (internal quotation marks

omitted)); *Van Hollen v. Fed. Election Comm'n*, 811 F.3d 486, 497 (D.C. Cir. 2016) (using cancer society example to explain earmarking requirement); *Indep. Inst. v. Williams*, 812 F.3d 787, 797 (10th Cir. 2016) (noting importance of earmarking); *Indep. Inst. v. Fed. Election Comm'n*, 216 F. Supp. 3d 176, 191 (D.D.C. 2016) (three judge panel) (noting that requirements tailored to donors giving “for the specific purpose of supporting the advertisement”).

The FCPA demands generalized donor disclosure that is not substantially related to informing the electorate about the financial supporters or opponents of any given ballot measure, disclosure that in fact misleads the electorate. It requires registration and reporting for contributions if donors know or should know that they might be used for *any* political purpose. *See GMA I*, 5 Wn. App. 2d at 187 (“if . . . segregated for political purposes” (internal quotation marks omitted)). That is, contributions must be reported whether or not they have anything to do with the ballot measure at issue, or even whether or not they were meant for advocacy in another state. Thus contributions meant to support other educational efforts or advocacy in Washington must still be reported as advocacy regarding, for example, I-522. Indeed, donations meant for advocacy in other states must be reported as advocacy regarding I-522. This will confuse, not inform, voters about the financial constituencies

opposing and supporting the ballot measure. Thus, there is little relation between the informational interest and the substantial fines allowed under the FCPA to punish speakers for intentionally and maliciously failing to inform voters about who supported or opposed a ballot measure.

Furthermore, given the information already available to the state, the fine is not narrowly tailored to the informational interest as applied to GMA. Exacting scrutiny does not require “least restrictive means,” but it does require that government action “be narrowly tailored to the interest it promotes.” *AFP*, 210 L. Ed. 2d at 729. This is not a case where a measure’s opponents made up an anodyne name concealing their identities and economic interests. Rather, the information that was disclosed fulfilled the purposes of the informational interest: *No on I-522* or GMA reported GMA’s contributions, and voters knew of GMA’s and its members’ interests. Furthermore, GMA is not some fly-by-night organization.¹ While it has since changed names, it is a long-standing organization, and voters can look to that history to discern the information about it and its members that might be important to them. *Cf. Citizens*

¹ Indeed, imposing such large fines may be counter-productive to any asserted transparency interests. In imposing fines that kill organizations, the State will encourage the use of fly-by-night organizations that are not known to the voters.

United v. Gessler, 773 F.3d 200, 213-15 (10th Cir. 2014) (noting that voters’ familiarity with reputations and communications over time fulfilled any interest the state had). Given the information already available to voters, such a substantial, punitive fine is not narrowly tailored to the informational interest.

III. THE FINE IS NOT SUBSTANTIALLY RELATED TO PUNISHING REPREHENSIBLE CONDUCT

Given the technical violations at issue, the substantial fines imposed here cannot be substantially related to any interest in expressing “moral condemnation” for “reprehensible conduct.” *Cooper Indus.*, 532 U.S. at 432 (internal quotation marks omitted). This is not a case where GMA’s efforts to conceal its actions imposed \$18 million in investigation and prosecution costs on the state. *See State v. Clark*, 124 Wn.2d 90, 103-04, 875 P.2d 613, 619 (1994), *overruled on other grounds by State v. Catlett*, 133 Wn.2d 355, 361, 945 P.2d 700, 703 (1997)² (noting fine proportional to costs of prosecution and investigation).³

² The *Catlett* Court overruled *Clark*’s holding that civil forfeiture triggered the Fifth Amendment’s double jeopardy clause. But, as repeatedly recognized by this and the United States Supreme Court, forfeitures and other fines are subject to the Eighth Amendment “when they are at least partially punitive.” *Timbs*, 139 S. Ct. at 689; *see Clark*, 124 Wn.2d at 103-04 (subjecting to excessiveness analysis).

³ Indeed, the Superior Court ordered that the State was entitled to its prosecution costs, in an amount later to be determined. Findings of Fact,

Nor did the State confiscate \$18,000,000 in drugs, illegal weapons, or similar contraband. Indeed, this case does not even involve impermissible contributions. In praising the Superior Court’s decision to grant its request for the “largest campaign finance penalty in US history,” the State boasts that the largest federal fine ever granted was \$3.8 million, almost a sixth the trebled fine.⁴ But that case did not involve mere reporting errors. MUR 5390 involved a corporation’s illegal contributions and illegal fundraising, solicitation, and collection of contributions.⁵

Rather, this case is akin in reprehensibility to what may be the largest FEC administrative fine ever given, which amounted to just 1% of the fine imposed on GMA.⁶ Under AF 2512, the Commission concluded that

Conclusions of Law and Order on Trial at 24, ¶ 3, *State v. Grocery Mfrs. Ass’n*, No. 13-2-02156-8 (Thurston Cty. Super. Ct. Nov. 2, 2016).

⁴ Washington State Attorney General, *Grocery Manufacturers Assoc. To Pay \$18M, Largest Campaign Finance Penalty In US History* (Nov. 2, 2016), <https://www.atg.wa.gov/news/news-releases/ag-grocery-manufacturers-assoc-pay-18m-largest-campaign-finance-penalty-us>.

⁵ See Federal Election Commission, *MUR 5390: Chartered corporation pays record \$3.8M civil penalty* (June 1, 2006), <https://www.fec.gov/updates/mur-5390-chartered-corporation-pays-record-38m-civil-penalty/>; Conciliation Agreement, MUR 5390 (April 17, 2006), <https://eqs.fec.gov/eqsdocsMUR/000051B2.pdf>.

⁶ Brad Sylvester, *Fact Check: Did Obama’s 2008 Campaign Pay the Largest FEC Fine Ever* (Dec. 24, 2018), <https://checkyourfact.com/2018/12/24/fact-check-obama-2008-largest-campaign-fec-fine/>.

Obama for America had violated reporting requirements by failing to file 48-hour reports for large contributions totaling \$1,895,956.⁷ For all the unfiled notices and unreported contributions, the FEC fined the committee \$191,135, or a mere 1% of the \$18,000,000 imposed here.⁸

GMA and the *No on I-522* were disclosing GMA's contributions. GMA Pet. for Review at 5, *State v. Grocery Mfrs. Ass'n*, No. 96604-4 (Wash. Dec. 7, 2018). GMA and its interests are known, because GMA has existed for over 100 years as a trade association for food, beverage, and consumer-product makers. *Id.* at 3. Even its name expressed its interests. GMA Supplemental Br. at 5. And through at least part of the election cycle, it listed its membership on its website. Findings of Fact and Conclusions of Law at 17, ¶ 84.

The fine imposed here is massively incommensurate to fines in similar cases, while GMA's conduct bears none of the hallmarks of cases where truly reprehensible conduct justified a punitive fine. Thus, while the massive fines permitted by the FCPA might serve to stifle disfavored speech, they are not substantially related to any purpose or interest in discouraging reprehensible conduct.

⁷ See Commission Letter at 1, Federal Election Commission, AF 2512 (May 24, 2012), <https://eqs.fec.gov/eqsdocs/AF/13092681857.pdf>.

⁸ See *id.*

CONCLUSION

For the reasons above, this Court should hold that the massive fine imposed on GMA fails the exacting scrutiny required by the First Amendment to the United States Constitution.

Submitted August 13, 2021

Alan Gura
Owen Yeates
INSTITUTE FOR FREE SPEECH
1150 Connecticut Ave., NW, Ste.
801
Washington, DC 20036
Phone: 202-301-3300
agura@ifs.org
oyeates@ifs.org

/s/ Ryan P. McBride

Ryan P. McBride
WSBA No. 33280
LANE POWELL PC
1420 Fifth Ave. Ste. 4200
Seattle, WA 98111-9402
Telephone: 206-223-7000
mcbriider@lanepowell.com

Attorneys for Amicus Curiae Institute for Free Speech

CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the laws of the State of Washington, that on this date I have caused a true and correct copy of the above document to be served on counsel of record via the Court's electronic filing system.

Robert B. Mitchell
Aaron E. Millstein
Daniel-Charles Wolf
K&L GATES
925 4th Avenue, Suite 2900
Seattle, WA 98104-1158
rob.mitchell@klgates.com
aaron.millstein@klgates.com
dc.wolf@klgates.com
Attorneys for Petitioner GMA

Robert W. Ferguson
Noah G. Purcell
Karl D. Smith
Cristina Sepe
ATTORNEY GENERAL'S OFFICE
Office ID 91087
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
karl.smith@atg.wa.gov
*Attorneys for Respondents State
of Washington and Attorney
General*

Jackson Wilder Maynard, Jr.
Brooke Frickleton
BUILDING INDUSTRY
ASSOCIATION OF WASHINGTON
300 Deschutes Way SW, Ste.
300
Tumwater, WA 98501-7719
jacksonm@biaw.com
brookef@biaw.com
*Attorneys for Amici Curiae
BIAW, Enterprise Washington,
and Washington Farm Bureau*

Paul Graves
13509 SE 83rd Street
Newcastle, WA 98059-3308
gravesp1982@gmail.com
*Attorney for Amici Curiae BIAW,
Enterprise Washington, and
Washington Farm Bureau*

Patrick Hedren
Erica Klenicki
NATIONAL ASSOCIATION
OF MANUFACTURERS
733 10th Street, NW, Suite 700
Washington, D.C. 20001
*Attorneys for Amicus Curiae
Nat'l Ass'n of Mfrs.*

Sean Marotta
Benjamin A. Field
Patrick C. Valencia
Elizabeth Och
HOGAN LOVELLS US LLP
1601 Wewatta Street, Suite 900
Denver, CO 80202
elizabeth.och@hoganlovells.com
*Attorney for Amici Curiae Nat'l
Ass'n of Mfrs.*

Andrew Stokesbary
CITIZEN ACTION DEFENSE FUND
1003 Main Street, Suite 5
Sumner, WA 98390
drew@citizenactiondefense.org
*Attorney for Amicus Curiae State
Legislators*

Tara S. Morrissey
Stephanie A. Maloney
U.S. CHAMBER LITIGATION
CENTER
1615 H Street, NW
Washington, DC 20062
*Attorneys for the Chamber of
Commerce of the United States*

Signed August 13, 2021

/s/ Ryan P. McBride
Ryan P. McBride, WSBA No. 33280
LANE POWELL PC
1420 Fifth Ave. Ste. 4200
Seattle, WA 98111-9402
Telephone: 206-223-7000
mcbriider@lanepowell.com

Attorney for Amicus Curiae

LANE POWELL PC

August 13, 2021 - 11:42 AM

Transmittal Information

Filed with Court: Supreme Court
Appellate Court Case Number: 99407-2
Appellate Court Case Title: State of Washington v. Grocery Manufacturers Association
Superior Court Case Number: 13-2-02156-8

The following documents have been uploaded:

- 994072_Briefs_20210813113507SC115005_1616.pdf
This File Contains:
Briefs - Amicus Curiae
The Original File Name was IFS GMA Supreme Court amicus brief.pdf
- 994072_Motion_20210813113507SC115005_8883.pdf
This File Contains:
Motion 1 - Amicus Curiae Brief
The Original File Name was IFS Motion to file Amicus Curiae Brief.pdf

A copy of the uploaded files will be sent to:

- Alicia.Mendoza@atg.wa.gov
- EKlenicki@nam.org
- PHedren@nam.org
- SGOOlyEF@atg.wa.gov
- SMaloney@USChamber.com
- TMorrissey@USChamber.com
- TorTacEF@atg.wa.gov
- aaron.millstein@klgates.com
- agura@ifs.org
- alicia.mendoza@ago.wa.gov
- benee.gould@klgates.com
- benjamin.field@hoganlovells.com
- brookef@biaw.com
- cristina.sepe@atg.wa.gov
- docketing@lanepowell.com
- drew@citizenactiondefense.org
- dstokesbary@StokesbaryPLLC.com
- elizabeth.och@hoganlovells.com
- gartha@atg.wa.gov
- gravesp1982@gmail.com
- greg.appt@hoganlovells.com
- jacksonm@biaw.com
- jwmaynard2003@yahoo.com
- karl.smith@atg.wa.gov
- noah.purcell@atg.wa.gov
- oyeates@ifs.org
- patrick.valencia@hoganlovells.com
- rmorrison@ifs.org
- rob.mitchell@klgates.com

- sean.marotta@hoganlovells.com

Comments:

Sender Name: Kathryn Savaria - Email: savariak@lanepowell.com

Filing on Behalf of: Ryan P McBride - Email: mcbrider@lanepowell.com (Alternate Email:)

Address:

1420 Fifth Avenue

Suite 4200

Seattle, WA, 98101

Phone: (206) 223-7023

Note: The Filing Id is 20210813113507SC115005