

Complaint References

References Cited in Complaint Against Local Health Officers

- Washington State Communicable Disease and Pandemic Response Concept of Operations – [Appendix 4: Pandemic Response, Emergency Support Function \(ESF\) 8: Public Health, Medical and Mortuary Services, Washington State Comprehensive Emergency Management Plan \(CEMP\)](#).
 - The complaint references that local health officers are refusing to comply with their clearly defined duties under ESF 8
- [RCW 70.05.070](#)
 - Complaint references that local health officers are refusing to take any steps to control and prevent the spread of a dangerous and highly infectious SARS coronavirus in their jurisdictions under RCW 70.05.070
- [WAC 246-100-040 through 060](#)
 - Complaint references that local health officers are failing to protect the public by refusing to enforce rules and regulations relating to isolation and quarantine under WAC 246-100-040 through 060
- [Secretary of Health Amending Order 20-03, 20-03.10, Face Coverings – Statewide](#)
 - Complaint references that local health officers are failing to protect the public by enforcing the Statewide Face Covering Order
- [Governor Jay Inslee News Release, September 8, 2022](#)
 - Complaint references that Governor Inslee’s release states local health officers are refusing to enforce public health laws, and it’s resulting in “easily prevented deaths of more than ten people per day in Washington State”
- [Washington State Department of Health May 18, 2020, 2019-nCOV Literature Situation Report](#)
 - Complaint references that local health officers have known since May 2020 that COVID-19 infections cause lymphopenia and increase the risk of heart injury in pediatric patients, yet they refuse to take any steps to protect the public and are actively recommending and sometimes encouraging behaviors that will increase the risk of COVID-19 exposure.

References Cited in Supplemental Document for Complaint

- Letter from Local Health Officers and Health Care Leaders, December 9, 2022, published by multiple health departments
 - <https://jeffersoncountypublichealth.org/CivicAlerts.aspx?AID=1065>
 - <https://www.tpchd.org/home/components/news/news/326/286?backlist=%2f>
 - <https://kingcounty.gov/depts/health/news/2022/December/09-masks-indoors.aspx>
 - <https://www.whatcomcounty.us/civicalerts.aspx?AID=3606>

- <https://clark.wa.gov/public-health/clark-county-health-officers-join-other-health-leaders-recommend-masks-indoors>
- <http://www.snohd.org/civicalerts.aspx?AID=736>
- The complaint states that this letter shows the State has declined to comply with its duty to prevent or control the spread of dangerous and infectious diseases under [RCW 70.05.060](#) (powers and duties of local boards of health) and [RCW 70.05.070](#) (powers and duties of local health officers).
- [RCW 70.05.120\(4\)](#)
 - Complaint alleges that local health officers are expressly stating, in writing, their intent to continue allowing isolation to remain completely optional, and it's a violation of RCW 70.05.120(4)
- [Public Health Seattle King County COVID-19 After Action Report](#) (AAR)
 - Complaint references this report and alleges that King County officials failed to establish processes to provide isolation and quarantine services for people who needed them (pages 3, 50, and 77-80 of the AAR).
 - Complaint references that in the AAR, officials acknowledge they did not comply with “any duty under our laws, rules, and regulations concerning public health” (pages 4-5 of the AAR) and duties set forth under the WA State [Communicable Disease and Pandemic Response Concept of Operations](#) and Washington State Comprehensive Emergency Management Plan (pages 32-36 of the AAR).
 - Complaint states that King County officials did not appropriately implement [Washington’s Comprehensive Emergency Management Plan](#) (CEMP), which was updated in 2019 and references the promulgation letter signed by Governor Jay Inslee, acknowledging and approving this updated plan for circulation.