LEGAL UPDATE FOR WASHINGTON LAW ENFORCEMENT

Law Enforcement Officers: ***Thank you for your service, protection and sacrifice***

MAY 2022

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2022 WASHINGTON LEGISLATIVE SUMMARIES FROM THE WASHINGTON ASSOCIATION OF SHERIFFS AND POLICE CHIEFS

Readers who have not already done so will want to review the excellent and comprehensive listing and summaries by staff of the Washington Association of Sheriffs and Police Chiefs (WASPC) of 2022 Washington legislation of interest to law enforcement. Go to the WASPC Home Page, click on *Programs & Services*, scroll down and click on *Legislation*, and scroll down and click on *2022 End of Session Report*. Or go to the following Internet address:

https://waspc.memberclicks.net/assets/legislative/2022%20WASPC%20End%20of%20Session%20Report.pdf

Unless otherwise noted in the text of the legislation, bills generally become effective on June 9, 2022.

2022 WASHINGTON LEGISLATIVE SUMMARIES FROM THE WASHINGTON ADMINISTRATIVE OFFICE OF THE COURTS

The Washington Administrative Office of the Courts has issued legislative summaries for the enactments of the 2022 Washington State Legislature. The summaries are accessible on the Internet on the "Resources" page of the Washington Courts website. Or go to the following Internet address:

https://www.courts.wa.gov/newsinfo/content/pdf/2022%20Legislative%20Summary.pdf

WASHINGTON ATTORNEY GENERAL'S OFFICE HAS RELEASED FOR COMMENT A DRAFT MODEL POLICY ON USE OF FORCE AND DE-ESCALATION

This week, the Washington Attorney General released for comment a draft Model Policy on Use of Force and De-escalation. Thank you to the Washington Association of Sheriffs and Police Chief for notice of this item. The draft policy can be accessed via a link on the Internet at (click on the word, "here"):

https://fortress.wa.gov/atg/formhandler/ago/LawEnforcementPolicyFeedback.aspx

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NINTH CIRCUIT OF THE UNITED STATES COURT OF APPEALS

CIVIL RIGHTS ACT SECTION 1983 CIVIL LIABILITY FOR LAW ENFORCEMENT: VIEWING THE PLAINTIFF'S ALLEGATIONS IN THE BEST LIGHT FOR HIM, PANEL DENIES QUALIFIED IMMUNITY TO DETECTIVES WHO, IN A SURPRISE ATTACK WITHOUT WARNING, TACKLED AND FRACTURED THE HIP OF A ROBBERY SUSPECT WHO THEY ARGUABLY KNEW (BECAUSE HE HAD JUST EMERGED FROM A COURTHOUSE) WAS NOT ARMED

In Andrews v. City of Henderson, ___ F.4th ___ , 2022 WL ___ (9th Cir., May 23, 2022), a three-judge Ninth Circuit panel denies qualified immunity to two police detectives who, per Plaintiff's

allegations, tackled a robbery suspect without warning after he emerged from a courthouse. A staff summary that is not part of the Ninth Circuit Opinion provide the following synopsis of those parts of the panel's Opinion that address the qualified immunity argument of the detectives:

> The panel affirmed the district court's denial, on summary judgment, of qualified immunity to two police detectives in an action brought pursuant to 42 U.S.C. § 1983 alleging defendants used excessive force, in violation of the Fourth Amendment, when, without warning, they tackled plaintiff to the ground, fracturing his hip.
>
> [The detectives] believed they had probable cause to arrest plaintiff for a series of armed robberies and forcibly tackled him as he was leaving a Nevada state courthouse. The panel held that the use of force was substantial. Although plaintiff was suspected of a serious crime, viewing the evidence in his favor, the detectives knew [because the plaintiff presumably had gone through a metal detector at the courthouse] that he was not armed and was not posing an immediate threat to anyone as he exited the courthouse.
>
> Under these circumstances, a reasonable jury could find that the degree of force used against plaintiff violated his Fourth Amendment right against excessive force, and the detectives were not entitled to summary judgment on the question of whether they committed a constitutional violation.
>
> The panel further held that Blankenhorn v. City of Orange, 485 F.3d 463 (9th Cir. 2007) clearly established – and thus put a prudent officer on notice – that an officer violates the Fourth Amendment by tackling and piling on top of a relatively calm, non-resisting suspect who posed little threat of safety without any prior warning and without attempting a less violent means of effecting an arrest.

Result: Affirmance of the order of the U.S. District Court (Southern District of California) that denied qualified immunity to the two detectives.

CIVIL RIGHTS ACT SECTION 1983 CIVIL LIABILITY FOR CORRECTIONS UNDER THE EIGHTH AMENDMENT: VIEWING PRISONER-PLAINTIFF'S ALLEGATIONS IN THE BEST LIGHT FOR PLAINTIFF, NEVADA CORRECTIONS OFFICIALS' "WAIT AND SEE" MEDICAL TREATMEDT PLAN FOR PRISONER WITH ENLARGED PROSTATE EVENTUALLY VIOLATES THE EIGHTH AMENDMENT PROHIBITION OF CRUEL AND UNUSUAL PUNISHMENT UNDER THE "DELIBERATE INDIFFERENCE" STANDARD

In Stewart v. Aranas, ___ F.4th ___ , 2022 WL ___ (9th Cir., May 4, 2022), a three-judge Ninth Circuit panel affirms a U.S. District Court ruling against the government defendants from the Nevada Prison system. The panel Opinion rules that the District Court correctly denied qualified immunity to prison officials in an action brought pursuant to 42 U.S.C. § 1983 alleging that defendants violated the Eighth Amendment cruel-and-unusual-treatment standard by being deliberately indifferent to a prisoner-plaintiff's medical needs. The standard was violated, the Lead Opinion concludes in analysis that accepts the prisoner's allegations as true, when, despite his numerous complaints over a period of years and a visibly deteriorating condition, they ignored his enlarged prostate.

A staff summary (which is not part of the panel's Opinion), includes the following description of part of the Lead Opinion for the panel:

> The [Lead Opinion determines] that only examination of the second prong of the qualified immunity analysis was necessary—whether the right was clearly established at the time of the violation – because doing so would not hamper the development of precedent, and both parties expressly acknowledged that this case turned on the second prong.
>
> The [Lead Opinion determines that] it was clearly established at the time of plaintiff's treatment that prison officials violate the constitution when they choose a medically unacceptable course of treatment for the circumstances, and a reasonable jury could find that the prison officials here did just that. At some point "wait and see" becomes deny and delay.
>
> Plaintiff's condition sharply deteriorated during his last few years at Southern Desert Correctional Center. Yet prison officials never deviated from their "wait and see" treatment plan. As a result, plaintiff alleged he developed stage 3 kidney disease, erectile dysfunction due to the prostate tissue cavity, urine build up, and some pain from a prostatectomy. Plaintiff alleged more than mere disagreement with a medical treatment plan, and there was evidence that he suffered from intractable pain over an approximately three-year period that was interfering with his daily activities.

[Some paragraphing is revised for readability]

Result: Affirmance of U.S. District Court (Nevada) order the denied summary judgment to Nevada Corrections defendants; case is remanded for trial.

CIVIL RIGHTS ACT SECTION 1983 CIVIL LIABILITY: NO LIABILITY FOR COUNTY ATTORNEYS' ACTIONS OF REVIEWING, WITHOUT FIRST OBTAINING A COURT ORDER, OF COUNTY CHILD ABUSE INVESTIGATION FILES WHERE THE FILE REVIEW WAS CONDUCTED IN ORDER TO DEFEND AGAINST THE CHILDREN'S LAWSUIT FOR INVESTIGATORS' EARLIER INTERVIEWING THE CHILDREN WITHOUT FIRST OBTAINING A COURT ORDER OR PARENTAL CONSENT

In A.C. v. Cortez, ___ F.4th ___ , 2022 WL ___ (9th Cir., May 13, 2022), a three-judge panel issues an Opinion that summarizes the panel's ruling in the opening paragraph (broken into subparagraphs by the Legal Update Editor) as follows:

> Plaintiffs sued the County and County social workers for allegedly violating their Fourth Amendment rights by interviewing them without a court order or parental consent during the course of a child-abuse investigation. During that investigation, the County created and maintained files related to the alleged child abuse.
>
> Attorneys defending the County reviewed the child-abuse investigation file without first obtaining a court order. The panel held that, contrary to plaintiffs' argument, Gonzalez v. Spencer, 336 F.3d 832 (9th Cir. 2003) . . . . does not stand for the proposition that a right to privacy necessarily attaches to the type of records at issue here. Thus, Gonzalez did not recognize a per se constitutional right in juvenile records that is always violated by third-party access.

Further, even if plaintiffs were entitled to informational privacy, the balancing test recognized in Seaton v. Mayberg, 610 F.3d 530, 539 (9th Cir. 2010), showed the County's interest in defending this litigation outweighed plaintiffs' asserted privacy interest. Even assuming that the social workers' records comprised sensitive medical and psychological records, there was no constitutional violation because the County's need to access the records was high.

Plaintiffs [the children who sued the County for earlier interviewing them without a court order or parental consent] initiated that need, and the professional obligations that lawyers owe their clients minimized the risk of misuse, harassment, or embarrassment. Thus, the district court properly dismissed plaintiffs' [claim under Monell v. Department of Social Services, 436 U.S. 658 (1978) against the County of San Diego and certain named defendants].

Result: Affirmance of order of U.S. District Court (Southern District of California) that dismissed a Monell claim against County of San Diego and certain named defendants.

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WASHINGTON STATE SUPREME COURT

DUI: WASHINGTON SUPREME COURT IS UNANIMOUS IN HOLDING CONSTITUTIONAL THE PER SE THC DUI PRONG AT RCW 46.61.502, WHICH CRIMINALIZES DRIVING WITH A THC BLOOD LEVEL OF 9.4 +/- 2.5 NG/ML WITHIN TWO HOURS OF DRIVING; ALSO, THE COURT DECLARES THAT THE WORD "MARIJUANA" IS NOW DISFAVORED

In State v. Fraser, ___ Wn.2d ___ 2022 WL ___ (May 12, 2022), the Washington Supreme Court is unanimous in rejecting constitutional attacks on the per se THC statutory DUI prong. The Court's introductory section, summarizes the ruling as follows:

> In 2012, Washington voters approved Initiative 502, which legalized cannabis1 for recreational use, as well as created a regulatory system for cannabis. In doing so, the initiative modified the driving under the influence (DUI) law and created a prong under which a person can be convicted of DUI depending on the level of tetrahydrocannabinol (THC) found in one's blood. Under RCW 46.61.502(1)(b) a person is per se guilty of DUI when one drives a vehicle and "[t]he person has, within two hours after driving, a THC concentration of 5.00 or higher [nanograms per milliliter (ng/mL)] as shown by analysis of the person's blood" (hereinafter the "per se THC prong").
>
> Douglas Fraser III was convicted of DUI under the per se THC prong for driving with a THC blood level of 9.4 +/- 2.5 ng/mL within two hours of driving. On appeal, Fraser challenges the constitutionality of this prong of the DUI statute, claiming that the statute is not a legitimate exercise of the legislature's police power, that it is unconstitutionally vague, and that it is "facially unconstitutionally overbroad because no scientific evidence supports the conclusion that there is a perse concentration of active THC at which all or most drivers would be impaired."
>
> We hold that this statute is constitutional and that it is a legitimate exercise of police powers as the limit is rationally and substantially related to highway safety. The research shows that the minimum 5.00 ng/mL limit appears to be related to recent cannabis consumption for most people (including chronic users), which is linked to

> impaired driving and highway safety, although there is no similar scientific correlation to impairment akin to the minimum 0.08 percent blood alcohol concentration (BAC) limit for alcohol. Further, there is a reasonable assumption that having the limit will deter people who have recently consumed cannabis from driving, thus reasonably and substantially furthering a legitimate state interest.
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> We hold that this statute is not vague because this specific 5.00 ng/mL limit does not lead to arbitrary enforcement, but rather it avoids arbitrary, erratic, and discriminatory enforcement.
>
> Finally, we hold that this statute is not facially unconstitutional because there exists a circumstance under which the limit can be constitutionally applied even under Fraser's allegations of arbitrariness. Fraser's own expert testified that some people are impaired at a THC blood level of 5.00 ng/mL. Therefore, when someone who is impaired at 5.00 ng/mL consumes cannabis and drives, this limit would not be unconstitutionally arbitrary in that circumstance. Accordingly, we affirm Fraser's conviction.

In footnote 1, the Fraser Opinion also declares as follows that the word "marijuana" is now a disfavored word, and that the favored word is "cannabis:"

> We recognize that using the term "marijuana" instead of "cannabis" is rooted in racism. See, e.g., Michael Vitiello, Marijuana Legalization, Racial Disparity, and the Hope for Reform, 23 LEWIS & CLARK L. REV. 789, 797-98 (2019) ("Advocates of criminalizing marijuana often made overtly racist appeals."). The transition from using the scientific "cannabis" to "marijuana" or "marihuana" in the early 20th century stems from anti-Mexican, and other racist and antiimmigrant, sentiments and efforts to demonize cannabis. Id. at 797-99. Our legislature has recently acknowledged this discriminatory origin and has enacted a law to replace "marijuana" with "cannabis" throughout the Revised Code of Washington with various effective dates depending on the statute. See LAWS OF 2022, ch. 16, § 1. Accordingly, unless quoting language or referring to the text of a statute, we use "cannabis."

Result: Affirmance of Snohomish County Superior Court conviction of Douglas Fraser III for DUI under the statutory per se THC prong for driving with a THC blood level of 9.4 +/- 2.5 ng/mL within two hours of driving.

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WASHINGTON STATE COURT OF APPEALS

SIXTH AMENDMENT RIGHT TO CONFRONTATION: OUT-OF-COURT STATEMENTS BY DEFENDANT'S BROTHERS ARE HELD NOT TO BE "TESTIMONIAL," AND THEREFORE ADMISSION OF THE STATEMENTS AT TRIAL DID NOT VIOLATE THE CONFRONTATION CLAUSE

In State v. Ta'afulisia, ___ Wn. App. 2d ___ , 2022 WL ___ (Div. I, May 9, 2022), a three-judge Division One panel addresses a complicated, fact-based issue under the Sixth Amendment right to confrontation. The ruling of the Court of Appeals is summarized briefly on the website of the Washington Association of Prosecuting Attorneys (see Case Law 2022 WAPA Weekly Roundup for May 13, 2022) as follows [bracketed words added by the Legal Update editor]:

_____

Confrontation Clause, Out of Court Statement, and Testimonial Statements –

The Sixth Amendment to the U.S. constitution guarantees an accused the right to confront witnesses against him. The confrontation right applies to out-of-court statements by witnesses who have not been subject to previous cross-examination. The right to confront applies only when the challenged statements are testimonial in nature. A statement is testimonial when its primary purpose is to create an out-of-court substitute for trial testimony. And the primary purpose of the encounter in which the challenged statement was made is discerned by objectively evaluating all of the pertinent circumstances, including not only the motivations of the speaker but also of other participants. In this case, the challenged out-of-court utterances of the defendant's brothers [made to persons not in law enforcement or other official roles] admitted into evidence against him at his trial, fell outside the protections of the confrontation clause, and, accordingly, the trial judge properly allowed their placement before the jury. This is consistent with prior cases where courts have found that statements made unwittingly to an informant are not testimonial.

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Result: Affirmance of King County Superior Court convictions of Jerome K. Ta'afulisia (A) two counts of felony murder in the first degree predicated on robbery, and (B) three counts of assault in the first degree.

WITHOUT PROVIDING AN ILLUMINATING EXPLANATION, DIVISION TWO WITHDRAWS OPINION OF AUGUST 19, 2021, IN STATE V. MICHAEL LEON PALMER

On May 24, 2022, Division Two of the Court of Appeals declares that the Court has granted the defense attorney's motion for reconsideration of an August 19, 2021, Opinion in State v. Michael Leon Palmer. The Palmer court declares that a new opinion will be issued in the case in the future. No explanation is provided for the ruling withdrawing the August 2021 Opinion.

In the now-withdrawn August 19, 2021, Opinion, the Court of Appeals (1) ruled that the prosecution violated defendant's Fifth Amendment right against self-incrimination by asking a law enforcement officer about defendant's decision to remain silent after arrest and a night in jail; and (2) reversed the Grays Harbor County Superior Court convictions of Michael Leon Palmer for child molestation in the first degree, assault in the fourth degree, and assault of a child in the second degree.

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BRIEF NOTES REGARDING MAY 2022 UNPUBLISHED WASHINGTON COURT OF APPEALS OPINIONS ON SELECT LAW ENFORCEMENT ISSUES

Under the Washington Court Rules, General Rule 14.1(a) provides: "Unpublished opinions of the Court of Appeals have no precedential value and are not binding on any court. However, unpublished opinions of the Court of Appeals filed on or after March 1, 2013, may be cited as nonbinding authorities, if identified as such by the citing party, and may be accorded such persuasive value as the court deems appropriate."

Every month I will include a separate section that provides very brief issue-spotting notes regarding select categories of unpublished Court of Appeals decisions that month. I will include such decisions where issues relating to the following subject areas are addressed: (1) Arrest, Search and Seizure; (2) Interrogations and Confessions; (3) Implied Consent; and (4) possibly other issues of interest to law enforcement (though probably not sufficiency-of-evidence-to-convict issues).

The four entries below address the May 2022 unpublished Court of Appeals opinions that fit the above-described categories. I do not promise to be able catch them all, but each month I will make a reasonable effort to find and list all decisions with these issues in unpublished opinions from the Court of Appeals. I hope that readers, particularly attorney-readers, will let me know if they spot any cases that I missed in this endeavor, as well as any errors that I may make in my brief descriptions of issues and case results. In the entries that address decisions in criminal cases, the crimes of conviction or prosecution are italicized, and descriptions of the holdings/legal issues are bolded.

1. Personal Restraint Petition of Martin David Pietz, Jr.: On May 2, 2022, Division One of the COA rejects the defendant's Personal Restraint Petition challenge to his 2013 King County Superior Court conviction for murder in the second degree. The Pietz Court applies the "independent source" exception to the warrant requirement in a case where a detective was already in the process of preparing a search warrant at a point when a witness showed the detective some of the evidence that (1) was already targeted by the in-process search warrant paperwork and (2) was subsequently seized under the warrant. Some of the Washington appellate court decisions on the "independent source" exception noted in Pietz are State v. Betancourth, 190 Wn.2d 357 (2018) and State v. Gaines, 154 Wn.2d 711 (2005). The Pietz Court disagrees with defendant's argument that ruling against him in this case essentially means that the Pietz Court is applying the "inevitable discovery" exception to the warrant requirement, which exception the Washington Supreme Court rejected in an interpretation of the Washington constitution (article I, section 7) in State v. Winterstein, 167 Wn.2d 620 (2009).

The Pietz Opinion can be accessed on the Internet at:
https://www.courts.wa.gov/opinions/pdf/767160.pdf

2. State v. Henry Estuar Paguada Barrientos: On May 17, 2022, Division Two of the COA agrees with defendant's challenge to the sufficiency of evidence for his Lewis County Superior Court conviction for felony violation of a no-contact order – domestic violence. The Barrientos Court rules that where Barrientos was being chased as a possible trespasser by a home-owner and the home-owner's daughter and son-in-law, the fact that the fleeing Barrientos ran in front of the trailer of his estranged wife (who was protected against him by a no-contact order) did not support the willful violation element of RCW 26.50.110.

The Barrientos Opinion can be accessed on the Internet at:
https://www.courts.wa.gov/opinions/pdf/D2%2055898-0-II%20Unpublished%20Opinion.pdf

3. Andrea Clare v. Kevin J. Clare: On May 26, 2022, Division Three of the COA affirms a Franklin County Superior Court order dismissing civil lawsuit brought under the Washington Privacy Act, RCW 9.73.030. The lawsuit arose from an acrimonious divorce involving Adrea and Kevin Clare. Kevin used Andrea's telephone while she was sleeping to access her office e-mail account. He forwarded several of her messages to his personal email account. He also had previously opened text messages stored on her phone. The Clare Opinion rules that Kevin

Clare did not, within the prohibition of the Privacy Act, "intercept" Andrea Clare's e-mail and text messages by merely reading the messages after she did.

The Clare Opinion can be accessed on the Internet at:
https://www.courts.wa.gov/opinions/pdf/386031_unp.pdf

4. State v. James Ta'afulisia: On May 31, 2022, Division One of the COA rejects the challenges of defendant to his King County Superior Court convictions for "multiple counts of murder and assault" that arose his participation with his brothers in doing some shootings. The Division One Opinion rules that (1) a Superior Court order for a one-party consent tape recording was supported by probable cause (under a statutory PC test that is not as strict as the Aguilar-Spinelli PC test under the Washington constitution, article I, section 7); and (2) the State's application for the court order adequately showed that other investigative methods were unlikely to succeed.

The Ta'afulisia Opinion can be accessed on the Internet at:
https://www.courts.wa.gov/opinions/pdf/817353%20order%20and%20opinion.pdf

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LEGAL UPDATE FOR WASHINGTON LAW ENFORCEMENT IS ON WASPC WEBSITE

Beginning with the September 2015 issue, the most recent monthly Legal Update for Washington Law Enforcement is placed under the "LE Resources" link on the Internet Home Page of the Washington Association of Sheriffs and Police Chiefs. As new Legal Updates are issued, the three most recent Legal Updates will be accessible on the site. WASPC will drop the oldest each month as WASPC adds the most recent Legal Update.

In May of 2011, John Wasberg retired from the Washington State Attorney General's Office. For over 32 years immediately prior to that retirement date, as an Assistant Attorney General and a Senior Counsel, Mr. Wasberg was either editor (1978 to 2000) or co-editor (2000 to 2011) of the Criminal Justice Training Commission's Law Enforcement Digest. From the time of his retirement from the AGO through the fall of 2014, Mr. Wasberg was a volunteer helper in the production of the LED. That arrangement ended in the late fall of 2014 due to variety of concerns, budget constraints and friendly differences regarding the approach of the LED going forward. Among other things, Mr. Wasberg prefers (1) a more expansive treatment of the core-area (e.g., arrest, search and seizure) law enforcement decisions with more cross references to other sources and past precedents; and (2) a broader scope of coverage in terms of the types of cases that may be of interest to law enforcement in Washington (though public disclosure decisions are unlikely to be addressed in depth in the Legal Update). For these reasons, starting with the January 2015 Legal Update, Mr. Wasberg has been presenting a monthly case law update for published decisions from Washington's appellate courts, from the Ninth Circuit of the United States Court of Appeals, and from the United States Supreme Court.

The Legal Update does not speak for any person other than Mr. Wasberg, nor does it speak for any agency. Officers are urged to discuss issues with their agencies' legal advisors and their local prosecutors. The Legal Update is published as a research source only and does not purport to furnish legal advice. Mr. Wasberg's email address is jrwasberg@comcast.net. His cell phone number is (206) 434-0200. The initial monthly Legal Update was issued for January 2015. Mr. Wasberg will electronically provide back issues on request.

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INTERNET ACCESS TO COURT RULES & DECISIONS, RCWS AND WAC RULES

The Washington Office of the Administrator for the Courts maintains a website with appellate court information, including recent court opinions by the Court of Appeals and State Supreme Court. The address is [http://www.courts.wa.gov/]. Decisions issued in the preceding 90 days may be accessed by entering search terms, and decisions issued in the preceding 14 days may be more simply accessed through a separate link clearly designated. A website at [http://legalwa.org/] includes all Washington Court of Appeals opinions, as well as Washington State Supreme Court opinions. The site also includes links to the full text of the RCW, WAC, and many Washington city and county municipal codes (the site is accessible directly at the address above or via a link on the Washington Courts' website). Washington Rules of Court (including rules for appellate courts, superior courts, and courts of limited jurisdiction) are accessible via links on the Courts' website or by going directly to [http://www.courts.wa.gov/court_rules].

Many United States Supreme Court opinions can be accessed at [http://supct.law.cornell.edu/supct/index.html]. This website contains all U.S. Supreme Court opinions issued since 1990 and many significant opinions of the Court issued before 1990. Another website for U.S. Supreme Court opinions is the Court's own website at [http://www.supremecourt.gov/opinions/opinions.html]. Decisions of the Ninth Circuit of the U.S. Court of Appeals since September 2000 can be accessed (by date of decision or by other search mechanism) by going to the Ninth Circuit home page at [http://www.ca9.uscourts.gov/] and clicking on "Opinions." Opinions from other U.S. circuit courts can be accessed by substituting the circuit number for "9" in this address to go to the home pages of the other circuit courts. Federal statutes are at [http://www.law.cornell.edu/uscode/].

Access to relatively current Washington state agency administrative rules (including DOL rules in Title 308 WAC, WSP equipment rules at Title 204 WAC, and State Toxicologist rules at WAC 448-15), as well as all RCW's, is at [http://www.leg.wa.gov/legislature]. Information about bills filed since 1991 in the Washington Legislature is at the same address. Click on "Washington State Legislature," "bill info," "house bill information/senate bill information," and use bill numbers to access information. Access to the "Washington State Register" for the most recent proposed WAC amendments is at this address too. In addition, a wide range of state government information can be accessed at [http://access.wa.gov]. For information about access to the Criminal Justice Training Commission's Law Enforcement Digest and for direct access to some articles on and compilations of law enforcement cases, go to [cjtc.wa.gov/resources/law-enforcement-digest].

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