

NO. 72256-5-1

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**IN THE COURT OF APPEALS  
OF THE STATE OF WASHINGTON, DIVISION I**

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WASHINGTON DEPARTMENT OF CORRECTIONS,

Appellant,

v.

ROBERT NORTHUP,

Appellee.

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**APPELLANT'S OPENING BRIEF**

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## I. INTRODUCTION

The Department of Corrections (Department) appeals an order granting prisoner Robert Northup's motion for summary judgment and awarding him penalties, attorney's fees, and costs under the Public Records Act (PRA), RCW 42.56. The superior court erred in finding a violation of the PRA, in awarding Northup penalties, and in awarding Northup attorney's fees and costs.

Northup submitted an extensive, nine-part public records request seeking documents that contained confidential information regarding Security Threat Groups or prison gangs. The Department responded to Northup's request by providing over 5,600 pages of pages and over 1,100 native-format files. Northup challenged the handling of this request. The superior court found that the Department violated the PRA in two ways. The court found that the Department improperly redacted a 16-page "debrief" document with information provided by a confidential informant. The court also found the Department should have provided some emails in an earlier installment rather than the seventh installment.

The superior court erred in four respects. First, the court wrongly decided that extensive prison gang information in the 16-page "debrief" document was not exempt. The redacted information was exempt as an investigative record or intelligence information under RCW 42.56.240(1)

and was also exempt as confidential Security Threat Group information under RCW 42.56.240(12). Second, the court erred in faulting the Department's decision to produce certain emails in a later rather than an earlier installment. The emails in question required extensive review and redaction, and the Department continued to produce other documents while it reviewed these emails. Third, the trial court further erred when it awarded Northup daily penalties without a finding of bad faith as required by RCW 42.56.565(1). Finally, the trial court erred when it awarded Northup attorney's fees without any findings of fact or conclusions of law.

## **II. ASSIGNMENTS OF ERROR**

1. The superior court erred when it ruled that the information redacted from a confidential informant debrief document was not exempt under RCW 42.56.240(1) and RCW 42.56.240(12).
2. The superior court erred when it ruled that the Department violated the PRA by producing certain emails that required extensive review and redaction in a later rather than an earlier installment.
3. The superior court erred when it determined that Northup's claims were ripe for resolution despite the fact that the Department's response to Northup's request was ongoing.
4. The superior court erred in awarding Northup penalties without an explicit finding of bad faith or evidence to support such a finding as required in RCW 42.56.565(1).
5. The superior court abused its discretion in awarding Northup attorney's fees without findings of fact and conclusions of law to support such an award.

### **III. ISSUES RELATED TO ASSIGNMENTS OF ERROR**

1. Was the 16-page document containing confidential information regarding prison gangs exempt as an investigative record or intelligence information under RCW 42.56.240(1)?
2. Was the 16-page document containing confidential information about prison gangs exempt as Security Threat Group Information under RCW 42.56.240(12)?
3. When responding to a nine-part request by disclosing thousands of pages of documents in multiple installments, does an agency violate the PRA when it provides certain documents in a later, rather than earlier installment?
4. Does a requester have a cause of action under the PRA prior to the agency's final action on the request?
5. Where RCW 42.56.565(1) requires a finding of bad faith before awarding penalties to an inmate, did the superior court err in awarding penalties without an explicit finding of bad faith in the order or evidence to support such a finding?
6. Did the superior court abuse its discretion in awarding attorney's fees without providing findings of fact and conclusions of law to support such fees?

### **IV. STATEMENT OF THE CASE**

#### **A. Statement Of Facts**

Northup filed this case on December 10, 2012. CP 120. Two months later, in February 2013, Northup filed the public records request which is at issue in this appeal. CP 437-39. In June 2013, while the Department was processing this request and providing installments,

Northup amended his complaint to challenge the Department's handling of his February 2013 public records request. CP 120. The sequence of events is detailed below.

**1. Northup's Public Records Request**

On February 20, 2013, the Department received a public records request from Mr. Northup, an inmate in the custody of the Department. CP 437-39, 563. This complex request contained nine parts, including a "Copy of the FBI debrief hearing of Robert Northup, #761654 sent via email to William Riley by Special Agent Michael Rollins" and "All other emails from FBI Special Agent Michael Rollins to any staff member of the Department of Corrections from June 1, 2010 to January 1, 2013." CP 441-42.<sup>1</sup> This request, described by the Department employee assigned to handle it as one of the most complex and time consuming of the approximately 1,280 request that she had handled, required review of over 22,000 potentially responsive emails. CP 48-50, 154-55, 441-42. As of May 29, 2014, the Department had reviewed 8,000 emails to determine if they were responsive and had provided Northup with 5,664 pages of responsive records and 1,104 native-format files. CP 49-50. The request

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<sup>1</sup> The Department engaged in a significant amount of correspondence with Northup during this request. The Department's brief provides a general timeline of its handling of the request and more specific information only when such information is needed to evaluate the issues raised in its brief. The Department has provided a timeline that outlines the handling of Northup's request in Appendix A for the convenience of the Court and the parties.

was so extensive that the Department was still providing documents to Northup at the time of the conclusion of the proceedings in the superior court. CP 49-50.<sup>2</sup>

On February 25, 2013, within five business days of receiving the request, the Department sent a letter to Northup acknowledging the request and seeking clarification on part of the request. CP 441-42. The Department notified Northup that it would identify and gather records and that it would provide further response within 45 business days or by April 29, 2013. CP 442. After the Department received clarification from Northup, it understood one portion of his request to be seeking any record in which his name was mentioned from June 1, 2010, until February 15, 2013. CP 444, 446.

As indicated, the Department notified Northup on April 29, 2013, that the first installment of records was available once payment was received. CP 454-55. The Department then provided the first installment of records after it received payment. CP 462-63, 465-69. Because Northup had requested that the records be sent to his attorney, the Department mailed the records to his attorney and mailed a letter directly to Northup informing him that the records had been sent. CP 465-69, 471.

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<sup>2</sup> As explained above, Northup's complaint in this case was filed before Northup submitted his February 2013 public records request, and he thereafter amended his complaint to challenge the Department's response to his February 2013 request without waiting for the Department to finish providing installments.

The Department continued to provide regular installments of records over the course of next year. The Department provided installments on July 17, 2013; September 3, 2013; October 14, 2013; November 21, 2013; January 7, 2014; and February 12, 2014.<sup>3</sup> CP 158-159, 167-68, 176-77, 475-76, 486-87, 495-96. When records were redacted or withheld, the Department provided Northup's attorney with a copy of an Agency Denial Form/Exemption Log that indicated the basis for the redactions. CP 186-88, 467-69, 502-03. Whenever the Department mailed records to Northup's attorney, it also sent Northup a letter notifying him that the records had been sent. CP 165, 174, 190, 471, 482, 493, 521. The request was ongoing at the time of the hearing on the parties' motions for summary judgment. CP 49, 153-54. At that point, the Department had just received payment for the eighth installment of records. CP 153, 192-93.

The October 14, 2013 installment contained a document concerning the debriefing of a confidential informant.<sup>4</sup> In the trial court, Northup specifically challenged the Department's redaction of this 16-page record that memorialized the debriefing of the informant. CP 318-

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<sup>3</sup> These dates refer to the day that the Department disclosed the records to Northup by making them available for his inspection and copying via a cost letter. *See, e.g., Sanders v. State*, 169 Wn.2d 827, 835-36, 240 P.3d 120 (2010); *Mitchell v. Wash. Dep't of Corr.*, 164 Wn. App. 597, 603, 277 P.3d 670 (2011).

<sup>4</sup> Northup has identified himself as this confidential informant. CP 310.

25. The inmate participated in the debriefing with law enforcement officers as part of the Department's process that allows an offender to renounce his gang affiliation. CP 344. The 16-page "debrief" or confidential informant record was generated after the interview and contained detailed notes of the interview. CP 526.<sup>5</sup>

This document mentions the names of over 100 members of various prison gangs and reveals the activities of several prison gangs, including but not limited to the Aryan Family, Skinheads, Surenos, and Nortenos. CP 504-19, 526. The document reads like a history of various prison gangs, their members, and their activities. CP 504-19. It details the standing of many individuals in their respective gangs, the illegal activity they had to do to obtain such standing (including serious assaults), the manner in which gangs conduct their business (including ways in which they operate in prison), ideologies of each gang, and points of contention between the gangs. *See e.g.*, CP 505-507 (names); CP 510-11 (illegal activities); CP 518-19 (connections between gangs and ideologies of gangs). For example one portion reads as follows: "[John doe] went ahead and 'whacked the guy.' [Details of assault with the location of the assault]." CP 508. The debrief document also details how prison officials could identify gang members based on tattoos or other identifying

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<sup>5</sup> A copy of this debrief was previously inadvertently released in an unredacted form. CP 396, 526.

characteristics. *See e.g.*, CP 508. After careful review, the Department redacted information in this confidential informant debrief pursuant to RCW 42.56.240(1) and RCW 42.56.240(12). CP 147-48, 427-28, 526. The Department redacted information in the document that it reasonably believed was necessary to ensure the safety and security of its facilities, the confidential informant, and the gang members identified in the document. CP 147-48, 526. The Department provided Northup's attorney with an Agency Denial Form/Exemption Log which identified the basis for the redactions. CP 502-03.

Northup also challenged the timeliness of a small number of emails provided to him as part of the seventh installment of records. These emails were sent to Northup on March 5, 2014 (and are referred herein as the March 5, 2014 emails). CP 324-25. Specifically, he argued that the Department's production of certain responsive emails from FBI Agent Michael Rollins to Department staff was untimely. CP 323-25, 441-42. These emails are communications between FBI Investigator Michael Rollins and several Department investigators regarding activities and debriefs of prison gang members formerly in Department custody, including reports from local law enforcement, summaries of jail phone calls, and lists of gang members. CP 238-307.

In total, the Department produced 5,664 pages of records and 1,104 native-format files. CP 49-50. The Department's processing of Northup's request was impacted by the volume of documents that needed to be reviewed as well as the sensitive nature of the information in the responsive documents. CP 147, 427-28, 526. As part of its response, the Department searched for responsive emails in the Symantec Enterprise Vault. CP 154. The Department ran several searches in the vault to find documents responsive to this request. CP 154. In total, there were over 17,000 emails that were discovered that were potentially responsive to one of the items in Northup's request. CP 154. There were over 5,000 emails that were potentially responsive to another portion of the request, and this portion of the request required the Department to do more detailed and complex computer searches to narrow the number of results and allow the Department to determine whether the emails were responsive. CP 154-55.

Beyond the time necessary to review records for potential responsiveness, Department staff had to review highly sensitive records for redactions. To ensure information in the records did not threaten the safety of inmates, undermine the Department's investigations, or compromise the security of the Department's facilities, the redactions were reviewed carefully multiple times by multiple people. CP 49, 147-48, 427-28, 526. These reviews included consultation with the Attorney

General's Office and the Department's Intelligence and Investigations Unit. CP 49, 148. Final redactions were being reviewed up until the day that the documents were released. CP 49, 148. While the Department reviewed these sensitive documents, it continued to produce other records that required less intensive review. CP 49, 199.

The Department's processing of Northup's request also was impacted by the large number of requests that the Department regularly receives. Due to the nature of its work, the Department responds to thousands of public records requests each year. CP 146. For example, in 2012, the Department responded to 15,145 total requests, including inmate central and medical file reviews, health record requests, and other broader requests. CP 146. Of these requests, 4,967 requests—generally the broader or more complicated requests—were handled by the Department's centralized public disclosure unit. CP 146. This unit is made up of 17 full-time staff, including 3 Administrative Staff, 12 Public Disclosure Specialists, 1 Unit Manager, and 1 Public Records Officer/Compliance Manager. CP 146. During the time of the request, the unit was experiencing significant turnover. CP 155-56. Ms. Gerken who handled Northup's request was the Public Disclosure Unit Manager. CP 150. She had worked in the unit for over six years and had received over 64 hours of formal public records training. CP 150. She typically handled requests

that were large, complex, or especially sensitive. CP 155. As part of her responsibilities, Ms. Gerken helped train and review all of the work of new specialists. CP 155-56. During Northup's request, this meant Ms. Gerken was reviewing all of the work of either two or three specialists depending on the time period in question. CP 155-56.

**B. Procedural History**

Northup filed this case in December 2012. CP 120. The original complaint challenged an unrelated public records request. CP 120. In 2013, Northup amended his complaint to challenge the Department's handling of his February 20, 2013 public records request. CP 120. The Department moved for summary judgment arguing that Northup's claims related to the 2010 request were barred by the statute of limitations; that the redactions made to the 16-page debrief described above were proper under RCW 42.56.240(1) and RCW 42.56.240(12); that the Department had otherwise complied with the PRA in its handling of Northup's February 2013 request; and that any other claims were not ripe because the request was ongoing. CP 402-11. The trial court granted Northup a continuance under Civil Rule 56(f) and set a briefing schedule. CP 334-37.

After Northup filed a cross-motion for summary judgment, the trial court heard argument on April 16, 2014. Without regard to the fact that

the Department was regularly producing other responsive records, the trial court ruled that the Department violated the PRA in its production of the March 5, 2014 emails because it took the Department eight months to review these very sensitive emails. I RP at 21.<sup>6</sup> The trial court took the remaining arguments under advisement to conduct an *in camera* review of the 16-page confidential informant debrief document. I RP at 38.<sup>7</sup>

The trial court issued an oral ruling on May 16, 2014, denying the Department's motion for summary judgment and granting Northup's cross-motion for summary judgment. CP 4-8. In addition to the violation previously found, the trial court ruled that 792 of the 799 redactions made by the Department to the debrief were improper. CP 5-7. The court determined that the investigative records/intelligence information exemption found in RCW 42.56.240(1) did not apply because the debrief contained "generalized information only." II RP 4. The court also ruled that the exemption in RCW 42.56.240(12) did not apply because Northup knew the information contained in the debrief, and the debrief therefore did not reveal any Security Threat Group information to Northup. II RP 4-5. The court awarded daily penalties to Northup based on the court's

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<sup>6</sup> The Verbatim Report of Proceedings was filed in two volumes, one for the hearing on April 16, 2014, and the second for the hearing on May 16, 2014. The Department will refer to the April 16 hearing as I RP and the May 16 hearing as II RP.

<sup>7</sup> The 16-page debrief document was filed under seal. I RP 9. As part of the *in camera* review process, the Department also submitted an index that briefly explained each redaction and this index has been provided in the Appendix B of this brief.

analysis of the *Yousoufian* factors. CP 6-7. After the parties submitted briefing on the issue of the appropriate amount of attorney's fees, the Court awarded Northup \$20,000 in attorney's fees and \$553.50 in costs. CP 11.

The court denied the Department's motion for reconsideration on July 9, 2014. CP 15-16. The Department filed its notice of appeal on July 23, 2014. CP 1-2

## V. STANDARD OF REVIEW

Judicial review of an agency's denial of a PRA request is reviewed *de novo*. *Sargent v. Seattle Police Dep't*, 179 Wn.2d 376, 385, 314 P.3d 1093 (2013). If a trial court bases its decision on whether there has been a PRA violation solely upon affidavits and documents without testimony, the court of appeals engages in *de novo* review of the violations. *Ames v. City of Fircrest*, 71 Wn. App. 284, 292, 857 P.2d 1083 (1993). When a PRA case is decided on summary judgment, the appellate court stands in the same position as the trial court. *West v. Dep't of Licensing*, --- Wn. App. ---, 331 P.3d 72, 74 (2014). Summary judgment is appropriate when—viewing the evidence in the light most favorable to the nonmoving party—there are no material issues of fact and the moving party is entitled to judgment as a matter of law. *West*, 331 P.3d at 74.

As discussed below, the standard of review for a court's determination of bad faith under RCW 42.56.565(1) is a combination of de novo review and abuse of discretion. An appellate court's review of the trial court's interpretation of the term "bad faith" is a question of statutory interpretation that is reviewed de novo. *See Telford v. Thurston Cnty. Bd. of Comm'r*, 95 Wn. App. 149, 157, 974 P.2d 886 (1999). However, when the trial court correctly interprets "bad faith," the trial court's ultimate determination of whether penalties are appropriate under RCW 42.56.565(1) is an exercise of discretion that should be reviewed for abuse of discretion.

Finally, the amount of attorney's fees awarded to the prevailing party is reviewed for abuse of discretion. *See Sanders v. State*, 169 Wn.2d 827, 866-67, 240 P.3d 120 (2010).

## VI. ARGUMENT

### A. **The Department Properly Redacted Information In The Debrief As Specific Investigative Records And Intelligence Information Under RCW 42.56.240(1)**

The PRA requires agencies to produce public records unless the record or information contained in the record falls within a statutory exemption. *Bainbridge Island Police Guild v. City of Puyallup*, 172 Wn.2d 398, 407, 259 P.3d 190 (2011). Agencies are not permitted to distinguish among requesters. RCW 42.56.080. When the Department

produced the 16-page debrief, it properly redacted information pursuant to RCW 42.56.240(1). The trial court erred in holding that this exemption did not apply.

Specific investigative records and intelligence information the nondisclosure of which is essential to effective law enforcement are exempt from disclosure under RCW 42.56.240(1). To be exempt under this provision: (1) the record must be investigative in nature or contain specific intelligence information; (2) the record must be compiled by an investigative, law enforcement, or penology agency; and (3) the nondisclosure of the information must be essential to law enforcement or essential to the protection of a person's privacy. *See Cowles Publ'g Co. v. State Patrol*, 109 Wn.2d 712, 728, 748 P.2d 597 (1988).

There is no dispute that the debrief was compiled by a law enforcement or penology agency. Additionally, Northup did not dispute that the nondisclosure of the information contained in the debrief is essential to effective law enforcement. Nonetheless, the Department adequately demonstrated that the nondisclosure of this information is essential to effective law enforcement. The uncontested evidence presented by the Department's Chief Investigative Officer Tim Thrasher indicated that the release of the information would place the individuals identified in the debrief in danger and would jeopardize the safety and

security the Department's facilities. CP 526. Specifically, the release of identifying information of a confidential informant could place that informant in jeopardy by exposing the informant to manipulation, harassment, or physical retribution. CP 525-26. The other individuals identified in the document could be placed at risk of harm from other people within their own gang or another gang. CP 526. Ultimately, the release of the identity of a confidential informant and the information provided by the informant would deter other confidential informants from coming forward and providing information to the Department. CP 526-27; *see Haines-Marchel v. State, Dep't of Corr.*, --- Wn. App. ---, 334 P.3d 99, 2014 WL 4627661, at \*7.

Northup's arguments in the trial court focused on whether the information qualified as an investigative record or intelligence information. CP 91, 320-21. The information contained in the debrief qualifies as both. A record is an investigative record under RCW 42.56.240(1) if it is compiled as a result of a specific investigation that focuses with special intensity upon a particular party. *See Dawson v. Daly*, 120 Wn.2d 782, 792-93, 845 P.2d 995 (1993), *overruled on other grounds by Progressive Animal Welfare Soc'y v. Univ. of Wash.*, 125 Wn.2d 243, 884 P.2d 592 (1994). The investigation must be "one designed to ferret out criminal activity or to shed light on some other

allegation of malfeasance.” *Koenig v. Thurston Cnty.*, 175 Wn.2d 837, 843, 287 P.3d 523 (2012) (quoting *Columbian Publ’g Co. v. City of Vancouver*, 36 Wn. App. 25, 31, 671 P.2d 280 (1983)).

The 16-page debrief qualifies as an investigative record. The record was compiled by law enforcement based on specific information that a confidential informant provided about the members and activities of prison gangs during an interview with members of a number of different law enforcement agencies. CP 526. The 16-page debrief contains substantial information about one prison gang in particular, the Aryan Family, and its various criminal activities. CP 504-19, 526. The Department investigates and gathers information about prison gangs in order to manage the threat posed by these criminal organizations through detection, prevention, and punishment. CP 525; *see also* RCW 72.09.745 (authorizing the Department to “collect, evaluate, and analyze data and *specific investigative and intelligence information* concerning the existence, structure, activities, and operations of security threat groups and the participants involved therein under the jurisdiction of the department” (emphasis added)). Gangs are responsible for a significant amount of prison violence and the Department’s investigation of gangs is at the core of its role as a penology agency. CP 525.

One of the primary methods of investigating these gangs is through the use of confidential informants. CP 525. This debrief—the product of an interview with a confidential informant about the informant’s involvement in a prison gang—was created and maintained pursuant to the Department’s investigation of prison gangs. CP 525. Therefore, this record is an investigative record, and the Department properly redacted information that it deemed essential to effective law enforcement.

In addition, information in the debrief qualifies as intelligence information. Intelligence information has been defined as “the gathering or distribution of information, especially secret information.” *See King Cnty. v. Sheehan*, 114 Wn. App. 325, 337, 57 P.3d 307 (2002). Intelligence information involves information identifying confidential sources or persons involved in organized crime. *Id.* at 337-38 (citing *ACLU v. Deukmejian*, 32 Cal.3d 440, 450-51, 651 P.2d 822 (1982)). Intelligence information also includes information about the methods by which a law enforcement agency conducts its investigations. *Haines-Marchel*, 2014 WL 4627661, at \*6.

Here, the Department redacted specific intelligence information from the debrief. The information contained in the debrief document was gathered from a confidential source i.e., a confidential informant. CP 526. This information was provided by this confidential informant as part of an

interview with law enforcement and was designed to gather information about criminal organizations, namely the various prison gangs in the Department's facilities. CP 525. This qualifies as intelligence information as defined in *Sheehan*. Other portions of the redacted information deal with the specific circumstances, location, and the individuals who were involved in this debrief. CP 504-19. Such information reveals the method by which the Department and other law enforcement organizations conduct these types of investigations, and therefore also falls within the intelligence information exemption in RCW 42.56.240(1).

The trial court determined that the information redacted from the debrief did not qualify as an investigative record or intelligence information because the debrief contained "generalized information only." II RP 4. But the debrief contains very specific information about the Aryan Family and other prison gangs, including the names of their members, their activities, and other information. The Department asks this Court to review *in camera* the debrief and the redactions made by the Department; this review will demonstrate the specificity of the information that was redacted from the debrief.<sup>8</sup>

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<sup>8</sup> The Department has not provided individualized arguments for all 792 redactions that trial court found improper because the trial court did not provide individualized findings regarding all 792 redactions that it found improper. The

Because the information contained in the 16-page debrief qualifies as a specific investigative record and intelligence information the non-disclosure of which would be essential to effective law enforcement, the trial court erred in finding that the RCW 42.56.240(1) did not provide a basis for redacting information in the debrief.

**B. The Department Properly Redacted Information In The Debrief As Security Threat Group Information Under RCW 42.56.240(12)**

The information redacted from the debrief was also exempt from disclosure as confidential Security Threat Group information under RCW 42.56.240(12). No appellate decision has interpreted this particular exemption. In the absence of case law and a statutory definition, courts turn to principles of statutory construction. *See Francis v. Wash. State Dep't of Corr.*, 178 Wn. App. 42, 59, 313 P.3d 457 (2013). In interpreting a statute, courts attempt to give effect to the legislature's intent by first considering the statute's plain meaning. *Id.* at 59-60. Based on the plain language of the provision, the information redacted by the Department from the debrief document is exempt under RCW 42.56.240(12).

The Security Threat Group information exemption applies to:

- (a) Information that could lead to the identification of a person's security threat group status, affiliation, or

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Department did submit an *in camera* review index (Appendix B) that briefly explained each redaction. The Department is further prepared to explain any specific redaction about which the Court has a question.

activities; (b) information that reveals specific security threats associated with the operation and activities of security threat groups; and (c) information that identifies the number of security threat group members, affiliates, and associates.

RCW 42.56.240(12). This provision applies to the Department's redaction of the names of prison gang members,<sup>9</sup> other identifying information of gang members and affiliates,<sup>10</sup> and the activities of prison gangs, such as the Aryan Family, Skinheads, Surenos, and Nortenos.<sup>11</sup> Specifically, because the debrief details the standing of many individuals in their respective prison gangs, the illegal activity they had to do to obtain such standing (including serious assaults), the manner in which prison gangs conduct their business (including ways in which they operate in prison), ideologies of each prison gang, and points of contention between prison gangs, it was properly redacted as information that could lead to the identity of gang members, their gang affiliation, and their gang activities.

The trial court erred when it recognized that the debrief contained Security Threat Group or prison gang information but found that the exemption did not apply because Northup had indicated that he had provided the information and therefore Northup already knew the information. II RP 3-4. This distinction is unsupported by the language in

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<sup>9</sup> For example, redaction nos. 14, 28, 29, 44, 49, 68-76, 79-107.

<sup>10</sup> For example, redaction nos. 275, 407, 656, 760, 762.

<sup>11</sup> For example, redaction nos. 485, 489-90, 511.

the exemption itself, is inconsistent with the principles of the PRA, and would create an untenable scheme for the Department that would require it to evaluate the subjective knowledge of a requester and would not address the security concerns faced by the Department. Based on the Department's experience, as explained below, even the disclosure of the identity of a confidential informant to the confidential informant himself can pose a security threat and a potential threat to the safety of the informant.

First, the Court's interpretation is contradicted by the plain language of the statute. The statute protects "information that *could* lead to the identification of a person's security threat group status, affiliation, or activities." RCW 42.56.240(12)(a) (emphasis added). The word "could" indicates that the information only needs to possibly lead to the identification of a person's Security Threat Group status, affiliation, or activities, and the exemption does not require the Department to demonstrate that the information has actually led to the identification of a person's prison gang status, affiliation, or activities. Additionally, the statute also protects "information that reveals specific security threats associated with the operation and activities of security threat groups." RCW 42.56.240(12)(b). The information in the debrief—which this Court can review *in camera*—contains specific descriptions of the activities of

the Aryan Family and other prison gangs, and it reveals ongoing activities and threats posed by these criminal organizations. CP 504-19. There is no basis in the language of the statute for concluding that because the requester knows the information, such information can be disclosed. *See Koenig v. City of Des Moines*, 158 Wn.2d 173, 183, 142 P.3d 162 (2006) (rejecting the idea that a court can look beyond the four corners of the record to determine if the exemption applies).

Furthermore, the trial court's interpretation is inconsistent with the PRA's basic principles. The PRA prevents agencies from distinguishing among requesters. RCW 42.56.080. The trial court's interpretation would require the Department to distinguish between the inmate who provided the information and other inmates. When the legislature intended for an agency to treat a public records request from the source or subject of the information differently, it provided an explicit basis for the agency to do so in the statutory exemption itself. *See e.g.*, RCW 42.56.330(6) ("Any information obtained by governmental agencies that is collected by the use of a motor carrier intelligent transportation system or any comparable information equipment attached to a truck, tractor, or trailer; however, the information may be given to other governmental agencies or the owners of the truck, tractor, or trailer from which the information is obtained. As used in this subsection, 'motor carrier' has the same definition as provided

in RCW 81.80.010.”); RCW 42.56.430(1) (“[I]nformation may be released to government agencies concerned with the management of fish and wildlife resources.”); RCW 42.56.440(1) (“These records will be available only to the veteran, the veteran’s next of kin, a deceased veteran’s properly appointed personal representative or executor, a person holding that veteran’s general power of attorney, or to anyone else designated in writing by that veteran to receive the records.”). There is no basis in the language of this provision to support Northup’s argument that the exemption does not apply to requests from the source of the information.

The trial court’s interpretation of this provision places the Department in an untenable position. Under the trial court’s interpretation, the exemption applies to information only if the requester did not already know the information. This requires the Department to speculate about the subjective knowledge of an individual requester. Not only would such an interpretation be contrary to the plain language of the statute, it would be inadequate to the security concerns that the Department typically confronts. CP 147. For example, the Department has dealt with situations in which a requester is forced to make requests by certain groups and individuals in order to demonstrate that he or she is not a confidential informant. CP 147. Additionally, once a record that identifies a confidential informant is released, it can be freely

disseminated to other individuals, including other inmates. There is no evidence that the legislature intended to create such an unworkable scheme. Because the information redacted pursuant to RCW 42.56.240(12) contained the names and identifying information of Security Threat Group members, the activities of Security Threat Groups, and information about specific security threats associated with Security Threat Groups, the trial court erred in finding that this exemption did not apply.

**C. The Department’s Timeline For Responding To This Request Was Reasonable**

The superior court also erred when it found that the Department violated the PRA by failing to produce a number of emails provided on March 5, 2014, in an earlier installment. Instead, the record demonstrates that the Department’s timeline for producing records in response to Northup’s voluminous request was reasonable. When a public agency receives a request, it must acknowledge the request within five business days. RCW 42.56.520. The agency must respond by either providing the records, denying the public records request, or providing a reasonable estimate of the time that will be required to respond to the request. *Id.* An agency is allowed additional time—beyond the five days—“based upon the need to clarify the intent of the request, to locate and assemble the

information requested, to notify third persons or agencies affected by the request, or to determine whether any of the information requested is exempt and that a denial should be made as to all or part of the request.”

*Id.* Additionally, an agency may provide records on a partial or installment basis as records that are part of a larger set of requested records are assembled or made ready for inspection and disclosure. RCW 42.56.080.

Courts review the agency’s overall response to determine if it was reasonable. *See West v. Dep’t of Licensing*, --- Wn. App. ---, 331 P.3d 72, 78 (2014). In general, agencies must respond to requests with reasonable thoroughness and diligence, *Andrews v. Wash. State Patrol*, --- Wn. App. ---, 334 P.3d 94, 2014 WL 4627656, at \*5 (2014), but the reasonableness of an agency’s response must be viewed in light of the agency’s workload and resources. *See Forbes v. City of Gold Bar*, 171 Wn. App. 857, 864-66, 288 P.3d 384 (2012). In *West*, the requester argued that an agency’s response was untimely because certain records were at the agency’s fingertips and could have been disclosed sooner. *West*, 331 P.3d at 78. This court rejected that argument because the agency’s overall response was reasonable and the requester had failed to show that agencies are required to provide installments in any particular order. *Id.*

Here, the trial court erred in finding the time in which the Department produced certain emails on March 5, 2014, was unreasonable. First, the trial court erred by examining the production of the emails in isolation. I RP 21. It is undisputed that the Department produced 5,664 responsive pages and 1,104 native-format files. CP 49-50. In the trial court, Northup did not challenge the overall reasonableness of the Department's response but instead cherry picked two parts<sup>12</sup> of the request and argued that they could have been produced sooner. CP 323-25. The 69 pages of emails challenged by Northup amount to a little more than 1% of the responsive records that were ultimately produced. CP 238-307. Due the voluminous nature of the request, the over 22,000 emails that needed to be reviewed, and the sensitive nature of the documents, the Department produced these responsive documents in installments. CP 151-53; 419-428. These documents needed thorough review because some of the documents were sensitive in nature and needed to be carefully redacted. CP 153-154.<sup>13</sup> Again, Northup has never challenged the reasonableness of the Department's response as a whole. CP 323-25. However, Northup argued in the trial court that the Department could have

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<sup>12</sup> In the trial court, Northup also argued that the Department's production of the debrief was untimely. CP 323-25. The trial court did not rely on this basis when it determined that the Department violated the PRA in its production of the debrief. II RP 4-5.

<sup>13</sup> At the time of the trial court proceedings, Northup's request was still ongoing due to its voluminous nature. CP 153-154.

produced these emails in an earlier installment; this Court recently rejected a similar argument in *West*, 331 P.3d at 78-79.

The Department's response to this request as a whole was reasonable. Mr. Northup's request was broad and complex. The clarified request sought nine different categories of records. One of these nine categories was any records, electronic or paper, in which Northup's name was mentioned from June 1, 2010, to February 15, 2013. CP 441-42, 446. The Department's search of this one portion of the request required it to review over 17,000 emails. CP 154. To respond to another portion of the request, the Department needed to determine if any of 5,000 emails were responsive. CP 154-55.

Ms. Gerken, who had worked in the Department's Public Disclosure Unit for over 6 years, indicated that she spent at least four times as much time on Northup's request as she did on an average records request. CP 154. She described this request as one of the "largest and most time-consuming requests" that she ever worked on. CP 50. In addition, Ms. Gerken had a number of other responsibilities while she was handling this request, including training and reviewing the work of new public disclosure specialists. CP 155-56. Moreover, the Department itself receives and responds to a large number of records request, and its public

disclosure unit was experiencing significant turnover while this request was being handled. CP 146, 155-56.

Furthermore, the March 5, 2014 emails were highly sensitive and needed to be heavily redacted. CP 49. Northup did not challenge the basis for these redactions. The Department took appropriate time to review the documents and the redactions that were made. CP 49. Meanwhile, it continued to produce documents that required less intensive review and were not as sensitive. CP 49. This approach was reasonable. The record does not support Northup's implication that the records were ready to be produced on July 9, 2013. CP 200-01. Instead, these emails needed further review before they were produced, and the Department reasonably decided to provide other responsive documents while this review was completed. CP 49. Therefore, the trial court erred in determining that the Department's production of the March 5, 2014 emails was unreasonable and violated the PRA.

**D. The Trial Court Erred When It Found That Northup Could Bring Claims Challenging The Handling of His Request Prior To The Department's Last Production Of Documents**

Before a requestor files a PRA lawsuit against an agency, there must be some agency action, or inaction, that indicates the agency will not be providing responsive records. *Hobbs v. State*, --- Wn. App. ---, No. 44284-1-II, at pp. 9-10 (October 7, 2014). A cause of action under the

PRA arises only after it reasonably appears that the agency will not or will no longer provide responsive records. *Id.* at 9. In *Hobbs*, the requester filed his PRA lawsuit two days after the agency made its first installment of records available. *Id.* at 2. The trial court found that the requester did not have a cause of action to challenge the installment because the agency was still in the process of responding to the request. *Id.* at 5. Finding that a cause of action does not arise until the agency has taken final agency action, the court of appeals affirmed. *Id.* at 14 & n.12.

Here, Northup initiated this action prior to even filing the public records request at issue. CP 120. Indeed, the Department was still providing Northup with regular installments of responsive documents at the time of the final hearing. CP 49. Because there was no final agency action, Northup's lawsuit was premature and he did not have any cause of action based on the handling of his request. Because Northup did not have a cause of action at the time that he filed his lawsuit, the trial court erred in denying the Department's motion for summary judgment and granting Northup cross-motion for summary judgment.

**E. The Trial Court Erred In Awarding Penalties Under RCW 42.56.565(1) Without An Explicit Finding Of Bad Faith Or Evidence To Support Such A Finding**

Based on the PRA violations, the superior court awarded Northup daily penalties. CP 4-8. Under RCW 42.56.565(1), an inmate serving a

criminal sentence in a state correctional facility is entitled to penalties under the PRA only if “the court finds that the agency acted in bad faith in denying the person the opportunity to inspect or copy a public record.” Here, the trial court erred in awarding penalties to Northup because the Department did not act in bad faith in denying Northup any records.

**1. The Proper Standard of Review Of A Bad Faith Finding Under RCW 42.56.565(1)**

Because RCW 42.56.565(1) is a relatively new provision, the standard of review has not been squarely addressed. The standard of review for a court’s determination of bad faith under RCW 42.56.565(1) is a mixture between de novo review and abuse of discretion. An appellate court’s review of the trial court’s interpretation of the term “bad faith” is a question of statutory interpretation, and such questions are reviewed de novo. *See Telford v. Thurston Cnty. Bd. of Comm’r*, 95 Wn. App. 149, 157, 974 P.2d 886 (1999). However, when the trial court correctly interprets “bad faith,” the trial court’s ultimate determination of whether penalties are appropriate under RCW 42.56.565(1) is an exercise of discretion that should be reviewed for abuse of discretion.

The courts in *Francis v. Wash. State Dep’t of Corr.*, 178 Wn. App. 42, 51-52, 313 P.3d 457 (2013), and *Faulkner v. Wash. Dep’t of Corr.*, --- Wn. App. ---, 332 P.3d 1136, 1140 (2014), purported to apply a de novo

standard of review to a bad faith finding under RCW 42.56.565(1) because they found the question to be a mixed question of law and fact. However, the parties did not appear to raise the issue of the proper standard of review in either case and both cases dealt with the proper interpretation of “bad faith” in RCW 42.56.565. *Faulkner*, 332 P.3d at 1140-42; *Francis*, 178 Wn. App. at 466. Furthermore, in *Faulkner* which clarified the *Francis* decision, the appellate court gave some deference to the trial court’s ultimate factual decision of whether an agency’s actions rose to the level of bad faith. *Faulkner*, 332 P.3d at 1140, 1143.

This mixture of de novo review and abuse of discretion standards is consistent with the PRA and traditional principles applied to appellate standards of review. Although courts review a determination of whether an agency violated the PRA de novo, *City of Federal Way v. Koenig*, 167 Wn.2d 341, 344, 217 P.3d 1172 (2009), courts review the award and amount of penalties under an abuse of discretion standard. *Yousoufian v. Office of Ron Sims*, 152 Wn.2d 421, 430-31, 98 P.3d 463 (2004); *King Cnty. v. Sheehan*, 114 Wn. App. 325, 357, 57 P.3d 307 (2002). In *Yousoufian*, the Court reached this conclusion by examining the language in the penalty provision found in RCW 42.56.550(6) which refers to the court’s discretion to award penalties. *Yousoufian*, 152 Wn.2d at 430.

In enacting RCW 42.56.565(1), the legislature placed a substantive limitation on the discretion of trial courts by requiring a finding of bad faith. However, there is no indication that the legislature intend to take away the traditional discretion afforded to trial courts when it comes to awarding penalties under the PRA and trial courts are in a better position to determine whether the agency's conduct as a whole rose to the level of bad faith. Therefore, this Court should review de novo the trial court's interpretation of "bad faith" in RCW 42.56.565(1). However, the trial court's ultimate finding that the agency's conduct rose to the level of bad faith is reviewed for abuse of discretion.

**2. The Trial Court Erred Awarding Penalties To Northup Without A Finding Of Bad Faith or Evidence To Support Such A Finding**

RCW 42.56.565(1) does not otherwise define "bad faith." However, this Court has found that bad faith requires "a wanton or willful act or omission by the agency." *Faulkner*, 332 P.3d at 1141. *But see Francis*, 178 Wn. App. at 57 (indicating that negligence or gross negligence may be sufficient). A wanton act is one where the agency unreasonably or maliciously risks harm while being utterly indifferent to the consequences. *Id.* This standard is higher than simple or causal negligence. *Faulkner*, 332 P.3d at 1141.

This interpretation of bad faith is consistent with the legislative history of the bad faith requirement. RCW 42.56.565(1) was enacted in 2011 in order to severely limit an inmate's ability to recover penalties under the PRA. This provision altered the requirements for penalties under the PRA for inmates and required an additional showing of bad faith before an inmate could receive any penalties. The inmate penalty amendment first appeared in Senate Bill 5025 as a complete ban on inmates receiving penalties. Senate Bill 5025, 62nd Leg. Reg. Sess., § 1(5) (Wash. 2011). The Act itself was originally called: "An Act Relating to making requests by or on behalf of an inmate under the public records act ineligible for penalties." Laws of 2011, ch. 300, § 1 (adding RCW 42.56.565(1)). While the complete ban on inmate penalties was ultimately amended to provide a narrow exception, the progression of the bill is instructive. The simple fact that the bill started as an outright ban on penalties for inmate requestors and changed slightly to create this very limited exception supports the heightened standard in *Faulkner*.

The willful and wanton standard of bad faith is consistent with other PRA cases interpreting bad faith. In *Yousoufian III*, the court of appeals defined bad faith for purposes of setting penalties as requiring a showing that the agency's actions were more than negligent, grossly negligent, or reckless. See *Yousoufian v. Office of Ron Sims (Yousoufian*

*III*), 137 Wn. App. 69, 80, 151 P.3d 243 (2007). In reviewing the trial court's penalty determination, the court of appeals determined that bad faith and willful non-compliance were the highest levels of culpability under the PRA and deserved the harshest penalties as a result. *Yousoufian*, 137 Wn. App. at 78-80. It further noted that "Examples of bad faith would include instances where the agency refused to disclose information that it knew it had a duty to disclose in an intentional effort to conceal government wrongdoing and/or to harm members of the public." *Id.* at 80. Although the Supreme Court ultimately rejected this sliding-scale methodology for determining penalties in *Yousoufian v. Office of Ron Sims (Yousoufian V)*, 168 Wn.2d 444, 463, 229 P.3d 735 (2010), it did not reject the court of appeals' definition or discussion of the various degrees of culpability under the PRA.

Other instances where the Court has discussed bad faith in terms of the PRA include instances where an agency's withholding of documents is based on a wholly unreasonable interpretation of the PRA. See *Yousoufian III*, 137 Wn. App. at 80; *King Cnty. v. Sheehan*, 114 Wn. App. 325, 356-57 (2002). In *Sheehan*, the requestor argued that the trial court abused its discretion in finding that the agency acted in good faith. *Id.* at 356-57. The court compared the county's actions in that case with the school district in *ACLU v. Blaine School Dist.*, 95 Wn. App. 106, 975 P.2d

536 (1999). In *Blaine*, the court found that the school district did not act in good faith<sup>14</sup> because its decision to refuse to mail records to a requestor was based on an unreasonable interpretation of the PRA. *Blaine*, 95 Wn. App. at 114-15. Unlike in *Blaine*, however, the court in *Sheehan* determined that the county acted in good faith because its arguments were not farfetched and were motivated by a desire to protect the safety and privacy of police officers. *Sheehan*, 114 Wn. App. at 323.

Finally, courts have found bad faith when an agency engages in a search that is so cursory and unreasonable as to amount to a deliberate and willful failure to comply with the PRA's requirements. *Faulkner*, 332 P.3d at 1142; *Francis*, 178 Wn. App. at 63-64. In *Francis*, the court found bad faith when an agency deliberately failed to comply with the PRA's requirements by conducting a cursory search that failed to look in any of the usual record locations and producing documents that were clearly not responsive to the request. *See Francis*, 313 P.3d at 468. Division III of this Court recently clarified *Francis* by indicating that *Francis* involved a wanton act because the agency knew it had a duty to conduct an adequate search but decided to perform a cursory search and make a delayed

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<sup>14</sup> The Department notes that "lack of good faith" and bad faith are not coextensive. Although an agency cannot by definition act in bad faith when it is acting in good faith, it is not apparent that a lack of good faith is per se bad faith. Therefore, in *Sheehan*, when the agency was found to have acted in good faith, it could not have—by definition—been acting in bad faith. Because *Blaine* discussed the agency's lack of good faith, it is unclear that the agency acted in bad faith.

disclosure that was “well short of even a generous reading of what is reasonable under the PRA.” *Faulkner*, 332 P.3d at 1142 (quoting *Francis*, 178 Wn. App. at 63).

Despite the fact that both parties devoted a significant amount of time to the issue of bad faith in their written briefing and oral argument in the trial court, the trial court did not make an explicit finding of bad faith under RCW 42.56.565(1) in its written order and this failure alone warrants reversal. CP 4-8. Even if this Court generously interprets the trial court’s ruling to include a determination of bad faith under RCW 42.56.565(1), the trial court’s written order and oral ruling indicates that it was applying the wrong legal standard in interpreting “bad faith.”

The trial court made two specific references to bad faith as part of its analysis of the *Yousoufian* factors. Specifically, with respect to the debrief, the trial court found that the Department acted in bad faith because of the delay in providing the 16-page debrief and the fact that Northup had still not received a copy. II RP 8. The court also found, however, that the Department did not intentionally act with reckless noncompliance. CP 6; II RP 8. With respect to the March 5, 2014 emails, the court again found bad faith based solely on what it found to be a delay in production of the emails. CP 7; II RP 11. The court indicated that it

found that there had been negligence in getting the records to Northup and that fell within bad faith as defined by the case law. II RP 11.

The trial court's determination that delay alone is sufficient to constitute bad faith is erroneous. An unreasonable delay in producing records can be the basis for a violation under the PRA, but the bad faith provision in RCW 42.56.565(1) requires an additional finding that the agency acted with heightened culpability—i.e., bad faith. To conclude otherwise would effectively render the bad faith provision superfluous. Moreover, the trial court's reference to negligence and the fact that the Department did not act with "reckless noncompliance" indicates that the trial court was not properly interpreting bad faith to require a willful or wanton act. In *Faulkner*, the court indicated that a showing of bad faith requires more culpability than simple or causal negligence. *Faulkner*, 332 P.3d at 1141. It further indicated that bad faith differs from recklessness because "One who is acting recklessly is fully aware of the unreasonable risk he is creating, but may be trying and hoping to avoid any harm. One acting wantonly may be creating no greater risk of harm, but he is not trying to avoid it and is indifferent to whether harm results or not." *Id.* Here, the trial court found reckless noncompliance and negligence based on the Department's delay in providing records, but this is insufficient to establish bad faith. Because the trial court did not properly interpret the

meaning of “bad faith” in RCW 42.56.565(1), its determination that Northup was entitled to daily penalties was erroneous.

**3. The Superior Court’s Determination That Bad Faith Was Present In This Case Was Manifestly Unreasonable**

A trial court abuses its discretion when its decision is manifestly unreasonable or based on untenable grounds or reasons. *Yousoufian v. Office of Ron Sims*, 168 Wn. 2d 444, 458-59, 229 P.3d 735 (2010). A decision is manifestly unreasonable when a trial court—despite applying the correct legal standard—adopts a view that no reasonable person would take. *Id.* Even if this Court were to determine that the trial court applied the proper legal standard, the trial court took a view of these facts that no reasonable person would take in finding that the Department acted in bad faith. The Department did not willfully or wantonly delay the production of the March 5, 2014 emails. There is no evidence that the Department acted in bad faith when it took appropriate care to review the March 5, 2014 emails before producing them. Any delay in producing the March 5, 2014 emails—even if the court concludes they could have been produced earlier—was the result of the Department’s desire to carefully review these sensitive documents in the course of handling a voluminous and complicated public records request while timely providing hundreds of other pages responsive to this request and while also meeting its

obligations under the PRA with respect to other public records requests. Ms. Gerken indicated that Northup's request was one of the largest and most time-consuming that she had ever worked on and that she spent at least four times as much time on this request as she does on the average request. CP 48, 154. Meanwhile, the Department continued to provide Northup with regular installments. Northup does not ascribe any particular importance to the emails or present any evidence that the delay was caused by anything other than the desire to carefully review these documents and the Department's need to balance its other obligations under the PRA. Based on the evidence presented, no reasonable person would find that the delay in the production of the March 5, 2014 emails constituted bad faith.

The Department's redaction of sensitive prison gang information from the debrief of a confidential informant was also not a willful or wanton act or omission. These redactions were made based on a reasonable interpretation of the statutory exemptions and case law—even if the Court ultimately finds that they violated the PRA—and were conducted in a good faith attempt to protect legitimate security concerns. *See Sheehan*, 114 Wn. App. at 323. Again, any delay in producing the debrief was based on a need to carefully review the document and the redactions while providing Northup with regular installments of other

responsive documents. Based on the evidence presented, no reasonable person could find that the Department acted in bad faith in denying Northup the right to inspect the debrief. Because the trial court abused its discretion in determining that the Department acted in bad faith under RCW 42.56.565(1) in denying Northup the opportunity to inspect the March 5, 2014 emails and the debrief document, its decision to award Northup daily penalties must be reversed and this case must be remanded for the trial court to enter an order finding the Department did not act in bad faith.

**F. The Superior Court's Award Of Attorney's Fees Was An Abuse of Discretion**

“Washington courts have repeatedly held the absence of an adequate record upon which to review a fee award will result in a remand of the award to the trial court to develop such a record.” *Mahler v. Szucs*, 135 Wn.2d 398, 435, 957 P.2d 632 (1998), *abrogated on other grounds by Matsyuk v. State Farm Fire & Casualty Co.*, 173 Wn.2d 643, 272 P.3d 802 (2012). Findings of fact and conclusions of law are required to establish such a record, and the failure to include such findings is an abuse of discretion. *Id.*; *Berryman v. Metcalf*, 177 Wn. App. 644, 656-57, 312 P.3d 745 (2013); *Day v. Santorsola*, 118 Wn. App. 746, 76 P.3d 1190 (2003).

Because the superior court's ruling that the Department violated the PRA was erroneous, this Court should also reverse the court's decision to award Northup attorney's fees and costs. Even if this Court upholds the superior court's decision that the Department violated the PRA, this Court must reverse the trial court's awarding of attorney's fees under *Mahler* because the court failed to make any findings of fact or conclusions of law.

After Northup moved for attorney's fees and costs, the Department responded and made a number of arguments about the appropriate amount of attorney's fees. CP 31-35, 63-67. The trial court entered an order awarding Northup \$20,000 in attorney's fees and \$553.50 in costs. CP 13-14. This order lacks any findings of fact and conclusions of law. CP 13-14. Therefore, at the very least, the Court must reverse and remand this order to the superior court to enter findings of fact and conclusions of law. If the Court reverses on the merits of the PRA violations as well, it should remand and order the trial court to dismiss the action without any payment of attorney's fees and costs.

## **VII. CONCLUSION**

The Department did not violate the PRA in its handling of Northup's request and Northup is not entitled to daily penalties, attorney's fees, or costs. Thus, this Court should reverse the trial court's ruling on

the parties' motions for summary judgment and remand to the trial court for it to enter an order finding the Department did not violate the PRA and dismissing Northup's claims with prejudice.

Even if the Court finds that the Department violated the PRA, the Department did not act in bad faith in denying Northup records under RCW 42.56.565(1) and Northup is not entitled to daily penalties. For that reason, the Court should remand to the trial court for it to enter an order finding the Department did not act in bad faith and Northup is not entitled to daily penalties. Additionally, on remand, the trial court must evaluate Northup's request for attorney's fees and enter findings of fact and conclusions of law.

RESPECTFULLY SUBMITTED this 10th day of October, 2014.

ROBERT W. FERGUSON  
Attorney General



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TIMOTHY J. FEULNER, WSBA #45396  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I certify that I served a copy of the foregoing document on all parties or their counsel of record as follows:

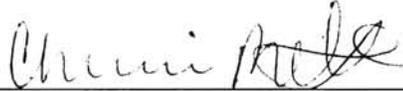
- US Mail Postage Prepaid
- United Parcel Service, Next Day Air
- ABC/Legal Messenger
- State Campus Delivery
- Hand delivered by \_\_\_\_\_

TO:

MICHAEL C. KAHRs, ATTORNEY  
KAHRs LAW FIRM, P.S.  
5215 BALLARD AVE. NW, SUITE 2  
SEATTLE, WA 98107

I certify under penalty of perjury that the foregoing is true and correct.

EXECUTED this 10th day of October, 2014, at Olympia, WA.



\_\_\_\_\_  
CHERRIE MELBY  
Legal Assistant

2014 OCT 13 PM 9:10  
1000 2nd St NW  
SEATTLE WA 98107

# APPENDIX A

### Timeline

**February 20, 2013:** The Department received Northup's request. CP 437-438

**February 25, 2013:** The Department acknowledges Northup's request and tells Northup the request has been assigned PDU-23961. The Department summarizes the request as follows:

1. Copy of the FBI de-brief hearing of Robert Northup, #761654 sent via email of William Riley by Special Agent Michael Rollins.
2. All other emails from FBI Special Agent Michael Rollins to any staff member of the Department of Corrections from June 1, 2010 to January 1, 2013.
3. Copy on an investigation into the improper disclosure of documents related to Robert Northup, #761654 and the document referenced in item 1.
4. Any correspondence between Robert Northup, #761654 and any staff member about the topic of DOC Public Disclosure releasing the document referenced in item 1.
5. Any information related to DOC Public Disclosure releasing the document referenced in item 1 (to include; investigative reports, findings and correspondence letters, emails w/meta data, memorandums, etc.).
6. A copy of the original public disclosure request which resulted in the disclosure of the above mentioned document (item 1) and all correspondence with the Public Disclosure Unit and the requestor.

7. A copy of any/all memos with Robert Northup's name mentioned between June 1, 2010 and February 15, 2013. This includes every email (and meta data) within the DOC data base and the STG data base.
8. Any disciplinary action, notation or documents placed in any member of the Public Disclosure Unit's file related to the disclosure of the document listed in item 1.
9. All records (electronic, emails, meta data and paper) related to John Padilla placing Robert Northup in involuntary protective custody for STG concerns related to the release of the document listed in item 1.

The Department asks for clarification regarding item 7 of the request. The Department informs Northup that it will provide further response within 45 business days or by April 29, 2013. CP 442.

**March 5, 2013:** The Department receives Northup's clarification of item 7 of his request. This clarification indicated that:

DOC database is to be interpreted as any electrical (sic) file or system such as OMNI/OBITZ (but not limited to that); any system DOC utilizes to store or record electronic (or paper) info from any DOC sources. I am searching for any documents/emails/memos where my name is mentioned (to or from) any DOC employee. CP 444.

**March 12, 2013:** The Department sends Northup a letter acknowledging his clarification. CP 446.

**March 20, 2013:** The Department receives a letter from Northup asking about multiple public records requests. He asks which specialist is assigned to the request and also asks that the records be sent to his attorney. CP 448.

- March 26, 2013:** The Department sends Northup a response indicating that PDU-23961 is being handled by Jamie Gerken. CP 450.
- April 29, 2013:** The Department makes the first installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 455.
- May 28, 2013:** The Department receives payment for the first installment. CP 424, 462-63.
- June 5, 2013:** Northup files a motion to amend his complaint to add claims related to PDU-23961.
- June 10, 2013:** The Department sends the first installment of records to Northup's attorney along with an Agency Denial Form/Exemption Log. The Department also sends a letter to Northup informing him that the records were sent and that he would receive further response within 21 business days or by July 10, 2013. CP 465-472.
- July 10, 2013:** The Department sends Northup a letter acknowledging that he had indicated that items 1-3 were the most important. The Department indicated it had gathered records responsive to item 2 and that it would provide an additional response within 5 business days or by July 17, 2013. CP 473.
- July 17, 2013:** The Department makes the second installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 475-76.
- July 30, 2013:** The Department receives payment for second installment. CP 478.
- August 5, 2013:** The Department sends the second installment of records to Northup's attorney. The Department also sends a letter to Northup informing him that the

records were sent and that he would receive further response within 20 business days or by September 3, 2013. CP 480-82.

**September 3, 2013:** The Department makes the third installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 486-87.

**September 9, 2013:** The Department receives payment for the third installment. CP 489.

**September 16, 2013:** The Department sends the third installment of records to Northup's attorney. The Department also sends Northup a letter informing him that the records were sent and that he would receive the next installment within 20 business days or by October 14, 2013. CP 491-93.

**October 14, 2013:** The Department makes the fourth installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 495-96.

**October 21, 2013:** The Department receives payment for the fourth installment. CP 498.

**October 24, 2013:** The Department sends the fourth installment of records to Northup's attorney along with an Agency Denial Form/Exemption Log. The Department also sends Northup a letter informing him that the records were sent and that he would receive the next installment within 19 business days or by November 21, 2013. CP 500-521.

**November 12, 2013:** The Department moves for summary judgment. CP 395.

- November 21, 2013:** The Department makes the fifth installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 158-159.
- November 27, 2013:** The Department receives payment for the fifth installment. CP 161.
- December 6, 2013:** The Department sends the fifth installment of records to Northup's attorney. The Department also sends Northup a letter informing him that the records were sent and that he would receive the next installment within 20 business days or by January 7, 2014. CP 163, 165.
- December 12, 2013:** At the hearing on the Department's motion for summary judgment, the Court grants Northup additional time to conduct discovery under CR 56(f). CP 334.
- January 7, 2014:** The Department makes the sixth installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 167-68.
- January 13, 2014:** The Department receives payment for the sixth installment. CP 170.
- January 21, 2014:** The Department sends the sixth installment of records to Northup's attorney. The Department also sends Northup a letter informing him that the records were sent and that he would receive the next installment within 15 business days or by February 12, 2014. CP 172, 174.
- February 12, 2014:** The Department makes the seventh installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 176-77.

- February 21, 2014:** The Department receives payment for the seventh installment. CP 183.
- March 5, 2014:** The Department sends the seventh installment of records to Northup's attorney along with Agency Denial Form/Exemption Log. The Department also sends Northup a letter informing him that the records were sent and that he would receive the next installment within 15 business days or by March 26, 2014. CP 185-88, 190.
- March 25, 2014:** Northup files a cross-motion for summary judgment. CP 309.
- March 26, 2014:** The Department makes the eighth installment available and sends Northup a letter indicating that the records will be sent once payment is received. CP 192.
- April 2, 2014:** The Department receives payment for the eighth installment. CP 153.
- April 16, 2014:** The superior court holds the hearing on the parties' motions for summary judgment. CP 4.

# APPENDIX B

Redaction #	Statutory Basis	Explanation of redaction
1	RCW 42.56.240(1)	redactions made were to remove intelligence information outside law enforcement is collecting
2	RCW 42.56.240(1)	redactions made were to remove intelligence information outside law enforcement is collecting
3	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
4	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and intelligence information outside law enforcement is collecting
5	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
6	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and intelligence information outside law enforcement is collecting
7	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
8	RCW 42.56.240(1)	redactions made were to remove intelligence information outside law enforcement is collecting
9	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
10	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
11	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and intelligence information outside law enforcement is collecting
12	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
13	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
14	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a member of a STG and intelligence information outside law enforcement is collecting
15	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
16	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
17	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting
18	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and intelligence information outside law enforcement is collecting
19	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and intelligence information outside law enforcement is collecting
20	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and intelligence information outside law enforcement is collecting

Redaction #	Statutory Basis	Explanation of redaction
21	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and intelligence information outside law enforcement is collecting
22	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
23	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
24	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
25	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
26	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
27	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
28	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
29	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
30	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
31	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
32	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
33	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
34	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
35	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
36	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
37	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
38	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
39	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
40	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
41	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
42	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
43	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
44	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG members
45	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG members

Redaction #	Statutory Basis	Explanation of redaction
46	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
47	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
48	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed, the names of STG members, and security threat group information
49	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
50	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
51	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
52	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
53	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and his STG activities
54	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and his STG activities
55	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
56	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
57	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
58	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
59	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
60	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
61	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
62	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the name of a STG member
63	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of a STG member and his/her activities
64	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed, the identity of a STG member, and his/her activities
65	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
66	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove security threat group information
67	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
68	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
69	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
70	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
71	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
72	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
73	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove name of STG member



Redaction #	Statutory Basis	Explanation of redaction
112	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
113	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
114	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
115	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
116	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
117	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members, information related to the identity of STG members, and his/her activities
118	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
119	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
120	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
121	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
122	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
123	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
124	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
125	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
126	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
127	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
128	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
129	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
130	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
131	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
132	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
133	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
134	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
135	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
136	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
137	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information

Redaction #	Statutory Basis	Explanation of redaction
138	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
139	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
140	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
141	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
142	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
143	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
144	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
145	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
146	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
147	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
148	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
149	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
150	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
151	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
152	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
153	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
154	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
155	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
156	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
157	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
158	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
159	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
160	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members



Redaction #	Statutory Basis	Explanation of redaction
183	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
184	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
185	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
186	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
187	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
188	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
189	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
190	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
191	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
192	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
193	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
194	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
195	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
196	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
197	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
198	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
199	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
200	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
201	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
202	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
203	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
204	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
205	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
206	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
207	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
208	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and STG activities
209	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and STG activities
210	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and STG activities

Redaction #	Statutory Basis	Explanation of redaction
211	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and STG activities
212	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and STG activities
213	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
214	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, names of STG members and security threat group information
215	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
216	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
217	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
218	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
219	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
220	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
221	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
222	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
223	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
224	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
225	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
226	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
227	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
228	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
229	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
230	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
231	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
232	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
233	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
234	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
235	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities

Redaction #	Statutory Basis	Explanation of redaction
236	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
237	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
238	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
239	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
240	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
241	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
242	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
243	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
244	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
245	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
246	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
247	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
248	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
249	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
250	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
251	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
252	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
253	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
254	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
255	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
256	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
257	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
258	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
259	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
260	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
261	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
262	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
263	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
264	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
265	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members

RCW Section #	Statutory Basis	Explanation of redaction
266	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
267	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
268	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
269	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
270	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
271	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
272	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
273	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
274	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
275	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to STG activities
276	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
277	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
278	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
279	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
280	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
281	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
282	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
283	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
284	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
285	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
286	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
287	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
288	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
289	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and STG information
290	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and other intelligence information provided
291	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and other intelligence information provided

Redaction #	Statutory Basis	Explanation of redaction
292	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and other intelligence information provided
293	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and other intelligence information provided
294	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
295	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
296	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and other intelligence information provided
297	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
298	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
299	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
300	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG activities
301	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
302	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
303	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG activities
304	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
305	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
306	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
307	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
308	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
309	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
310	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
311	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
312	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
313	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
314	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
315	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
316	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
317	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities

Redaction #	Statutory Basis	Explanation of redaction
318	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
319	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
320	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
321	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
322	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
323	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
324	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
325	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
326	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
327	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
328	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
329	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
330	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
331	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
332	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
333	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
334	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
335	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
336	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
337	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
338	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
339	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
340	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
341	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
342	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
343	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
344	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
345	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members

Redaction #	Statutory Basis	Explanation of redaction
346	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
347	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
348	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
349	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
350	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
351	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
352	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
353	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
354	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
355	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
356	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove STG information and activities
357	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
358	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
359	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
360	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
361	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
362	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
363	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
364	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
365	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
366	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
367	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
368	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
369	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
370	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
371	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
372	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
373	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
374	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
375	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information

Redaction #	Statutory Basis	Explanation of redaction
376	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
377	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
378	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
379	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, names of STG members, and security threat group information
380	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
381	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
382	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
383	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
384	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
385	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
386	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
387	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
388	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
389	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
390	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
391	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member
392	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
393	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
394	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
395	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
396	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
397	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
398	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG activities
399	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
400	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
401	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
402	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities

Redaction #	Statutory Basis	Explanation of redaction
403	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
404	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
405	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed, information related to the identity of STG members, and security threat group information
406	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
407	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of STG members
408	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
409	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
410	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
411	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
412	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
413	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
414	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
415	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
416	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
417	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
418	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
419	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
420	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
421	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
422	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
423	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
424	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
425	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
426	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
427	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
428	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
429	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members

Redaction #	Statutory Basis	Explanation of redaction
430	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
431	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
432	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
433	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
434	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information about STG activities
435	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information about STG activities
436	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information about STG activities
437	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
438	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
439	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
440	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG activities
441	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
442	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
443	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
444	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
445	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
446	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
447	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
448	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
449	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
450	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
451	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
452	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
453	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
454	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
455	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
456	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
457	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information about STG activities
458	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
459	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
460	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
461	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities

FOIA ID #	Statutory Basis	Explanation of redaction
462	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
463	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
464	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove the identity of the person being debriefed, names of STG members, and his/her activities
465	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information about STG activities
466	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
467	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
468	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
469	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
470	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
471	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
472	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
473	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
474	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
475	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
476	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
477	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
478	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
479	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
480	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
481	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
482	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
483	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
484	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
485	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
486	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
487	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
488	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
489	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
490	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities

Redaction #	Statutory Basis	Explanation of redaction
491	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
492	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
493	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
494	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
495	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
496	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
497	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
498	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
499	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
500	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
501	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
502	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
503	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, names of STG members, and security threat group information
504	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
505	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
506	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, names of STG members, and security threat group information
507	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
508	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
509	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
510	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
511	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
512	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
513	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, names of STG members, and security threat group information

Redaction #	Statutory Basis	Explanation of redaction
514	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
515	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
516	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
517	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
518	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
519	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
520	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
521	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
522	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
523	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
524	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
525	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
526	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
527	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
528	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
529	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
530	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
531	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
532	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
533	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
534	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
535	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
536	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
537	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
538	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
539	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
540	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information

Redaction #	Statutory Basis	Explanation of redaction
541	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
542	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
543	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
544	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
545	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
546	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
547	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
548	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
549	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
550	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
551	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
552	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
553	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
554	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
555	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
556	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
557	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
558	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
559	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
560	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
561	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
562	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
563	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
564	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
565	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
566	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
567	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
568	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
569	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
570	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
571	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
572	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
573	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members

Redaction #	Statutory Basis	Explanation of redaction
574	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
575	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
576	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
577	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
578	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
579	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
580	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
581	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
582	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
583	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
584	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
585	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
586	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove names of STG members and his/her activities
587	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
588	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
589	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
590	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
591	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
592	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
593	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
594	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
595	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
596	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
597	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
598	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
599	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
600	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
601	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
602	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
603	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
604	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members



Redaction #	Statutory Basis	Explanation of redaction
637	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
638	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
639	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
640	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
641	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
642	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
643	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
644	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
645	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
646	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
647	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
648	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
649	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
650	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
651	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
652	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
653	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
654	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
655	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
656	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
657	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
658	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
659	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
660	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
661	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
662	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
663	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
664	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
665	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities

Redaction #	Statutory Basis	Explanation of redaction
666	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
667	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
668	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
669	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
670	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
671	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
672	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
673	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
674	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
675	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
676	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
677	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
678	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
679	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
680	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
681	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
682	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
683	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
684	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
685	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
686	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
687	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
688	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, information related to the identity of STG members, and security threat group information

Redaction #	Statutory Basis	Explanation of redaction
689	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed, information related to the identity of STG members, and security threat group information
690	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
691	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
692	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
693	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
694	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
695	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
696	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
697	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
698	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
699	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
700	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
701	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
702	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
703	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
704	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
705	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
706	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
707	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
708	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
709	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
710	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
711	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove information about activities of STGs
712	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
713	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
714	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
715	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
716	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
717	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members

Redaction #	Statutory Basis	Explanation of redaction
718	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
719	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
720	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
721	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
722	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
723	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
724	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
725	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
726	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members and his/her activities
727	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
728	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
729	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
730	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
731	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions were made to remove information about activities of STGs
732	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
733	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
734	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of the person being debriefed and security threat group information
735	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed
736	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
737	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
738	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
739	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove information related to the identity of a STG member and his/her activities
740	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
741	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
742	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
743	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
744	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
745	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove security threat group information
746	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
747	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members



Redaction #	Statutory Basis	Explanation of redaction
788	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
789	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
790	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
791	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
792	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove names of STG members
793	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
794	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the person being debriefed and security threat group information
795	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the law enforcement officer involved and intelligence information outside law enforcement is collecting
796	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the law enforcement officer involved and intelligence information outside law enforcement is collecting
797	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the law enforcement officer involved and intelligence information outside law enforcement is collecting
798	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the law enforcement officer involved and intelligence information outside law enforcement is collecting
799	RCW 42.56.240(1) & RCW 42.56.240(12)	redactions made were to remove the identity of the law enforcement officer involved and intelligence information outside law enforcement is collecting