

22-5595 ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED
SEP - 6 2022
OFFICE OF THE CLERK

LARRY BAKER — PETITIONER
(Your Name)

STATE OF WASHINGTON ^{VS.}
DEPARTMENT OF CHILDREN RESPONDENT(S)
YOUTH, AND FAMILIES
ON PETITION FOR A WRIT OF CERTIORARI TO

COURT OF APPEALS WASHINGTON STATE ; WASHINGTON SUPREME COURT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE) DENIED REVIEW

PETITION FOR WRIT OF CERTIORARI

LARRY BAKER
(Your Name)

701 WASHINGTON ST SW
(Address)

ATLANTA, GA 30303
(City, State, Zip Code)

805-628-6497
(Phone Number)

QUESTIONS PRESENTED

Did the state of Washington violate Mr. Baker's 14th amendment rights by terminating his parental rights under a preponderance of the evidence standard not consistent with Santosky v. Kramer, 455 U.S. 745 (1982)?

Does RCW 13.34.180(1) Violate the 14th Amendment of the US Constitution by allowing the court to terminate parental rights under a preponderance of the evidence standard in contradiction to precedent set by Santosky v. Kramer, 455 U.S. 745 (1982)?

Did the state of Washington violate Mr. Baker's 14th amendment rights by terminating his parental rights under a preponderance of the evidence standard not consistent with Santosky v. Kramer, 455 U.S. 745 (1982), when Mr. Baker did all the prerequisites required by the State and complied with each court ordered process?

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

~~SANTOSKY v. KRAMER. 455 U.S. 715 (1982)~~

~~DUCHESNE v. SUGARMAN. 566 F.2d 817 (1977)~~

N/A

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CASES	PAGE NUMBER
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STATUTES AND RULES

14th Amendment of the US Constitution
Washington State Statute - RCW 13.34.180(1)

OTHER

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the State Court of Washington, King County court appears at Appendix B to the petition and is

reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was July 13, 2022. A copy of that decision appears at Appendix C.

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

14th Amendment of the US Constitution
Washington State Statute - RCW 13.34.180(1)

STATEMENT OF THE CASE

The parental rights of Larry Baker were terminated unlawfully and against the 14th Amendment of the Constitution of the United States of dependent children U.M.R.B. and E.E.B. The State of Washington required numerous classes, counseling sessions, and intellectual evaluations, all of which Mr. Baker complied with and succeeded in completing. Despite his complying with each state provision, the State determined by preponderance of the evidence that he was unfit, in direct contradiction with the Supreme Court's prior precedent.

REASONS FOR GRANTING THE PETITION

1. A "preponderance of the evidence" standard for Parental Rights Termination Conflicts with decisions from this Court.
2. The Opinion Below Conflicts with the Fourteenth Amendment of the US Constitution and has a lower standard of review than required.
3. Parental Rights and the importance of the Family Unit is an Issue of utmost importance and is worthy of the Court's Review.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary C. Bala".

Date: AUGUST 19, 2022