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IN SUPREME COURT
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BELLEVUE JOHN DOES 1-11, FEDERAL WAY JOHN DOES 1-5 and
JANE DOES 1-2, and SEATTLE JOHN DOES 1-13 and JOHN DOE,
CLERK

Petitioners,

v.

BELLEVUE SCHOOL DISTRICT #405, a municipal corporation and
subdivision of the State of Washington, FEDERAL WAY SCHOOL
DISTRICT #210, a municipal corporation and subdivision of the State of
Washington, and SEATTLE SCHOOL DISTRICT #1, a municipal
corporation and subdivision of the State of Washington, and SEATTLE
TIMES COMPANY

Respondents,

**BRIEF OF *AMICI CURIAE* SESAME, INC., PACIFIC
NORTHWEST ASSOCIATION OF JOURNALISM EDUCATORS,
SEATTLE COMMUNITY COUNCIL FEDERATION AND
CENTER FOR JUSTICE IN SUPPORT OF THE SEATTLE TIMES**

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I. IDENTITIES AND INTERESTS OF *AMICUS CURIAE*

SESAME, Inc. ("SESAME") is a national nonprofit group incorporated in New York whose name stands for Stop Educator Sexual Abuse, Misconduct and Exploitation. SESAME works as a voice for the prevention of sexual abuse and harassment of students by teachers nationwide. Its goals are, among other things, to increase public awareness by breaking the silence surrounding educator abuse, foster recovery of survivors, and encourage increased reporting of abuse to state education authorities and law enforcement officers.

Pacific Northwest Association of Journalism Educators

("PNAJE") is a nonprofit association comprised of journalism educators and student press advisors of university and community colleges in the northwest. Organized in 1970, PNAJE works to advance journalism education in the Pacific Northwest through an annual conference; workshops and panel discussions; public discussions of issues related to freedom of the press and open government; and interaction with publishers, editors, journalism scholars, government officials and citizens' groups. PNAJE also advocates for other issues important to its members, who are teachers.

Seattle Community Council Federation ("Federation") is a collaboration among more than thirty individual community councils in

the city of Seattle. The Federation was originated in 1947 to ease the return of Japanese Americans from World War II internment camps. Today, the Federation is an all volunteer, private nonprofit corporation dedicated to promoting the general welfare of the community, including effective and open government. The Federation promotes monitoring government to ensure the general welfare of the community, including children.

The **Center for Justice** is a non-profit, public interest law firm located in Spokane, Washington. The Center for Justice employs six lawyers and six law students to further its mission of providing a legal voice to those with limited funds and influence. In addition to providing legal services to citizens in poverty, the Center for Justice devotes itself to litigation on matters related to government accountability, civil rights and environmental health. It has paid particular attention to the problem of government agencies not providing citizen access to public records under Washington's Public Records Act.

SESAME, PNAJE, the Federation and Center for Justice collectively are referred to herein as the "Public Interest *Amici*." The Public Interest *Amici* all promote the public good through open government and increased awareness of issues important to the public welfare. The interest of the Public Interest *Amici* in this case stems from

the public's need to receive full access to information regarding allegations of abuse by public employees entrusted with the care of children. Only if such information is made available can the public ensure that the government is complying with its obligations to thoroughly investigate such abuse and to prevent future abuse by public educators. This appeal presents an opportunity to properly enforce, and affirm the validity of, the state statute that guarantees the public's right to information regarding allegations against public educators, as well as an opportunity to recognize the public interest served by making this information available. The Public Interest *Amici* have a legitimate interest in addressing these issues before this Court.

II. STATEMENT OF THE CASE

In 2002, The Seattle Times made requests pursuant to Washington's Public Record Act ("PRA") to school districts throughout the state. *See Bellevue John Does v. Bellevue School District*, 129 Wn. App. 832, 839, 120 P.3d 616 (2005). The requests sought public records regarding teachers accused of sexual misconduct. *Id.* Although most districts complied, the Seattle, Bellevue and Federal Way districts, which are public agencies under the PRA, alerted the teachers union prior to releasing records and provided the union an opportunity to sue to block disclosure. *Id.* The unions, purportedly through anonymous teachers,

brought lawsuits against each district to prevent public access to supposedly “false” allegations (many of which, in fact, had been proven true). CP 8, 20, 257.

The trial court consolidated the three lawsuits and ordered the districts to release many of the records.¹ *See Does*, 129 Wn. App. at 841. However, the trial court also held that the PRA exempts teacher names from disclosure when allegations remain unsubstantiated after an adequate district investigation or if the conduct resulted in only a “letter of direction” rather than formal punishment. *Id.* In doing so, the trial court held that the public does not have a “legitimate” interest in obtaining certain classes of sexual misconduct records. *Id.*

Three groups of the teachers whose records were ordered released appealed the order. *Id.* The Seattle Times cross-appealed to obtain release of all records. *Id.* The Court of Appeals ordered the names of all but three teachers released. *Id.* at 857. The Court of Appeals rejected the trial court’s ruling that exempted the names of teachers who received “letters of direction.” *Id.* at 845. The court distinguished letter of direction from standard performance evaluations and recognized the public interest in such actions:

¹ The records ultimately released by the districts, and records obtained from other districts, provided the sources for a four-part series by The Seattle Times, titled “Coaches Who Prey,” available at <http://seattletimes.nwsourcc.com/news/local/coaches/>.

... a district's decision not to discipline a teacher after investigating a complaint does not convert the investigative file into a performance evaluation. . . . to hold that the public interest in a complaint of sexual misconduct is legitimate only if the school district has decided that discipline is warranted would . . . creat[e] an exemption that is broad, malleable and open-ended.

Id. at 848-49.

The Court also rejected the trial court's decision to shield the names of teachers involved in "unsubstantiated" allegations of misconduct. *Id.* at 853. Instead, the Court recognized the public interest in disclosing names in all cases unless the allegations were "patently false." *Id.*:

... it is possible that the accuser misunderstood the words, misinterpreted the intent, or even fabricated the entire event. But it is also possible that the accuser was accurately reporting inappropriate conduct. Where that possibility exists, the public has a legitimate interest in knowing the name of the accused teacher.

Id. at 856.

The teachers then petitioned this Court for review. Because the public has a legitimate interest in knowing the names of educators accused of sexual misconduct, whether the district ultimately sustains allegations or not, the Public Interest *Amici* file this brief in support of The Seattle Times.

III. ARGUMENT

The culture of silence that has grown up around the issue of educator sexual misconduct has harmed both children and the teaching profession. Although the vast majority of teachers provide a great service to the State's children, there are some who, unfortunately, use their position to harm children. Historically, and today, much misconduct goes unreported because of perceptions by victims that districts will not take action, that districts will believe the abuser, or that the child is alone in his or her pain. The public has a right and a duty to ensure that children report misconduct and that districts act swiftly and appropriately upon the allegations. The only way for the public to effectively monitor the district's efforts, and to protect children when a district fails to take action, is to receive full disclosure regarding allegations, including the accused teacher's identity.

The public policy favoring disclosure applies regardless of whether the allegation is "significant" or whether the district manages to "substantiate" an allegation. As the Court of Appeals correctly recognized, the realities of sexual misconduct show that such behavior often starts out subtly and then escalates; in other words, a slightly inappropriate act often precedes egregious behavior. *See Does*, 129 Wn. App. at 856. Moreover, the power dynamics of the student-

teacher relationship, and the vested interest districts have in keeping the peace with teachers' unions, often leave many investigations unresolved. The public has no less of an interest in full disclosure of these incidents and the teachers involved than it does of any other incidents. If anything, the public interest is heightened in these cases because a district employee untrained in detecting sexual misconduct may misinterpret the first signs of abuse, never interview victims, or place district politics above a child's welfare.

The Appellants essentially want this Court to revise the PRA by imposing a test for disclosure that would shield critical information from public view and would run afoul of the key public policies of preventing and punishing misconduct. Because the public has a legitimate interest in the names of teachers accused of sexual misconduct, the Public Interest *Amici* request that this Court rule that those names are not exempt whether the allegations are deemed true or unsubstantiated.

A. PRA Sections RCW 42.56.230(2) and RCW 42.56.050 Require Disclosure

The PRA mandates broad public disclosure, RCW 42.56.030, and courts must interpret the PRA's exemptions narrowly, *Hearst Corp. v. Hoppe*, 90 Wn.2d 123, 128, 580 P.2d 246 (1978). RCW 42.56.230(2) exempts from disclosure "[p]ersonal information in files maintained for employees, appointees, or elected officials of any public agency to the

extent that disclosure would violate their right to privacy.” The PRA explicitly limits the meaning of “right to privacy.” “A person’s ‘right to privacy’ . . . is invaded or violated only if disclosure of information about the person: (1) Would be highly offensive to a reasonable person *and* (2) is not of legitimate concern to the public.” RCW 42.56.050 (emphasis added).

Despite the limited definition of privacy, Appellants ask this Court to interpret the exemption broadly, finding that only when a district “substantiates” an allegation is it of legitimate public interest. Appellants would further reduce public access by relying on *Dawson v. Daly*, 120 Wn.2d 782, 845 P.2d 995 (1993), to analogize investigations into sexual misconduct by an educator to routine employee performance evaluations. *Dawson* dealt solely with performance evaluations that did not address misconduct allegations; it distinguished evaluations that *did* involve misconduct allegations. Appellants would extend the rationale in *Dawson* to distinguish between formal discipline and letters of direction or other lesser forms of discipline. According to Appellants, if a district chooses to provide an educator merely with “a letter of direction” regarding his or her misconduct, the public has no legitimate interest in the teacher’s identity. Only if the district chooses to term its misconduct findings a “reprimand” that imposes punishment is the public entitled to the teacher’s name. A

district thus can avoid revealing misconduct by putting its findings in a "direction letter" to the offending teacher.

The fallacy of this argument is that it would define the legitimacy of the public's interest based on whether a district is interested in or capable of fully investigating allegations and, even after taking these steps, whether it chooses to impose punishment. The reasoning does not reflect the breadth of the public's interest recognized by this Court in prior cases, nor does it reflect the important public policies that favor full disclosure when an educator is accused of sexual misconduct.

B. This Court Has Recognized the Public Interest in Revealing Names of Educators Accused of Misconduct

This Court already has recognized the public interest in the names of educators accused of sexual misconduct:

Sexual abuse of students is a proper matter of public concern because the public must decide what can be done about it. The public requires information about the extent of known sexual misconduct in the schools, its nature, and the way the school system responds in order to address the problem.

Brouillet v. Cowles Publ'g Co., 114 Wn.2d 788, 798, 791 P.2d 526 (1990).

A court cannot balance the teacher's interest in privacy with this legitimate public concern because to do so would involve a "freewheeling policy judgment." *Id.* Courts also cannot defer to a district's conclusion regarding what should remain confidential and what the district believes is

of public interest. *Id.* at 794. The reason is simple: “leaving interpretation of the act to those at whom it was aimed would be the most direct course to its devitalization.” *Id.*, quoting *Hearst*, 90 Wn.2d at 131.

In reaching its conclusion regarding the important public policy served by disclosing names of teachers accused of sexual misconduct, the *Brouillet* Court noted additional purposes served by disclosure.

Disclosure eases the isolation of victims and encourages them to come forward. *Id.* at 791. Transparency regarding misconduct stems rumors because accurate information is available. *Id.* The *Brouillet* opinion also reflected a healthy skepticism of districts’ willingness to investigate their own. *Id.* at 792. Disclosure of teacher identities “enables the public to encourage the school system to diligently investigate complaints.” *Id.*

Rather than heeding *Brouillet’s* warning against deferring to agency conclusions regarding the public’s right to know, Appellants would defer to the districts, and use the districts’ decisions about whether misconduct was significant enough to warrant formal reprimands as a yardstick for whether the public’s interest in the misconduct is “legitimate.” Nor do Appellants acknowledge the important policies served by public disclosure that the *Brouillet* court described. Instead, they would reverse the priorities of the PRA by placing secrecy first. The important public policies of encouraging victims to report incidents, of

ensuring complete and independent investigations, and of monitoring teachers to ensure that improper behavior is not repeated all weigh in favor of disclosure and should not be used instead as a justification for withholding important information from the public.

C. The Public Has a Legitimate Interest in Monitoring Teachers Accused of Sexual Misconduct, Even When Districts Cannot Substantiate Allegations or Misconduct is Not “Significant”

1. The Public Has an Interest in Monitoring and Preventing Sexual Misconduct by Educators

The public policies favoring disclosure of sexual misconduct allegations remain as vital today as when the *Brouillet* court raised them more than fifteen years ago. As the U.S. Department of Education stated in a comprehensive report on educator sexual misconduct, “sexual misconduct in whatever form it takes is a serious problem in our nation’s schools and one about which parents and taxpayers *have a right to be informed.*” EDUCATOR SEXUAL MISCONDUCT: A SYNTHESIS OF EXISTING LITERATURE, Policy and Program Studies Service, Dept. of Educ. at Preface (2004), *available at* <http://www.ed.gov/rschstat/research/pubs/misconductreview/report.pdf> (hereinafter “MISCONDUCT REPORT”). The report concludes that more than nine percent of students in grades eight to eleven have experienced unwanted sexual misconduct from a school

employee. *Id.* at 17. That equates to more than 4.5 million students. *Id.* at 18.²

The MISCONDUCT REPORT and other researchers recognize the ongoing importance of the issues addressed in *Brouillet*. For example, they cite the danger of relying on districts to police their own because — just as in this case — investigators receive little or no training and investigations often are cursory. *Id.* at 36; Caroline Hendrie, *Principals Face a Delicate Balancing Act in Handling Allegations of Misconduct*, EDUCATION WEEK, Dec. 18, 1998 (discussing inadequate training and inherent bias when schools conduct their own investigations).³ In addition, studies discuss how children fear reporting because of backlash from others or because they feel isolated, which the *Brouillet* court recognized can be eased through broader disclosure of misconduct allegations. See Hendrie, *Cost Is High When Schools Ignore Abuse*, EDUCATION WEEK, Nov. 25, 1998 (six-month study revealed wide

² News reports confirm that Washington is not immune to the problem and that public concern about these issues remains high. See, e.g., Debby Abe & Stacey Mulick, *Teacher in Sex Case Was Suspended Before*, THE NEWS TRIBUNE, B4, Jan. 27, 2005, available at 2005 WLNR 1168871 (teacher had previously been suspended from different district for using internet pornography, but that offense never showed up on reference checks, so the second district never knew of the earlier offense); Doug Pacey, *MacIntosh Denies Allegations*, BELLINGHAM HERALD, B1, Jan. 26, 2005 (basketball coach charged criminally with sexual abuse of a student at a prior school); Linda Shaw, *Abuse Victim Who Killed Teacher Settles With District*, THE SEATTLE TIMES, A1, Jan. 27, 2005, available at http://seattletimes.nwsourc.com/html/localnews/2002/162113_cloud26m.html (student who killed teacher after years of undetected abuse settled lawsuit against school district).

³ Education Week's series on educator abuse is available at http://www.edweek.org/ew/collections/trust_betrayed/index.html.

skepticism of allegations among administrators that, in turn, discouraged children from reporting misconduct). These concerns are compounded by the tendency of abusers to target children who are “vulnerable or marginal students who are grateful for the attention” and are less likely to complain or to be believed. MISCONDUCT REPORT at 31. Because of this disparity in credibility, officials may be tempted to ignore allegations. As the MISCONDUCT REPORT explained,

[a]buse is allowed to continue because even when children report abuse, they are not believed. Because of the power differential, the reputation difference between the educator and the child, or the mindset that children are untruthful, many reports by children are ignored or given minimal attention.

Id. at 33. “Other students note this lack of response and conclude that teachers (or coaches or administrators) cannot be stopped.” *Id.* at 35.

The veil of secrecy that leaves children isolated, combined with the lack of training and potential conflicts when educators investigate their own, make clear the need for public monitoring. The *Brouillet* court’s concerns about educator misconduct remain key public policy concerns and are best addressed by full disclosure to the public. The public has a legitimate interest in monitoring teachers and investigations of teachers, making sure districts thoroughly investigate and prevent misconduct.

2. The Public's Interest in Obtaining Information About Sexual Misconduct Allegations Extends to Incidents that Are Not Deemed "Significant"

Abusers, whether in schools, churches or homes, often increase the severity of their behavior over time. This practice, known as "grooming," begins with seemingly minor indiscretions and builds after the abuser has established that the child will remain silent. *Id.* at 32 (describing the typical grooming process of providing rewards followed by increases in sexual behavior). Because of this progression, even behavior that some might view as "insignificant" may indicate deeper problems, something the Court of Appeals in this case properly recognized:

If a teacher's record includes a number of complaints found to be "unsubstantiated," the pattern is more troubling than each individual complaint. Yet, if the teacher's name in each individual complaint is withheld from public disclosure, the public will not be able to see any troubling pattern that might emerge concerning that teacher.

Does, 129 Wn. App. at 856.

Appellants' arguments sidestep the very real problem of grooming. Rather than recognizing that small instances of misconduct can signal broader problems, they would defer to the subjective assessments of districts by allowing them to withhold the identities of teachers if the districts conclude that the misconduct is not "significant." A district's conclusion regarding significance is by no means infallible. Decisions

about the seriousness of misconduct “often leave so much to personal discretion that even the best-intentioned administrator may be befuddled about what constitutes a reportable suspicion.” Hendrie, *No Easy Answers for Schools in Misconduct Inquiries*, EDUCATION WEEK, May 7, 2003.

Moreover, students and educators often differ in their views on the seriousness of allegations and how to interpret the potential for repeated behavior. See Hendrie, *At One California School, a ‘Never-Ending Nightmare,’* EDUCATION WEEK, Dec. 16, 1998 (administrators at one school orally warned teacher about overfriendliness but took no additional steps; four female students later reported molestation by same teacher). Finally, districts may face pressure to minimize incidents to avoid the costs of potential legal challenges by the teachers.

The inherently subjective nature of deciding whether misconduct is significant, differences in opinion regarding the meaning of acts, and the lack of training about sexual misconduct provided to administrators all counsel against allowing districts to shield information from the public based on the individual district’s view of the gravity of the charges and its desire to avoid harming its reputation. Parents, students and the general public must have access to the identities of teachers who commit even seemingly insignificant misconduct. Only then can the public ensure that

the incidents do not repeat themselves on a broader scale and that schools do not ignore early warning signs of abuse.

Appellants would remove this information from the public. In doing so, they seek a test that relies far too much on persons not trained in investigating sexual misconduct and who might be predisposed to believe the accused teacher merely showed poor judgment rather than a propensity for improper behavior. Moreover, it means the requestor must rely on a district's determination of what is "significant" — or sue to prove otherwise. Because this test runs afoul of the reality of sexual misconduct and the vital public policy of preventing abuse and protecting children, this Court should reject Appellants' proposed framework.

3. Public Policy Favors Disclosure of Educator Names Even When Districts Do Not Substantiate Allegations

The culture of silence and the power dynamic in the teacher-student relationship prevent many children from reporting abuse. Even when students do report, it is often difficult to fully substantiate the allegations for various reasons. Students may recant under pressure. *See, e.g.,* Larry McShane, *Child Sex Abuse Case Enrages Giuliani*, THE RECORD, A7, May 4, 2001 (inquiry dropped when students gave conflicting statements). Parents may not wish to pursue the allegations for fear of putting their children through more pain. *See* Susan Edelman,

Abusive Teachers Wriggling Off Hook, NEW YORK POST, at 8, April 2, 2000, available at 2000 WLNR 8139325 (investigation stopped when parents chose not to proceed). School investigators with a lack of training may not thoroughly examine the charges or take them seriously.

MISCONDUCT REPORT at 44 (documenting that schools often provide warnings off-the-record); see Hendrie, *Cost Is High When Schools Ignore Abuse*, EDUCATION WEEK, Nov. 25, 1998 (describing case in which district ignored allegations until parents went to police). And, perhaps most significantly, schools may find it easier to “pass the trash” by assessing informal punishment — akin to the “letters of direction” in this case — than to engage in a disciplinary battle with the teachers union.

See, e.g., Diana Jean Schemo, *Silently Shifting Teachers in Sex Abuse Cases*, NEW YORK TIMES, A19, June 18, 2002, available at 2002 WLNR 4044030 (describing examples); Hendrie, *‘Passing the Trash’ by School Districts Frees Sexual Predators to Hunt Again*, EDUCATION WEEK, Nov. 25, 1998.

The phenomenon of “passing the trash” exemplifies the need for disclosure *even* when districts do not substantiate allegations. In districts throughout the country, teachers accused of sexual misconduct have been allowed to keep teaching or move to other schools despite the allegations and without any information provided to the new school. See, e.g., Tracy

Loew, *S-K District Knew About Complaints*, STATESMAN J., A1, Jan. 16, 2005; *Report Documents Years of Complaints Before Teacher Convicted of Rape*, ASSOCIATED PRESS, Oct. 27, 2003 ; *Despite Prior Complaints, Teacher Not Reported to Police*, ASSOCIATED PRESS, Mar. 12, 2003; *Prior Sex Allegations Against Panhandle Teacher Dropped*, ASSOCIATED PRESS, Feb. 6, 2002 (teacher accused of new misconduct after prior investigation resulted in "unfounded" conclusion).

Administrators may justify the practice in various ways, noting the costs of legal battles with teachers unions, the need to at least get the teacher out of that school, and the fact that the district could not ultimately "prove" the allegations. Hendrie, *'Passing the Trash' by School Districts Frees Sexual Predators to Hunt Again*, EDUCATION WEEK, Nov. 25, 1998. Thus, districts also may decline to follow up to find out whether the accused teachers continue to teach or whether they have faced additional misconduct allegations. See Jane Elizabeth Zemel & Steve Twedt, *Lessons in Betrayal*, PITTSBURGH POST-GAZETTE, A1, Oct. 31, 1999, available at 1999 WLNR 3119296.⁴ The Court of Appeals recognized

⁴ One of the most notorious examples of passing the trash reveals the various problems with allowing accusations to remain under wraps. A band teacher in Michigan, George Crear, was accused of abusing students, but by the time the two victims came forward the statute of limitations had passed. Zemel & Twedt, *Lessons in Betrayal*, PITTSBURGH POST-GAZETTE, A1, Oct. 31, 1999. The school district allowed Crear to resign with a clean personnel file, and the man began teaching in Florida. There, he molested at least three more students, one of whom committed suicide. Crear was not detected until another *Michigan* victim who had previously remained quiet came forward, which gave

that these are “substantial concerns” of districts, *Does*, 129 Wn. App. at 848, but that they cannot outweigh the public interest. *Id.*

Examples from across the nation (including from the record in this case), show the Court of Appeals was correct in recognizing the danger in assuming that the label of “unsubstantiated” renders the complaints a private matter that is not of public interest. Regardless of whether the complaints embarrass a teacher, or whether there is a risk that in a rare case a teacher is falsely accused, the public interest in ensuring safety of children when in the hands of government employees remains significant and certainly “legitimate.” By deferring to a district’s efforts to “substantiate” allegations, the Appellants would prevent the public from exercising its legitimate right to obtain information about potential abusers and to monitor districts’ actions. Full disclosure will prevent, or at least diminish, the tendency to “pass the trash” that has arisen *because* districts have failed to disclose in the past. Again, public policy dictates that more information — not less — is better and safer.

D. The Veil of Secrecy Harms the Teaching Profession

The educators among the Public Interest *Amici* realize all too well that the veil of secrecy imposed over allegations does not serve the

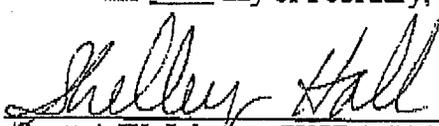
Florida victims the confidence to tell their story as well. *Id.* The horrible events depict many of the classic difficulties of detecting and preventing abuse: victims afraid to report, districts willing to look the other way, and an abuser who moves on to escape consequences. At a minimum, disclosure by the first school could have prevented additional abuse.

accused or his or her profession. Colleagues are aware when a teacher is accused and when an investigation is concluded; when the teacher returns to the classroom, the cloud of suspicion remains. Allowing access to the investigation records and public oversight of district behavior would improve public confidence and trust in the profession and school system. It also would squelch rumors that may continue to circulate about a teacher after the investigation concludes. Teachers who are falsely accused could be openly exonerated before their colleagues and the public.

IV. CONCLUSION

For the foregoing reasons, the Public Interest *Amici* support the Court of Appeal's opinion requiring the districts to disclose names of accused educators unless the allegations are patently false.

RESPECTFULLY SUBMITTED this 20th day of February, 2007.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on the 20th day of February, 2007, I caused a true and correct copy of the foregoing document, "BRIEF OF *AMICI CURIAE* SESAME, INC., PACIFIC NORTHWEST ASSOCIATION OF JOURNALISM EDUCATORS, SEATTLE COMMUNITY COUNCIL FEDERATION, AND CENTER FOR JUSTICE IN SUPPORT OF THE SEATTLE TIMES," to be delivered via Electronic and U.S. Mail to the following counsel of record:

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