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NO. 53373-1-II

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

PHYLLIS FARRELL, and individual; BRANDY KNIGHT, an individual; DEBRA JAQUA, an individual; LONI JEAN RONNEBAUM, an individual; SARAH SEGALL, an individual,

Respondents,

v.

FRIENDS OF JIMMY, a registered political committee; WE WANT TO BE FRIENDS OF JIMMY, TOO, a registered political committee; GLEN MORGAN and JANE DOE MORGAN, and the marital community comprised thereof;

Petitioners.

PETITION FOR DISCRETIONARY REVIEW

Attorney for Petitioners

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A. Identity of Petitioner

Petitioners FRIENDS OF JIMMY, a registered political committee; WE WANT TO BE FRIENDS OF JIMMY, TOO, a registered political committee; GLEN MORGAN and JANE DOE MORGAN, ask this Court to accept review of the Court of Appeals decision entered on July 21, 2020 pursuant to RAP 13.4.

B. Court of Appeals Decision

Petitioners seek review of Division Two's determination that Petitioners' conduct occurred in "trade or commerce" as well as the legal conclusion that Respondents' were injured in their "business or property" as required for liability under the Consumer Protections Act[1] (CPA). Petitioners further asserts error with the trial court's award of attorney's fees and its determination that Petitioners failed to preserve his claim and its determination that Petitioners failed to argue the issue of injury before the trial court. A copy of the decision is attached as Appendix A.

C. Issues Presented for Review

This case presents squarely a question of first impression as to the extent of conduct that is actionable under the CPA. The first question presented is whether the Act envisages liability for conduct occasioned during entirely political interactions. The second question is whether the mere receipt of an unsolicited phone call is an injury to "business or

[1] Chapter 19.86 RCW.

property" as required by the Act. Third, if the Court finds that Petitioners are not liable, the Court must conclude that the award of attorney's fees was likewise in error.

D. Statement of the Case

Petitioner Glen Morgan is a political activist who directed the operations of the Petitioner Political Action Committees, "Friends of Jimmy" and "We Want To Be Friends of Jimmy, Too". CP at 177-178, 188. During the 2016 election season on behalf of the two PAC's, Mr. Morgan sought out the services of Dialing Services, LLC a New Mexico corporation that provides bulk automated call services. Dialing Services is not now nor has ever been a party to this litigation.

Mr. Morgan contracted with Dialing Services to make automated phone calls on the Petitioners' behalf on five separate dates in during the fall election season of 2016. CP at 194. The calls were to various potential voters in Thurston County including Respondents. Dialing Services at all times assured Mr. Morgan that it would scrub the list for cells and that Dialing Services "will never dial a cell phone on our robodialers." CP at 259, 266.

There is no dispute that the calls scripted by Mr. Morgan were political in nature and that such variously urged voters to not vote for Jim Cooper a then-candidate for Thurston County Council who identified as a Democrat. CP 354-355.

Below, a chart identifies a transcript of what was communicated in each call:

Date (2016)	**Call Description**	**Transcribed Script**
Oct. 21	"JimCooperTrumpCall"	Why does Democrat Commissioner Candidate, Jim Cooper, treat woman like Donald Trump does? This is Karen Rogers, former Olympia City Council Woman. Several complaints were filed against Cooper for employee mistreatment and one female employee even quit because of his behavior. Jim Cooper even used his political influence to get a gag order against the woman to prevent them from talking. County Commissioner is an important position that oversees hundreds of workers. I will not vote for Cooper because I don't want him treating the County workers the way he treated woman at [inaudible]. Protect Thurston County employees; do not vote for Jim Cooper. [7 second pause] Paid for by Friends of Jimmy. Top contributor, we want to be Friends with Jimmy too.
Oct. 24	"RejectHateCalCooperHulseJZKn"	Why did Democrat Commissioner Candidates, Jim Cooper and Kelsey Hulse, accept campaign support from a racist cult leader? According to NPR Radio, J.Z. Knight said "Mexican's breed like rabbits, they're poison." Knight has contributed $80,000 to Cooper and Hulse's campaigns, breaking records for contribution. Democratic groups have rejected hate money; but, Cooper and Hulse keep it all. They even defended these comments to the Olympians. Please demand that Jim Cooper and Hulse get out of the gutter and reject hate money

		[7 second pause] Paid for by friends of Jimmy. Top contributor, we want to be friends with Jimmy too.
Oct. 31	"FinalThurstonRobocall"	According to the Olympians, Democratic Commissioner candidate, Jim Cooper, refuses to talk about why he was terminated from a local non-profit. This is Karen Rogers, former Olympia City council member. I served with Cooper and I know how he mistreats people. Several employees that worked under Cooper filed complaints against him for his behavior and the entire staff threatened to walk out unless he was fired. He was later fired unanimously by the Board. Cooper can't be trusted with managing employees and you shouldn't trust him to manage Thurston County. [9 second pause] No candidate authorized this ad. Paid for by Friends of Jimmy. Top sponsor, We want to be friends with Jimmy, Too.

Nov. 4	"CalltoArmsforDemsFINAL"	Hi, I'm Glenn Morgan. The Democrat Party has always opposed racism and violence in politics. That is why the Washington State Democratic Party divested itself from racist cult cash from J.Z. Knight in 2012. However, some have tried to turn the Party away from its principals. In Thurston County, the Party is funded by the same racist cult cash J.Z. Knight our State Party rejected. In Thurston County, Democratic Party officials have even made death threats. We are better than this. Call the State Party at this number and tell them to reject J.Z. Knight's racist cult cash and

		violence. Make your voice heard and keep the Party principals pure. [3 second pause] Paid for by friends of Jimmy. Top contributor, we want to be friends with Jimmy too.
Nov. 7	"FINALBIGONEROBOCALLGL"	This is Glenn Morgan again. The message the State Democrat Party doesn't want you to hear is I believe the State Party is not racist, which is why in 2012, divested $60,000 from J.Z. Night, a cult leader, who made racist speeches about Mexicans, Jews, and others. But the Thurston County Democrats took $150,000 from the same racist cult leader and will not reject her racist words. Please tell the Thurston Democrats to refute racism and not allow itself to be funded by it. [7 second pause] Paid for by friends of Jimmy. Top contributor, we want to be friends with Jimmy too.

CP 354-355.

Dialing Services, at the request of Mr. Morgan, engineered the calls to variously display as the originating numbers, the phone numbers of the Thurston County Democratic Party Headquarters, The Washington State Democratic Party, the Cooper Campaign and a return number owned and operated by Appellant. CP 155-156. Indeed, one of the calls explicitly asked the recipient to "Call the State Party *at this number*" in order to relay their concerns about the suitability of Cooper's candidacy. CP at 355.

Respondents initiated suit against Petitioner alleging that the phone calls violated the federal Telephone Consumer Protection Act 42 U.S.C. § 227(b)(1)(A) as calls to cellular phones were allegedly violative of the statue and that by falsely implying that the numbers originated from local and state Democratic Party such calls violated the TCPA. CP 185-197. Respondents also alleged that the calls violated Washington's Consumer Protection Act as the calls were unfair and deceptive "including that the spoofed caller ID numbers *and the substance of the pre-recorded messages* were likely to mislead reasonable persons." CP at 195. And that Respondents were "injured in their business or property by Defendant's unfair and deceptive practices." *Id.*

The trial court heard oral argument on February 15, 2019 and issued a ruling from the bench granting Respondents Motion for Summary Judgment and a subsequent written order on Respondents' WCPA claim. See RP 2/15/19[2] Vol.1 at 1 (Oral Ruling) and CP at 671 (Written Order).

Subsequently, on March 22, 2019 the trial court ordered fees and costs and entered a judgment in favor of Respondents of totaling $121,501.01. RP 3/22/19 at 34-37. CP at 1090-1093 (Order on Fees), CP at 1140-1142 (Final Judgment and Judgment Summary). This award was comprised of a "Principal Amount of $13,000", "prejudgment interest of

[2] To avoid confusion because of multiple transcripts identified as "Volume 1" and "Volume 2", Petitioner has designated the Report of Proceedings by the hearing date.

$2,337.33", "costs of $3,347.84", and "attorney's fees of $102,815.84". CP at 1140-1142. Neither the trial court's oral ruling subsequent written determinations allocate which portion of the principal, fees or cost were attributable to which of the two causes of actions. RP 3/22/19 at 34-37. CP at 1090-1093, CP at 1140-1142.

Petitioners did not contend error in the trial court's determination with respect to liability for the TCPA claim, rather Petitioners asserted error in the trial court's finding of liability pursuant to the CPA claim as well as the award of penalties, fees, costs and interest, associated with that claim.

Division Two rejected Petitioners' arguments and held that Petitioner's "phone calls occurred in trade or commerce". Appendix A at 2. Citing *Stephens v. Omni Ins. Co*., 138 Wn. App. 151, 160, 163, 159 P.3d 10 (Div. I, 2007), Division Two concluded that the CPA violation may occur even without a consumer of business relationship between a plaintiff and a defendant. Id. at 5. And that "[Petitioner's] meet the trade or commerce element based on [their] purchase and use of Dialing Services' automated call platform which affected the people of Washington." Id. at 6.

Division Two declined to reach the issue of whether or not Respondents had suffered an injury finding that Respondents had conceded the "argument by failing to contest the injury element during the trial court proceedings below. Id at 7.

E. Argument Why Review Should Be Accepted

This Court should accept review because if let stand, Division Two's interpretation of the extent of the CPA will usher in the limitless application of the CPA to a universe of conduct outside what is "trade" or "commerce". This Court should take this opportunity to provide guidance as to the extent that the CPA is applicable and confirm that the Act is not a catch-all that provides a right of action in non-commercial settings.

To establish a CPA violation, the plaintiff must prove five elements: (1) an unfair or deceptive act or practice that (2) occurs in trade or commerce, (3) impacts the public interest, (4) and causes injury to the plaintiff in her business or property, and (5) the injury is causally linked to the unfair or deceptive act." *Michael v. Mosquera-Lacy*, 200 P.3d 695, 698-699 (2009). "A plaintiff alleging injury under the CPA must establish all five elements." *Id.* at 699.

The terms "trade" and "commerce" are explicitly defined to "include the sale of assets or services, and any commerce directly or indirectly affecting the people of the state of Washington." RCW 19.86.010. Because Respondents' calls were purely political in nature and devoid of any economic characteristic that would bring such into the requisite economic purview of the CPA, the trial court erred when it determined that Respondents' conduct violated the CPA.

The purpose of the CPA is to "protect the public and foster fair and honest competition." RCW 19.86.920. In the instant case, the trial court and the Court of Appeals erred by expanding the coverage of the CPA to cover claims where no economic relationship exists between the parties. Accordingly, the appellate decision is in conflict with the express statutory provisions of the CPA, case law and is a matter of great public importance. Indeed, there are few reported cases from the Supreme Court that define the boundaries of the Act's applicability and this Court should take the opportunity to provide guidance on the Act's extent.

Notably, the lower courts' reliance on *Stephens* ignored the salient factual distinction of *Stephens* that there the defendant insurance company was attempting to collect repayment from the plaintiff for an insurance payment the insurance company had made to a third party. In other words, in *Stephens*, the defendant was attempting to collect a debt allegedly owed to it by plaintiff. *Stephens,* 159 P.3d 10, 14. Accordingly, there, unlike here, the complained of conduct -- the illegitimate and deceptive attempt to collect reimbursement for an insurance payout -- is clearly a commercial activity. To the contrary, in the present case, Respondents did not have any commercial relationship with Petitioners, nor did Respondents have any commercial relationship with Dialing Services.

Rather, the motivation, substance and content of the robocall was entirely political. The only commercial activity here was Petitioners'

contracting with an out-of-state vendor, Dialing Services. In essence, were the decisions below are left to stand, any service or product procured in the market that is subsequently used for deception -- even in an entirely non-economic realm -- would be actionable under the CPA. Indeed, it would be difficult to imagine any circumstance where a deception is perpetrated without some instrumentality of commerce being utilized. Were the lower court's decision left undisturbed, all sorts of causes of action sounding in the CPA could be asserted in the realms of politics, romance, neighborly disputes, academics and others, regardless of the clear language and intent of the CPA.

F. Conclusion

This Court should accept review and reverse the appellate Court's determination that the CPA applies to the facts of this case. The Court should further reverse the award of attorney's fees associated with the CPA claim and remand matter to the trial court for further proceedings.

Respectfully submitted this 20th day of August 2020.

s/Nicholas Power
Nicholas Power
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Appendix A

Filed
Washington State
Court of Appeals
Division Two

July 21, 2020

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION II

PHYLLIS FARRELL, an individual; BRANDY KNIGHT, an individual; DEBRA JAQUA, an individual; LONI JEAN RONNENBAUM, an individual; and SARAH SEGALL, an individual, Respondents, v. FRIENDS OF JIMMY, a registered political committee; WE WANT TO BE FRIENDS OF JIMMY, TOO, a registered political committee; GLEN MORGAN and JANE DOE MORGAN, and the marital community comprised thereof, Appellants.	No. 53373-1-II UNPUBLISHED OPINION

WORSWICK, J. — After receiving automated phone calls, Phyllis Farrell and others brought an action under the Washington Consumer Protection Act[1] (CPA) against Glen Morgan and two political action committees. Farrell moved for summary judgment on her claim, which the trial court granted. This case requires us to resolve only the narrow issue of whether the automated calls meet the trade or commerce element of a CPA claim.

Morgan argues that the trial court erred by granting Farrell's motion for summary judgment because Ferrell failed to prove two elements of her CPA claim: (1) that the phone calls occurred in trade or commerce and (2) that the phone calls injured Farrell's business or

[1] Chapter 19.86 RCW.

property. Morgan also argues that the court improperly awarded Farrell her attorney fees. Farrell argues that Morgan failed to preserve his argument regarding the injury element and that she is entitled to attorney fees on appeal.

We hold that Morgan's phone calls occurred in trade or commerce and that Morgan did not preserve his argument regarding injury. Additionally, we hold that the trial court properly awarded Farrell reasonable attorney fees and that Farrell is entitled to reasonable attorney fees on appeal. Thus, we affirm the trial court's grant of summary judgment.

FACTS

During the 2016 election cycle, Morgan, director of two political action committees, "Friends of Jimmy" and "We Want To Be Friends of Jimmy, Too" (collectively Morgan), made five automated telephone calls to voters in Thurston County. These phone calls urged the receiver of the calls to not vote for a certain candidate for Thurston County Council. Morgan sent these calls to cell phones as well as landlines.

To place these calls, Morgan contracted with Dialing Services LLC. Dialing Services provided Morgan access to its auto-dialing platform. Morgan entered phone numbers into the system, selected a prerecorded message to send, and chose a "spoofed"[2] phone number to appear on the receivers' phones. Clerk's Papers at 156. Morgan sent approximately 146,032 prerecorded automated phone calls to 52,122 phone numbers. Morgan spoofed the caller I.D. (identification) to make it appear as though the phone calls came from the Thurston County Democrats, the targeted candidate, and another local Democratic party office.

[2] Spoofing a phone number means that the phone number which shows up as the caller I.D. (identification) is not the actual instigator of the phone call.

Farrell, Brandy Knight, Debra Jaqua, Loni Jean Ronnenbaum, and Sarah Segall (collectively Farrell), received Morgan's automated calls. Farrell filed a lawsuit against Morgan, alleging a violation of the federal Telephone Consumer Protection Act of 1991 (TCPA), 47 U.S.C. § 227.[3] Farrell later filed an amended complaint, alleging that Morgan's automated calls violated the CPA. Farrell then moved for summary judgment, arguing that she met all elements of a CPA claim. The trial court granted Farrell's motion for summary judgment on the CPA claim and awarded Farrell her attorney fees and costs.

Morgan appeals the order granting summary judgment and awarding Farrell's attorney fees and costs.

ANALYSIS

I. CONSUMER PROTECTION ACT

Morgan argues that Farrell failed to prove her CPA claim. Specifically, Morgan argues that Farrell failed to prove that the phone calls (1) occurred in trade or commerce and (2) injured business or property. Farrell contends that we should decline to address Morgan's argument regarding the injury element because Morgan failed to contest this element during the trial court proceedings below. We hold that the phone calls meet the trade or commerce element, and we decline to address the injury element.

[3] In a separate, prior motion for summary judgment, Farrell argued that Morgan violated the TCPA. The trial court ruled as a matter of law that Morgan violated the TCPA. Morgan's violation of the TCPA is not at issue on appeal.

A. *Legal Principles*

We review a motion for summary judgment de novo. *Michael v. Mosquera-Lacy*, 165 Wn.2d 595, 601, 200 P.3d 695 (2009). Summary judgment is appropriate when there are no genuine issues of material fact and the moving party is entitled to judgment as a matter of law. CR 56(c). We view all evidence in a light most favorable to the nonmoving party. *Michael*, 165 Wn.2d at 601. Where reasonable minds could reach but one conclusion from the admissible facts, summary judgment should be granted. *Elliott Bay Seafoods, Inc. v. Port of Seattle*, 124 Wn. App. 5, 11 n.2, 98 P.3d 491 (2004).

The CPA provides, "Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful." RCW 19.86.020. The CPA broadly protects the public interest and is liberally construed. RCW 19.86.920; *Panag v. Farmers Ins. Co.*, 166 Wn.2d 27, 40, 204 P.3d 885 (2009).

To prevail on a CPA claim, a private plaintiff "must prove (1) an unfair or deceptive act or practice, (2) occurring in trade or commerce, (3) affecting the public interest, (4) injury to a person's business or property, and (5) causation." *Panag*, 166 Wn.2d at 37.

B. *Trade or Commerce Element*

Morgan first argues that Farrell failed to show that the automated calls met the trade or commerce element. Specifically, he argues that the "calls were purely political in nature and totally devoid of economic attributes or consequences that could implicate the WCPA." Br. of Appellant at 9. We hold that the automated calls meet the trade or commerce element.

"Trade or commerce" includes the sale of services and "any commerce directly or indirectly affecting the people of the state of Washington." RCW 19.86.010(2). This element

broadly includes "every person conducting unfair acts in any trade or commerce." *Nordstrom, Inc. v. Tampourlos*, 107 Wn.2d 735, 740, 733 P.2d 203 (1987). An actor can violate the CPA without any consumer or business relationship between the plaintiff and the actor because the "trade or commerce" element is not limited to those transactions. *Panag*, 166 Wn.2d at 39.

In *Stephens v. Omni Ins. Co.*, automobile insurance companies contracted with Credit Control Services to collect debt from underinsured or uninsured motorists. 138 Wn. App. 151, 160, 163, 159 P.3d 10 (2007). Credit Control Services sent "collection notices" to the motorists on behalf of the insurance companies. *Stephens*, 138 Wn. App. at 160. Division One of this court considered whether the "collection notices" of Credit Control Services met the "trade or commerce" element. *Stephens*, 138 Wn. App. at 173. The court held that the sale of Credit Control Services' collection services to the insurance companies "indisputably occurred in trade or commerce." *Stephens*, 138 Wn. App. at 173. An alleged violator and a plaintiff need not have an underlying consumer relationship to meet the trade or commerce element. *Stephens*, 138 Wn. App. at 176. "Because Credit [Control Services] conducts commerce with [the insurance companies], and their commerce directly or indirectly affects people of the state of Washington including uninsured drivers, we conclude that Credit's practice of sending the notices is one that occurred in trade or commerce." *Stephens*, 138 Wn. App. at 176.

The Supreme Court affirmed *Stephens* in *Panag v. Farmers Ins. Co.*, 166 Wn.2d at 34. The court emphasized that a CPA violation may occur without a consumer or business relationship. *Panag*, 166 Wn.2d at 39. The CPA requires a causal link between the alleged CPA violation and the injury to a plaintiff's business or property. *Panag*, 166 Wn.2d at 39; RCW 19.86.090.

Morgan's calls meet the trade or commerce element. Morgan contracted with Dialing Services to conduct his automated calls. He purchased access to and use of Dialing Services' automated call platform and paid Dialing Services for each call that was sent out. These calls were sent to people in Thurston County. Morgan meets the trade or commerce element based on his purchase and use of Dialing Services' automated call platform which affected the people of Washington.

Morgan cites to *Michael v. Mosquera-Lacy*, 165 Wn.2d 595, to argue that his phone calls were not used to increase revenue or hinder competition. But *Michael* addressed whether a CPA claim was properly asserted against a learned professional when a dentist used cow bone for a procedure after the dentist told the patient that only human bone would be used. 165 Wn.2d at 603-04. Our Supreme Court held that learned professionals are not exempt from the CPA; however, the term "trade" as used in the CPA includes only the entrepreneurial or commercial aspects of professional services. *Michael*, 165 Wn.2d at 602-03. Claims for negligence against professionals are exempt from the CPA. *Michael*, 165 Wn.2d at 603. The court held that the dentist's use of cow bone was not entrepreneurial, but instead related to the dentist's judgment and treatment of a patient. *Michael*, 165 Wn.2d at 604. As a result, the patient did not have an actionable CPA claim. *Michael*, 165 Wn.2d at 604. *Michael* is inapplicable here because Morgan was not acting as a learned professional. We hold that the trial court did not err by granting summary judgment based on the "trade or commerce" element.

C. *Injury to Business or Property Element*

Morgan next argues that Farrell failed to show an injury to business or property. Farrell argues that Morgan conceded this argument by failing to contest the injury element during the trial court proceedings below. We agree with Farrell and decline to address the injury element.

We generally do not consider arguments on issues that a litigant did not raise to the trial court. *Cave Properties v. City of Bainbridge Island*, 199 Wn. App. 651, 662, 401 P.3d 327 (2017). RAP 9.12 provides, "On review of an order granting or denying a motion for summary judgment the appellate court will consider only evidence and issues called to the attention of the trial court." RAP 9.12's purpose is to effectuate the rule that the appellate court engages in the same inquiry as the trial court below. *Vernon v. Aacres Allvest, LLC*, 183 Wn. App. 422, 436, 333 P.3d 534 (2014).

Here, Morgan never disputed the injury element of Farrell's CPA claim in the trial court. Farrell's motion for summary judgment argued that every CPA element was established, including injury. Morgan's response to Farrell's motion for summary judgment contested only the first two elements: (1) unfair or deceptive and (2) trade or commerce. In reply and at the summary judgment hearing, Farrell stated that Morgan did not dispute the injury element. Morgan did not refute this.

On appeal, Morgan argues that he did not concede injury because the phone calls were factually accurate and because he was self-represented. However, the factual accuracy of the content of Morgan's calls is not related to the injury element. Additionally, a pro se litigant is bound by the same procedural rules and substantive laws as an attorney. *Westberg v. All-*

Purpose Structures, Inc., 86 Wn. App. 405, 411, 936 P.2d 1175 (1997). We do not consider Morgan's argument regarding the injury element for the first time on appeal.

ATTORNEY FEES

Morgan argues that the trial court improperly awarded Farrell's attorney fees and costs. Morgan argues only that the attorney fees and costs were "predicated on the invalid WCPA claim." Br. of Appellant at 13. Because Farrell's CPA was valid, we hold that the trial court properly awarded Farrell's attorney fees below.

Farrell argues that she is entitled to her attorney fees on appeal under RAP 18.1 and RCW 19.86.090. A litigant who brings a successful CPA action is entitled to recover expenses and attorney fees on appeal. RCW 19.86.090; *Svendsen v. Stock*, 143 Wn.2d 546, 560, 23 P.3d 455 (2001). Thus, we award Farrell her attorney fees.

We affirm.

A majority of the panel having determined that this opinion will not be printed in the Washington Appellate Reports, but will be filed for public record in accordance with RCW 2.06.040, it is so ordered.

Worswick, J.

Melnick, J.

Sutton. A.C.J.

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that today I e-filed and delivered a copy of the foregoing **Petition for Discretionary Review** by email pursuant to an electronic service agreement among the parties to the following:

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Address:
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Dated this 20th August 2020
Friday Harbor, Washington.

s/Nicholas Power
Nicholas Power

LAW OFFICE OF NICHOLAS POWER

August 20, 2020 - 12:08 PM

Transmittal Information

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