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No. 98768-8

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

BRIAN GREEN, Respondent

v.

PIERCE COUNTY, a municipal corporation, Petitioner

**PIERCE COUNTY'S ANSWER TO ALLIED DAILY
NEWSPAPERS' AMICUS CURIAE BRIEF**

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I. INTRODUCTION

Amicus Allied Daily Newspapers of Washington (“Allied”) makes clear it “takes no position on Mr. Green’s right to access the requested records in this case.” Allied Br. 7 n. 3. Rather, it files an amicus curiae brief out of concern the instant Public Records Act (“PRA”) suit by Respondent Brian Green creates “a danger of stretching the definition” of “news media” entity under RCW 5.68.010(5) “so far as to jeopardize the [Media Shield] law’s continued existence.” Allied Br. 1; *see also id.* at 10 (citing *Xcentric Ventures, L.L.C. v. Borodkin*, 934 F.Supp.2d 1125, 1145 (D. Ariz. 2013)(refusing to apply shield law to self-publishing blogger unaffiliated with a news organization and noting “in today’s world of blogs, tumblrs, and tweets...anyone could claim the mantra of a reporter”).

Thus, Allied agrees with Respondent Pierce County that “[i]f the term ‘news media’ includes everyone posting commentary online or self-identifying as journalists, the potential impact on the justice system is significant.” *Id.* *See also* AB 1-8, 9 n. 7, 25-28, 33-34; Reply Br. 5-7, 15.¹ Further, Allied and the County also agree that one of the essential requirements to meet RCW 5.68.010(5)(a)-(b)’s definition is that “a ‘news media’ entity *must be a business*” and that the “Libertys Champion” social

¹ Neither Green’s Answer to Allied’s Amicus Brief nor his Response Brief dispute this conclusion. *See generally* Green Answer to Allied Br. *See also* AB 9 n. 9, 29, 38; RB 12-13, 17; Reply 2.

media account “is not a business.”² See Allied Br. 11-12 (emphasis added). See also *id.* at 12 n. 9 (citing 2007 Media Shield Law bill report confirming the statute “has an economic test because journalism is a business.” H. B. REP. on H.B. 1366, 60th Leg., Reg. Sess. (Wash. 2007))³; AB 28-31; Reply 18-21; Jonathan Peters et. al., *A Paper Shield? Whether State Privilege Protections Apply to Student Journalists*, 27 Fordham Intell. Prop. Media & Ent. L.J. 763, 785 (2017)(noting that Washington’s RCW 5.68.010(5) – like other media shield laws -- defines “news media” in “relation to *conducting business* as a journalist, or being *employed* as one.”) Finally, Allied agrees with the County that under RCW 5.68.010(5) there must be a “*news gathering ... nexus* between the information” being sought “and the entity at issue (Libertys Champion).”⁴ See Allied Br. 10-

² Green claims such an economic test would “run afoul of the constitutional protections of the Freedom of Press.” Green Answer to Allied Br. at 13-20. In so doing he again ignores “the First Amendment *does not guarantee* the press a constitutional right of special access to information not available to the public generally” nor “a testimonial privilege that other citizens do not enjoy.” *Branzburg v. Hayes*, 408 U.S. 665, 684, 690 (1972) (emphasis added). See also discussion and authority cited *infra.* at 8-9; AB 19 n. 16; Reply 11-12; Cy’s Answer to Amicus First Amendment Clinic at 15-20.

³ Green alleges the House Bill Report was “based off a draft of the law, and not the final version that was enacted into law” which supposedly removed any economic test. See Green Answer to Allied Br. at 10. However, this confuses a change in the wording of the statute’s economic test for its supposed wholesale removal. *Id.* 11-13. Green’s argument ignores that *as enacted* the final language of RCW 5.68.010(5)(b) still expressly requires a “person” to be “an *employee, agent, or independent contractor* of any entity listed in (a)” – and that subsection (a) requires such an “entity” be “in the regular *business* of news gathering and disseminating news or information)(emphasis added).

⁴ Though Green denies his need to show the existence of a nexus between the information being sought and the “news media ... entity,” see Green Answer to Allied Br. at 5-9, he offers no other meaning to RCW 5.68.010(5)(b)’s requirement that a “person” claiming

11 (emphasis added). *See also* AB 43-44; Reply 22-23. Because Allied is correct in these positions, the County does not provide further response to them.

However, Allied is mistaken regarding its brief's two remaining arguments. First, though Allied expresses no interest in – and provides no analysis of – RCW 42.56.250(8)'s exemption protecting from PRA disclosure law enforcement worker photographs and telephone numbers, the amicus inexplicably asserts in passing that “the burden of proof is on the agency to prove that RCW 42.56.250(8) (allowing ‘news media’ to access otherwise exempt records) justifies a withholding.” *See* Allied Br. 4-5. Second, Allied also erroneously argues that “a good faith desire to gather news” should not be one of the elements required to find RCW 5.68-.010(5)'s definition of “news media” has been met. *See* Allied Br. 5-10. Because Allied is in error concerning each of these latter assertions, the County responds to them below.

II. ANALYSIS

A. TO OBTAIN RECORDS PROTECTED BY A PRA EXEMPTION, A REQUESTOR HAS THE BURDEN TO PROVE AN EXCEPTION APPLIES TO THE REQUEST

Allied appears to concede that *Republic of Kazakhstan v. Does 1-100*,

its protection must be “engaged in bona fide news gathering *for such [news media] entity*, and who obtained or prepared the news or information that is sought *while serving in that capacity*.” (Emphasis added).

192 Wn. App. 773, 781, 368 P.3d 524 (2016) holds that "[t]he burden of showing that [the news media shield law] privilege applies in any given situation rests entirely upon the entity asserting the privilege." (Emphasis added). See also Allied Br. 4 ("when testimonial privileges are involved, the person asserting a privilege must show that the privilege applies.") Indeed, one of the cases cited in Allied's own brief refused to apply its state's shield law privilege because the claimant "has not shown a sufficient relationship or connection to 'news media' as required under the Shield Law" See *Too Much Media, LLC v. Hale*, 206 N.J. 209, 238, 20 A.3d 364, 381 (2011)(noting that lower appellate court held "there is little evidence (other than her own *self-serving statement*) that [defendant] actually intended to disseminate anything newsworthy to the general public.")(emphasis added). See also e.g. *J.O. v. Twp. of Bedminster*, 433 N.J. Super. 199, 217, 77 A.3d 1242, 1253 (N.J. Super. Ct. App. Div. 2013) ("Before a newsperson is permitted to" claim the shield statute privilege "the claim of privilege must be invoked and the requisite *prima facie showing must be made.*")(emphasis added). However, amicus cites no authority supporting its position but simply asks that a different rule apply where the test for that evidentiary privilege is the same as that used for an *exception* to records otherwise protected by a PRA exemption. *Id.* at 5.

Aside from the fact such a rule would create *two bodies of law* applying

two rules for interpreting *the same* RCW 5.68.010(5), Allied's position ignores that the Legislature is presumed to have known the burden of proof for evidentiary privileges when it incorporated the media shield definition into the PRA as an exception. *See e.g. Sheehan v. Cent. Puget Sound Reg'l Transit Auth.*, 155 Wn.2d 790, 811, 123 P.3d 88 (2005) ("We presume that the legislature knows the existing state of the case law in the areas in which it legislates") (citing *Price v. Kitsap Transit*, 125 Wn.2d 456, 463, 886 P.2d 556 (1994)). More importantly, where – as here – it is undisputed that records are otherwise statutorily exempted, under the PRA the "*burden shifts* to the party *seeking disclosure* to establish exemption is clearly unnecessary." *See e.g. Resident Action Council v. Seattle Housing Authority*, 177 Wn.2d 417, 433, 327 P.3d 600 (2013) (citing *Oliver v. Harborview Med. Ctr.*, 94 Wn.2d 559, 567-68, 618 P.2d 76 (1980)) (emphasis added). *See also Thomas v. Pierce Cty. Prosecuting Attorney's Office*, 190 Wn. App. 1036, *9 (unpublished 2015) (in PRA action "Plaintiffs never told the PCPAO *at the time they requested the documents* that they had a substantial need" so as to overcome the attorney work-product protection) (emphasis added); *Koenig v. Pierce Cty.*, 151 Wn. App. 221, 233, 211 P.3d 423, 429 (2009), *as amended* (July 20, 2009), *as amended on denial of reconsideration* (Oct. 26, 2009) (where the PRA "exemption is applicable, the office invoking it need not take steps to provide the documents *unless the re-*

quester makes an affirmative showing" of the exception)(emphasis added).

Thus, the burden of proof required of “news media” entities under the Media Shield Act RCW 5.68.010(5) is the *same burden* as that imposed on them to satisfy the exception to RCW 42.56.250(8)’s PRA protection.

B. TO SATISFY RCW 5.68.010(5)(B)’s REQUIREMENTS, A PERSON MUST—AMONG OTHER THINGS—BE SEEKING THE RECORD WHILE ENGAGED IN BONA FIDE NEWS GATHERING

Allied does not dispute that: 1) Green used the PRA and court motions to retaliate against law enforcement personnel for his personal grievances both before and after his PRA request at issue;⁵ 2) *at the time* of his instant request he failed to show he was “news media” engaged in bona fide news gathering, AB 34-38; 3) Green “made his Public Records Act seeking [sic] documents regarding his [own supposed] unlawful imprisonment,” RB 37 (emphasis added); 4) the request targeted *his* correctional officer’s protected photographs and birthdates, RB 3, 8-9, 37; CP 6; 5) he intends to disclose them to a wide range of the public, CP 107; 6) doing so will endanger those law enforcement workers and their families, AB 3-5; and 7) RCW 42.56.250 was enacted to prevent precisely such disclosures by just such requestors as Green. *See* AB 8, 42-45; CP 290, 302.⁶ Nevertheless,

⁵ *See e.g.* AB 1 n. 1, 13 n. 13, 44 n. 24; 6/10/19, 7/3/19, 10/15/19, 11/14/19, 11/15/19, 12/11/19, 12/26/19, 1/7/20 Green COA Motions/Replies; 1/6/20 McDaniel Dec., ex. “A”; Nicholson Dec., ex. “A;” CP 443-45.

⁶ Though Allied quotes Green’s gratuitous and self-serving claim that his PRA request

citing a foreign state's decision interpreting a different statute, Allied advocates that the "Court should decline to adopt an intent test for applying the media shield." *See* Allied Br. at 6-10, 12. Allied is mistaken.

Our state's precedent instead confirms that courts "should resist the temptation to rewrite an unambiguous statute to suit our notions of what is good public policy, recognizing the principal that the drafting of a statute is a legislative, not a judicial, function." *Sedlacek v. Hillis*, 145 Wn.2d 379, 390, 36 P.3d 1014 (2001)(quotation marks omitted)(quoting *State v. Jackson*, 137 Wn.2d 712, 725, 976 P.2d 1229(1999)); *State v. Cromwell*, 157 Wn. 2d 529, 598, 140 P.3d 593 (2006) (same). Instead, the goal of our state's courts in statutory interpretation is to effectuate *the legislature's* intent, *Burns v. City of Seattle*, 161 Wn.2d 129, 164 P.3d 475 (2007), and to do so our courts look first to the language of the statute. *State v. Van Woerden*, 93 Wn.App. 110, 116, 967 P.2d 14 (1998). Here, however, Allied's argument on this issue neither mentions Legislative intent nor analyzes its applicable statutory language – despite the fact RCW 5.68.010-(5)(b) expressly states that to be "news media" a "person" must – among other things – be "engaged in *bona fide news gathering*" and have sought

pursued "a bona fide news story to report on unlawful arrests," Allied Br. 11 (citing RB 37), amicus neglects to disclose that Green has never explained how targeting protected photographs and birthdates of his correctional officers (who *did not arrest* him) so they can be widely disseminated to their harm somehow constitutes "bona fide news gathering" about "unlawful *arrests*." *See* CP 302 n. 6 (emphasis added).

the information “*while serving* in that capacity” (Emphasis added).

As a matter of law, a “legislative body is presumed not to use nonessential words,” and courts “are bound to give meaning, if possible, to every word contained in it.” *See State v. Beaver*, 148 Wn.2d 338, 343, 60 P.3d 586 (2002)(*citing State v. Lundquist*, 60 Wn.2d 397, 403, 374 P.2d 246 (1962))(emphasis added). Allied’s argument neither ascribes any meaning to the above quoted statutory language nor disputes the County’s textual analysis showing such language requires showing a good faith, sincere and genuine effort to gather news – rather than, as here, misusing the statute to retaliate against law enforcement workers with whom a requestor has contact. AB 43-44; Reply 22-23. Without citing any precedent or offering any legal analysis, Allied simply argues the Court should “not embrace ‘good faith’ as a test for ‘bona fide news gathering’” solely because it surmises that such “a test would permit litigants to investigate the thought processes of journalists, which would be highly intrusive and offend the First Amendment right to freedom of the press.” Allied Br. 5-6. However, the statutes’ additional requirement of showing “bona fide news gathering” to obtain a statutory evidentiary privilege and access protected records unavailable to the general public *has no First Amendment implication*.

Indeed, even legitimate news media have no such constitutional right that could be intruded upon or offended in this scenario because “the First

Amendment *does not guarantee* the press a constitutional right of special access to information not available to the public generally” nor “a testimonial privilege that other citizens do not enjoy.” See *Branzburg v. Hayes*, 408 U.S. 665, 684, 690 (1972)(emphasis added). See e.g. also *Houchins v. KQED, Inc.*, 438 U.S. 1, 14 (1978)(media has no “First Amendment right to government information” because “[t]here is no constitutional right to have access to particular government information”); *Univ. of Pennsylvania v. E.E.O.C.*, 493 U.S. 182, 201 (1990)(no First Amendment privilege from producing subpoenaed records because it “does not invalidate every incidental burdening of the press that may result from the enforcement of civil or criminal statutes of general applicability.”)(quoting *Branzburg, id.* at 682); *State v. Rinaldo*, 102 Wn.2d 749, 752, 689 P.2d 392 (1984) (recognizing that Federal Courts reject any absolute First Amendment privilege for reporters); *Tacoma News, Inc. v. Cayce*, 172 Wn.2d 58, 75, 256 P.3d 1179 (2011)(under the Federal Constitution the “press is not guaranteed a right of special access to information that is not available to the public generally; rather, the press has the same right of access that the public has.”)(quoting *Branzburg, id.* at 684); *King Cty. Dep't of Adult & Juvenile Det. v. Parmelee*, 162 Wn.App. 337, 358, 254 P.3d 927 (2011)(“no basis” to claim “the First Amendment compels Governments to supply information.”)(quoting *KQED, Inc., id.*).

Finally, the out of state decision upon which Allied exclusively relies as support for its position does not in fact support it. *See* Allied Br. 7-10. Rather, amicus' description and extensive citation to *Too Much Media, LLC v. Hale*, obscures that there a New Jersey court recognized its media shield statute – like that of Washington and several others – requires proof of a person's intent *as well as* proof of various other requirements before he or she could claim its special benefits. *See* 20 A.3d at 380 (New Jersey's "Shield Law requires that claimants show *three things*: first, a *connection to news media, ...*; second, a purpose to gather, procure, transmit, compile, edit, or disseminate *news*; and third, that the materials sought were obtained *in the course of pursuing professional newsgathering activities*")(*citing* N.J.S.A. 2A:84A-21.3)(emphasis added). Thus, *Too Much Media* merely recognized an assertion of the shield law could not "rest *only* on defendant's intent" and rejected the assertion before it because the claimant "has not shown a sufficient relationship or connection to 'news media' as required" so "her *intent alone* cannot validate her claim of privilege." 20 A.3d at 381. The statute's multi-faceted test was held appropriate because, though "a newsperson with ties to traditional news media ... could readily make out a *prima facie* showing," those "self-appointed journalists or entities with little track record who claim the privilege require more scrutiny" since otherwise "the popularity of the Internet has

resulted in millions of bloggers who have no connection to traditional media” and “anyone with a Facebook account, could try to assert the privilege.” *See id.* at 383.

Accordingly, there is neither a legal ground, logical rationale nor policy basis to read out of the statute its *additional* express requirement that claimants to the statutory privileges for qualifying as “news media” under RCW 5.68.010(5)(b) must – among other things – be “engaged in bona fide news gathering” and have sought the information “while serving in that capacity”⁷

III. CONCLUSION

As noted above, Allied is correct that: 1) Green’s action creates “a danger of stretching the definition” of “news media” entity under RCW 5.68.010(5) “so far as to jeopardize the [Media Shield] law’s continued existence;” 2) that “[i]f the term ‘news media’ includes everyone posting commentary online or self-identifying as journalists, the potential impact on the justice system is significant;” 3) that one of the essential requirements to meet RCW 5.68.010(5)(a)-(b)’s definition is that “a ‘news media’

⁷ Though he does not attempt to show how he could be found to have met RCW 5.68-.010(5)(b)’s “bona fide” requirement, even Green’s Answer to Allied’s amicus brief agrees with the County that “the plain language of Washington’s Media Shield statute *uses a good faith test* by the Washington Legislature’s use of the term *bona fide*.” Green Answer to Allied Br. at 4 (emphasis added). *Compare* AB 42-43; Reply 22-23. Instead, however, Green erroneously and without explanation goes too far by stating “Good Faith Intent Is The Test Under RCW 5.68.010(5)” -- rather than that it is just *one out of many necessary parts* of the statute’s requirements. *See Id.* at 2.

entity *must be a business*” but the “Libertys Champion” social media account “is not a business;” and 4) under RCW 5.68.010(5) there must be a “*news gathering ... nexus* between the information” being sought “and the entity at issue (Libertys Champion).” However, for the reasons stated above, Allied is mistaken in its unsupported assertions that “the burden of proof is on the agency to prove that RCW 42.56.250(8) (allowing ‘news media’ to access otherwise exempt records) justifies a withholding,” and that “a good faith desire to gather news” should not be one of the requirements for meeting RCW 5.68.010(5)’s definition of “news media.”

DATED this 27th day of February, 2020.

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CERTIFICATE OF SERVICE

On February 27th, 2020, I hereby certify that I electronically filed the foregoing PIERCE COUNTY'S ANSWER TO ALLIED DAILY NEWSPAPERS' AMICUS CURIAE BRIEF with the Clerk of the Court, with the Clerk of the Court, which will send notification of such filing to the following:

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