NO. 99068-9

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

M.E. and J.E., minors, through MICHAEL MCKASY,
as Litigation Guardian *ad Litem*;
and JOSHUA EDDO, individually,

Plaintiffs/Petitioners,

v.

CITY OF TACOMA

Defendant/Respondent.

ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

There is no question that law enforcement agencies have a duty, under RCW 26.44.050, to investigate allegations of possible abuse or neglect of children. As this Court has made clear, however, this cause of action only arises when the alleged negligent investigation results in a harmful placement decision. In this case, the undisputed facts establish that the officers did not have probable cause to believe that M.E. and J.E. were in imminent danger and therefore, the officers could not take the girls into protective custody. Further, the undisputed facts establish that the officers made an arrest just as soon as they had probable cause to do so and were able to locate the suspect. Absent probable cause, either to make an arrest or to take the children into protective custody, the police are powerless to act and are not capable of making any placement decisions.

Division II carefully and thoughtfully applied this Court's precedents to the undisputed facts in this case. In so doing, Division II reached the same conclusion that the trial court had reached – plaintiffs have failed to adduce sufficient evidence to establish a *prima facie* case of negligent investigation under RCW 26.44.050, and consequently, their claims fail as a matter of law

As outlined herein, there are no grounds to grant review of Division II's opinion in this case. The instant petition should be denied.

II. ISSUES PRESENTED FOR REVIEW

1. Did Division II correctly decide that plaintiffs' claim for negligent investigation failed, as a matter of law, where there was no probable cause to take enforcement action and consequently, the officers did not make harmful placement decision.

2. Did Division II correctly refuse to consider an argument about the existence of a common law duty where plaintiffs made the argument in a footnote and failed to provide citation to the record or any legal authority in support of such a duty.

III. STATEMENT OF THE CASE

Division II's opinion lays out the salient facts underlying this case. As this case involved multiple investigations, however, a comprehensive timeline will assist the Court in evaluating the instant petition:

October 14, 2011: TPD Officers Corn and Terwilliger were dispatched to check on the welfare of a child (J.E., 3 years old) who might have taken some of mom's medicine and vomited. CP 111-120. Officers determined that child had a fever and there was no evidence the child had taken any medication. Id. Although the house was a wreck, the children were in the custody of an adult and there was food in the house. Id. Because there was no probable cause to take the children into protective custody, the officers referred the conditions in the house to CPS. CP 114.

January 3, 2012: TPD Detective Brooks was assigned CPS referral 2551025, wherein it was alleged that M.E. (age 5) and J.E. (age 3)

said that there was a ghost in the shower watching them and the ghost had punched J.E. in the back. CP 152-167; CP 230-256.

January 5, 2012: Detective Brooks contacted and interviewed the person who made the CPS referral. CP 152-153; CP 251-256.

January 6, 2012: Detective Brooks and CPS social worker conducted a safety interview with both girls. CP 155-157. That same day, both girls were seen at the Child Advocacy Center for medical examinations. Id.; CP 238-249. There were no disclosures of abuse by either girl and no physical evidence of abuse. Id. The investigation did not give rise to probable cause to believe that a crime had been committed. CP 159-160. Further, as a result of the investigation, the detective did not have probable cause to believe that M.E. or J.E. were in imminent danger. Id. Consequently, the detective had no legal authority to make an arrest or to take the girls into protective custody. Id.

May 1, 2013: Detective Quillio was assigned CP referral 2800654, wherein it was reported that Jason Karlan had sexually abused a 6-year old boy, J.B.. CP 130-134; CP 1040. CPS referral 2800654 did not include any allegations of abuse against M.E. or J.E.. CP 130-136.

May 16, 2013: Following her initial investigation, Detective Quilio and medical social worker at the Child Abuse Intervention

Department (CAID)[1] conducted a forensic interview with J.B.. CP 122-123; CP 1040-1041. During the forensic interview, J.B. made clear disclosures of molestation by Karlan[2]. CP 1041. As a result of J.B.'s disclosures, Detective Quilio had probable to arrest Karlan. CP 1042. At that time, Detective Quilio did not have a current address for Karlan and did not know where he was. Id.; CP 123-124.

May 16, 2013 through July 13, 2013: Detective Quilio attempted to locate Karlan, but was unable to do so. CP 123; CP 1051. Because Karlan lived with Jocelyn Drayton (M.E. and J.E.'s mother) M.E. and J.E., Detective Quilio had no way to contact Ms. Drayton and no way to speak with M.E. or J.E.. Id.

July 13, 2013: At Detective Quilio's request, the superior court issued an arrest warrant for Karlan for the rape of J.B.. CP 1054.

July 13, 2013 through August 27, 2013: Detective Quilio continued her efforts to locate Karlan (and by extension, Drayton, M.E. and J.E.).

[1] CAID, a department at Mary Bridge Children's Hospital, is responsible for both the medical and forensic aspects of child abuse investigations. The Child Advocacy Center (CAC) is part of CAID.

[2] J.B. did not make any reference to M.E. or J.E. during his forensic interview and did not disclose any abuse of the girls by Karlan.

August 27, 2013: Shortly before midnight, Karlan was located by patrol officers and arrested. CP 1054-1055.

August 28, 2013: In the early morning hours, Detective Quilio responded to the station and interviewed Karlan. Id.; CP 1043. Karlan was then booked into jail. CP 1056.

August 29, 2013: Detective Quilio contacted Jocelyn Drayton and advised her of Karlan's arrest and the allegations against him. CP 1043. Detective Quilio advised Drayton to talk with her girls to see if they would disclose abuse by Karlan, now that he was out of the home. CP 1043-1044. During this conversation, Drayton advised Detective Quilio that she had spoken with her girls and they had not disclosed any abuse. Id. That same day, Detective Quilio then contacted Joshua Eddo and had the same conversation with him as she had had with Drayton. Id. Specifically, Detective Quilio advised Eddo to talk with his girls about the possibility of abuse by Karlan. Id. Later that day, Eddo called Detective Quilio back and left a message, saying he had spoken with his girls and they had not disclosed any abuse by Karlan. Id.; CP 1060.

October 29, 2013: M.E. went to her school counselor and disclosed, *for the first time*, that she had been abused by Karlan[3]. CP 144.

[3] The CPS referral indicated that Karlan had been released from jail, but had not returned to Jocelyn Drayton's home and was not currently living with M.E. and J.E.. CP 144.

The school counselor reported the disclosure to CPS. CP 144-150. Detective Quilio investigated the referral and during a forensic interview, M.E. made a clear disclosure of abuse. CP 126-127.

November 8, 2013: Karlan was arrested again and charged with the rape of M.E.. CP 303-306; CP 425. In the Information, the prosecutor indicated that the sexual abuse of M.E. occurred sometime between *August 1, 2012, and October 1, 2013*. CP 303-306. Similarly, as noted by Division II, plaintiffs' damage expert wrote a report, indicating that M.E. had claimed the abuse began in the first grade in the fall of 2012 and ended the summer before she began second grade in 2013. M.E. v. City of Tacoma, No. 53011-2-II, 2020 Wash. App. LEXIS 2426, 2020 WL 5223232 (Wash. Ct. App. Sept. 1, 2020), as contained in the Appendix to the Petition for Review, at p. A-8; CP 424-425. Thus, all available evidence in the record indicates that any abuse of M.E. by Karlan did not occur until *at least six months after* Detective Brooks completed her investigation into the "ghost in the shower" referral.

J.E. never made a disclosure of abuse and Karlan was never charged with abusing J.E..

IV. REASONS WHY REVIEW SHOULD BE DENIED

A. Standard for Review

Pursuant to the Washington Rules of Appellate Procedure, a petition for review to the Washington Supreme Court is accepted only:

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
> (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals; or
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13 .4(b). Plaintiffs contend that review is warranted because Division II's decision is in conflict with this Court's decision in M.W. Petition for Review, p. 7 (citing RAP 13.4(b)(1)). Plaintiffs further contend that review is warranted because Division II's opinion diminishes the protection of children in Washington State and involves an issue of substantial public importance. Id. at p. 16 and 19 (citing RAP 13.4(b)(2) and (4)). As outlined herein, there is no basis for this Court to grant review. Division II's opinion in this matter is well-reasoned, supported by the facts and consistent with this Court's decisions on negligent investigations claims and its progeny. Moreover, contrary to plaintiffs' contentions, Division II's opinion does not lessen the protections of RCW

26.44.050 and this case does not present a new or substantial issue of public importance.

The instant petition should be denied.

B. Division II's decision does not conflict with this Court's decision in M.W.

RCW 26.44.050 imposes a duty, actionable in tort, on law enforcement to investigate reports of possible abuse or neglect of a child. A plaintiff asserting negligent investigation under RCW 26.44.050 must prove that law enforcement conducted an incomplete or biased investigation that resulted in a harmful placement decision. McCarthy v. Clark County, 193 Wn. App. 314, 328-29, 376 P.3d 1127 (2016)(citing M.W. v. Dep't of Soc. & Health Svcs., 149 Wn.2d 589, 602, 70 P.3d 954 (2003)). "A harmful placement decision includes 'removing a child from a nonabusive home, placing a child in an abusive home or letting a child remain in an abusive home.'' Id.

Plaintiffs allege that because the officers did not remove M.E. and J.E. from the family home in October 2011 (at the time of the child welfare check) or in January 2012 (at the time of the "ghost in the shower" investigation), the officers made a harmful placement decision and Division II erred in not so finding. Plaintiffs assert that, on this basis, Division II's opinion is contrary to this Court's decision in M.W., *supra*,

since "leaving children in the same home as a nonrelative child rapist" is certainly a harmful placement decision. Petition for Review, p. 7. Plaintiffs' argument is premises on the assumption that 1) abuse had occurred; and 2) the officers had the legal authority to take some action. Both assumptions are wrong. Plaintiffs' arguments notwithstanding, Division II corrected noted that the police did not make a harmful placement decision in either of those instances because there was no evidence of abuse. In other words, there was no evidence in the record to establish that Karlan was abusing the girls in October of 2011 and January of 2012, and consequently, the officers necessarily did not make a harmful placement decision.

Throughout their petition, plaintiffs argue that police have the ability to "immediately remove a child at risk from an abusive placement[.]" Petition for Review, p. 5 n.4. Plaintiffs fail, however, to ever correctly articulate the standard that applies to such a circumstance, and their gross generalizations are disingenuous, at best. RCW 26.44.050 allows an officer to take a child into protective custody, without a court order, only when "there is *probable cause* to believe that the child is abused or negligence and that the child would be injured or could not be taken into custody if it were necessary to first obtain a court order[.]" (emphasis added) RCW 26.44.050 (2018). Thus, under the express terms

of the statute, in order to take a child into protective custody, the officer must have probable cause to believe the child has been abused and probable cause to believe that the child is in imminent danger. As outlined by Division II, the officers did not have probable cause in either October 2011 or January 2012 to believe that the children had been abused or to believe that the children were in imminent danger. M.E., *supra*, as contained in the Appendix to the Petition for Review, at p. A-12 to A-13.

Once the investigatory avenues were depleted and probable cause had not been established, the officers had no legal authority to take any enforcement action (either arrest of a suspect or removal of the children from the home)[4]. Absent legal authority to take enforcement action, it cannot be said that the officers made a "placement decision." To hold that they did under these circumstances would be to grossly expand the scope of liability under RCW 26.44.050 in a way that has already been rejected by the appellate courts. See Yonker v. Dep't of Soc. & Health Svcs., 85 Wn. App. 71, 81, 930 P.2d 958 (1997)(RCW 26.44.050 does not create duty to prevent every case of child abuse).

[4] Plaintiffs argue that their experts' opinion created a material question of fact. It did not. The courts are imminently qualified to determine whether specific facts are sufficient to give rise to probable cause, as both the superior court and Division II did in this case. The fact that an expert disagrees on the existence of probable cause – which is essentially a legal question – does not create a material question of fact. Ball v. Smith, 87 Wn.2d 717, 722-23, 556 P.2d 936 (1976).

Contrary to plaintiffs' claims, Division II's opinion in the instant case is entirely consistent with this Court's jurisprudence.

C. Division II's opinion does not lessen the protections of RCW 26.44.050 and does not present a new or substantial issue of public importance

Plaintiffs argue that Division II's opinion in this case will result in less protection for children of Washington State, and consequently, involves an issue of substantial public importance. Plaintiffs' argument on this point is premised primarily on the idea that the police had a duty to re-open the "ghost in the shower" investigation in May of 2013, when TPD received the referral for the abuse of J.B.. In essence, plaintiffs argue that a report of abuse of J.B. by Karlan triggered a duty owed by police to M.E. and J.E. because Karlan had access to M.E. and J.E.. This argument is contrary to both the undisputed facts and the law.

First, plaintiffs claim that if officers had reopened the 2012 investigation in 2013, when J.B. disclosed that Karlan had abused him, "it should have resulted in Karlan's separation from the girls until the investigation resolved what had occurred." Petition for Review, p. 15. This contention is negated by the undisputed facts in the record.

As outlined above, the first time Tacoma Police had probable cause to arrest Karlan was on May 16, 2013, when J.B. made clear disclosures of abuse during the forensic interview. The earlier

contacts/investigations (the child welfare check and the "ghost in the shower" referral) had not resulted in probable cause to arrest anyone. In May of 2013, when probable cause was developed to arrest Karlan, Detective Quilio did not know where Karlan was and was not able to immediately find him. Moreover, Karlan was living with Jocelyn Drayton, and the girls, which meant that Detective Quilio also did not know where M.E. or J.E. were. Thus, even if Detective Quilio had re-opened the earlier "ghost in the shower" investigation at the time of J.B.'s disclosure[5], nothing she could have done would have "resulted in Karlan's separation from the girls." The material facts are undisputed. Karlan was separated from M.E. and J.E. at the earliest possible moment – on August 27, 2013, when Karlan was located by patrol officers and arrested.

Second, the lower courts have already considered – and rejected – the argument that RCW 26.44.050 creates a duty owed to a child and their families other than the child who is the subject of the referral. M.M.S. v. Dep't of Soc. & Health Servs., Child Protective Servs., 1 Wn. App. 2d 320, 404 P.3d 1163 (2017), rev. denied, 190 Wn.2d 1009 (2018); Boone v. Dep't of Soc. & Health Servs., 200 Wn. App 723, 403 P.3d 873 (2017).

[5] As outlined in her declaration, without new or additional information, there was no basis for Detective Quilio to reopen Detective Brooks' investigation. All investigatory leads had been exhausted and there was no probable cause to take enforcement action. CP 1043.

For example, in M.M.S., Division II relied upon the plain language of the statute in concluding that the duty was limited to the child is the subject of the referral:

> Under the plain language of RCW 26.44.050, neither Crystal nor M.M.S. is within the class of persons for whose benefit RCW 26.44.050 was enacted. RCW 26.44.050 imposes a duty to investigate "upon the receipt of a report concerning the possible occurrence of abuse or neglect . …" Based on this anguage, RCW 26.44.050 was enacted to benefit children *who are subjects of reports concerning possible abuse or neglect*.

M.M.S., Wn. App. 2d at 331. The Boone court engaged in a similar analysis and reached the same conclusion:

> As it relates to the investigations done in 1992, 1997, and January 2006, the Boone children are not within the class of persons for whose benefit RCW 26.44.050 was enacted. The Boones allege that they are within the class of persons because RCW 26.44.050 was enacted to protect all abused children. Br. of Appellant at 19-20. But, the Boones' reading of the class of persons for whose benefit RCW 26.44.050 was enacted is too broad. Under RCW 26.44.050, the duty to investigate with reasonable care is triggered by "a report concerning the possible occurrence of abuse or neglect." Therefore, the class of persons protected by the duty to investigate are the children ***who are the subjects*** of a report of possible abuse or neglect. Insofar as the Boones rely on the investigations into the abuse of other children in the day care in 1992, 1997, and January 2006, the Boones are not within the class of persons for whose benefit RCW 26.44.050 was enacted because the Boone children were not the subjects of the reports of alleged abuse that triggered those investigations.

> The Boones cite to two cases, *Lewis v. Whatcom County*, 136 Wn. App. 450, 149 P.3d 686 (2006) and *Yonker v. Department of Social & Health Services*, 85 Wn. App. 71, 930 P.2d 958 (1997). However, neither case supports the conclusion that children and families who were not the subject of the report triggering the investigation are within the class of persons for whose benefit RCW 26.44.050 was enacted.

(emphasis added) Boone, 200 Wn. App. at 734. Thus, contrary to plaintiffs' claims, the disclosure of abuse by J.B. did not impose a duty on law enforcement to investigate Karlan for the benefit of M.E. and J.E..

There is no question that Washington has deemed the safety of its children to be of great importance and a significant issue of public policy. In that respect, this case – like every case involving allegations of child sexual abuse – involves a matter of public importance. But this case does not present any unique issues or considerations that require review by this Court. Division II correctly applied the legal standards to the undisputed facts, and in so doing, affirmed the grant of summary judgment to the City. There is no error that warrants review.

D. Division II did not err in refusing to consider an argument not briefed to the court.

Plaintiffs argue that Division II also erred in "failing to discern" a common law duty owed to M.E. and J.E. under the facts of this case. Petition for Review, p. 16-19. As outlined in Section E, *infra*, there is no legal basis for the imposition of a common law duty in the instant case.

But the Court need never reach the merits of this argument, as plaintiffs waived the argument on appeal.

The reason for Division II's treatment of plaintiffs' common law duty argument was made plain in the court's opinion:

> In addition to their references to RCW 26.44.050 and the common law duty identified in H.B.H., the appellants note that "[u]nder the common law, in general, where police officers act 'they have a duty to act with reasonable care.'" The appellants only make this assertion in a footnote. They do not appropriately define the scope or nature of an actionable common law duty against law enforcement. Nor do the appellants actually apply the assertion to the facts of this case.

(internal citations omitted). M.E., *supra*, as contained in the Appendix to the Petition for Review, at p. A-17. Plaintiffs' failure to provide any citation to the record or authority/argument in support of this issue all but guaranteed that Division II would not consider this argument. See Bohn v. Cody, 119 Wn.2d 357, 368, 832 P.2d 71 (1992)(appellate court will not consider inadequately briefed argument; Cowiche Canyon Conservancy v. Bosley, 118 Wn.2d 801, 809, 828 P.2d 549 (1992)(argument unsupported by citation to the record or authority will not be considered). Division II's refusal to consider an inadequately brief issue does not merit review.

E. There is no common law duty to investigate allegations of child abuse or neglect.

In the alternative, law enforcement did not owe a common law duty to the plaintiffs under the facts of this case. To begin, there is no question that Washington does not recognize a common law cause of action for negligent investigation against law enforcement. See, e.g., M.W. v. Dept. of Social and Health Services, 149 Wn.2d 589, 601, 70 P.3d 954 (2003) ("Our courts have not recognized a general tort claim for negligent investigation."); Laymon v. Department of Natural Resources, 99 Wn. App. 518, 530, 994 P.2d 232 (2000) ("A claim of negligent investigation will not lie against police officers."); Rodriguez v. Perez, 99 Wn. App. 439, 994 P.2d 874 (2000) ("Thus, in general, a claim for negligent investigation does not exist under the common law because there is no duty owed to a particular class of persons."); Corbally v. Kennewick School District, 94 Wn. App. 736, 740, 973 P.2d 1074(1999) ("In general, a claim for negligent investigation is not cognizable under Washington law.")'; Fondren v. Klickitat County, 79 Wn. App. 850, 862, 905 P.2d 928 (1995) ("A claim for negligent investigation is not cognizable under Washington law."); Donaldson v. City of Seattle, 65 Wn. App. 661, 671, 831 P.2d 1098 (1992) ("Washington does not recognize the tort of negligent investigation."); Dever v. Fowler, 63 Wn. App. 35, 816 P.2d

1237 (1991) ("The reason courts have refused to create a cause of action for negligent investigation is that holding investigators liable for the negligent acts would impair vigorous prosecution and have a chilling effect upon law enforcement."). Thus, plaintiffs' contention that a common law duty arises under general negligence principles, as set out in §218 of the Restatement (Second) of Torts, is unavailing.

Second, plaintiffs' argument that §302B of the Restatement gives rise to an actionable duty under the facts of this case is equally futile. §302B of the Restatement (Second) of Torts is limited to situations where there is a duty to protect the plaintiff from the criminal acts of a third party[6]. See, e.g., Robb v. City of Seattle, 176 Wn.2d 427, 439-40, 295 P.3d 212 (2013). This duty "can arise 'where the actor's own affirmative act has created or exposed the other to a recognizably high degree of risk of harm" from the criminal acts of a third party. Id. For example, in Robb, this Court reasoned that "absent some kind of special relationship between the plaintiff and defendant under Restatement § 302B, only misfeasance, not nonfeasance, could create a duty to act reasonably to prevent

[6] §302B provides: "An act or an omission may be negligent if the actor realizes or should realize that it involves an unreasonable risk of harm to another through the conduct of the other or a third person which is intended to cause harm, even though such conduct is criminal." The comments to this section indicate that this section imposes a duty in some situations where an actor's own affirmative act has created or exposed the plaintiff to a recognized high degree of risk of harm through the misconduct or criminal act of third person.

foreseeable criminal conduct." Robb, 176 Wn.2d at 758. Because the police had no special relationship with the plaintiff and their conduct did not create a new risk to the plaintiff (but rather simply failed to ameliorate an existing risk by picking up the shotgun shells), § 302B did not operate to create a duty. Id. at 758-59.

In contrast, in Washburn, the court concluded that the officer had a statutory duty to serve the anti-harassment order and by his affirmative conduct, the officer created a new risk to the decedent. Consequently, § 302B operated to create a duty, imposed on the officer, to guard the decedent against the criminal acts of her boyfriend. Washburn v. City of Federal Way, 178 Wn.2d 732, 759-60, 310 P.3d 1275 (2013). In the instant case, there is no evidence to suggest that the City's affirmative conduct operated to create a new risk to M.E. or J.E.. Consequently, §302 has no application in this case.

V. CONCLUSION

As outlined herein, there are no grounds for the Supreme Court to grant review of Division II's decision in this case. Decision II's opinion is well supported by both the law and the facts, and is consistent with this Court's teachings on the nature and scope of a negligent investigation claim under RCW 26.44.050.

Therefore, the City respectfully asks this Court to deny the instant petition for review.

DATED this 26th day of October, 2020.

/s/ Jean P. Homan
JEAN P. HOMAN, WSBA #27084
Deputy City Attorney
For Respondent

CERTIFICATE OF SERVICE

On said day below, I electronically served a true and accurate copy of the Response to Petition for Review in the Supreme Court of the State of Washington, Cause No. 99068-9 to the following parties:

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EXECUTED this 26 day of October, 2020, at Tacoma, WA.

/s/ Gisel Castro
GISEL CASTRO, Legal Assistant
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TACOMA CITY ATTORNEYS OFFICE

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