THE HONORABLE CHARLES R. SNYDER

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR WHATCOM COUNTY

17 1 00291 0

IN RE SEARCH WARRANT NO. 17A03639 SERVED ON FACEBOOK

MOTION TO QUASH SEARCH WARRANT

APPROVED FOR SPECIAL SET HR'G MARCH 14, 2017 AT 8:30 AM

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I. INTRODUCTION

This matter involves an overbroad and unconstitutional request for private data belonging and related to a local political advocacy group's associational activity. On February 16, 2017—just days after a peaceful political protest in Bellingham—the Whatcom County Sheriff's Department served Facebook with a warrant seeking not only private online communications and information about the group's political activity, but also data related to an unknown number of individuals who merely interacted with the group via Facebook at some point during the 12 days (both before and after the protest) covered by the warrant. The First Amendment protects political speech, the right to receive information, and the right to associate with others to engage in political speech and advocacy without state monitoring or interference. The warrant here intrudes on all of these rights and would chill both political speech and association at the heart of the First Amendment. The warrant also fails to meet the basic Fourth Amendment requirement that warrants be particularized, not least because it potentially extends to any member of the public, supportive or not, who interacted with the group.

Given the important First Amendment–protected associational interests and Fourth Amendment–protected privacy interests at stake, the context of the County's investigation centered on a political protest, and the breadth of information sought by the warrant, it is inconceivable that the County can meet its exacting burden for compelled production of such information. Furthermore, in the protected context of this case, an after-the-fact suppression remedy would plainly be insufficient to ensure the adequate protection of the First Amendment associational and speech rights at issue. For these reasons and those given below, Movant respectfully requests that the Court quash the County's warrant.

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II. FACTS

Neah Monteiro, a resident of Bellingham, created the "bellinghamnodapl" Facebook page in October 2016, and she continues to administer it today. Monteiro Decl. ¶ 2. This page is used by the Bellingham #NoDAPL Coalition to provide information regarding environmental issues, specifically related to the Dakota Access Pipeline.[1] Monteiro Decl. ¶ 3. The page is also used to organize political actions and as a platform to connect political activists. Monteiro Decl. ¶ 5. Much of the page can be viewed by the public, and as of March 7, 2017, 916 individuals or organizations had "liked" the page. Monteiro Decl. ¶ 6. During the period covered by the search warrant, 14 individuals served as "administrators" of the group's Facebook page, giving them the ability to publish posts, photos, videos, and events on the page and respond to messages as Bellingham #NoDAPL Coalition. Monteiro Decl. ¶ 7.

On February 11, 2017, the Bellingham #NoDAPL Coalition, their supporters, and others concerned about climate-justice issues engaged in a political protest against action taken by the Trump Administration regarding the Dakota Access Pipeline. Monteiro Decl. ¶9. The protest lasted a few hours and moved through various streets of downtown Bellingham. *Id.* The protest organically moved onto I-5 and blocked the freeway for an hour. *Id.* There were no arrests. *Id.* However, after the protest, #NoDAPL organizers, members, and associates were targeted and harassed for their participation in this political activity. Monteiro Decl. ¶ 10.

[1] #NoDAPL refers to an international, decentralized political organizing campaign opposed to the building of the Dakota Access Pipeline in North Dakota. *See* Monteiro Decl. ¶ 4; *see also, e.g.*, Lynda V. Mapes, *Standing Rock Sioux Tribe Prepares to Push Back Against Trump's Dakota Access Pipeline Order*, Seattle Times (Jan. 24, 2017), http://www.seattletimes.com/nation-world/nation/standing-rock-sioux-tribe-prepares-to-push-back-against-trumps-dakota-access-pipeline-order.The organizing around #NoDAPL also includes advocacy for local environmental issues, including protesting coal and oil trains that traverse tribal lands or lands that are environmentally vulnerable. *See* Monteiro Decl. ¶ 4.

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On February 22, 2017, Ms. Monteiro—who is the account holder for the bellinghamnodapl Facebook page—received an email from Facebook informing her that it had received legal process from law enforcement seeking information about the bellinghamnodapl account. *See* Email from Facebook to bellinghamnodapl (Feb. 22, 2017) (Baker Decl. Ex. A). On March 2, Ms. Monteiro responded to Facebook to request clarifying information about the legal process. *See* Email from Monteiro to Facebook (Mar. 2, 2017) (Baker Decl. Ex. B). The next day, she received a second email from Facebook. *See* Email from Facebook to bellinghamnodapl (Mar. 3, 2017) (Baker Decl. Ex. C), attaching a copy of a search warrant issued pursuant to RCW 10.96.020 by this Court on February 16 for "[s]tored contents" of the bellinghamnodapl account, including "messages, photos, videos, wall posts and location information" dating from February 4 to February 15. *See* Search Warrant (Baker Decl. Ex. D). The email also informed Ms. Monteiro that bellinghamnodapl would have to provide Facebook with a file-stamped copy of a motion to quash the warrant by March 8, 2017, or else Facebook would respond to the legal process. *See* Email from Facebook to bellinghamnodapl (Mar. 3, 2017) (Baker Decl. Ex. C).

III. ARGUMENT

A. Ms. Montero Has Standing to Move to Quash the Search Warrant

As the creator, and one of the 14 administrators, of the bellinghamnodapl Facebook group, Ms. Monteiro has constitutional rights that are plainly implicated by the execution of the County's warrant, which seeks her and her associates' private content including "messages, photos, videos, wall posts and location information." Baker Decl. Ex. D. The warrant substantially burdens Ms. Monteiro's First Amendment right to free association, as well as that of the group's other members. *See NAACP v. Alabama*, 357 U.S. 449, 462, 78 S. Ct. 1163, 2 L. Ed. 2d 1488 (1958) ("It is hardly a novel perception that

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compelled disclosure of affiliation with groups engaged in advocacy may constitute a[n] effective[] restraint on freedom of association . . . ."); *Gibson v. Fla. Legis. Investigation Comm.*, 372 U.S. 539, 544, 83 S. Ct. 889, 9 L. Ed. 2d 929 (1963); *Bedford v. Sugarman*, 112 Wn.2d 500, 516, 772 P.2d 486 (1989).

Moreover, Ms. Monteiro's reasonable expectation of privacy under the Fourth Amendment in these kinds of private communications and other data is clear. *See Riley v. California*, 134 S. Ct. 2473, 2493, 189 L. Ed. 2d 430 (2014) ("[T]he fact that a search in the pre-digital era could have turned up a photograph or two in a wallet does not justify a search of thousands of photos in a digital gallery."); *State v. Hinton*, 179 Wn.2d 862, 869–70, 319 P.3d 9 (2014) ("Text messages can encompass the same intimate subjects as phone calls, sealed letters, and other traditional forms of communication that have historically been strongly protected under Washington law."); *see also Katz v. United States*, 389 U.S. 347, 88 S. Ct. 507, 19 L. Ed. 2d 576 (1967).[2] As the Supreme Court has repeatedly emphasized, individuals whose constitutional rights are implicated by a government request for private data held by a third party have standing to challenge the request in order to protect their constitutional rights before the disclosure of the requested information. *See, e.g.*, *Gravel v. United States*, 408 U.S. 606, 608–09, 92 S. Ct. 2614, 33 L. Ed. 2d 583 (1972); *Pollard v. Roberts*, 283 F. Supp. 248, 258–59 (E.D. Ark. 1968) (three-judge court), *aff'd per curium*, 393 U.S. 14, 89 S. Ct. 47, 21 L. Ed. 2d 14

[2] Ms. Monteiro also has third-party standing to assert the First and Fourth Amendment rights of other users of the bellinghamnodapl group, which are also at issue here. More than 900 individuals have "liked" the group's Facebook page, and even more have potentially interacted with the group via messages or other posts. First, like Ms. Monteiro, those users would also suffer an injury if Facebook executes the warrant; second, the users' participation in the bellinghamnodapl group creates a close relationship with Ms. Monteiro as creator of the group; and third, the users potentially affected by the execution of the warrant are hindered from asserting their legal interests because the County has not given them notice of the warrant. *See Powers v. Ohio*, 499 U.S. 400, 411, 111 S. Ct. 1364, 113 L. Ed. 2d 411 (1991).

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(1968); *Perlman v. United States*, 247 U.S. 7, 12–13, 38 S. Ct. 417, 62 L. Ed 950 (1918).[3]

B. The Warrant is Unconstitutional Because it Permits a Generalized Search of Electronic Data that Is Private, Sensitive, and Protected by the First and Fourth Amendments

The Fourth Amendment requires that warrants "particularly describ[e] the place to be searched, and the persons or things to be seized." U.S. Const. amend. IV; *see* Wash. Const. art. I, § 7. This particularity requirement prohibits general warrants that would allow the government to "rummage" through someone's personal effects. *Coolidge v. New Hampshire*, 403 U.S. 443, 467, 91 S. Ct. 2022, 29 L. Ed. 2d 564 (1971). The need for such particularity, and for stringent limitations on warrants, is "especially great" when the searches by their nature "involve[] an intrusion on privacy that is broad in scope." *Berger v. New York*, 388 U.S. 41, 56, 87 S. Ct. 1873, 18 L. Ed. 2d 1040 (1967) (imposing procedural limitations on wiretapping warrants).

The County's request is too broad in scope for two reasons. First, because the County's warrant seeks private and sensitive information related to First Amendment–protected speech and political activity, the Fourth Amendment's requirement of particularity requires both the application of "scrupulous exactitude," *Stanford v. Texas*, 379 U.S. 476, 485, 85 S. Ct. 506, 13 L. Ed. 2d 431 (1965), as well as heightened showings of the state interest in the records sought and the nexus between the records sought and the underlying investigation. *See, e.g.*, *Bursey v. United States*, 466 F.2d 1059, 1083 (9th Cir. 1972); *State v. Perrone*, 119 Wn.2d 538, 547, 834 P.2d 611 (1992) ("[W]here a search warrant authorizing a search for materials protected by the First Amendment is concerned, the degree of particularity demanded is greater than in the case

[3] That the County's search instrument here is a warrant, rather than a subpoena, is of no moment. Indeed, the County's search warrant here is issued under procedures more akin to a traditional subpoena than a warrant, as it may be quashed by motion within twenty days. *See* RCW 10.96.020(4). Where state law provides an opportunity for the recipient of a warrant to move to quash an unlawful warrant, it is clear that the same opportunity must be provided to the holder of the privacy and associational rights at stake.

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where the materials sought are not protected by the First Amendment."). And second, the Fourth Amendment's particularity requirement is more demanding in the context of searches of electronic data, like the one here, which can sweep up large amounts of sensitive information. The County's warrant fails to meet these standards, and it should therefore be quashed.

1. The search warrant does not satisfy the exacting requirements for particularity in searches of information protected by the First Amendment.

At its most elementary level, the First Amendment prohibits government from taking actions that burden speech except in extraordinary circumstances. *Turner Broad. Sys., Inc. v. F.C.C.*, 512 U.S. 622, 641–42, 114 S. Ct. 2445, 129 L. Ed. 2d 497 (1994). More specifically, courts have recognized, including in the criminal context, that government demands for information concerning expressive activities implicate the First Amendment and therefore require greater protection. *See Perrone*, 834 P.2d at 616; *Branzburg v. Hays*, 408 U.S. 665, 680–81, 92 S. Ct. 2646, 33 L. Ed. 2d 626 (1972) (explaining that "justifiable governmental goals may not be achieved by unduly broad means having an unnecessary impact on protected rights of speech, press, or association"). In particular, political activity and advocacy like that at issue in this case is at the core of First Amendment–protected speech. *See Mills v. Alabama*, 384 U.S. 214, 218–19, 86 S. Ct. 1434, 16 L. Ed. 2d 484 (1966).

Where information is closely guarded by the First Amendment, a warrant for the information must meet heightened particularity requirements. *See Perrone*, 119 Wn.2d at 547. In practice, these heightened requirements demand that the County demonstrate both an "immediate, substantial, and subordinating" interest in the object of the warrant, as well as a "substantial connection between the information it seeks to have the witness compelled to supply and the overriding governmental interest in the subject matter of the investigation." *Bursey*, 466

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F.2d at 1083 (quotation marks omitted); *see In re Faltico*, 561 F.2d 109, 111 (8th Cir. 1977) (per curium); *Gibson*, 372 U.S. at 551. In addition, the County must show that "the means of obtaining the information is not more drastic than necessary to forward the asserted governmental interest." *Bursey*, 466 F.2d at 1083.

The search warrant for the bellinghamnodapl's Facebook page does not meet these standards. First, the page's contents and related information are undoubtedly protected speech, and the information sought by the warrant includes political views and opinions, images and videos of political actions, and potentially identifying information regarding members or associates of the Bellingham #NoDAPL Coalition. Disclosure of that information could reveal the names of individuals involved in planning or attending political protests, their images and political speech, the physical locations of the group's creator over a 12-day period, and more. In fact, the County's warrant would reach the messages of even general members of the public who interacted with the group on the Facebook page by asking questions about the group's activities or engaging with the group in political debate. Hosting and participating in an online forum for political organizing, debate, and advocacy is activity that lies at the core of the First Amendment—and the Founders would have recognized it as such.

Disclosure of identifying information of those associated with the Bellingham #NoDAPL Coalition will have a chilling effect on free speech and association. After the February 11, 2017 protest, people associated with the Bellingham #NoDAPL Coalition found themselves personally targeted. *See* Monteiro Decl. ¶10. They found personally identifying information, including their addresses and employment information, posted online. *See* Monteiro Decl. Exs. A & B. If the identifying information of people whose only activity was to participate in a political organizing group is seized and searched, fear of retaliation will

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inevitably keep some people from engaging with or joining such groups. Furthermore, this chill is not limited to those sympathetic to the political aims of the Bellingham #NoDAPL Coalition, or to those on the Coalition's side of the political spectrum. If the State may intrude on the political and associational conduct of the bellinghamnodapl Facebook group, it can do the same with respect to *any* politically associated groups.

Second, the County's interest is neither "immediate, substantial, and subordinating," nor sufficiently connected to the wide swath of information requested. Reckless endangerment—the only offense indicated on the face of the warrant—is a gross misdemeanor under state law. *See* RCW 9A.36.050. Upon information and belief, the warrant relates to a political protest against the Dakota Access Pipeline that took place in Bellingham on February 11, 2017. *See* Monteiro Decl. ¶9–10. But while a charge of reckless endangerment might relate—tangentially or not—to the protest activities on that date, the warrant will sweep into its ambit large amounts of First Amendment–protected information, almost all of which will not be evidence of a crime or material to any investigation. *See* Baker Decl. Ex. D (requesting all "messages, photos, videos, wall posts and location information" from February 4 to 11, 2017).[4]

Last, the objectives of the warrant could plainly be achieved through less intrusive means. *See Bursey*, 466 F.2d at 1083. To request 12 days of sensitive and private content, in addition to location information, related to the First Amendment–protected political speech of potentially hundreds of individuals is not a particularized search—rather, it is a fishing

[4] Ms. Monteiro has not been able to obtain a copy of the supporting affidavit, nor was one submitted to Facebook with the warrant at issue.

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expedition. The First Amendment prohibits the County from proceeding in such a broad and unbound way.[5]

2. The search warrant does not satisfy particularity under the Fourth Amendment.

Even if the bellinghamnodapl Facebook group were not engaged in political advocacy and speech, the County's warrant would fail under the Fourth Amendment.

As an initial matter, the warrant would still be subject to a form of heightened scrutiny with respect to particularity because it seeks electronic data. Courts around the country have recognized that "the particularity requirement assumes even greater importance" in electronic searches because otherwise there is "a serious risk that every warrant for electronic information will become, in effect, a general warrant, rendering the Fourth Amendment irrelevant." *United States v. Galpin*, 720 F.3d 436, 446–47 (2d Cir. 2013) (quoting *United States v. Comprehensive Drug Testing, Inc.*, 621 F.3d 1162, 1177 (9th Cir. 2010)); *State v. Roden*, 179 Wn.2d 893, 898, 321 P.3d 1183 (2014); *see also United States v. Riccardi*, 405 F.3d 852, 862–63 (10th Cir. 2005). This is because "advances in technology and the centrality of [electronic devices] in the lives of average people have rendered [such devices] akin to . . . residence[s] in terms of the scope and quantity of private information [they] may contain." *Galpin*, 720 F.3d at 446. Indeed, this is why Washington courts have repeatedly held that the search of computers or other electronic storage devices gives rise to heightened particularity concerns. *See, e.g.*, *State v. Keodara*, 191 Wn. App. 305, 314, 364 P.3d 777 (2015); State v. Griffith, 129 Wn. App. 482, 488–89, 120 P.3d 610 (2005). So too can the contents of electronic accounts like Facebook, which is at once a message

[5] In addition, an after-the-fact suppression remedy would be insufficient to ensure the adequate protection of the First Amendment associational and speech rights at issue.

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board, an email service, a diary, a calendar, a photo book, a video archive, and much more. As explained above, the County's warrant cannot meet heightened constitutional scrutiny.

Beyond that, however, the warrant in this case fails to meet even the most elemental Fourth Amendment particularity requirements, as it does not adequately limit the scope of the privacy intrusion that it authorized. The Fourth Amendment's particularity requirement serves three central purposes: to prevent general searches; to "eliminate[] the danger of unlimited discretion in the executing officer's determination of what to seize"; and to prevent the execution of "warrants issued on loose, vague, or doubtful bases of fact." *Perrone*, 834 P.2d at 615–16. In effect, the particularity requirement ensures that the County has a specific aim in mind before conducting a search; that it explicitly limits its search to that aim; and that it has good reason to obtain the information it seeks.

The County's warrant here fails on all three counts. First, the warrant is akin to the very kind of general warrant the Fourth Amendment was meant to prohibit. Rather than specifically target an individual based on information suggesting that the individual committed the misdemeanor of reckless endangerment, the warrant asks for information related to a political advocacy group, which may include information belonging to hundreds of people. Rather than narrowly focus the warrant on a particular person, the warrant allows the County to engage in a fishing expedition, search through the personal messages, photos, videos, and location information of the bellinghamnodapl advocacy association, and even the information of any member of the public who communicated with the group's Facebook page during the time period covered by the warrant.

Second, the County's warrant lacks any limitation on what the County may do with the information it gathers. Courts around the country routinely

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reject warrant applications for electronic searches of online communication accounts that—like the warrant issued here—fail to propose reasonable limitations on those searches, by, for example, specifying the types of material sought, imposing date restrictions, and articulating clear procedures governing materials that are irrelevant to the investigation.[6] And third, there is reason to doubt that the County has demonstrated a sufficient justification to rummage through the political messages, photos, and videos of bellinghamnodapl and the users it interacts with—indeed, if the County knew what or who it was looking for in connection with its investigation, it could have sought information about an individual's communications and location, rather than target a hub for political organizing.

IV. CONCLUSION

For the reasons given above, Movant respectfully requests that the Court quash the State's warrant.

DATED this 8th day of March, 2017.

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By: 

La Rond Baker, WSBA No. 43610
ACLU of Washington Foundation

[6] *See, e.g.*, *In re the Search of Information Associated with [redacted]@mac.com that is Stored at Premises Controlled by Apple, Inc.*, 13 F. Supp. 3d 145, 148 (D.D.C. 2014) (rejecting application for account's emails "that constitute evidence and instrumentalities of violations of 41 U.S.C. § 8702" where it did not specify what would occur with non-relevant information); *In re Applications for Search Warrants for Info. Associated with Target Email Accounts/Skype Accounts*, No. 13–MJ–8163, et al., 2013 WL 4647554, at *8 (D. Kan. Aug. 27, 2013) (rejecting application for all electronic communications associated with target accounts because it "fail[ed] to set any limits" and lacked "filtering procedures" to ensure limited capture of non-relevant and privileged information); *In re [REDACTED] @gmail.com*, No. 14-70655, slip op. at 6 (N.D. Cal. May 9, 2014) (rejecting application for account's emails where government failed to provide "date restriction of any kind" or make "any kind of commitment to return or destroy evidence that is not relevant to its investigation"), *available at* https://www.techdirt.com/articles/20140512/09130627206/ government-goes-judge-shoppingemail-warrant-rubber-stamp-gets-request-shot-down-second-judge-row.shtml.

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CERTIFICATE OF SERVICE

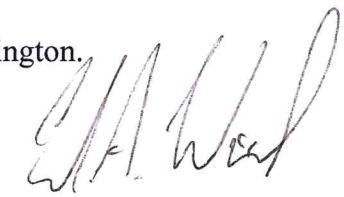
I, Edward Wixler, am a legal assistant for the American Civil Liberties Union of Washington Foundation, 901 Fifth Avenue, Suite 630, Seattle, WA 98164. I hereby certify that on the date indicated below, I caused to be served via Messenger Service true and correct copies of the ***Motion to Quash Search Warrant No. 17A03639*** and this ***Certificate of Service*** on the following:

Sheriff Bill Elfo
WHATCOM COUNTY SHERIFF'S OFFICE
311 Grand Avenue
Bellingham, Washington 98225

David S. McEachran
WHATCOM COUNTY PROSECUTOR
311 Grand Avenue, Suite 201
Bellingham, Washington 98225

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 8th day of March, 2017 at Seattle, Washington.



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