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COURT OF APPEALS
DIVISION III
JANUARY 10, 2017

CASE NO.: 342255

IN THE WASHINGTON STATE COURT OF APPEALS
DIVISION III

FOWLER

v.

KIM VANDOREN, ANGELA NEWPORT, D.S.H.S et al

ON APPEAL FROM PENDOREILLE COUNTY SUPERIOR COURT
THE HONORABLE JUDGE PATRICK A. MONASMITH

SUPPLIMENTAL BRIEF OF APPELLANT

JANUARY 9, 2016

Suzie Leane Fowler
Pro se litigant
P.M.B. 6143 P.O. Box 257
Olympia, WA, 98507

Oral Argument Denied

*Supplemental brief follows Respondent’s Brief; specifically section V. at P. 26, which argues the request for attorney’s fees and costs on appeal. Citation to other parts of respondent brief and record are made as necessary for clarification of argument.

*As noted in motion for supplemental brief, grounds for relief, this also includes citing authority on E-discovery relating to E.S.I.

(R.P)- Report of proceedings

(R.B.)- Response brief

(C.P.)-Clerk’s papers

(D.S.H.S)- Department of Social and Health Services

(D.C.S)-Division of Child Support

(E.S.I) Electronically Stored Information

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In Re (R.B. V. P.26) REQUEST FOR ATTORNEY FEES ON APPEAL

Disclosures to DSHS

The first issue under the requests for fees, (R.B. V. P.26) argues that based on my disclosures to DSHS and in my brief, it is beyond debate that Edwin Twitchell, referred to hereafter as (E.T), not Chris Grisham, is the father of C.C. The references to “disclosures” refer to a timeframe after C.C.’s information disclosure to E.T, with the exception of the establishment of the good cause claim on April 6, 2011, which was initially for the purpose protection, and not establishing paternity. The not establishing paternity in report of proceedings from the trial court somehow became “inaudible.” (R.P. P.11, 22). The first (inaudible) was “establish paternity,” the second (inaudible) was “collect.”

However, the most relevant disclosure to D.S.H.S, furthermore the only legally applicable disclosure made in this case, would be that of my marriage during the time in question. This fact was recorded by the agency, and has remained undisputed throughout proceedings. I will further address this later in my brief under the section titled “Ms. Fowler’s Disclosures to the Court.”

My Marriage

In this case the agency failed to provide necessary affidavits, including a denial of paternity, to my husband throughout the entire course of dependency proceedings. Legal standards for both denying paternity, and making a paternity acknowledgment, were not followed. These laws

are clearly outlined in the state's Uniform Parentage Act. My marriage was never disputed or questioned; this is indicated from the CPS intake narrative to the summary judgment hearing. There was never a proceeding to adjudicate parentage, as required of the court under the State's Uniform Parentage Act, specifically outlined in **RCW26.26.530**. If the process of adjudication is required of the court, why would it not be required of the agency involving actions brought into a court of law? If the court is to be any sort of "check and balance system," in helping make determinations for the agency, the agency should not be given authorities and powers supreme to those of the court.

In answers to interrogatories regarding C.C's birth being during my marriage, the defendants denied due to lack of sufficient knowledge. (C.P. 6, 3.3) though knowledge of my marriage was recorded before disclosing C.C's information to a man other than my husband. It was later affirmed by the defendant's counsel in court that the worker in fact had this knowledge, (R.P. P.7, 18-22).

The Law (RCWs)

In reply to (R.B. V. P. 26) The *West* case presented no debatable point of law, where Fowler has presented multiple debatable points of law. The points of law the respondent has presented are debatable, and Fowler has presented multiple reasons why the respondent's points of law are debatable. This includes, but is not limited to **RCW 13.34.062**, and

13.34.070. These statutes, again, are not relevant in the context of this case's facts or timeline.

The proper test to confirm this is evidence, and based on the evidence I still believe this to be a prime face case for negligence. Reasonable but competing inferences of negligence and duty arise. The statutory duty cited in the foregoing, and (R.B. V. P.26) is not relevant to this case when viewed in light of the record. This is due to the facts that **RCW 13.34.062(b)** specifies that in no case shall disclosure under the statute be made more than 24hrs after the child is taken into C.P.S custody.

RCW13.34.070 pertains to disclosures made prior to a shelter care hearing. The shelter care hearing order was held on April 20:21, 2011. (C.P 8). The first information disclosure was made on April 28, 2011; more than a week later. (C.P. 15, EX B). Thus, there is no application for either dependency statute in this case. Both dependency statutes were applied by the trial court out of the context of the law entirely. They continue to be cited by the respondent out of context.

Even though the dependency statutes are vague and undefined in what to do in the context of marriage, or in cases of reported imminent harm; the law is clear when it comes to defining the juncture in which a duty to disclose a child's information under dependency statutes is applicable.

The Uniform Parentage Act Statutes should be a guideline for determining the legal processes that must take place when a legal marriage is recognized, such as the adjudication process that must take place if the court wishes to determine any rights for parent besides the mother's husband. I believe the Uniform Parentage Act Statutes to be relevant in this case based on the uncontested fact of my marriage. The dependency statutes do not address or specify any authority over other statutes, nor do they grant any authority over matters requiring adjudication.

I fulfilled the burden of production, producing evidence that the records before the court, as well as the law have specifically addressed and answered legal questions ignored by the trial court and respondent regarding legal paternity. I produced evidence that declarations of defendants are inconsistent with the record, (C.P. 8), which is evidence of it being disputed whether E.T was the father, as his name was allowed to be crossed off the document when I assertively disputed it.

Discovery of my marriage in addition to the discoverability for the good cause are substantial factors in the negligence cause of action.

The Fourteenth Amendment of the United State's Constitution

The due process clause of the fourteenth amendment is also cited under "Requests for attorney's fees on appeal." (R.B. V. P.26). The respondent left out the pertinent part, which states:

No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall

any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

I apologize, but I honestly can only find irony in the defense attorney's use here of the due process clause of the fourteenth amendment. I have learned that the agency thrives on breaking this amendment frequently. As my case demonstrates, C.P.S is given legal immunities while those under investigation for dependencies by C.P.S are treated as inferior to the law and are denied protections, including those of the constitution. The protection from discrimination that is the foundation of the fourteenth amendment is not remedied, it has merely shifted demographics. Albeit, I am not asking for new law at this time; I am simply asking for the existing laws to be followed to the extent that they are stated.

To allow immunity in lieu of due process, and not allow my family protection including the protection of law, also without due process, is what the defendants seem to be asking for in this case. I do not see any application for the fourteenth amendment being used against me here. Removal to federal court for constitutional violations may be the only applicable remedy in light of any emerging constitutional violations in *C.P.S's future*.

Agency liability immunity is an unequal protection of law, inconsistent with the foundations of both the State's Constitution, and the United State's Constitution.

Parental Rights Subject to Limitation in Dependency Proceedings

At the time C.C's information was disclosed to E.T, the only other person whose rights could have been affected by the dependency proceeding or termination of rights were my husband's, Chris Grisham's, because my husband did not rescind (nor was ever asked to rescind) his rights throughout the entire dependency proceedings.

Secondary Authority Cited By Respondent

Fowler v. D.S.H.S et al offers no case specific parallel criterion related to the *West* case in any way. The respondent had cited cases that support the defense's desired outcome throughout litigation, that offer little to no insight on this case's specific facts or issues before the court. Upon information and belief, common law is a tool of precedence, not a vice for solely attempting to grasp an outcome.

Arthur West was engaged in multiple cases in the state, and has even since been banned from any further litigation in the Western region of Washington.

Unlike the specific case, *West v. Thurston county*; I feel that the record in Fowler v. D.S.H.S et al contains sufficient evidence supporting my claims, furthermore that the opening report of proceedings itself is enough to justify a claim capable of overcoming summary judgment because of the improper information governance I believe amounts to

spoliation, (R.P. P.3) This assertion is based on F.R.C.Ps on E.S.I and relating to proper information governance and discovery.

After I address RAPs in the next section, I will cite authority in the sections titled “Spoliation,” and “E.S.I.”

RAPs

Respondent argues in (R.B. V. P.26) the request attorney’s fees and costs for the defendants pursuant to RAP 18.1, and cite the authority that appellant meets the criteria of *West v. Thurston County*, Citation at (R.B. V. P. 26).

The suggestion is based on the respondent’s assumption that this appeal is frivolous, yet there is no specific authority cited as to the appeal being frivolous with the exception of citing *West*. (R.B. P. 26).

R.A.P 18.1(a) allows for compensatory damages for filing a frivolous appeal. Attorney Cartwright for the defense suggests that I have met criteria outlined in *West v. Thurston County*, pursuant to RAP 18.9(a).

I do not feel that the criteria in *West* have been met. I have presented debatable issues on both questions of laws and fact through evidence; where as in *West* there was failure to submit evidentiary support. There was no justifiable controversy for the court to rule on in *West*; there is evidence of justifiable controversy in this case. *Fowler v. D.S.H.S et al.*

This is an important opportunity for the courts to rule on the important questions of law, shrouded by the defense's attempt to sweep multiple questions of fact under the rug using biased information governance that ultimately resulted in prejudice.

Spoliation

An issue that arises from reading the (R.B. P. 19 & 24) arguments and references to the record made by the other parties suggest spoliation on their behalf.

Defense's argument in the trial court was that the good cause is a decision specifically by D.C.S , and implied that good cause is solely relevant to the D.C.S. (R.P 19, 12-21).

In providing documentation to back up their argument, text from a D.C.S communication regarding the good cause is referenced and produced to this court. (R.B. P.19)

The defendants have been able to access electronically stored information, referred to hereafter as E.S.I. The defendants have selectively chosen and produced the information that they please from within their custody.

E.S.I

(R.B. B. P. 13) The lawsuit in this case was filed, complaint served in June of 2014, which should have reasonably suggested a litigation hold

in anticipating litigation, yet the defendant/ defendants in the matter have retained unrestricted access to the plaintiffs electronically stored records, and have controlled information governance relating to the plaintiff's E.S.I. The trial court record verifies multiple documents were produced that should have been sealed, attached to Kim Vandoren's declaration in 2016, what appeared to be an amended declaration, shortly before the summary judgment hearing (R.P. P.3). The defendants should have reasonably been able to produce these documents previously; furthermore all E.S.I and/or documentation should have been authenticated, and further reviewed and coded by counsel as confidential, etc. Instead, confidential and sealed records were attached to a defendant's declarations before the summary judgment hearing, as recorded (R.P. P. 3). This indicates improper information governance that I feel meets the standards of failure to preserve and/or timely produce, F.R.C.P 26(e) on spoliation, which I feel meets the criteria of *Zubulake V. Zubulake v. UBS Warburg, 02 CIV.1243 (SAS)*. This case has a cautionary analysis, but no subsequent negative appellate review. Cautionary analysis is likely due to the new F.R.C.P 37, which does not negatively affect the applicability of *Zubulake V.* as authority in this case regarding discovery duty and spoliation.

This builds on a previous issue I believe also suggests spoliation, regarding acting negligently, recklessly, or willfully. Instead of definitively affirming or denying questions laid out in interrogatories, the defendants claimed to not have sufficient knowledge on answers to the

interrogatories, specific to the plaintiff's good cause (C.P. 6, 3.5), and marriage, (C.P. 6, 3.3).

Defendants accessed E.S.I, then selected and referenced documentation within the plaintiff's record that would appear to support them in their argument. Among these are references to the D.C.S acknowledgment of the good cause, such as the letter (R.B. P. 19) cited as C.P 125 -1. This relates to E.S.I authority, FRCP 37(e)(2), indicating that missing and incomplete information regarding the good cause may have been unfavorable to the defendants. The production of documents only relating to the D.C.S acknowledgment of the good cause caused prejudice. This may have been done to confuse the court.

The foundations of electronic discovery were able to be manipulated in favor of the defendants, creating confusion on the issues, through diversion and manipulation of facts surrounding the good cause. Also, evasive and incomplete answers to interrogatories play a role; see (C.P.6) and the following clarification:

Only the D.C.S good cause is cited by the defense, though it is not debated that the initial good cause was entered on April 6, 2011. (R.B. P. 18). It is debated whether I identified E.T as a "non-custodial parent." I never Identified E.T in any way, or received any documentation of reference to E.T as a "non-custodial parent" at any time from D.S.H.S, when D.S.H.S did intake the good cause on April 6, 2011. (R.B. P. 18). I

was only informed that there would be no attempt to establish paternity or make any contact with E.T.

The claims that I am addressing in this appeal do not cite or rely on the bulk of the record that was provided to the trial court. I feel that sanctions for the other parties for spoliation would be more appropriate than paying their costs/attorneys fees. This would address F.R.C.P 26 and F.R.C.P 37. *Zubulake v. UBS Warburg, 02 CIV.1243 (SAS)*, puts a focus on rule 26, but rule 37 is implied. The current rule 37, amended since *Zubulake* applies because the defendant's evasive answers to the interrogatories are inconsistent with their later admissions by counsel, and productions to the court. Even the report of proceedings verifies that the answers to previous interrogatories were evasive and incomplete. In regard to social worker's "denial due to lack of sufficient knowledge" about my marriage at the time of the child's birth in response to interrogatories, see (R.P. 7, 18-22). The fact of my marriage was also not contested throughout the dependency proceedings, or the civil case.

F.R.C.P rule 37(a) (4) *Evasive or Incomplete Disclosure, Answer, or Response*. For purposes of this subdivision (a), an evasive or incomplete disclosure, answer, or response must be treated as a failure to disclose, answer, or respond.

F.R.C.P Rule 26(e) then applies, and meets the criteria in *Zubulake V.* on spoliation of potentially relevant evidence. The spoliation in Fowler

v. D.S.H.S et al is evident when responsive evidence from interrogatories is treated as failure to disclose, which it was.

The information accessed and produced from electronic files, in the custody of D.S.H.S. that is now on record with the courts, does not match the information that I obtained from the case in 2011.

E-discovery is a currently ever-evolving area of law. I think this area of law is evolving for good reason. I believe that *Fowler v. D.S.H.S et al* meets the criteria in *Zubulake V.* and that spoliation on behalf of D.S.H.S is apparent for reasons parallel to *Zubulake V.* regarding F.R.C.P 26 and rule 37, in regards to cooperation in discovery.

The defendants claimed to not have sufficient knowledge, yet defense sited and produced evidence suggesting that the defendants did have knowledge of the very information they claimed to not have sufficient knowledge of.

The defendants had the burden of proving the affirmative defenses, which they denied due to lack of sufficient knowledge, but then used evidence specifically showing that they *did* have knowledge in later defenses.

My husband did not sign a denial of paternity for C.C. until August of 2011, four months after the identifying information for C.C. had been sent to Mr. Twitchell, and several months after Mr. Twitchell was

provided with representation, subsequently allowed access to personal and confidential information contained within the dependency file.

Mrs. Fowler's Disclosures to the Court

(R.B. V. P.26) In response to the request for attorney's fees, with the defense cited sources saying I admitted E.T was father that were all after the time in question, after C.C's information had already been disclosed. The only source is the social worker's claim, and the defense citing the good cause intake as an "application for public assistance." This should only serve as further proof that C.P.S workers did gain access to the good cause information on file, though they deny due to lack of sufficient knowledge in answers to interrogatories, (C.P. 6, 3.5).

My uninhibited candor with this court regarding the paternity of C.C. in no way reflects my behavior or actions toward C.P.S at the relevant time frame in question, which *should be* the time leading up to, and the time of the disclosure of C.C's information. This would be from 4/17/2011-4/28/2011. Files contained and accessed within the D.S.H.S system during this 12 day period would be the only record on review relevant to this appeal. The mirage of seemingly contentious discovery is primarily due to the defendants and counsels' questionable version of information governance, and inability to narrow the scope of discovery to responsive documents.

The record cited (R.B. V. P.26) and throughout litigation by defense pertains to statements and supposed admissions made after the time C.C's information had already been disclosed. This includes pages cited from Appellant Opening Brief, more than (5) five years after the information disclosure in question.

The majority of the record on review seems to be contentious discovery, created and manipulated by the defendants themselves; is that not an incredible bias and further prejudice?

An excited utterance made to a police officer at the time of my arrest about the child's father being a sex offender in no way constitutes a source of identification, the record reflects that I never said his name. I'd had a babysitter that day, had gone out and 'tied one on;' I was very drunk for the first time in years, but I know that I did not state a name. Fact based evidence of this would be that the man's name is not in the police report. (Confidential C.P. 13. EX 1).

There is no credible source that the defense can cite in alleging that it wasn't debated whether E.T was father at the time of disclosure. I never claimed to C.P.S that Mr. Twitchell was the father before C.C's information was disclosed to him. There are multiple documents that are part of the record that have been cited, clearly showing that it was disputed, and I did everything within my power to assert that he was not the father. (Confidential C.P. 8).

I studied the state laws surrounding paternity; I studied the good cause administrative procedures, (which have been amended multiple times since the good cause was active in this case). I had every reason to believe that my child's information would be kept safe, but that was a false reality made apparent by those calling themselves "Child Protective Services."

(R.B. P. 18) Suggests that data relevant to the establishment of the good cause on April 6, 2011 was preserved in some form, it is referenced by the other party. The facts concerning the April 6, 2011 date establishing the initial good cause have been manipulated, and it is cited as an application for public assistance, where supposedly I identified E.T as C.C's non-custodial parent. However, I was already receiving public assistance at the time of the April 6 appointment, and establishing the good cause was necessary to be in compliance with my D.S.H.S IRP contract.

The only change that I was made aware of on April 6 2011, was the establishment of the good cause by D.S.H.S, in accordance with my pre-existing individual responsibility contract with D.S.H.S. The defense citing knowledge of the D.S.H.S appointment on April 6 is contradictory to previous pleadings in response to interrogatories in the course of litigation. (C.P. 6. 3.5) I cited the good cause order previously, but it was not cited by me as an "application for public assistance," suggesting that the defendants did have access to the information within the E.S.I. If the

defendants were able to access this information after the case was closed, we could reasonably anticipate that they would have had access to this information at the time in question; also at the time that they denied knowledge of the good cause due to lack of sufficient knowledge in the interrogatories. (C.P. 6, 3.5). I believe there has been multiple discovery violations indicated in this case

Spoliation and Duty to Preserve E.S.I

Proof of the defendant's ability to access and cite knowledge of the reports made to D.S.H.S for the initial good cause (R.B P. 18-19) conflict with denial due to lack of sufficient knowledge (Interrogatories. C.P. 6, 3.5). The defendant's answers to interrogatories exhibit contradictions within themselves, and the defendants should not be able to have it both ways. This is further evidence of the manipulation of E.S.I within the custody and control of the defendants. I believe that this evidence of spoliation and a violation of preservation duty.

Another question of an issue with regard to preservation duty; does downloading E.S.I from an accessible to an inaccessible format violate preservation duty? In short, a committee Note to FRCP 34 states: "if ESI for production is searchable, format for production should not alter this feature." To analyze, E.S.I in the defendant's control was searchable, and the defendants altered this feature by selectively providing inaccessible documents that originated as E.S.I to the court. Counsel referenced a document in brief (R.B. P. 19, cited C.P. 125-1). This is a prime example

of the prejudice from production to the court being in inaccessible format. D.S.H.S files were accessed from electronic searchable form, and then produced in inaccessible paper form to the courts.

Since the defendants and their counsel provided an inaccessible format of files that originated in electronic form, this could also suggest a violation of preservation duty.

The litigation hold that would have commenced when litigation began has been for lack of proportionality abused at the discretion of the defendants. The defendants have themselves, as well as with the aid of their counsel, chosen to discriminatorily produce documents with such bias that they have ultimately contradicted themselves. None of the documents that were produced from E.S.I are in searchable format.

(R.B. P. 19) It is clear that the defendants used the searchable format in selecting the documents they wanted to produce, such as a D.C.S letter. The D.C.S recognition of the good cause was not in dispute; the D.S.H.S establishment of the good cause on April 6, 2011, and its relevance however, was disputed.

Conclusion & Summary of Argument

I believe that the defendants clearly violated their preservation duty in this case. I do not think that paying costs/ attorney fees in this case is relevant under RAP 18.1, 18.9, or title 14 on costs; as these request I further pay for has been burdensome and costly for me on an appeal; I also

believe this appeal to be about everything but frivolous based on facts and evidence.

Not only is the evidence shown through respondent's productions contradictory in nature, but the very authority they cite in this case is contradictory to the facts specific in this case, and the laws defense claims are in the defendant's favor. Another example of this is (R.B. P. 16) **RCW 4.24.595** cites as follows:

- (1) Governmental entities, and their officers, agents, employees, and volunteers, are not liable in tort for any of their acts or omissions in emergent placement investigations of child abuse or neglect under chapter 26.44 RCW including, but not limited to, any determination to leave a child with a parent, custodian, or guardian, or to return a child to a parent, custodian, or guardian, unless the act or omission constitutes gross negligence. Emergent placement investigations are those conducted prior to a shelter care hearing under RCW 13.34.065.

In fact, the shelter care hearing had also already been conducted when C.P.S workers disclosed the child's information, so they should not have been entitled to the liability immunity. The shelter care hearing was held on April 20:21, 2011 (Confidential C.P. 8). The disclosure of C.C's information was initially made on April 28, 2011. (C.P. 11, EX. B). Every defense cited dependency statute is legally inapplicable to the facts and the timeframe in this case; therefore none of the dependency statutes can be applied for defense.

Statutory authorities cited for defense are not relevant to this case or the situational facts at all. The respondent duplicated the same arguments.

none which are relevant to this case; the trial court's ruling was based on these same arguments. For all of the reasons stated in the foregoing, all of the respondent's citations to statutory authority should be debunked by the law itself, as written .

(R.B. V. P. 26) *In re, Dependency of K.N.J.*, as cited, has a cautionary analysis that has had negative appellate review. However, this case outlines the termination of parental rights of *parents* in a *legal* context. *In re Martin*, cited additionally (R.B. V. P. 26) also is not analogous to the factual situation in *Fowler v. D.S.H.S et al.*

In this case, *Fowler v. D.S.H.S et al*, there was a statutory duty to adjudicate presumed parentage under the Uniform Parentage Act RCWs as a whole. Only the rights of me and my husband could have been subject to termination at the time of disclosure. Unless my husband rescinded his legal parental rights for C.C, E.T could not have had any parental rights to be subject to termination. The foregoing paragraph is the due process of law which was denied by the defendants, and is argued against by their counsel.

I had to move to Idaho for the safety of myself and my child because we were in imminent danger due to the disclosure of C.C's information to E.T, and the fact that he gained access via the agency's acknowledgment to the dependency file that contained personal and confidential information. (R.B. P. 11).

When we were safe, I asked my husband to rescind his rights. This was months after the disclosure of C.C.'s information to E.T. A denial and affidavit of paternity were submitted to the Washington Department of Health on the same day, establishing a legal father for C.C. C.C.'s father is not E.T. (Affidavits available upon request).

The facts are that E.T is a dangerous offender, and has my minor child's identifying information. E.T also had access to my identifying and confidential information because of the agency's pseudo-paternity acknowledgment that gained him access to the dependency file in 2011.

I don't have to worry about good cause anymore. The day my husband rescinded his rights, another man signed an affidavit of paternity. We had to follow state law, which says if a denial and acknowledgment are necessary, neither is valid until both are filed. Too bad it was too late, and my innocent minor child's information was disclosed in full to a dangerous man. No redactions- full name, birth date, all the things that would legally be protected from the general public, were directly given to a man reported that may cause the child and parent to be seriously harmed. This included access to the dependency file when E.T was wrongfully provided representation (R.B. P 11). My personal information was in the dependency file, so it's beyond debate that my privacy was invaded, and personal information was exchanged. This is contradictory to defense's claims that no personal information was exchanged in the trial court. (R.P. P. 22-23). This conclusion was also based on the court ruling that there

was a statutory duty to disclose the information. This presumed duty arose from an erroneously interpreted and applied dependency statute previously addressed in brief. (R.P. 22, 15-17).

This has resulted in what will be a life-long battle; it will haunt my family for years to come. I have had to up and move, leave behind my family and friends in an attempt to keep them safe. I have paid the price for the harm resulting from what I feel I have proved to be gross negligence resulting in the invasion of privacy caused by C.P.S.

Further, it is my duty as a citizen to do everything legally within my power to prevent this type of situation from happening to any more children or venerable adults.

Respectfully submitted this 9th day of January, 2017

Suzie Leane Fowler 01/09/2017

Suzie Leane Fowler
PMB 6143 P.O Box 257
Olympia, WA. 98507

CERTIFICATE OF SERVICE

I certify that I ^{served} ~~mailed~~ a copy of the foregoing Appellant Supplemental Brief
to Jarold Cartwright, Attorney for D.S.H.S et al,
at 1116 W. Riverside Ave, ~~postage prepaid~~, on
[date] 01/09/2017. ~~process service by~~ non-party over 10yrs. age

Suzie L Rowles
(Signature)

I certify (or declare) under penalty of perjury under the laws of the State of Washington
that the forgoing is true and correct:

01/09/2017
(Date and Place)

Suzie L Rowles
(Signature)