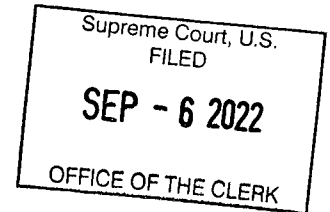


22-5595 ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES



LARRY BAKER — PETITIONER  
(Your Name)

STATE OF WASHINGTON<sup>VS.</sup>  
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)

201 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 US 745 (1982)~~

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

N/A

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## **TABLE OF AUTHORITIES CITED**

### **CASES**

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**Santosky v. Kramer. 455 US 745 (1982)**  
**Duchesne v. Sugarman. 566 F.2d 817 (1977)**

### **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,

Lang C. Baker

Date: AUGUST 19, 2022