



Welcome to the Administrative Law Section's E-Newsletter!

We hope you enjoy our newsletter and we encourage your feedback. Please forward our newsletter to your colleagues, and encourage them to join the Section if they find the newsletter informative! We also welcome your suggestions for topics for future newsletters.

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Greetings from the Chair

by Katy Hatfield

Greetings to my friends and colleagues in the Administrative Law Section. Our section is involved in all areas of the practice of administrative law in Washington, including state administrative law, federal administrative law, tribal administrative law, and interstate compact administrative law. The section strives to be pertinent to all of our members, who include private practitioners representing clients subject to government regulation, assistant attorneys general, requestors of public records, city attorneys (on private contract and municipal employees), administrative law judges, and more. Our section has produced an administrative law practice manual, a deskbook on the Public Records Act, and a free publication titled *Ensuring Equal Access for People with Disabilities—A Guide for Washington Administrative Proceedings*. In addition, our section regularly publishes a newsletter that includes articles and case law updates to keep practitioners up-to-date on the ever-changing field of administrative law.

This year, the section is pleased to announce the publication of the new second edition of the *WSBA Public Records Act Deskbook: Washington's Public Disclosure and Open Public Meetings Law*. The second edition, available for purchase by clicking [here](#), is not just an update; rather, it contains significant revisions from the first edition (published in 2006

and last updated in 2010) and offers significantly expanded coverage. To provide an accurate and balanced perspective, every chapter in the Deskbook that was written by a public agency practitioner was edited by an attorney who primarily represents records requestors, and vice-versa. Also, a number of chapters were co-written by agency and requestor authors. One of the editors-in-chief is an attorney who primarily represents news requestors (Eric M. Stahl) and the other is an attorney who represents agencies (Ramsey Ramerman). Discussion that veers into uncertain or undecided areas of the law, or that offers commentary beyond the decided cases, is set out in separate "Comment" boxes, while text designated as "Editors' Comment" was added by the two editors-in-chief. The editors-in-chief also designed and chaired a successful CLE on November 12, titled *The State of the Public Records Act in 2014 and Beyond*.

We welcome you to get involved in the section and make it yours! Please feel free to get in touch with me or one of the other board members if you would like to contribute. We always welcome volunteers who are willing to write up a case summary for the newsletter, have coffee with a law student or young attorney, or come socialize at a section-sponsored reception.

Recap of Northwest Administrative Law Institute CLE

In September, the section, together with the Oregon State Bar Administrative Law Section, held a first-ever joint Washington-Oregon Administrative Law CLE, entitled the *Northwest Administrative Law Institute*. It was a resounding success, with over 100 attendees traveling to Vancouver, Washington, for the day-and-a-half program. The program focused on commonalities and differences between the administrative law and practice in the two states.

First up was the Honorable Paul DeMuniz, the immediate past Chief Justice of the Oregon Supreme Court. Justice DeMuniz spoke about key administrative law developments in Oregon that he had been involved in and compared those to law in Washington.

The program continued with a session about the complexities of drafting interlocal agreements between public entities in Washington and public entities in other states, and a panel of law professors from Gonzaga, Lewis and Clark, and Willamette, speaking about the future of federal, Washington, and Oregon administrative law. Other sessions included a panel on seeking stays of administrative decisions, case law update, best practices in administrative hearings, legal ethics of going around or above an agency lawyer, and a comparison of rulemaking between Washington's I-502 and Oregon's medical marijuana law.

Current Supreme Court Justices Mary Fairhurst (Washington) and Jack Landau (Oregon) gave a lively back-and-forth discussion about administrative law developments in the other state. And the last session covered new approaches for accessing agency orders.

Reviews of the program were overwhelmingly positive, and both sections are looking forward to the next Institute. If you are interested in being on the planning committee for the next bi-state Institute, please contact Katy Hatfield, Section Chair, or Suzanne Mager, CLE Chair.

Finally, special thanks to the Oregon State Bar CLE Department for handling the logistics, to the WSBA CLE Department for its assistance to the Oregon State Bar, and especially to event sponsors, Harrang Long Gary Rudnick PC in Portland, Oregon, and the Columbia River Gorge Commission in White Salmon, Washington.

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The Administrative Law Section welcomes articles and items of interest for publication. The editors and Board of Trustees reserve discretion whether to publish submissions.

Send submissions to: Gabe Verdugo (gabeverdugo@gmail.com).

This is a publication of a section of the Washington State Bar Association. All opinions and comments in this publication represent the views of the authors and do not necessarily have the endorsement of the Association or its officers or agents.

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Accepting Nominations for the Frank Homan Award

The Frank Homan Award is given to an individual who has made a demonstrated contribution to the improvement or application of administrative law. Only section members can nominate someone, but a nominee does not have to be an attorney or a section member.

Nominations can be made until **July 31, 2015**, by sending an email to graymr2@dshs.wa.gov. Please include:

- Your name and contact information
- Information about the person being nominated (name, position, affiliation)
- Why you think this person should be recognized

The award is named for Frank Homan, a dedicated teacher and mentor who was passionate about improving the law. After receiving his law degree from Cleveland State University of Law in 1965, he began practicing law in Washington in 1968, serving as an Employment Security Department hearings examiner from 1970 to 1974, and as a senior administrative law judge at the Office of Administrative Hearings from 1975 to 1993. He continued to serve as an ALJ pro tem after his retirement in 1993. He was an early proponent for the creation of a central hearings panel and played an important role in the creation of the Office of Administrative Hearings (RCW 34.12). Frank was generous with his time and expertise, and is well remembered for his sense of humor, his command of the English language, and his writing style—including his knowledge of legal terminology and history. His commitment to promoting justice for all and the practice of administrative law is the inspiration for the award that bears his name.

Prior Recipients

2013 — Alan D. Copsey
 2011 — Larry A. Weiser
 2010 — Jeffrey Goltz
 2008 — Kristal Wiitala
 2007 — C. Dean Little
 2006 — William R. Andersen
 2005 — Bob Wallis

Recipients have been involved in administrative law in many different roles. Larry Weiser and Bill Andersen taught many of us about administrative law. Bob Wallis and Kristal Wiitala have been involved in our publications and in helping with amendments to the statutes that govern our practice.

If you have a teacher, mentor, or person you admire in their service to administrative practice, please consider nominating him or her for this honor.

Public Service Grant Project Update

by Janell Stewart

Congratulations to the recipients of the Administrative Law Section's 2014 Public Service Grant Project! Thurston County Volunteer Legal Services (TCVLS) received \$1,500 to provide a civil legal clinic in Grays Harbor County. Legal Assistance by Whatcom (LAW) Advocates was also granted \$1,500 for their program, which helps disabled homeless adults and veterans obtain disability benefits.

Law Student Scholarship Recipient – Matthew Dick



Last year, the Administrative Law Section began providing a \$2,000 scholarship to a law student working in an unpaid capacity in the area of administrative law. This year, the section is proud to sponsor its second law student scholarship recipient, Matthew Dick, who spent the summer at the Federal Communication Commission's Wireline Competition Bureau in Washington, D.C.

Matthew Dick is currently a 2L at Seattle University School of Law. Matthew grew up on Bainbridge Island and graduated from the University of Washington with a degree in Political Science. During his undergraduate studies, Matthew's interest in state level politics led to an extended internship with the Jay Inslee for Governor campaign.

After playing collegiate soccer for two years at schools in both Oregon and Arizona, Matthew was offered a unique job opportunity halfway through his undergraduate studies. He jumped at the chance to travel to Alaska and work on large charter vessels. What started as a summer job turned into five years of working and traveling between Alaska and Mexico on marine vessels, culminating with Matthew obtaining his U.S. Coast Guard Captain's License. Eventually, his desire to finish his college education and to live a less transient lifestyle led Matthew to return to Seattle, where he met and married his wife Sayuri.

Matthew's studies in his first year of law school intensified his existing interest in social justice issues, resulting in his current position as a Research Assistant focusing on homeless rights advocacy. Now back from his summer in D.C. at the Federal Communications Commission, Matthew is currently enrolled in an administrative law course. He believes that the skills he is gaining through the study of administrative law are invaluable to his future social justice advocacy work.

A Pacific Northwesterner's Administrative Law Experience in the Other Washington

by Matthew Dick

Checklist for a D.C. legal internship: Sublet tiny studio apartment with extortionate rental rate? Check. Purchase Metro card and rapidly become indoctrinated into a strict set of commuter "customs"? Check. Quickly come to the realization that those who first designed men's suits did not have the summer weather in D.C. in mind? Check. Obtain a security ID card complete with deer-in-headlights photo? Check. And finally, arrive at a cubicle with a temporary paper name placard indicating that this is where you will be spending the next 10 weeks? Check. At least this was how I began my internship, and I could not help but wonder: considering my lack of communications-specific experience or expertise, what will I be working on this summer at the Federal Communications Commission?

I was assigned to the FCC's Wireline Competition Bureau - Telecommunications Access Policy Division, and more specifically to the Rural Health Care Program team. The FCC Rural Health Care Program ensures health care providers in rural areas of the country have access to affordable broadband communications and Internet. Because of the increased cost of access to these remote areas, the Program provides funds to rural healthcare providers to cover a large portion of their overall broadband cost. Through this Program, rural healthcare providers are given access to necessary modern technology at rates that are comparable to their urban counterparts. Other than the cost benefits, this program also allows doctors in remote and inaccessible areas to communicate with specialists in urban areas and to utilize technology such as telemedicine and electronic medical record-sharing.

During my time working in the maritime industry in Southeast Alaska, I visited many remote and isolated island towns, seeing first-hand the struggles that accompany living without the technological conveniences that are commonplace in urban areas. Because so many of Alaska's residents live in remote areas, Alaskan health care providers receive a large portion of the Program's funding. My familiarity with Alaska allowed me to provide insight on unique issues that concern these rural residents. Whether by describing the distinctive geographic obstacles of Alaska or by providing a narrative of the often-difficult task of living in such a harsh environment, it felt great to have a specialized knowledge to contribute to the team. It was also particularly rewarding to know that my work was helping people out. One of my main tasks was to help draft agency orders granting rural health care providers' appeals for funding, usually based on the special circumstances of their cases and the public's interest in maintaining these vital rural health care facilities.

The FCC attorneys I worked with this summer were amazing mentors and are great people who work extremely hard to improve the quality of life for residents in rural areas. Considering my interest in social justice legal issues, I was thrilled to have the opportunity to work in a small division at the FCC that helps those who otherwise would not be able to afford equal medical services. I believe that if more law students knew about the social justice opportunities available through administrative law channels, there would inevitably be an increase in administrative law interest overall.

INFORMATION FOR YOUR CLIENTS

Did you know that easy-to-understand pamphlets on a wide variety of legal topics are available from the WSBA? For a very low cost, you can provide your clients with helpful information. Pamphlets cover a wide range of topics:

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Each topic is sold separately. Pamphlets are \$9 for 25, \$15 for 50, \$20 for 75, and \$25 for 100. Pricing for larger quantities is available on request.

To place your order or for more information, please contact the WSBA Service Center at 800-945-WSBA or 206-443-WSBA. Sales tax is applicable to all in-state orders.

Help us make this newsletter more relevant to your practice.

If you come across federal or state administrative law cases that interest you and you would like to contribute a summary (approx. 250 – 500 words), please contact Gabe Verdugo at gabeverdugo@gmail.com.

Case Summaries – Washington Supreme Court

***In the Matter of the Disciplinary Proceeding Against:
Lori A. Petersen, Certified Professional Guardian No.
9713, 180 Wn.2d 768, 329 P.3d 853 (2014)***

Allegations of misconduct were launched against a certified professional guardian (CPG). Ms. Petersen had more than 10 years of experience and a caseload of more than 60 guardianships. She was alleged to have failed to assist in the timely purchase of new glasses for an elderly woman with dementia and to consult regarding the movement of a younger adult to a hospice facility. The CPG argued that her actions were appropriate and consistent with the discretion accorded her under a “substitute judgment” standard.

In its July 3, 2014 decision, the Washington Supreme Court rejected defendant’s arguments about a “personal vendetta” against her, upheld the findings and conclusions regarding her alleged violation of state guardianship standards in serving the two wards, and rejected her arguments about procedural unfairness.

Notwithstanding that, the court ruled that “(b)ecause this is a case of first impression and the Board aspires to consistency with disciplinary sanctions, we remand to the Board to consider whether the sanctions sought against (defendant), including the monetary fees, are consistent with those imposed in other cases.” The court questioned the Washington State CPG Board’s imposition of a one-year suspension from practice and more than \$30,000 in costs and fees, stating its belief that the “circumstances of this case and the severity of the sanctions and fees in light of the charges brought by Petersen warrant an explicit proportionality inquiry.” Furthermore, the court clarified the separation of powers and procedural safeguard rules when an agency uses a regulatory board to hear a disciplinary matter. Moreover, this case extends the appearance of fairness doctrine to a disciplinary case for a guardian because the action is prosecutorial in nature. The court remanded the matter to the CPG Board to conduct a consistency analysis pursuant to its internal regulations and the court’s opinion.

Lisa Malpass

Case Summaries – Washington Court of Appeals

Nissen v. Pierce Cnty., ___ Wn. App. ___, 333 P.3d 577 (2014)

The Court of Appeals held that text messages on a public employee’s personal cell phone, if related to government business, are public records. The court also found that personal cellular phone call logs could be a public record, but only if a government employee used or retained the call logs in his capacity as a government official.

Glenda Nissen, a detective in the Pierce County Sheriff’s Office, filed a public records request for all of Prosecutor Mark Lindquist’s personal cellular records. It was already known to Nissen that Lindquist used his personal cell phone, rather than his county-issued cell phone, to conduct government business. Pierce County provided heavily redacted records of Lindquist’s personal cellular phone use and an exemption log asserting that the records were exempt from disclosure.

Nissen sued the county, asserting that it had claimed improper exemptions and had wrongfully redacted records. The superior court granted the county’s motion to dismiss Nissen’s complaint, finding that Prosecutor Lindquist’s private cell phone records are not public records. The Court of Appeals reversed the superior court and remanded the case to the superior court for additional fact finding. Specifically, the Court of Appeals held that text messages conducting government work, even on a personal cell phone, are a public record because the messages are (1) a writing, (2) relating to government conduct, and (3) used or retained by a government agency. The court noted that Lindquist, as an elected official in charge of a local government agency, was preparing and using the text messages in his capacity as a public official and, therefore, the messages were used or retained by a government agency.

The court found the call log records, however, to be more “problematic” because the call logs were prepared by the cellular phone company and mailed to Lindquist at his private address. The court found that the logs are not public records if the prosecutor’s office did not have the records and did not review, refer to, or otherwise use the records for any government purpose.

Katy Hatfield

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Case Summaries – Washington Court of Appeals *continued*

***Puget Sound Harvesters Ass'n v. Wash. Dep't of Fish and Wildlife and Purse Seine Vessel Owners Ass'n*, ___ Wn. App. ___, 332 P.3d 1046 (2014)**

Puget Sound Harvesters Association (PSHA) sought to invalidate two administrative rules adopted by Washington Department of Fish and Wildlife (WDFW) regulating non-treaty commercial chum salmon fishing. WDFW annually adopts recreational and commercial salmon fishing schedules. The schedule issued in 2008 was similar to the schedules issued each year since 2008.

WDFW appears to go through a fairly comprehensive evaluation process to equate the fishing opportunities for each gear group harvesting commercial chum salmon. The two major types of gear group are gillnets and purse seines. Purse seines have larger boats and can catch more fish per hour than gillnetters. PSHA filed for injunctive relief and declaratory judgment under the APA claiming that the 2012 schedule for fishing, issued as a rule, was arbitrary and capricious and violates due process and the equal protection clause.

The trial court denied the PSHA motion and PSHA appealed. PSHA argued that the WDFW had to articulate a rational basis for the disparate treatment between gear groups. However, the court could find no statutory basis to require that the gear types have an equal allocation of harvest time absent a rational basis for the disparity. The court further rejected PSHA's equal protection argument, finding that the WDFW was discriminating only against the type of fishing appliance used, which any person is free to use with the same restrictions. Although PSHA argued that some of WDFW's decisions were arbitrary and capricious, the court quickly dismissed those claims, finding that ample research had gone into each of WDFW's decisions and holding that mere disagreement over an agency opinion does not constitute arbitrary and capricious action.

Stephen Manning

***Arthur West v. Port of Olympia*, ___ Wn. App. ___, 333 P.3d 488 (2014)**

The Port of Olympia redacted identifying information from an investigative report concerning unsubstantiated allegations of government misconduct against an employee, claiming that disclosure of the information would violate the employee's right to privacy. The court held that the Port violated the PRA because disclosure of the identifying information would not be highly offensive to a reasonable person and therefore would not violate the employee's right to privacy.

West submitted a PRA request to the Port, seeking records related to the investigation of a whistleblower complaint against an employee. The Port's attorney had investigated a number of allegations against that

employee and had prepared a report. Among other inquiries, the report addressed whether the employee had derived personal gain from Port activities, exceeded his or her authority, and disposed of environmentally sensitive materials improperly. Apparently, the attorney found that the allegations lacked merit.

The Port produced the report but redacted all information that might identify the employee. According to the Port, the information was exempt under former RCW 42.56.230(2) (recodified at RCW 42.56.230(3)) because its disclosure would violate the employee's right to privacy under RCW 42.56.050.

The court assumed without deciding that the employee's identity constituted personal information and that the employee had a right to privacy in his or her identity in relation to the accusations of misconduct. However, a person's right to privacy is "violated only if disclosure of information about the person: (1) Would be highly offensive to a reasonable person, and (2) is not of legitimate concern to the public." RCW 42.56.050.

The court found that whether disclosure of information would be "highly offensive" to a reasonable person must be determined on a case-by-case basis. The court summarily concluded that some of the allegations merely involved failure to follow the Port's policies and procedures, which might be embarrassing, but not highly offensive.

Whether the allegation of improperly benefitting from Port activities was highly offensive, however, posed a greater problem for the court. The court noted that the alleged conduct might amount to theft or some other criminal offense. Comparing the alleged conduct to other cases, considering the entire unredacted report as a whole, and in light of its duty liberally to construe the PRA in favor of disclosure, the court held that the allegation was not highly offensive.

Gabe Verdugo

***O'Neill v. City of Shoreline*, ___ Wn. App. ___, 332 P.3d 1099 (2014)**

The court held that successful PRA requesters who failed to meet the 10-day time limit for seeking attorney fees and expenses under the Civil Rules did not waive their right to fees and costs because Shoreline had failed to demonstrate any prejudice due to the delay.

The O'Neills accepted an offer of judgment, which did not include attorney fees. The offer did, however, specify that the court would determine attorney fees and costs, and Shoreline sought discovery about the fee amount from the O'Neills after they accepted the offer.

Nearly one month after the trial court entered stipulated judgment on the offer and acceptance, the O'Neills moved for determination of the attorney fee and cost award. The

Case Summaries – Washington Court of Appeals *continued*

trial court awarded fees and costs. Shoreline argued on appeal that the request was barred because the O'Neills had failed to meet the 10-day deadline in CR 54(d)(2) and they had not shown excusable neglect.

The court noted that neither party had cited the controlling case, *Goucher v. J.R. Simplot Co.*, 104 Wn.2d 662 (1985). In *Goucher*, the trial court considered a motion that was untimely under the Civil Rules. On review, the Washington Supreme Court found that the rule governing the deadline for the motion was not jurisdictional, and that reversal required a showing of prejudice.

Here, the court found that there were no meaningful differences between the time requirements for CR 54(d)(2) and the rule at issue in *Goucher*. Because Shoreline conceded at oral argument that it had demonstrated no prejudice at the trial court, the court affirmed the trial court's award of \$428,966.18 in attorney fees and \$9,588.79 in costs.

Gabe Verdugo

***Linda Darkenwald v. Dep't of Emp't Sec.*, 182 Wn. App. 157, 328 P.3d 977 (2014)**

The Washington State Employment Security Department (Department) appealed the superior court's decision to award Linda Darkenwald unemployment benefits. Darkenwald left her job as a dental hygienist because she believed that her neck and back injuries prevented her from working the increased hours that her employer required. Darkenwald worked only two days per week, and when her employer presented her two options—taking more shifts or becoming a substitute hygienist—she quit. She did not cite any health problems when she quit.

Darkenwald applied for unemployment benefits, which an ALJ denied. The ALJ found that Darkenwald voluntarily quit employment without good cause, and therefore, under RCW 50.20.050, was not entitled to benefits. The Department's commissioner affirmed the ALJ's opinion. Darkenwald sought review by the superior court, which reversed the commissioner's decision based on a determination that the commissioner's findings were not supported by substantial evidence.

Darkenwald submitted a motion to dismiss the appeal, claiming that the case was moot. Darkenwald argued that because the Department had paid her benefits as directed by the superior court order, such payment constituted a final determination of benefits under RCW 50.20.160, and, therefore, the Department could not recover payments made to her unless it showed evidence of fraud, misrepresentation, or nondisclosure. Darkenwald cited numerous commissioner decisions that explain that final benefit payment determinations generally cannot be revoked. Darkenwald asserted that because the Department's forced payment of final benefit payments could not be

revoked, there was no recourse that the court could offer to the Department.

The court determined the case was not moot. The court found that there was an applicable exemption to the current situation under RCW 50.20.160, which provides that determinations of allowance of benefits are final *in the absence of a timely appeal*. The court then decided that the cases cited were distinguishable because they all involved instances where the Department originally had granted the payment to the benefit recipient, and here, the Department was forced to pay the benefits.

On the APA claim, the court evaluated the commissioner's decision and the ALJ's findings to the extent that the commissioner adopted them. The court found that Darkenwald was not discharged but instead left work voluntarily, and therefore was required to prove good cause for leaving in order to receive benefits. The court further found that Darkenwald did not have good cause because she failed to show that her disability was a primary reason for leaving, or that her employer caused a 25 percent reduction in her hours, as required under RCW 50.20.050. Accordingly, the superior court's decision was reversed.

Scott Hilgenberg

***Wash. Office of the Governor v. Public Employment Relations Commission*, __ Wn. App. __, 334 P.3d 1177 (2014)**

The Court of Appeals affirmed a superior court ruling upholding a Public Employment Relations Commission ("PERC" or "Commission") decision that included independent contractor interpreters in the statewide collective bargaining unit defined in RCW 41.56.030(10). The State claimed that this statute authorizes collective bargaining only with interpreters paid from state funds. It argued that because interpreters working in local health jurisdictions and public hospitals through the voluntary Medicaid Administrative Match ("MAM") program are paid using federal and local funds but not state funds, MAM interpreters could not be included in the bargaining unit. The court held that the Commission did not exceed its authority or err in its interpretation of the statute and that substantial evidence supported its finding that the statute includes MAM interpreters in the statewide bargaining unit.

The court examined the statutory definition of "language access providers" in RCW 41.56.030(10) and agreed with the Commission's conclusion that the statute includes independent contract interpreters paid by third-party agencies without distinguishing between funding sources. As a result, interpreters paid using state funds via the Department of Social and Health Services' language access

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Case Summaries – Washington Court of Appeals *continued*

brokerage and interpreters paid using local funds via the MAM program are properly included in the bargaining unit.

The court held that substantial evidence supported PERC's finding that MAM interpreters are paid in the manner required by the statute (e.g., via a language access agency) and therefore meet the statutory definition of a language access provider. Finally, the court held that the Commission did not exceed its authority to determine collective bargaining units when it included the independent contractor interpreters paid via the MAM program in the statewide bargaining unit of interpreters.

Tania Culbertson

***Andrews v. Wash. State Patrol*, __ Wn. App. __, 334 P.3d 94 (2014)**

Compliance with RCW 42.56.100 should be judged by "a flexible approach that focuses upon the thoroughness and diligence of an agency's response," the Court of Appeals Division III ruled in September in *Andrews v. Wash. State Patrol*. The court concluded that, when reviewing an agency that has failed to meet a self-imposed deadline for a public records request, a fact-specific approach is more appropriate than a rigid rule.

RCW 42.56.100 requires an agency to provide "the fullest assistance to inquirers and the most timely possible action on requests for information." In *Andrews*, the court faced the question of an agency, the Washington State Patrol ("WSP"), which failed to meet its self-imposed deadline for a public records request encompassing six months of digital recordings. Responding to the request required the police to listen to hundreds of conversations, many of which could be privileged. The safeguards necessary to protect privileged conversations necessitated a longer search than expected. The requester, a local lawyer, then sought damages for the 11 and 15 days that the WSP public records officer exceeded the agency's self-imposed deadlines.

In opting for an approach that measures diligence, rather than concrete deadlines, the court noted that the volume of requests must be considered when evaluating an agency's response. During the time that the agency was responding to the two requests in *Andrews*, between January 1, 2012, and March 8, 2012, the WSP had received approximately 2,307 public records requests and subpoenas duces tecum and, since March 15, 2012, it had received an additional 1,882 such requests.

Elizabeth de Bagara Steen

Administrative Law Section Listserv

The Administrative Law Section has a "closed" Listserv, which means only current subscribers of the Listserv can send an email to the Listserv. You can request to receive the Listserv messages in a daily digest format by contacting the list administrator below.

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Join Our Section!

We encourage you to become an active member of the Administrative Law Section. Benefits include a subscription to this newsletter, and networking opportunities in the field of administrative law. **Click here to join!**

The Section also has six committees whose members are responsible for planning CLE programs, publishing this newsletter, tracking legislation of interest to administrative law practitioners, and much more. Feel free to contact the chair of any committee you have an interest in for more information. Committee chairpersons are listed on page two of this newsletter, and on the Section's website.

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