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SUPREME COURT  
STATE OF WASHINGTON

**SUPREME COURT OF THE STATE OF WASHINGTON** 2 P 3: 29  
**CASE NO.: 78603-8**

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BELLEVUE JOHN DOE 11 AND SEATTLE JOHN DOES 6, 9, & 13

Appellants,

BELLEVUE JOHN DOES 1-10, FEDERAL WAY JOHN DOES 1-5  
AND JANE DOES 1-2 AND SEATTLE JOHN DOES 1-5, 7-8 & 10-12,  
AND JOHN DOE,

Plaintiffs/Non-Appellants/Respondents,

v.

BELLEVUE SCHOOL DISTRICT #405, FEDERAL WAY SCHOOL  
DISTRICT #210, AND SEATTLE SCHOOL DISTRICT #1,

Respondents; AND

THE SEATTLE TIMES COMPANY,

Respondent/Cross-Appellant.

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**SUPPLEMENTAL BRIEF OF BELLEVUE JOHN DOES 1, 2, 3, 4, 6,  
7, 9, FEDERAL WAY JOHN DOES 2, 3, and SEATTLE JOHN  
DOES 3, 5, 10**

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COURT OF APPEALS, DIVISION I  
CASE NO. 54300-8

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**ORIGINAL**

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## I. INTRODUCTION

This case does not question the public's right to receive redacted records disclosing the nature and extent of allegations made against public school teachers, the methods used to investigate the allegations, and the various agencies' responses to such allegations. Rather, this case examines whether the identities of public school teachers should be linked with false or unsubstantiated allegations of sexual misconduct.

## II. LEGAL ANALYSIS

The Petitioners in this case propose the following rules. (1) The identities of public employees should not be linked to false or unsubstantiated allegations that are disclosed as a public record. (2) Letters of direction are not subject to public disclosure unless the records contain references to founded allegations of misconduct. (3) The contours of the constitutional right of privacy are not defined by the rational basis test as erroneously stated in *O'Hartigan v. Dept. of Personnel*, 118 Wn.2d 111, 117-118, 821 P.2d 44 (1991). RCW 42.56.050 is unconstitutional because it attempts to restrict the constitutional right of privacy.

Proposed rules one (1) and three (3) will be discussed in the analysis that follows. However, to fully appreciate the Petitioners' assertions on appeal, a brief overview of the right of privacy in

Washington is necessary. As a consequence the last proposed rule will be discussed first.

**A. The Right of Privacy in Washington**

The common law right of privacy and the contours of the constitutional right of informational privacy have only recently been specifically defined by precedent in federal and state law. The origin of the right of privacy is often linked to a powerful dissent authored by Justice Louis Brandeis in *Olmstead v. U.S.*, 277 U.S. 438, 478, 48 S.Ct. 564, 572-572 (1928).<sup>1</sup> In *Olmstead*, Justice Brandeis wrote:

The makers of our Constitution undertook to secure conditions favorable to the pursuit of happiness. They recognized the significance of man's spiritual nature, of his feelings and of his intellect. They knew that only a part of the pain, pleasure and satisfactions of life are to be found in material things. They sought to protect Americans in their beliefs, their thoughts, their emotions and their sensations. They conferred, as against the government, the right to be let alone-the most comprehensive of rights and the right most valued by civilized men. To protect, that right, every unjustifiable intrusion by the government upon the privacy of the individual, whatever the means employed, must be deemed a violation of the Fourth Amendment.

*Olmstead v. U.S.*, 277 U.S. 438, 478, 48 S.Ct. 564, 572-572 (1928). Since *Olmstead*, the right of informational privacy has been recognized in numerous opinions. One of the earlier decisions on the right of informational privacy can be found in the Ninth Circuit case of *York v. Story*.

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<sup>1</sup> The theory of privacy was first authored by Brandeis in his seminal article on the right of privacy written some thirty years earlier, Warren & Brandeis, *The Right to Privacy*, 4 HARV. L. REV. 193 (1890).

*Ribar*, 156 F.3d 673, 685 (6th Cir.1998) (holding that sheriff who released intimate details of plaintiff's rape at a press conference violated her constitutional right to privacy); *Denver Policemen's Protective Ass'n v. Lichtenstein*, 660 F.2d 432 (10th Cir.1981)(deciding to what extent police officers had a right to prevent disclosure of personal matters within police personnel and investigative files); *Mangels v. Pena*, 789 F.2d 836, 839 (10th Cir.1986) (identifying fire fighters' privacy interests in personal information possessed by the state as founded upon rights of substantive due process derived from the Constitution, not upon state statutory provisions).

**B. Development of the Common Law Right of Privacy in Washington**

In Washington, the common law of the right of privacy has centered on the statutory construction of RCW 42.56.050 (formerly RCW 42.17.255) and the common law recognition of the tort of invasion of privacy. Remarkably, for most of the past century in Washington, our courts did not recognize the tort of invasion of privacy. See e.g., *Hillman v. Star Publishing Co.*, 64 Wash. 691, 117 P. 594 (1911)(court denies remedy to plaintiff for invasion of privacy); *Hodgeman v. Olsen*, 86 Wash. 615, 150 P. 1122 (1915)(plaintiff again denied a remedy for invasion of privacy); *State ex rel. LaFollette v. Hinkle*, 131 Wash. 86, 229 P. 317, 319 (1924)(plaintiff had remedy but not clear as to what theory); *Lewis v.*

*Physicians & Dentists Credit Bureau*, 27 Wn.2d 267, 268-72, 177 P.2d 896 (1947)(refused to address invasion of privacy squarely)

In *Doe v. Group Health Coop., Inc.*, 85 Wn. App. 213, 932 P.2d 178 (1997), the Court of Appeals explicitly denied the existence of the right of recovery for an invasion of privacy claim because the court was "unable to verify [the] assumption" that Washington recognizes the common law cause of action described in Restatement (Second) of Torts § 652D (1977). *Doe v. Group Health Coop.*, 85 Wn. App. at 221.

However, the *Doe* decision did not last long. This Court in *Reid v. Pierce County*, 136 Wn.2d 195, 961 P.2d 333 (1998) specifically overruled *Doe v. Group Health*. In *Reid*, the plaintiffs successfully stated a cause of action for invasion of privacy arising out of improper disclosure of their decedent's autopsy photos. *Id.*

Interestingly, in *Reid* this Court stated that it had already recognized the invasion of privacy claim in the case of *Hearst v. Hoppe*,<sup>2</sup> a Public Record Act case. Thus for the first time, the invasion of privacy tort was explicitly recognized, and its definition harmonized with the right of privacy in the Public Record Act.

### **C. The Changing Definition of Privacy in the PRA.**

In 1972, Washington State voters passed Initiative 276, the Public

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<sup>2</sup> 90 Wn.2d 123, 580 P.2d 246 (1978),

Records Act.<sup>3</sup> The first case to discuss the right of privacy set forth in the act was *Hearst*, 90 Wn.2d at 123, wherein a newspaper sought disclosure of personal and real property tax records of private citizens in an effort to determine whether the King County Assessor had given special favors to persons who contributed to his campaign. Mr. Hoppe, the Assessor, asserted that deletion of the names of the taxpayers involved was necessary to protect "the taxpayer's right to privacy" as required to exempt the information from disclosure under RCW 42.17.310(1)(c). This Court disagreed, and ordered that the records be disclosed with the names intact. This Court held:

Inasmuch as the statute contains no definition of the term, there is a presumption that the legislature intended the right of privacy to mean what it meant at common law. The most applicable privacy right would appear to be that expressed in tort law. Tort liability for invasions of privacy by public disclosure of private facts is set forth in Restatement (Second) of Torts § 652D, at 383 (1977): "One who gives publicity to a matter concerning the private life of another is subject to liability to the other for invasion of his privacy, if the matter publicized is of a kind that (a) would be highly offensive to a reasonable person and (b) is not of legitimate concern to the public."

*Hearst*, at 135-36, 580 P.2d 246.

This Court broadened its interpretation of the privacy exemption in *In re Rosier*, 105 Wn.2d 606, 717 P.2d 1353 (1986). There Rosier made a PRA request of the utility for a list of the names and addresses of all its

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<sup>3</sup> Initiative 276, 1973 Wash. Laws ch. 1 (codified at WASH. REV. CODE §§ 42.17.010-.945. (1985).

customers in order to mail them campaign literature. The utility refused to provide the list, alleging that disclosure would amount to an unreasonable invasion of its customers' privacy interests. *Rosier*, 105 Wn. 2d at 608, 615, 717 P.2d at 1355, 1359. This Court disagreed and granted *Rosier* access to the information he sought. In doing so the court articulated new standards for the protection of private information from PRA requests.

This Court held that any information which identified 'particular, identifiable individuals as somehow unique from most of society' implicated a privacy interest. *Rosier*, 105 Wn.2d at 612. The Court affirmed the propriety of balancing the individual privacy interest against the public interest in disclosure. *Id.* at 612, 614.

In response, the Legislature specifically overturned that holding. In 1987 the Legislature amended RCW 42.17 to add a new section which defines an invasion of privacy:

A person's "right to privacy," "right of privacy," "privacy," or "personal privacy," as these terms are used in this chapter, 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. The provisions of this chapter dealing with the right to privacy in certain public records do not create any right of privacy beyond those rights that are specified in this chapter as express exemptions from the public's right to inspect, examine, or copy public records.

Laws of 1987, ch. 403, § 2, p. 1547.

Subsequent to the enactment of RCW 42.17.255 (now RCW 42.56.050), this Court issued its opinion in the case of *Brouillet v. Cowles Publ'g Co.*, 114 Wn.2d 788, 791 P.2d 526 (1990). This Court's opinion made clear there would be no balancing of the employee's interest in non-disclosure against the public interest in disclosure. *Id.*

A few years later, the Court protected routine personnel files in the landmark case of *Dawson v. Daly*, 120 Wn.2d 782, 845 P.2d 995 (1993). In *Dawson*, the court refused to balance the public interest against the rights of the individual. Instead, the Court enunciated a test that balanced the public interest in obtaining the requested information against the efficient operation of the government.

#### **D. Comparing the Rights of Privacy**

From these cases, there has been an evolution of two distinct definitions of the right of privacy, the constitutional right of privacy and the Public Records Act/tort definition of the right of privacy.

Broadly, under the constitutional construction of the right of privacy, at least in the Ninth Circuit, the interests of the individual employee are balanced against the government's interest in disclosure.

However, under the PRA the individual's right of privacy specifically cannot be considered. Such a rule under the PRA seems strange indeed since the point of the statute is purportedly to protect

information to the “extent that disclosure would violate” the employee’s “right to privacy.” RCW 42.56.230.

The question then becomes, how can the PRA adopt a standard regarding the right to privacy that affords a public school teacher less protection under the statute than that which is guaranteed under the state and federal constitutions? For the appellate court in *Bellevue John Does*, the answer was found in the erroneous and logically flawed application of the rational basis test found in *O’Hartigan v. Dept. of Personnel*, 118 Wn.2d 111, 117-118, 821 P.2d 44 (1991). See *Bellevue John Does I-11 v. Bellevue School District* |405, 129 Wn.App. 832, 861, 120 P.3d 616,630 - 631 (2005). However, the *O’Hartigan* opinion ignores controlling constitutional standards regarding the right of informational privacy, applying instead a rational basis test to define the contours of the constitutional right. Such a construction is clearly an error and should be corrected by this Court in this case.

For example, in *Ino Ino, Inc. v. City of Bellevue*, 132 Wn.2d 103, 124, 937 P.2d 154, 167 (1997) this Court explained *O’Hartigan* as follows:

Our decision in *O’Hartigan v. Department of Personnel*, 118 Wn.2d 111, 117, 821 P.2d 44 (1991) is more persuasive in this case. There the court recognized two types of interests protected by the right to privacy: the right to autonomous decisionmaking and the right to nondisclosure of intimate personal information, or confidentiality. In questions involving the latter right, the state constitution offers no

greater protection than the federal constitution, which requires only application of a rational basis test. *Id.* at 117-18, 821 P.2d 44.

*Id.* at 124.

However, the federal constitutional right of privacy requires the application of a totally different standard than that enunciated in *O'Hartigan*.

The Ninth Circuit has specifically addressed the right of informational privacy as it relates to disseminating information collected by the government. The Court has held that individuals have a constitutionally protected interest in avoiding disclosure of personal matters. *Whalen v. Roe*, 429 U.S. 589, 599-600, 97 S.Ct. 869, 876, 51 L.Ed.2d 64 (1977); *Tucson Woman's Clinic v. Eden*, 379 F.3d 531, 551 (9th Cir.2004). However, “the right to informational privacy is not absolute; rather, it is a conditional right which may be infringed upon a showing of proper governmental interest.” *Tucson Woman's Clinic*, 379 F.3d at 551 (citation omitted); *Planned Parenthood of Southern Arizona v. Lawall*, 307 F.3d 783, 790 (9th Cir.2002). Thus, the Court must “ ‘engage in the delicate task of weighing competing interests’ to determine whether the government may properly disclose private information.” *In re Crawford*, 194 F.3d 954, 959 (9th Cir.1999), *cert. denied*, 528 U.S. 1189, 120 S.Ct. 1244, 146 L.Ed.2d 102 (2000) (citation omitted); *Planned Parenthood of Southern Arizona*, 307 F.3d at 790. Relevant factors

include: (1) the type of information requested; (2) the potential for harm in any subsequent non-consensual disclosure; (3) the adequacy of safeguards to prevent unauthorized disclosure; (4) the degree of need for access; and (5) whether there is an express statutory mandate, articulated public policy, or other recognizable public interest militating toward access. *Tucson Woman's Clinic*, 379 F.3d at 551; *In re Crawford*, 194 F.3d at 959. “The list is not exhaustive, and the relevant considerations will necessarily vary from case to case.” *In re Crawford*, 194 F.3d at 959. “In most cases, it will be the overall context, rather than the particular item of information, that will dictate the tipping of the scales.” *Id.*

Thus, in stark contrast to the PRA construction of the right of privacy, under a constitutional analysis the interests of the individual are balanced against the government’s interest in disclosure. The *O’Hartigan* decision appears to be premised on a fundamental error. That is, *O’Hartigan* ignores controlling constitutional principles and instead applies a rational basis test to define the right of privacy. As a consequence the underlying decision in this case, which relies on *O’Hartigan*, is also fatally flawed.

This Court must answer the question of whether the legislature can properly create a definition of the right of privacy that is more restrictive than the actual constitutional right of privacy.

It seems clear that, as in this case, where the constitutional right of privacy is implicated by the government's proposed disclosure, such a statutory enactment is fatally and constitutionally flawed. Washington state courts must be instructed to apply the constitutional standards, as adopted in the Ninth Circuit, to cases in which the right of privacy is affected by the government's proposed dissemination of information it has collected.

In this case, this Court must apply the proper standard, which includes balancing the right of the employee against the government's interest in disclosure. Such an approach makes sense even under the policy of the PRA which specifically provides for the protection of the employee's right of privacy. RCW 42.56.070. For the right of privacy to have meaning, it logically follows that a court must consider the employee's right to privacy. In other words, by eliminating the ability to balance the employee's right to privacy against the government's interest in disclosure, the current construction of the Act renders the employee's right of privacy meaningless.<sup>4</sup> The right of privacy cannot be legitimately protected if no one can take it into account. So whereas now Washington courts balance the harm to the efficient operation of government against

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<sup>4</sup> See *Brouillet v. Cowles Pub. Co.*, 114 Wn.2d 788, 791 P.2d 526 (1990)

the government's interest in disclosure, the employee's right of privacy is left out of the equation entirely.

The legislature is not permitted to create statutes that restrict constitutional rights. As an example, the legislature may not enact a statute that rewrites constitutional law on search and seizure under the Fourth Amendment. Similarly, the State may not enact legislation that restricts the right of informational privacy by creating a statutory definition of the right of privacy that is more limited than the constitutional right as defined by the federal courts.

This Court should take this opportunity to correct *O'Hartigan* and remand this case to the trial court so that the Petitioners may litigate this matter under the proper standard. Additionally, this Court should rule that RCW 42.56.050 is unconstitutional insofar as it purports to restrict the constitutional right of informational privacy. This brief will next examine the first proposed rule by Petitioners.

**D. The Identities of Public School Teachers Should not be Associated with False or Unsubstantiated Allegations.**

The Petitioners propose that this Court adopt the following rule: The identities of public employees should not be linked to false or unsubstantiated records that are disclosed as a public record. This rule actually acknowledges and protects the teacher's right of privacy.

This rule is supported by the Public Records Act itself. As an example, RCW 42.56.070 states in pertinent part:

To the extent required to prevent an unreasonable invasion of personal privacy interests protected by this chapter, an agency shall delete identifying details in a manner consistent with this chapter when it makes available or publishes any public record; however, in each case, the justification for the deletion shall be explained fully in writing.

RCWA 42.56.070

In this particular case, the public school teachers did not contend that the public was not entitled to the records at issue. The teachers recognized that although the media was involved in a fishing expedition, the information it sought was important. That is, the media sought school district records that showed the manner in which school districts reacted to and investigated allegations of sexual misconduct by public school teachers. The teachers merely sought a restraining order preventing the school district from releasing the identities of teachers, where the allegations were found to be false or unsubstantiated.

Today's public school teacher is expected to perform countless critical tasks in caring for our children. They are poorly paid. These teachers are also subjected to false accusations including an entire ambit of alleged improper conduct. And yet RCW 4.24.510 confers broad immunity to any person who might make a false allegation to a school district, such that the teacher has no civil remedy. *See also*, RCW

26.44.060.

Nor can the teacher file an action against the media. The media has a conditional privilege to repeat the false allegations in its coverage of the matter. *Mark v. Seattle Times*, 96 Wash.2d 473, 487, 635 P.2d 1081, 1089 (1981)(publication of defamatory matter concerning another in a report of an official action or proceeding or of a meeting open to the public that deals with a matter of public concern is privileged).

In summary, those that make false or unsubstantiated allegations, and those that republish those allegations are absolutely protected from civil redress by the public school teacher. The teacher's only protection from false allegations is his/her right of privacy.

The Court of Appeals now proposes that the teacher's right of privacy should be eviscerated by failing to protect our teachers from the dissemination of false or unsubstantiated allegations. This the Court of Appeals proposes despite its recognition of the significant privacy right implicated by disclosure of false allegations of sexual misconduct. The Court acknowledges:

But when information about an individual is protected by the right to privacy, the individual-not anyone else-gets to decide whether clearing the air is a good idea. Neither the existence of a school district file documenting the investigation, nor the circulation of rumors about who was involved, justifies forcing Seattle John Doe 1 to be publicly linked, without his consent, with these highly offensive allegations that are patently false. Public disclosure of his name would serve no interest other than gossip and sensation.

*Bellevue John Does 1-11*, 129 Wn.App. at 853-854. The Court further stated:

We agree with the *Tacoma News* holding that the public as a rule has no legitimate interest in finding out the names of people who have been falsely accused.

*Bellevue John Does 1-11*, 129 Wn.App. at 853.

However, the Court of Appeals states in *Bellevue John Does* in discussing the distinction between false and unsubstantiated allegations:

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.

*Bellevue John Does 1-11*, at 856. The Court's premise is disturbing indeed. When allegations become facts in our judicial process, we abandon our most basic legal principles. An allegation is not a fact, and no matter how many false or unsubstantiated allegations might be coupled together, they are nonetheless just allegations. As the famous United Nations General Secretary, Dag Hammerskjold, once said:

The Assembly has witnessed over the last weeks how historical truth is established; once an allegation has been repeated a few times, it is no longer an allegation, it is an established fact, even if no evidence has been brought out in order to support it.

Similarly, here the Court of Appeals proposes that the identities of teachers subjected to unsubstantiated allegations are not protected under

the right of privacy because of the theoretical possibility that there may be an instance in which a teacher was the subject of multiple unsubstantiated allegations. Where that possibility exists, reasons the Court of Appeals, even teachers who have been the subject of only one unsubstantiated allegation should not be protected. *Bellevue John Does*, at 856.

One of the flaws in the Court's reasoning is that Seattle John Doe 1 was the subject of unsubstantiated allegations. Under the Court of Appeals ruling a school district would have to release his identity unless it concluded that the allegations against Seattle John Doe 1 were more than unsubstantiated, more than merely false, but were patently false.<sup>5</sup> No school district or agency would make such a conclusion. And indeed none did in the case of Seattle John Doe 1. More importantly, no school district is likely to ever conclude that an allegation is plainly false. Thus, the proposed rule of the Court of Appeals is but a fig leaf, held in front its flawed statutory construction. Its proposed rule offers no protection whatsoever to the teacher falsely accused of sexual misconduct.

The practical result of the Court of Appeals opinion is that school districts will simply disclose the identities of all teachers unless the teacher obtains a court order prohibiting disclosure, as in this case. This will compel underpaid teachers to spend thousands of dollars to take on

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<sup>5</sup> In doing so the agency would risk the imposition of substantial attorneys' fees and penalties.

massive media corporations and school districts, just to enforce the right of privacy that all but the media acknowledge.

Moreover, even assuming an agency or school district did create a written finding of “patent falsity”, why would that teacher be any more deserving of protection than Seattle John Doe 1, who was the subject of an unsubstantiated allegation? Indeed, early on in this litigation there was an example of a memory of abuse recovered by way of hypnosis some thirty years after the alleged abuse. CP 1295-1309. That teacher’s right of privacy was not protected because there was no evidence that an adequate investigation was performed. Is that teacher, who is clearly the subject of a patently false allegation, also less deserving of protection?

That an allegation remains unsubstantiated at the time of a request should be dispositive of falsity unless the record requester can show more. This point was aptly made by the Court of Appeals, when it stated:

This will not devitalize the Act because the public will still be allowed to inspect the investigative files after deletion of information identifying the teachers. Requesters who wish to challenge in court a school district's decision to withhold a name may use the files, just as the Times has done here, to dispute the deletions.

*Bellevue John Does 1-11*, at 854. Thus, in the few and unique cases in which the media would actually need the identity of the teacher, such a rule would protect its right to seek additional records. After all, the policy of the Public Records Act is to examine the conduct of government, not

individuals. *Tiberino v. Spokane County*, 103 Wn.App. 680, 689, 13 P.3d 1104, 1109 (2000) (“[T]he basic purpose and policy of RCW 42.17 was ‘to allow public scrutiny of *government, rather than* to promote scrutiny of *particular individuals* who are *unrelated to any governmental operation.* ’ ”), citing, *Cowles Publ'g Co. v. State Patrol*, 44 Wn.App. 882, 724 P.2d 379 (1986).

Where it is shown that the alleged conduct did not take place, there is no public or governmental action that is worthy of examining. Stated another way, there is no legitimate interest in rumors, allegations and unsupported speculations.

For the right of privacy to have meaning, all teachers who are the subject of false allegations must be protected, even those where the allegations remain unsubstantiated at the time the record is requested.

The identities of teaches who have been the subject of false or unsubstantiated allegations are not matters of legitimate public concern. The right of privacy means more than a rhetorical flourish, more than a legal fiction. The right of privacy, “the most comprehensive of rights and the right most valued by civilized men”, should protect teachers against governmental dissemination of false or unsubstantiated allegations. *Olmstead v. U.S.*, 277 U.S. at 478. To do less, as the Court of Appeals proposes, is to render the right of privacy meaningless.

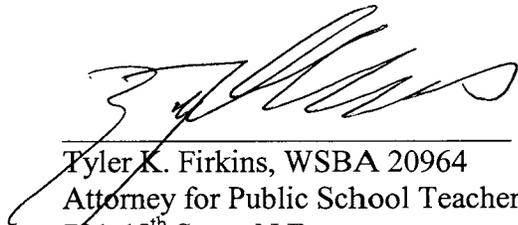
### III. CONCLUSION

The Petitioners in this case propose the following rules. (1) The identities of public employees should not be linked to false or unsubstantiated allegations that are disclosed as a public record. (2) Letters of direction are not subject to public disclosure unless the records contain references to founded allegations of misconduct. (3) The contours of the constitutional right of privacy are not defined by the rational basis test as erroneously stated in *O'Hartigan v. Dept. of Personnel*, 118 Wn.2d 111, 117-118, 821 P.2d 44 (1991). RCW 42.56.050 is unconstitutional because it attempts to restrict the constitutional right of privacy.

The proposed rules harmonize and give effect to both the PRA and the constitutional right of privacy.

RESPECTFULLY SUBMITTED this the  1  day of February, 2007

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws  
of the State of Washington that the following is true and correct.

CLERK

1. I am employed by the law offices of Van Siclen, Stocks & Firkins.
2. On February 2, 2007, I caused to be served a true and correct copy of the Respondent John Does' Supplemental Brief on the following via electronic mail and legal messengers (per agreement):

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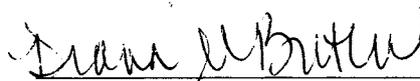
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A handwritten signature in cursive script, appearing to read "Diana M. Butler", written over a horizontal line.

Diana M. Butler