

1
2
3
4
5
6
7
8 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
9 IN AND FOR THURSTON COUNTY

10 FRIENDS OF CLARK COUNTY,

11 Petitioner,

12 v.

13 CLARK COUNTY; CLARK COUNTY
14 CITIZENS UNITED, INC.; FUTUREWISE;
15 3B NORTHWEST, LLC; CITY OF LA
16 CENTER; RDGB ROYAL FARMS LLC;
17 RDGK REST VIEW ESTATES LLC;
18 RDGM RAWHIDE ESTATES LLC; RDGF
19 RIVER VIEW ESTATES LLC; RDGS
20 REAL VIEW LLC; CITY OF
21 BATTLEGROUND; CITY OF
22 RIDGEFIELD; LAGLER REAL
PROPERTY LLC; ACKERLAND LLC; and
the GROWTH MANAGEMENT
HEARINGS BOARD;

Respondents.

No.:

17-2-02391-34

**PETITION FOR JUDICIAL REVIEW
OF AN ADMINISTRATIVE AGENCY
ADJUDICATIVE ORDER AS
AUTHORIZED BY RCW 36.70A.300(5)**

23 As authorized by Chapter 34.05 RCW, the State of Washington Administrative Procedure
24 Act, and RCW 36.70A.300(5), the Friends of Clark County (FOCC) files this petition for judicial
25 review to appeal certain issues in the Growth Management Growth Board's (GMHB or Board)
26 Final Decision and Order in *Clark County Citizens United, Inc.; Friends of Clark County; and*

**Petition For Judicial Review of an
Administrative Agency Adjudicative Order**

1

 816 Second Avenue, Suite 200
Seattle, Washington 98104
206-343-0681 Ext. 118
tim@futurewise.org

000216

1 *Futurewise v. Clark County; 3B Northwest, LLC; City of La Center; RDGB Royal Farms LLC;*
2 *RDGK Rest View Estates LLC; RDGM Rawhide Estates LLC; RDGF River View Estates LLC;*
3 *RDGS Real View LLC; City of Battle Ground, City of Ridgefield, Lagler Real Property LLC; and*
4 *Ackerland LLC, Growth Management Hearings Board Western Washington Region*
5 *(WWRGMHB) Case No. 16-2-0005c issued on March 23, 2017.¹ This petition for review*
6 *challenges the Board’s finding of compliance for Clark County’s comprehensive plan,*
7 *development regulations, and critical areas regulations update, failures to make certain*
8 *determinations of invalidity, and requests judicial review of parts of the Final Decision and*
9 *Order. A true and correct copy of the Final Decision and Order is attached to this petition as*
10 *Exhibit A.*

11
12
13 **I. NAME AND ADDRESS OF THE PETITIONER**

14 Petitioner Friends of Clark County is a Washington State nonprofit corporation with a
15 principle place of business in Clark County, Washington. Its mailing address, telephone number,
16 and email address is:

17 Friends of Clark County
18 PO Box 513
19 Vancouver, Washington 98666
20 Email: info@friendsofclarkcounty.org
21 Telephone: 360 887-7880

22 **II. NAME AND ADDRESS OF THE PETITIONER’S ATTORNEY**

23 The name, mailing address, telephone number, and email address of the attorney for the
24 Petitioner is:

25 Tim Trohimovich, WSBA No. 22367
26

¹ For brevity this Petition for Judicial Review cites the Final Decision and Order as *Clark County Citizens United, Inc. v. Clark County*, WWRGMHB Case No. 16-2-0005c, Final Decision and Order (March 23, 2017).

816 Second Avenue, Suite 200
Seattle, Washington 98104
(206) 343-0681 Ext. 118
Email: tim@futurewise.org

III. NAME AND MAILING ADDRESS OF THE AGENCY WHOSE ACTION IS AT ISSUE

The Growth Management Hearings Board (Board) was created by RCW 36.70A.250(1).

The Board is “charged with adjudicating GMA [the Growth Management Act, Chapter 36.70A RCW] compliance, and, when necessary, with invalidating noncompliant comprehensive plans and development regulations. RCW 36.70A.280, .302.”² The mailing address and other contact information for the Board is:

Growth Management Hearings Board
Physical Address:
1111 Israel Road SW, Suite 301
Tumwater, WA 98501

Mailing Address:
PO Box 40953
Olympia, WA 98504-0953

Main Telephone Number: (360) 664-9170

Email: western@luho.wa.gov

IV. AGENCY ACTIONS AT ISSUE

1. The Friends of Clark County (FOCC) was a petitioner before the Board in *Clark County Citizens United, Inc. v. Clark County*, WWRGMHB Case No. 16-2-0005c, Final Decision and Order (March 23, 2017). Appeals by citizens and citizen groups are the mechanism the Governor and Legislature adopted to enforce the Growth Management Act (GMA).³ Unlike

² *King County v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 142 Wn.2d 543, 552, 14 P.3d 133, 138 (2000).

³ *King County v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 138 Wn.2d 161, 175 – 77, 979 P.2d 374, 380 – 82 (1999).

1 some laws, such as Washington’s Shoreline Management Act, there is no state agency that
2 reviews and approves or disapproves GMA comprehensive plans and development regulations,
3 other than transportation related provisions.

4 2. On March 23, 2017, the Board issued the Final Decision and Order in *Clark*
5 *County Citizens United, Inc. v. Clark County*, WWRGMHB Case No. 16-2-0005c, (attached as
6 Exhibit A). FOCC files this petition for review challenging the Board’s Final Decision and
7 Order.
8

9 3. In its briefing and oral argument, FOCC requested that the Board find the
10 challenged provisions of the Clark County Comprehensive Plan, development regulations, and
11 critical areas regulation updates out of compliance with the Growth Management Act (GMA) for
12 failing to properly limit annexations while the urban growth area expansions were under appeal
13 as RCW 36.70A.110 and other GMA provisions require (Issue 7), failing to comply with RCW
14 36.70A.210, RCW 36.70A.365, and RCW 36.70A.367 including failing to consult with the cities
15 in Clark County in designating and zoning industrial land banks (Issue 18), failing to generally
16 fund the 20-year transportation plan as RCW 36.70A.070(6) and other GMA provisions require
17 resulting in a deficit (Issue 20), failing to include all of the provisions required by RCW
18 36.70A.070(3) and other GMA provisions in the capital facility element plan (Issue 21), and
19 failing to review and if necessary revise the County critical areas policies and regulations and
20 make the findings required by RCW 36.70A.130 (Issue 23). FOCC also argued that the Board
21 should make determinations of invalidity for the following provisions which the Board found
22 violated the GMA: The Rural element, the Urban Reserve Overlay and the Urban Reserve-10
23 (UR-10) and Urban Reserve-20 (UR-20) zoning districts, the Agriculture 10 (AG-10) and the
24 Forest 20 (FR-20) zoning districts, and the Industrial Land Banks.
25
26

1 **V. PARTIES TO THE PROCEEDINGS BEFORE THE BOARD**

2 1. The parties to the proceedings before the Board and their attorneys, in addition to
3 the Friends of Clark County and the Growth Management Hearings Board (Board) which are
4 listed above, are listed below.

5 2. Clark County Citizens United, Inc. was a petitioner before the Board in this case.
6
7 The mailing address of the Clark County Citizens United, Inc attorneys is:

8 Ms. Heather L. Burgess
9 Mr. Kent van Alstyne
10 Phillips Burgess PLLC
11 724 Columbia St NW #320
12 Olympia WA 98501
13 Email: hburgess@phillipsburgesslaw.com
14 Email: kvanalstyne@phillipsburgesslaw.com

15 3. Futurewise was a petitioner before the Board in this case. The mailing address of
16 the Futurewise attorney is:

17 Mr. Tim Trohimovich
18 Futurewise
19 816 Second Avenue, Suite 200
20 Seattle, Washington 98104
21 (206) 343-0681 Ext. 118
22 Email: tim@futurewise.org

23 4. Clark County was the respondent before the Board in this case. The mailing
24 address, telephone number, and emails of the County's attorneys are:

25 Ms. Christine Cook
26 Mr. Chris Horne
 Clark County Prosecutor's Office - Civil Division
 PO Box 5000
 Vancouver WA 98666-5000
 Tel: (360) 397-2478
 Email: Christine.Cook@clark.wa.gov
 Email: chris.horne@clark.wa.gov

1 5. 3B Northwest LLC, Lagler Real Property LLC, and Ackerland LLC were
2 intervenors before the Board in this case. The mailing address of the attorney for 3B Northwest
3 LLC, Lagler Real Property LLC, and Ackerland LLC is:

4 Mr. Stephen Horenstein
5 Horenstein Law Group
6 500 Broadway, Suite 120
7 Vancouver, WA 98660
8 Email: Steve@horensteinlawgroup.com

9 6. The City of La Center was an intervenor before the Board in this case. The
10 mailing address of the attorneys for the City of La Center are:

11 Mr. Daniel H. Kearns
12 Reeve Kearns PC
13 621 SW Morrison St #1225
14 Portland OR 97205
15 Email: dan@reevekearns.com

16 Ms. Sarah E. Mack
17 Mr. Bradford Doll
18 Ms. Nico Schulz
19 Tupper Mack Wells PLLC
20 1100 Market Place Tower
21 2025 First Avenue
22 Seattle WA 98121
23 Email: mack@tmw-law.com
24 Email: doll@tmw-law.com
25 Email: schulz@tmw-law.com

26 7. RDGB Royal Farms LLC, RDGK Rest View Estates LLC, RDGM Rawhide
Estates LLC, RDGF River View Estates LLC, and RDGS Real View LLC were intervenors
before the Board in this case. The mailing address of the attorney for the RDGB Royal Farms
LLC, RDGK Rest View Estates LLC, RDGM Rawhide Estates LLC, RDGF River View Estates
LLC, and RDGS Real View LLC is:

 Mr. James D. Howsley
 Jordan Ramis PC

1 1499 SE Tech Center Pl #380
2 Vancouver WA 98683
3 Email: jamie.howsley@jordanramis.com
4 Email: lisa.mckee@jordanramis.com
5 Email: joseph.schaefer@jordanramis.com

6 8. The City of Battle Ground was an intervenor before the Board in this case. The
7 mailing address of the attorney for the City of Battle Ground is:

8 Ms. Susan Drummond
9 Bldg. 500, #476
10 5400 Carillon Point
11 Kirkland WA 98033
12 Email: susan@susandrummond.com

13 9. The City of Ridgefield was an intervenor before the Board in this case. The
14 mailing address of the attorney for the City of Ridgefield is:

15 Ms. Janean Parker
16 City Attorney of the City of Ridgefield
17 Law Office of Janean Z. Parker
18 PO Box 298
19 Adna, WA 98532
20 Email: parkerlaw@wwestsky.net

21 **VI. FACTS DEMONSTRATING THE PETITIONER'S RIGHT 22 TO OBTAIN JUDICIAL REVIEW**

23 1. The Friends of Clark County (FOCC) was a party before the Board,⁴ argued
24 Issues 7, 18, 20, 21, 23, and other issues, and requested determinations of invalidity, and is
25 aggrieved by the Board's decisions on Issues 7, 18, 20, 21, 23, and other issues, and the failure to
26 make determinations of invalidity for the Rural element violations, the Urban Reserve Overlay
and the Urban Reserve-10 (UR-10) and Urban Reserve-20 (UR-20) zoning districts, the

⁴ *Clark County Citizens United, Inc. v. Clark County*, WWRGMHB Case No. 16-2-0005c, Final Decision and Order (March 23, 2017), at 4 of 101 in Exhibit A.

1 Agriculture 10 (AG-10) and the Forest 20 (FR-20) zoning districts, and the Industrial Land
2 Banks. So FOCC may appeal these decisions to superior court.⁵

3 2. The GMA, in RCW 36.70A.110 and other GMA provisions, requires land
4 annexed to a city to be in an urban growth area and includes requirements that urban growth
5 areas must meet. The Board erred in concluding it did not have subject matter jurisdiction over
6 the city annexation ordinances under Issue 7⁶ because the urban growth areas the city
7 annexations relied on were under appeal and violated the GMA.

9 3. RCW 36.70A.210, RCW 36.70A.365, and RCW 36.70A.367 require that certain
10 procedures and substantive requirements must be met before industrial land banks can be
11 designated and zoned including consultations with the cities in the county equivalent to the
12 consultations for the adoption or amendment of countywide planning policies. While the Board
13 correctly held that one of these requirements was not met, the Board misinterpreted or
14 misapplied the GMA and the Board's decision is not supported by substantial evidence in
15 concluded that the other requirements of RCW 36.70A.210, RCW 36.70A.365, and RCW
16 36.70A.367 were met under Issue 18.⁷

18 4. The GMA, in RCW 36.70A.070(6) and other GMA provisions, requires a funded
19 long-term transportation element. The Clark County Transportation Element has a deficit of
20 \$158,104,000 for the 20-year transportation facility plan,⁸ The Board erred in finding the
21 transportation element, in Issue 20, complied with the GMA.⁹

23 _____
24 ⁵ RCW 36.70A.300(5).

25 ⁶ *Clark County Citizens United, Inc. v. Clark County*, WWRGMHB Case No. 16-2-0005c, Final Decision and Order
(March 23, 2017), at 19 of 101 in Appendix A.

26 ⁷ *Id.* at 67 – 71 of 101.

⁸ *Id.* at 82 of 101.

⁹ *Id.* at 83 – 84 of 101.

1 5. RCW 36.70A.070(3) requires specific provisions in the capital facilities plan
2 element such as sources of the funds for capital improvements. The capital facilities plan element
3 did not include all of the provisions required by the GMA and the Board erred in finding the
4 capital facilities plan element, in Issue 21, in compliance with the GMA.¹⁰

5 6. RCW 36.70A.130 requires counties and cities to review, and if necessary revise,
6 their comprehensive plans and development regulations including critical areas regulations every
7 eight years. Clark County failed to conduct the required review, failed to revise their critical
8 areas regulations to protect the public health and safety from landslides, and failed to make the
9 findings required by RCW 36.70A.130. The Board even found that the Clark County ordinance
10 adopting the updated comprehensive plan and development regulation amendments, Amended
11 Ordinance 2016-06-12, “does not include a finding that a review and evaluation had occurred
12 and that revisions were not required” as RCW 36.70A.130 requires.¹¹ The Board erred in
13 concluded Clark County, under Issue 23, had complied with these provisions of the GMA.¹²

14 7. If the Board concludes that a comprehensive plan, development regulation, or
15 amendment violates the GMA, the Board may then also decide that the “continued validity of
16 part or parts of the plan or regulation would substantially interfere with the fulfillment of the
17 goals of the ...” GMA and specify which part or parts this determination of invalidity applies
18 too.¹³ A determination of invalidity prevents certain development applications from being
19 considered under the invalid provisions.¹⁴ The Board found that Clark County’s amendments to
20 the Rural element, the adoption of the Urban Reserve Overlay and the Urban Reserve-10 (UR-

21
22
23
24 ¹⁰ *Id.* at 87 of 101.

25 ¹¹ *Id.* at 90 of 101.

26 ¹² *Id.* at 89 – 91 of 101.

¹³ RCW 36.70A.302(1).

¹⁴ RCW 36.70A.302(3).

1 10) and Urban Reserve-20 (UR-20) zoning districts, the Agriculture 10 (AG-10) and the Forest
2 20 (FR-20) zoning districts, and the Industrial Land Banks all violated the GMA.¹⁵ The Board
3 did not, but should have, made a determination of invalidity for those GMA violations because
4 their continued validity will substantially interfere the GMA goals.¹⁶
5

6 **VII. THE REASONS RELIEF SHOULD BE GRANTED**

7 1. FOCC is aggrieved by the Board's decisions on Issues 7, 18, 20, 21, 23, and the
8 failure to make determinations of invalidity for the Rural element violations, the Urban Reserve
9 Overlay and the Urban Reserve-10 (UR-10) and Urban Reserve-20 (UR-20) zoning districts, the
10 Agriculture 10 (AG-10) and the Forest 20 (FR-20) zoning districts, and the Industrial Land
11 Banks. This is because the Board failed to correctly interpret and apply the GMA and the
12 Board's findings are not supported by substantial evidence.
13

14 2. The Washington Administrative Procedure Act, in RCW 34.05.570(3)(d), allows
15 an agency order to be challenged because "[t]he agency has erroneously interpreted or applied
16 the law[.]" Here, the Board's order has erroneously interpreted or applied the law when it
17 concluded that Issues 7, 18, 20, 21, 23 did not violate the GMA and the continued validity of the
18 GMA violations of the Rural element, the Urban Reserve Overlay and the Urban Reserve-10
19 (UR-10) and Urban Reserve-20 (UR-20) zoning districts, the Agriculture 10 (AG-10) and the
20 Forest 20 (FR-20) zoning districts, and the Industrial Land Banks will not substantially interfere
21 with the GMA goals.
22
23
24

25 ¹⁵ *Clark County Citizens United, Inc. v. Clark County*, WWRGMHB Case No. 16-2-0005c, Final Decision and
26 Order (March 23, 2017), at 95 – 97 of 101.

¹⁶ *Id.* at 97 – 99 of 101; RCW 36.70A.302(1)(b).

1 3. The Washington Administrative Procedure Act, in RCW 34.05.570(3)(e), allows
2 an agency decision to be challenged because “[t]he order is not supported by evidence that is
3 substantial when viewed in light of the whole record before the court ...” Here, the Board’s order
4 is not supported by substantial evidence because the evidence in the record before the Board
5 shows that Issues 7, 18, 20, 21, 23 violated the GMA and the continued validity of the GMA
6 violations in the Rural element, the Urban Reserve Overlay and the Urban Reserve-10 (UR-10)
7 and Urban Reserve-20 (UR-20) zoning districts, the Agriculture 10 (AG-10) and the Forest 20
8 (FR-20) zoning districts, and the Industrial Land Banks will substantially interfere with the GMA
9 goals.
10

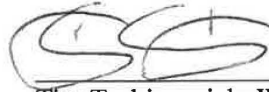
11 **VIII. RELIEF REQUESTED BY THE PETITIONERS**

12 FOCC respectfully requests that the Court:

- 13 1. Reverse and set aside the agency action concluding that Issues 7, 18, 20, 21, and
14 23 did not violate the GMA;
- 15 2. Reverse and set aside the agency action not making a determination of invalidity
16 for the Rural element violations, the Urban Reserve Overlay and the Urban
17 Reserve-10 (UR-10) and Urban Reserve-20 (UR-20) zoning districts, the
18 Agriculture 10 (AG-10) and the Forest 20 (FR-20) zoning districts, and the
19 Industrial Land Banks;
- 20 3. Remand the matter to the Growth Management Hearings Board for further
21 proceedings consistent with the GMA; and
- 22 4. Grant such other relief to which petitioners are entitled and as the Court deems
23 just and equitable.
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DATED this 21st day of April 2017, and respectfully submitted,



Tim Trohimovich, WSBA No. 22367
Attorney for the Friends of Clark County

DECLARATION OF SERVICE

I, Tim Trohimovich, declare under penalty of perjury and the laws of the State of Washington that, on April 21, 2017, I caused the following documents to be served on the persons listed below in the manner shown: Petition For Judicial Review of an Administrative Agency Adjudicative Order as Authorized By RCW 36.70A.300(5) with Exhibit A.

Ms. Dionne Padilla-Huddleston
Office of the Attorney General
TB-14
800 Fifth Ave Ste 2000
Seattle, WA 98104-3188
Tel. (206) 389-2127
Attorneys for the Growth Management Hearings
Board

<input checked="checked" type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email: western@luho.wa.gov

Mr. Stephen Horenstein
Horenstein Law Group
500 Broadway, Suite 120
Vancouver, WA 98660

<input checked="checked" type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email: Steve@horensteinlawgroup.com

Ms. Christine Cook
Mr. Chris Horne
Ms. Thelma Kremer
Clark County Prosecutor's Office - Civil
Division
PO Box 5000
Vancouver WA 98666-5000
Tel: (360) 397-2478
Attorneys for Respondent Clark County

<input checked="checked" type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email: Christine.Cook@clark.wa.gov ; chris.horne@clark.wa.gov ; Thelma.Kremer@clark.wa.gov

Ms. Susan Drummond
Bldg. 500, #476
5400 Carillon Point
Kirkland WA 98033

<input checked="checked" type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email: susan@susandrummond.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Mr. Daniel H. Kearns
Reeve Kearns PC
621 SW Morrison St #1225
Portland OR 97205

X	By United States Mail, postage prepaid and properly addressed
	By Legal Messenger or Hand Delivery
	By Facsimile
	By Federal Express or Overnight Mail prepaid
	By Email: dan@reevekearns.com

Mr. James D. Howsley
Jordan Ramis PC
1499 SE Tech Center Pl #380
Vancouver WA 98683

X	By United States Mail, postage prepaid and properly addressed
	By Legal Messenger or Hand Delivery
	By Facsimile
	By Federal Express or Overnight Mail prepaid
	By Email: jamie.howsley@jordanramis.com ; lisa.mckee@jordanramis.com ; joseph.schaefer@jordanramis.com

Ms. Sarah E. Mack
Mr. Bradford Doll
Ms. Nico Schulz
Tupper Mack Wells PLLC
1100 Market Place Tower
2025 First Avenue
Seattle WA 98121

X	By United States Mail, postage prepaid and properly addressed
	By Legal Messenger or Hand Delivery
	By Facsimile
	By Federal Express or Overnight Mail prepaid
	By Email: mack@tmw-law.com ; doll@tmw-law.com ; schulz@tmw-law.com

Ms. Heather L. Burgess
Mr. Kent van Alstyne
Phillips Burgess PLLC
724 Columbia St NW #320
Olympia WA 98501

X	By United States Mail, postage prepaid and properly addressed
	By Legal Messenger or Hand Delivery
	By Facsimile
	By Federal Express or Overnight Mail prepaid
	By Email: hburgess@phillipsburgesslaw.com ; kvanalstyne@phillipsburgesslaw.com

Ms. Janean Parker
City Attorney of the City of Ridgefield
Law Office of Janean Z. Parker
PO Box 298
Adna, WA 98532
360-748-7200

Futurewise
816 Second Avenue, Suite 200
Seattle, Washington 98104

<input checked="" type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email: parkerlaw@wwestsky.net

<input type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input checked="" type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email:

Friends of Clark County
PO Box 513
Vancouver, Washington 98666

<input checked="" type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email:

<input type="checkbox"/>	By United States Mail, postage prepaid and properly addressed
<input type="checkbox"/>	By Legal Messenger or Hand Delivery
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Federal Express or Overnight Mail prepaid
<input type="checkbox"/>	By Email:

DATED and certified this 21st day of April 2017,



Tim Trohimovich, WSBA No. 22367