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NO. 97232-0

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**SUPREME COURT OF THE STATE OF WASHINGTON**

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CARRI D. WILLIAMS,

Petitioner,

v.

JO WOFFORD, Superintendent,  
Washington Corrections Center for Women, and the  
WASHINGTON DEPARTMENT OF CORRECTIONS,

Respondents.

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**ANSWER TO PETITION FOR WRIT OF PROHIBITION  
AND/OR MANDAMUS**

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## I. INTRODUCTION

Carri Williams is in the custody of the Washington State Department of Corrections for a conviction of homicide by abuse for the death of her adopted daughter. *See State v. Williams*, 191 Wn. App. 1048 (2015), *review denied*, 185 Wn.2d 1036 (2016). Williams is currently housed at the Washington Corrections Center for Women where, after investigation and review of surveillance video, she was infractioned for filing a false Prison Rape Elimination Act (PREA) allegation. Petition at 2. In response to the infraction, Williams has filed a petition for a writ of mandamus, seeking to force the prison Superintendent and the Department of Corrections to withdraw the infraction issued against Williams for filing a false Prison PREA allegation as well as issue declaratory relief finding Department policy unconstitutional and granting Williams “complete immunity from prison discipline from having made her complaints of sexual misconduct to the prison.” Petition at 11. However, Williams’ writ is devoid of any argument showing she lacks an adequate alternative remedy at law. Because Williams fails to satisfy the high burden imposed for obtaining the extraordinary remedy of mandamus, the Court should deny the petition.

## II. STATEMENT OF THE CASE

The Department’s PREA Investigation policy notes that the Department will thoroughly, promptly and objectively investigate all

allegations of sexual misconduct involving inmates under its jurisdiction. The policy details investigation requirements, the duty to notify the alleged victims of the findings and requirements for law enforcement and licensing notification of substantiated findings. While the policy indicates that an alleged victim may not be subject to retaliation for filing a PREA complaint during the monitoring period, the policy also notes that alleged victims are not subject to disciplinary action related to violating PREA policies except when the Appointing Authority determines, by a preponderance of evidence, that the inmate caused an innocent person to be accused of a PREA violation by providing false or misleading information. Petition at Appendix D.

While housed at the Washington Corrections Center for Women, Williams made a PREA complaint alleging Corrections Officer Kaleopa conducted a pat search on her that included too much time being spent over her breast area with the Officer's thumbs making contact with her nipples. After conducting an investigation, it was determined that Williams' allegations did not occur and were unfounded. Consistent with policy, the investigator ensured that the Appointing Authority made a determination that there was a preponderance of evidence to support a finding that Williams caused an innocent person to be accused of a PREA violation by providing false or misleading information before issuing the infraction.

Petition at Appendix C. Williams was provided with a hearing notice and informed of her rights related to the hearing. Petition at Appendix B. The Department agreed to postpone the hearing. Notice of Withdrawal of Emergency Motion.

Williams files this Petition asserting due process, statutory and Washington state constitutional violations. However, Williams fails to satisfy the high burden necessary to obtain extraordinary relief of mandamus and Respondents respectfully request that the Court deny the Petition.

### III. ISSUES

1. **Williams is not entitled to an extraordinary writ because she has other adequate remedies at law available.**
2. **Williams' claims of due process, statutory and Washington state Constitutional violations have no merit and have already been decided by the Courts.**

### IV. STANDARD OF REVIEW

“Mandamus is an extraordinary writ, the issuance of which is not mandatory, even in response to allegations of constitutional violations.” *Staples v. Benton County*, 151 Wn.2d 460, 464, 89 P.3d 706 (2004) (citing *Walker v. Munro*, 124 Wn.2d 402, 407, 879 P.2d 920 (1994)). When mandamus is directed to an equal branch of government, “the judiciary should be especially careful not to infringe on the historical and constitutional rights of that branch.” *Walker*, 124 Wn.2d at 407. The

jurisdiction “to issue writs of mandamus to state officers, does not authorize [the Court] to assume general control or direction of official acts.” *Id.* at 407 (quoting *State ex rel. Taylor v. Lawler*, 2 Wn.2d 488, 490, 98 P.2d 658 (1940)). The Court “will not usurp the authority of the coordinate branches of government.” *Walker*, 124 Wn.2d at 410.

The Court will not direct the writ of mandamus at a general course of conduct, and mandamus will not lie to compel a discretionary act or to direct state officers to generally perform constitutional duties. *Walker*, 124 Wn.2d at 407 and 410. Mandamus is appropriate only “where there is a specific, existing duty which a state officer has violated and continues to violate....” *Id.* at 408. There must be a clear duty to act existing at the time the writ is sought. *Id.* at 409; *Gerberding v. Munro*, 134 Wn.2d 188, 195, 949 P.2d 1366 (1998); *In re Dyer*, 143 Wn.2d 384, 398, 20 P.3d 907 (2001). As this Court explained, “it must appear that there has been an actual default in the performance of a clear legal duty then due at the hands of the party against whom relief is sought. Until the time fixed for the performance of the duty has passed, there can be no default of duty.” *Walker*, 124 Wn.2d at 409 (quoting *State ex rel. Hamilton v. Cohn*, 1 Wn.2d 54, 58-59, 95 P.2d 38 (1939)).

“Doubtful plaintiff rights do not justify a writ of mandamus.” *Eugster v. City of Spokane*, 118 Wn. App. 383, 404, 76 P.3d 741 (2003)

(citing *United States ex rel. Arant v. Lane*, 249 U.S. 367, 371, 39 S. Ct. 293, 63 L. Ed. 650 (1919); *In re Life & Fire Ins. Co. v. Heirs of Wilson*, 33 U.S. (8 Pet.) 291, 302-03, 8 L. Ed. 949 (1834)). Whether an agency has a specific duty that must be performed is a question of law. *River Park Square, L.L.C. v. Miggins*, 143 Wn.2d 68, 76, 17 P.3d 1178 (2001). While the writ may direct an agency to exercise a mandatory discretionary duty, it cannot direct the manner in which the agency exercises that discretion. *Peterson v. Dep't of Ecology*, 92 Wn.2d 306, 314, 596 P.2d 285 (1979). "Mandamus will not lie to compel the performance of acts or duties which call for the exercise of discretion." *Vangor v. Munro*, 115 Wn.2d 536, 543, 798 P.2d 1151 (1990). A clear abuse of discretion must be found amounting to a failure to exercise discretion. *Id.* As this Court explained:

Mandamus lies to compel discretionary acts of public officials when they have totally failed to exercise their discretion to act, and therefore it can be said they have acted in an arbitrary and capricious manner. Once officials have exercised their discretion, mandamus does not lie to force them to act in a particular manner.

*National Electrical Contractors Assoc. v. Riveland*, 138 Wn.2d 9, 32, 978 P.2d 481 (1999) (quoting *Aripa v. Dept. of Soc. & Health Servs.*, 91 Wn.2d 135, 140, 588 P.2d 185 (1978)).

## V. ARGUMENT

### A. Williams Is Not Entitled to an Extraordinary Writ Because She Fails to Show She Lacks an Adequate Alternative Remedy at Law

The Court “will issue a writ of mandamus only in cases where there is no plain, speedy, and adequate remedy at law.” *Staples*, 151 Wn.2d at 464 (citing RCW 7.16.170). If the petitioner has an adequate remedy, the writ should not issue. *Washington State Council of County and City Employees, Council 2 v. Hahn*, 151 Wn.2d 163, 167, 86 P.3d 774 (2004). It is the petitioner’s burden to show a lack of an adequate remedy. *Eugster*, 118 Wn. App. at 415 n. 10.

The existence of an adequate remedy merely requires that there be a process by which the plaintiff may seek redress for the allegedly unlawful action. *Hahn*, 151 Wn.2d at 170 (remedy under Public Employees Collective Bargaining Act); *City of Seattle v. Williams*, 101 Wn.2d 445, 455-56, 680 P.2d 1051 (1984) (existence of RALJ appeal provided adequate remedy). “A remedy may be adequate even if attended with delay, expense, annoyance, or some hardship.” *City of Olympia v. Thurston Co. Bd. of Comm.*, 131 Wn. App. 85, 96, 125 P.3d 997 (2005). For a remedy to be inadequate, “[t]here must be something in the nature of the action that makes it apparent that the rights of the litigants will not be protected or full redress afforded without issuance of the writ.” *Id.* at 96.

Williams complains of various due process, statutory and Washington state Constitutional violations related to a disciplinary hearing which has not even occurred. Yet, Williams' Petition fails to even argue that the writ is necessary because she has no other adequate remedy available. As noted below, her claims of constitutional violations are appropriately raised through civil rights litigation or a Personal Restraint Petition where she has the opportunity to seek preliminary injunctive relief. Because Williams has other readily available adequate remedies at law, the Court should deny her Petition.

**B. There Is No Presumption of Impartiality Merely Because the Hearing Officer May Need to Determine the Credibility of a Prison Staff Member or the Superintendent Approved the Issuance of an Infraction**

The courts have already determined standards for showing the impartiality of a hearing officer. None of which include Williams' allegations that the hearing officer would automatically be impartial merely because they must determine the credibility of a "fellow guard" or because the superintendent made a requisite finding of preponderance to issue the infraction. The Supreme Court has recognized that inmates have the right under the Due Process Clause to disciplinary proceedings composed of impartial, disinterested members. *Morrissey v. Brewer*, 408 U.S. 471, 489,

92 S. Ct. 2593, 33 L. Ed. 2d 484 (1972). The Ninth Circuit has held that hearing officers on a disciplinary board are impartial so long as:

no member of the disciplinary committee has participated or will participate in the case as an investigating or reviewing officer, or either is a witness or has personal knowledge of material facts related to the involvement of the accused inmate in the specific alleged infraction (or is otherwise personally interested in the outcome of the disciplinary proceeding)...

*Clutchette v. Proconier*, 497 F.2d 809, 820 (9th Cir. 1974), *modified*, 520 F.2d 613, *rev'd on other grounds sub nom. Baxter v. Palmigiano*, 425 U.S. 308 (1976). District courts in the Ninth Circuit have repeatedly interpreted this rule strictly, holding that as long as these standards are met the hearing was impartial. *See e.g., Sneed v. Fox*, No. C14-0894-RSM, 2014 WL 6901763, at 7 (W.D. Wash. Dec. 5, 2014); *Campbell v. Rios*, No. 1:10-cv-01681-BAM-HC, 2012 WL 6651151, at 3 (E.D. Cal. Dec. 20, 2012); *James v. Rios*, No. 1:12-cv-00008-DLB (HC), 2012 WL 2912249, at 4 (E.D. Cal. July 16, 2012); *Rouse v. Boening*, No. C09-5655 RBL/KLS, 2010 WL 5583040, at 10 (W.D. Wash. Dec. 27, 2010), *report and recommendation adopted sub nom. Rouse v. Van Boening*, No. C09-5655 RBL KLS, 2011 WL 735389 (W.D. Wash. Feb. 23, 2011), *aff'd*, 472 F. App'x. 813 (9th Cir. 2012); *Hardney v. Sullivan*, No. CIV S-07-606 WBS KJM P, 2009 WL 1768694, at 4 (E.D. Cal. June 23, 2009).

The Ninth Circuit held the test is met even when a hearing officer had previously found an inmate guilty for a prior, unrelated charge. *Gauthier v. Dexter*, 573 F. Supp.2d 1282, 1289 (C.D. Cal. 2008), *aff'd sub nom. Gauthier v. Herndon*, 390 F. App'x. 711 (9th Cir. 2010).

Williams argues denial of due process because it is impossible for the Hearing Officer to be impartial because “he is charged with deciding whether or not his or her co-worker-a fellow guard-committed sexual misconduct” because a positive finding would result in the automatic firing of the officer. She also claims that with the Superintendent’s preponderance holding, that the Hearing Officer is unable to be impartial. As noted by the multiple cases cited above, neither of these allegations supports a viable due process claim. Therefore, her Petition should be denied.

**C. There Is No Right to A “Meaningful Opportunity to Be Heard” Before the Issuance of an Infraction**

Williams claims due process violations because she was not provided with the opportunity to be heard by the Superintendent before she made the initial determination that Williams filed a false PREA report. She provides no actual support for her position and the Courts have already determined that minimal due process for disciplinary infractions permits the inmate to present a defense on her behalf at the hearing itself. *In re Personal Restraint of Gronquist*, 138 Wn.2d 388, 396-397, 978 P.2d 1083 (1999); *In*

*re Malik*, 152 Wn. App. 213, 215 P.3d 209 (2009). As such, her Petition should be denied.

**D. Courts Have Already Determined That the “Some Evidence” Standard Meets Due Process Requirements**

Williams argues that the “some evidence” standard to support a guilty finding amounts to a due process violation. A prison disciplinary proceeding is not arbitrary and capricious if the prisoner was afforded the applicable minimum due process protections and the decision was supported by at least some evidence. *In re Krier*, 108 Wn. App. 31, 38, 29 P.3d 720 (2001); *In re Personal Restraint of Gronquist*, 138 Wn.2d 388, 978 P.2d 1083 (1999). Determination of whether the “some evidence” standard is met “does not require examination of the entire record, independent assessment of the credibility of witnesses, or weighing of the evidence. Instead, the relevant question is whether there is any evidence in the record that could support the conclusion reached by the disciplinary board.” *Superintendent v. Hill*, 472 U.S. 445, 455, 105 S. Ct. 2768, 86 L. Ed. 2d 356 (1985). Therefore, the Court should deny Williams’ Petition for claims related to due process violations related to the “some evidence” standard.

**E. RCW 4.24.515 Does Not Appear to Exist and RCW 4.24.510 Only Provides Immunity from Civil Damages for Good Faith Reporting**

Williams then argues that imposition of a disciplinary sanction for reporting a false PREA claim would violate RCW 4.24.515 because Williams has a right to be “free from civil liability for having made a report to the appropriate state agency.” Even assuming Williams meant to assert a violation of RCW 4.24.510, the statute does not provide her absolute immunity in this context. The purpose of RCW 4.24.510 was to protect citizens who provide information to government agencies by providing a defense for retaliatory lawsuits. *Valdez-Zontek v. Eastmont School Dist.*, 154 Wn. App. 147, 225 P.3d 339 (2010). That protection is only extended to “good faith” communications and only from the threat of a civil action for damages. *Port of Longview v. International Raw Materials, Ltd.*, 96 Wn. App. 431, 979 P.2d 917 (1999). Neither of which apply here. Accordingly, the Court should deny Williams’ Petition.

**F. Williams Has No Cause of Action under the Washington State Constitution**

Williams asserts a violation of her state constitutional right to petition for redress of grievances. However, no private right of action exists under the Washington Constitution. *Blinka v. Wash. State Bar Ass’n*, 109 Wn. App. 575, 590-591, 36 P.3d 1094 (2001) (“Washington courts have consistently rejected invitations to establish a cause of action for damages

based upon constitutional violations without the aid of augmentative legislation.”); *Reid v. Pierce County*, 136 Wn.2d 195, 961 P.2d 333 (1998). Because the Washington State Constitution provides no separate cause of the Court should deny Williams’ Petition.

## VI. CONCLUSION

For the reasons set forth above, Respondent respectfully requests that the Court deny the petition for a writ of mandamus.

RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of June, 2019.

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## CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing Answer to Petition for Writ Of Prohibition and/or Mandamus to be electronically filed with the Clerk of the Court, which will send notification of such filing to the following:

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

DATED this 11<sup>th</sup> day of June, 2019, at Spokane, Washington.

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