



- 1 4. On November 11, 2025, during a regularly scheduled and properly noticed meeting, DCD  
2 presented the Planning Commission with a work plan to discuss the proposed Boundary Line  
3 Adjustment Code for Title 16 and administrative amendments to Kitsap County Code Titles  
4 16, 17, and 21.
- 5 5. On December 10, 2025, a 60-day Notice of Intent to Adopt was sent to the Washington State  
6 Department of Commerce as required by RCW 36.70A.106.
- 7 6. On December 15, 2025, the written comment period closed with staff receiving 25  
8 comments. Additional comments were received after the close of the comment period.  
9 Several comments resulted in amendments to the draft code and were included in the March  
10 3, 2026 Staff Report to the Planning Commission.
- 11 7. On December 29, 2025, a State Environmental Policy Act (SEPA) Determination of Non-  
12 significance (DNS) was issued, and no comments were received prior to the closing of the  
13 30-day comment period on January 26, 2026.
- 14 8. On January 6, 2026, during a regularly scheduled and properly noticed meeting, the Planning  
15 Commission held a work study session to review and discuss the proposed code and  
16 amendments.
- 17 9. On January 26, 2026, during a regularly scheduled and properly noticed meeting, the Board  
18 of County Commissioners held a work study session to review and discuss the proposed code  
19 and amendments.
- 20 10. On February 3, 2026, during a regularly scheduled and properly noticed meeting, the  
21 Planning Commission held a work study session to review and discuss the proposed code and  
22 amendments.
- 23 11. On March 3, 2026, following timely and effective public notification, the Planning  
24 Commission held a public hearing to accept comments from interested parties.
- 25 12. On March 4, 2026, the written comment period closed with the Planning Commission  
26 receiving 17 comments. A total of 42 public comments were received from October 2026,  
27 through March 4, 2026.
- 28 13. On March 17, 2026, during a regularly scheduled and properly noticed meeting, the Planning  
29 Commission considered the proposed amendments, the testimony presented, and the record,  
30 and made recommendations via motions during deliberations. The final motion to approve  
31 the proposed Boundary Line Adjustment Code as presented by staff and amended by the  
32 Planning Commission resulted in a vote of 4 in favor and 4 opposed, and the motion did not  
33 pass. No Planning Commission recommendation was issued, and the proposal was forwarded  
34 to the Board of County Commissioners without recommendation.
- 35 14. On March 25, 2026, during a regularly scheduled and properly noticed meeting, the Board of  
36 County Commissioners held a work study session to review and discuss the Planning  
37 Commission deliberations, proposed code, and code amendments.

- 1 15. On April 20, and on May 18, 2026, during regularly scheduled and properly noticed  
2 meetings, the Board of County Commissioners held work study sessions to review and  
3 discuss the proposed code and code amendments.
- 4 16. On June 8, 2026, following timely and effective public notification, the Board held a public  
5 hearing to accept comments from interested parties.
- 6 17. On June 8, 2026, the written comment period closed with Board.
- 7 18. On **INSERT DATE**, during a regularly scheduled and properly noticed meeting, the Board of  
8 County Commissioners considered the proposed amendments, ordinance, the testimony  
9 presented, and the record. The Board moved to continue deliberations to the [INSERT  
10 DATE] Board of County Commissioners meeting.
- 11 19. On **INSERT DATE**, during a regularly scheduled and properly noticed meeting, the Kitsap  
12 County Board of Commissioners continued deliberations and adopted the Ordinance.

13

14 **Section 3: General Substantive Findings. The Kitsap County Board of Commissioners**  
15 **(Board) makes the following substantive findings:**

- 16 1. The proposed code and code amendments were developed with multiple opportunities for  
17 public participation and comment as required by GMA and the State Environmental Policy  
18 Act (SEPA), chapter 43.21C RCW.
- 19 2. The proposed code and code amendments were developed according to, and are consistent  
20 with, the requirements of GMA, chapter 36.70A RCW, the Countywide Planning Policies,  
21 the Kitsap County Comprehensive Plan, the Capital Facilities Plan, Kitsap County Code, and  
22 other applicable laws and policies.
- 23 3. The proposed code and code amendments are consistent with the requirements of Kitsap  
24 County Code 21.08.100(E): “An amendment to all or any part of a plan, development  
25 regulation or amendment thereto shall be allowed only if it is consistent with the community  
26 vision statements, goals, objectives, and the policy directives of the Comprehensive Plan and  
27 the proposal preserves the integrity of the Comprehensive Plan and assures its systematic  
28 execution.”
- 29 4. The proposed code will ensure that BLAs shall be reviewed for compliance with:  
30 a. KCC Title 17 Zoning  
31 b. Applicable Plat Conditions  
32 c. Kitsap County Health District Requirements
- 33 5. The proposed code and code amendments reflect current local circumstances and promote the  
34 public general health, safety, and welfare of the citizens of Kitsap County.

35 **Section 4: Kitsap County Code Section 16.10.070, Boundary Line Adjustment, last**  
36 **amended by Ordinance 637-2024, is amended as follows:**

37

1 16.10.070 Boundary line adjustment.

2 “Boundary Line Adjustment” means an adjustment of boundary lines between two or more  
3 platted or unplatted properties or both, which does not create result in any individual lot, tract,  
4 parcel, site, or division, nor create any lot, tract, parcel, site, or division which contains  
5 insufficient area and dimension to that does not meet minimum requirements for width and  
6 area for a building site, except as provided herein.

7  
8 **Section 5: Kitsap County Code Section 16.62.050, Approval Standards, last amended by**  
9 **Ordinance 489-2012, is amended as follows:**

10  
11 16.62.050 Approval standards.

12 Parcels that meet the following platting standards will be considered legal lots of record:

- 13  
14 A. The parcel was created through a plat, short plat, large lot plat, or binding site plan  
15 approved by Kitsap County and recorded with the Kitsap County auditor; or  
16  
17 B. The parcel is five acres or larger, or 1/128th of a section or larger, and was created by  
18 record of survey before January 13, 1986, the date of Kitsap County’s first large lot  
19 subdivision ordinance; or  
20  
21 C. The parcel was lawfully created through testamentary provisions, or the laws of descent.  
22 Development of said parcel is subject to the zoning regulations set forth at Title 17; or  
23  
24 D. The parcel was created through an exemption listed in RCW 58.17.035 or 58.17.040 or  
25 other statutory exemptions available at the time it was created; or  
26  
27 E. The parcel is twenty acres (or one-thirty-second of a section) or larger in size; or  
28  
29 F. The parcel deed description shown in a sales or transfer deed dated prior to July 1, 1974,  
30 is the same as the current parcel description; or  
31  
32 ~~G. The parcel is a resultant parcel of a BLA that utilized parcels legally created through a~~  
33 ~~tax segregation and said resultant parcel conforms to area and dimensional requirements at~~  
34 ~~the time it was created.~~

35  
36 **NEW SECTION Section 6: A new chapter 16.64, Boundary Line Adjustment and Property**  
37 **Aggregation, is added to Title 16 of Kitsap County Code as follows:**

38 Sections:

- 39 16.64.010 Purpose.  
40 16.64.020 Applicability and Exemptions.  
41 16.64.030 Limitations.  
42 16.64.040 Permit Type and Review Authority.  
43 16.64.050 Review Criteria.  
44

- 1 16.64.060 Legal Lot Determination.
- 2 16.64.070 Hourly-Rate Conference.
- 3 16.64.080 Submittal Requirements.
- 4 16.64.090 Acknowledgements and Signatures.
- 5 16.64.100 Final Documents - Recording and Signatures.
- 6 16.64.110 Property Aggregations.

7

8 16.64.010 Purpose.

9 The purpose of this section is to provide an administrative process for reviewing and  
10 approving adjustments to property lines between abutting properties.

11

12 16.64.020 Applicability and Exemptions.

13 Except as provided below, this chapter applies to boundary line adjustments between existing  
14 properties, as well as property aggregations. For the purposes of this chapter, “property” is a  
15 generic term that applies to all original or resulting lots, parcels, sites, or divisions; when a  
16 more specific term is used, the definition of that term in Chapter 16.10 shall apply.

- 17
- 18 A. When a boundary line adjustment meets the following criteria, an applicant may choose  
19 to forego the online permitting process and instead meet with department planning staff  
20 for a free over-the-counter review. If the department determines the criteria are met, and  
21 the BLA meets review criteria as outlined in 16.64.050, the BLA Cover Sheet will be  
22 stamped by staff. A department-stamped cover sheet is required for recording. For this  
23 process to apply, the boundary line adjustment must:
- 24 1. Be between two existing properties,
  - 25 2. Move only one property line, move only one property corner, or reduce the total  
26 number of property lines without creating additional corners, and
  - 27 3. Not involve an adjustment to exterior plat boundaries
- 28

29 This chapter shall not apply to boundary line agreements consistent with RCW 58.04.007.

30

31 16.64.030 Limitations.

- 32 A. Alteration of the area, dimensions, or location of tracts or easements are not permitted  
33 through a boundary line adjustment.
- 34 B. Tax title strips must be combined with one or more abutting properties through a property  
35 aggregation as provided in 16.64.110 before the land can be subject to boundary line  
36 adjustment. For the purposes of this section, “tax title strip” is a narrow strip of land  
37 associated with a tax-foreclosed property.
- 38 C. Adjustment of a property shall not be permitted when a resulting property will be newly  
39 located on either side of a road or street as respectively defined in KCC chapters  
40 16.10.290 and 17.110.698. This provision does not apply to a property already bisected  
41 by a road or street prior to the adjustment.
- 42 D. No boundary line adjustment shall result in a property that crosses multiple zone  
43 classifications, urban growth areas, overlay districts, or County or City jurisdictional  
44 boundaries. This provision shall not apply to properties that, prior to the proposed  
45 adjustment, legally crossed multiple zone classifications, urban growth areas, overlay

1 districts, or County or City jurisdictional boundaries, provided the adjustment does not  
2 increase the number of such instances.  
3

4 16.64.040 Permit Type and Review Authority.

5 Applications for boundary line adjustments shall be processed as a ministerial Type I  
6 application under Chapter 21.04. The Department Director or their designee (hereinafter  
7 Director) is authorized to review and approve, approve with conditions, or deny the  
8 application based on compliance with this chapter and other applicable county codes.  
9

10 16.64.050 Review Criteria.

11 The Director shall approve a boundary line adjustment under this chapter only if the  
12 following criteria are met:

- 13 A. No additional property, tract, or parcel results from the adjustment.
- 14 B. All resulting properties must comply with applicable zoning standards for total area,  
15 density, and dimensions, except as provided below:
- 16 1. The Director may allow a boundary line adjustment involving conforming and/or  
17 nonconforming lots, provided that the total number of nonconforming lots is not  
18 increased, no resulting lot becomes smaller than the smallest original  
19 nonconforming lot, and when the areas of all nonconforming lots are ordered from  
20 smallest to largest, the adjustment does not result in any lot being smaller than the  
21 property occupying the same position in that order prior to the adjustment. For the  
22 purposes of this section, “nonconforming lot” has the meaning provided in KCC  
23 17.110.508.; or
- 24 2. The Director may allow a minor deviation for a current or resulting lot up to ten  
25 percent of the total area, or ten thousand eight hundred ninety square feet,  
26 whichever is smaller.
- 27 C. A conforming structure shall not become nonconforming to the standards required by the  
28 applicable zoning, and a nonconforming structure shall not be increased in its degree of  
29 nonconformity to the standards required by applicable zoning, through a boundary line  
30 adjustment. For the purposes of this section, “nonconforming structure” has the meaning  
31 provided in KCC 17.110.510. For the purposes of this section only, a structure means  
32 anything that meets the definition in KCC 17.110.705 and would require a development  
33 permit from the Department of Community Development.
- 34 D. No new public roads or extensions of public infrastructure would be required solely to  
35 serve the adjusted properties.
- 36 E. All easements, including those for access and utilities, are kept.
- 37 F. No adverse impacts on water supply, septic systems, or access will result.
- 38 G. All resultant properties must have a building site and suitable access unless exempted by  
39 the Director under this subsection. An applicant may request an exemption from either or  
40 both requirements. The applicant shall demonstrate, to the satisfaction of the Director, the  
41 proposed adjustment qualifies for one or both exemptions under the following criteria:
- 42 1. adjustment is to occur on public property;
- 43 2. adjustment is to occur on utility property;
- 44 3. adjustment is to occur on parcels adjusted solely to support the conservation or  
45 preservation of critical areas or habitat; or

1           4. for a building site exemption, the Director has authorized the use of a  
2           nonconforming lot under this section.

3 H. The adjustment is not part of a concurrent or sequential series of adjustments which  
4       would result in the creation of additional lots, tracts, or building sites, or otherwise  
5       circumvent the subdivision regulations in Chapter 16.40.

6 I. Boundary line adjustments within a recorded plat are permissible provided they do not  
7       modify dedications, roads, easements, notes, or other features shown on the face of a plat,  
8       or its recorded conditions, which would require a formal plat alteration.

9 J. Approval by the Kitsap Public Health District.  
10

11       16.64.060 Legal Lot Determination.

12       When a boundary line adjustment is proposed under this chapter, requirements for legal lot  
13       determination may be deemed satisfied if the lots to be adjusted were previously determined  
14       legal under Chapter 16.62, or if the adjustment resolves discrepancies discovered in the  
15       determination process.  
16

17       16.64.070 Hourly-Rate Conference.

18       Prior to submittal of an application for a boundary line adjustment, applicants are  
19       encouraged, but are not required, to schedule an hourly-rate meeting as provided in Section  
20       21.04.120.  
21

22       16.64.080 Submittal Requirements.

23       Submittal requirements shall be specified in the BLA application guide and the application  
24       checklist and forms prepared by the Department.  
25

26       16.64.090 Acknowledgements and Signatures.

27       The applicant shall acknowledge by signature on the BLA Cover Sheet that County approval  
28       of a BLA proposal is subject to the following limitations:

29       A. A BLA approval does not guarantee or imply that the subject property may be developed  
30       or subdivided or involved in further BLAs;

31       B. Critical area and shoreline review has not been performed for the subject properties as  
32       part of the BLA review;

33       C. Additional information and approvals may be required during review of a subsequent  
34       development or land use permit application; and

35       D. Property configurations resulting from a BLA approval cannot be used to justify a future  
36       variance, buffer reduction, or other exception from County code.  
37

38       The signed BLA Cover Sheet shall be included when recording the BLA with the County  
39       Auditor.  
40

41       16.64.100 Final Documents - Recording and Signatures.

42       If the boundary line adjustment is not recorded within one year of approval, the approval  
43       shall expire unless an extension is otherwise approved in advance by the Director. Applicants  
44       shall record all final documents with the County Auditor. The recorded documents shall

1 include, at a minimum: (1) a survey or exhibit map signed and stamped by the licensed  
2 Surveyor, where a BLA permit was required, or where BLA permit was not required, an  
3 exhibit map; (2) revised legal descriptions for all affected parcels; (3) a BLA or BLA  
4 Property Aggregation Cover Sheet signed by the applicant and stamped by the Department of  
5 Community Development; and (4) all deeds conveying property. When a record of survey is  
6 prepared for a BLA it shall be recorded per RCW 58.09.040 and a BLA declaration shall be  
7 recorded separately from the record of survey. Refer to RCW 58.09.040 for survey recording  
8 timeline information. All recording of documents shall be at the expense of the applicant.  
9 The applicant shall obtain all required signatures prior to recording, including those of the  
10 Director, County Auditor, and County Treasurer.

11  
12 **16.64.110 Property Aggregations.**

13 Boundary line adjustments may be used to permanently aggregate abutting properties  
14 pursuant to this section. Those proposing property aggregation by BLA shall meet with  
15 Department planning staff for a free over-the-counter review. If the aggregation is  
16 approvable under the conditions set forth below, the BLA Property Aggregation Cover Sheet  
17 will be stamped by staff. A stamped cover sheet shall be required for recording.

18  
19 Boundary line adjustments may be used to permanently aggregate abutting properties under  
20 the following conditions:

- 21  
22 A. All resulting properties must comply with zoning standards for total area, density, and  
23 dimensions.  
24 B. Aggregation of properties shall not be permitted when a resulting property will be newly  
25 located on either side of a road or street as respectively defined in KCC chapters  
26 16.10.290 and 17.110.698. This provision does not apply to a property already bisected  
27 by a road or street prior to the aggregation.  
28 C. No aggregation of properties shall result in a property that crosses multiple zone  
29 classifications, urban growth areas, overlay districts, or County or City jurisdictional  
30 boundaries. This provision shall not apply to properties that, prior to the proposed  
31 aggregation, crossed multiple zone classifications, urban growth areas, overlay districts,  
32 or County or City jurisdictional boundaries, provided that the aggregation does not  
33 increase the number of such instances.  
34 D. Properties not individually meeting current development standards may be aggregated to  
35 create a conforming lot.  
36 E. Aggregations result in new permanently established properties, which may only be  
37 subdivided in the future according to the requirements of Title 16.  
38

39 **Section 7: Kitsap County Code Section 17.110.010, Abutting, last amended by Ordinance**  
40 **534-2016, is amended as follows:**

41  
42 **17.110.010 Abutting.**

43 “Abutting” means adjoining with a common boundary line; except that where two or more  
44 lots adjoin only at a corner or corners, they shall not be considered as abutting unless the  
45 common property line between the two parcels measures ten feet or greater in a single

1 direction. ~~Where two or more lots are separated by a street or other public right of way, they~~  
 2 ~~shall be considered “abutting” if their boundary lines would be considered abutting if not for~~  
 3 ~~the separation provided by the street or right of way.~~  
 4

5 **Section 8: Kitsap County Code Section, 21.02.080 Boundary Line Adjustment, last**  
 6 **amended by Ordinance 490-2012, is amended as follows:**  
 7

8 21.02.080 Boundary line adjustment.

9 “Boundary Line Adjustment” means an adjustment of boundary lines between two or  
 10 more platted or unplatted properties or both, which does not ~~create result in~~ any  
 11 individual lot, tract, parcel, site, or division, nor create any lot, tract, parcel, site, or  
 12 division which contains insufficient area and dimension to that does not meet minimum  
 13 requirements for width and area for a building site, except as provided herein.  
 14

15 **Section 9: Kitsap County Code Section 21.04.100, Review Authority Table, last amended**  
 16 **by Ordinance 589-2021, is amended as follows:**  
 17

18 21.04.100 Review Authority Table.

19 The Review Authority Table shows permits regulated by this chapter, how they are classified  
 20 and who the review authority is.

	Permit/Activity/Decision	Review Authority	Type I	Type II	Type III	Type IV
	<b>DEVELOPMENT ENGINEERING PERMITS – See also Title 12, Stormwater Drainage</b>					
1	Site Development Activity Permit – Subject to SEPA	D		X		
2	Site Development Activity Permit – SEPA Exempt	D	X			
	<b>ENVIRONMENTAL PERMITS – See also Titles 18, Environment, 19, Critical Areas Ordinance, and 22, Shoreline Master Program</b>					
3	Conditional Waiver, View Blockage Requirement	D		X		
4	Critical Area Buffer Reduction	D	X	X		
5	Critical Area Variance	HE			X	
6	Current Use Open Space	BC				X
7	Shoreline Administrative Conditional Use Permit	D		X		
8	Shoreline Buffer Reduction	D	X	X		
9	Shoreline Conditional Use Permit	HE			X	
10	Shoreline Permit Exemption	D	X			
11	Shoreline Revision	D		X		
12	Shoreline Substantial Development Permits	D		X		

13	Shoreline Variance (any variance for which an administrative variance is not applicable)	HE			X	
14	Administrative Shoreline Variance (development or expansion requiring < 25% reduction of the reduced standard buffer or any amount of buffer reduction within the shoreline residential designation per Section <a href="#">22.400.120(C)</a> )	D		X		
15	Timber Harvest Permit	D	X			
<b>LAND USE PERMITS – See also Title <a href="#">17</a>, Zoning</b>						
16	Administrative Conditional Use Permit	D		X		
17	Administrative Conditional Use Permit Major Amendment – Proposed After Approval	D		X		
18	Administrative Conditional Use Permit Minor Amendment – Proposed After Approval	D	X			
19	Conditional Use Permit	HE			X	
20	Conditional Use Permit Major Amendment – Proposed After Approval	HE			X	
21	Conditional Use Permit Minor Amendment – Proposed After Approval	D	X			
22	Development Agreement	BC				X
23	Home Business	D	X			
24	Master Plan	HE			X	
25	Master Plan – Amendments	D		X		
26	Performance Based Development	HE			X	
27	Performance Based Development Major Amendment – Proposed After Approval	HE			X	
28	Performance Based Development Minor Amendment – Proposed After Approval	D	X			
29	Rezone	PC/BC			X	

30	Sign	D	X			
31	Zoning Variance - Director's (≤ 10%)	D	X			
32	Zoning Variance - Administrative (> 10% to ≤ 25%)	D		X		
33	Zoning Variance - Hearing Examiner (> 25%)	HE			X	
<b>LAND DIVISION PERMITS - See also Title 16, Land Division and Development</b>						
34	Binding Site Plan	D		X		
35	Binding Site Plan Alteration	D		X		
<del>36</del>	<del>Boundary Line Adjustment</del>	<del>D</del>	<del>X</del>			
<del>37</del> 6	Final Large Lot Plat	D	X			
<del>38</del> 7	Final Large Lot Plat Alteration	D		X		
<del>39</del> 8	Final Plat	D	X			
<del>40</del> 39	Final Plat Alteration	HE <sup>2</sup>		X		
<del>41</del> 0	Final Short Plat	D	X			
<del>42</del> 1	Final Short Plat Alteration	D		X		
<del>43</del> 2	Land Segregation Vacation	D/HE		X	X	
<del>44</del> 3	Legal Lot Determination	D	X			
<del>45</del> 4	Preliminary Large Lot Subdivision	D		X		
<del>46</del> 5	Preliminary Large Lot Subdivision - Major Amendment	D		X		
<del>47</del> 6	Preliminary Large Lot Subdivision - Minor Amendment	D	X			
<del>48</del> 7	Preliminary Short Subdivision	D		X		
<del>49</del> 8	Preliminary Short Subdivision - Major Amendment	D		X		
<del>50</del> 49	Preliminary Short Subdivision - Minor Amendment	D	X			
<del>51</del> 0	Preliminary Subdivision	HE			X	
<del>52</del> 1	Preliminary Subdivision - Major Amendment	HE			X	
<del>53</del> 2	Preliminary Subdivision - Minor Amendment	D		X		
<b>MISCELLANEOUS PERMITS</b>						
<del>54</del> 3	Building Code Interpretation	BO	See Chapter <a href="#">14.04</a>	See Chapter <a href="#">14.04</a>	See Chapter <a href="#">14.04</a>	See Chapter <a href="#">14.04</a>
<del>55</del> 4	Building Permit	BO	Exempt	Exempt	Exempt	Exempt
<del>56</del> 5	Change of Use	BO	X			

<del>576</del>	Code Compliance	D	X			
<del>587</del>	Concurrency Certificate	CE	X			
<del>598</del>	Director's Interpretation	D	X			
<del>6059</del>	Reasonable Use Exception	HE			X	
<del>610</del>	Road Vacation	CE				X
<del>624</del>	Temporary Use	D	X			
<del>632</del>	Transfer of Development Right Program	D/HE/BC	X	X	X	X
D = Director BC = Board of County Commissioners BO = Building Official CE = County Engineer HE = Hearing Examiner PC = Planning Commission						

- 1
- 2
- 3
- 1 Hearing examiner recommendation subject to board of county commissioners approval.
- 2 Hearing at request of noticed party, RCW 58.17.215.

4 **Section 10: Severability.**

5 If any provision of this ordinance or its application to any person or circumstance is held invalid  
6 or unconstitutional, the remainder of the ordinance or its application to other persons or  
7 circumstances shall not be affected.

8 **Section 11: Scrivener's Error.**

9 Should any amendment to Kitsap County Code that was passed by the Board during its  
10 deliberations on this Ordinance be inadvertently left out upon publication, the explicit action of  
11 the Board as discussed and passed shall prevail upon subsequent review and verification by the  
12 Board.

13 **Section 12: Effective Date.**

14 This Ordinance shall take effect on **INSERT DATE**, three months after being adopted.

**DATED** or **ADOPTED** this \_\_\_\_ day of \_\_\_\_\_, 2026.

**BOARD OF COUNTY COMMISSIONERS  
KITSAP COUNTY, WASHINGTON**

\_\_\_\_\_  
**ORAN ROOT**, Chair

\_\_\_\_\_  
**KATHERINE T. WALTERS**, Commissioner

\_\_\_\_\_  
**CHRISTINE ROLFES**, Commissioner

ATTEST:

\_\_\_\_\_  
Marina Linville, Interim Clerk of the Board

Approved as to form:

\_\_\_\_\_  
Lisa Nickel, Deputy Prosecuting Attorney