SUPREME COURT OF THE STATE OF WASHINGTON

In the Matter of the Disciplinary Proceeding Against DOUGLAS A. SCHAFER, an Attorney at Law.	Bar No. 8652 MOTION FOR A RULING ON ISSUES OF DISQUALIFICATION

1. Identity of Moving Party: Douglas A. Schafer, the Respondent Attorney.

2. Statement of Relief Sought: I request that the Court consider whether the impartiality of certain members of the Court might reasonably be questioned based upon the information presented with this motion, and that the Court issue a ruling explaining to the public why no reasonable person might question the partiality of such of those members who decline to disqualify themselves.

3. Law Relevant to Motion: This Court's own Code of Judicial Conduct provides at Canon 3(D)(1) that "Judges should disqualify themselves in a proceeding in which their impartiality might reasonably be questioned," and provides a nonexclusive list of illustrative instances. The provision is materially identical to one in the American Bar Association Model Code of Judicial Conduct except

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that the ABA Model Code provision uses *"shall"* to compel a judge who reasonably appears to lack impartiality to disqualify himself or herself whereas this Court's provision uses *"should"* to suggest that a judge who reasonably appears to lack impartiality may choose ***not*** to disqualify himself or herself. The Code of Conduct for United States Judges and 28 U.S.C. § 455(a) both apply to federal judges the language that appears in the ABA Model Code, mandating by use of the word *"shall"* that a federal judge disqualify himself or herself whenever a reasonable person might question their impartiality.

Extensive analysis of the case law relating to judicial bias seems unnecessary, for ordinary reasonable persons (namely, the general public) who sit in judgment of the integrity of a court when an appearance of bias exists do not engage in law library research before drawing their own conclusions from the facts. Still, three quotations from prior judicial opinions may offer the Court some guidance:

> The proper standard for ascertaining whether a judge's impartiality might reasonably be questioned under Section 455(a) is whether the charge of lack of impartiality is grounded on facts that would create a reasonable doubt, not in the mind of the judge, or even necessarily that of the litigant, but rather in the mind of the reasonable person. *See United States v. Cowden*, 545 F.2d 257, 265 (1st Cir. 1976), cert. denied, 430 U.S. 909 (1977). ...
>
> Having said this, certain principles seem clear. A judge would ordinarily be disqualified to sit by Section 455(a) if an attorney in the case before him or her were, at the same time, actively representing the judge in a personal matter.

In re Cargill, Inc., 66 F.3d 1256 (1st Cir. 1995) (Appendix to Judge Campbell's dissent).

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> [W]e note that "[t]he issue of disqualification is a sensitive question of assessing all the facts and circumstances in order to determine whether the failure to disqualify was an abuse of sound judicial discretion."[citation omitted] The amendment of 28 U.S.C. § 455 did not alter the standard of appellate review on disqualification issues; however, the new statute requires a judge to exercise his discretion in favor of disqualification if he has any question about the propriety of his sitting in a particular case. Under the prior version of section 455, a judge faced with a close question on disqualification was urged to resolve the issue in favor of a "duty to sit." [citation omitted] The language of the new statute eliminates the so-called "duty to sit." The use of "might reasonably be questioned" in section 455(a) (emphasis added) clearly mandates that it would be preferable for a judge to err on the side of caution and disqualify himself in a questionable case. In reviewing the exercise of judicial discretion in this case, we cannot ignore that the disqualification of a judge in any given case does not cause the delay or inconvenience which resulted in prior times. The growing number of federal judges, and the availability of rapid transportation to move those judges from place to place when necessary, make the decision to disqualify much less burdensome on the judicial system than in times past; any inconvenience which does arise is more than outweighed by the need to protect the dignity and integrity of the judicial process. Our desire to maintain an untarnished judiciary compels us to hold that Judge Hand was required by 28 U.S.C. § 455(a) to disqualify himself from the Potashnick case, and his failure to do so constituted an abuse of sound judicial discretion.

Potashnick v. Port City Const. Co., 609 F.2d 1101, ¶ 37 (5th Cir. 1980).

> [T]he fact that [a lawyer involved in a case] represented [the judge adjudicating the case] in his 1985 divorce action is contained in the public records; however, that is not the type of knowledge we can agree to hold a lawyer to have constructively possessed. To do so would require lawyers in every action to sift through the public records to discover any possible evidence of a judge's impropriety, or, cause their client to suffer a denial of due process because they will be held to have known of the impropriety, and will be barred from later raising the issue. Lawyers are certainly not encouraged to await an outcome in their client's case prior to moving

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> for a recusal. In circumstances where the impropriety is more readily apparent to the lawyers involved in the case, we may reach a different result. ***It must be remembered, however, that it is the judge who must come forth and recuse himself so as to avoid any appearance of impropriety.*** (Emphasis added.)

Aetna Cas. and Sur. Co. v. Berry, 669 So.2d 56, 74-75 (Miss. 1996). Additional cases of similar tenor include *State v. Salazar*, 182 Ariz 604, 898 P.2d 982 (App. 1995)(citing Wash. Jud. Ethics Comm. Advisory Op. 89-13); *Atkinson Dredging Co. v. Henning*, 631 So.2d 1129 (Fla. App. 4 Dist. 1994); *Marcotte v. Gloeckner*, 6779 So.2d 1225 (Fla. App. 5 Dist. 1996).

4. Facts Relevant to Motion: As the Mississippi Supreme Court observed in the foregoing quote from *Aetna*, the burden rests on each jurist to "come forth and recuse himself" when facts known to them might cause a reasonable person who learns of the facts to question their impartiality. The facts that I present in this motion are substantially all *public* facts, but there may be other *nonpublic* facts that jurists also should consider (such as other close relationships with Kurt Bulmer or with Grant Anderson). If there are nonpublic facts that reasonable persons should consider as countering the facts that suggest a possibility of bias, then I would hope that such facts would be made public.

The relevance of the facts presented below to this proceeding is apparent from the Respondent Lawyer's Opening Brief filed in this proceeding.

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Chief Justice Gerry Alexander

Relationship with Former Judge Grant Anderson. In 1998 or early 1999 upon learning that Justice Alexander had recused himself from the judicial disciplinary proceeding of former Superior Court Judge Grant L. Anderson, I inquired as to the reason for his recusal. Justice Alexander willingly told me in a phone conversation that he had recused because of the personal friendship that had developed in recent years between him and Judge Anderson. The published opinion in *Discipline of Anderson*, 138 Wn.2d 830, 981 P.2d 426 (1999), reflects the nonparticipation by Justice Alexander. Consistent with that disqualifying personal relationship, Justice Alexander also recused from participation when this Court considered, on May 4, 2000, whether to approve the Stipulation to Discipline in the form of a two-year suspension from the practice of law of Grant L. Anderson. A copy of the Court's Order approving that stipulation and reflecting Justice Alexander's recusal is Exhibit 1 to this Motion. Since this pending proceeding involves a determination of whether the policy of maintaining the integrity of the judiciary by fully exposing the corruption of former Superior Court Judge Grant L. Anderson outweighs the policy of maintaining client confidentiality, a reasonable person might question Justice Alexander's impartiality in light of his personal friendship with former Judge Anderson.

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Justice Richard Sanders

Relationship with Kurt Bulmer. Lawyer Kurt Bulmer has had an attorney-client relationship with former Judge Grant Anderson since at least 1996, representing him in connection with his judicial and lawyer disciplinary proceedings and in matters before the state Legislature. One of Bulmer's chief strategies throughout his defense of Anderson has been to vociferously and maliciously attack my personal character and veracity. His initial letter to the State Bar's Office of Disciplinary Counsel ("ODC") of May 22, 1996, attached as Exhibit 2, (that ODC refused to provide to me until March 23, 1999), began his personal attack on me as Anderson's grievant. In early 1999, once the state Legislature began considering whether to exercise its Constitutional power to remove Anderson from judicial office, Bulmer registered as a lobbyist (Exhibit 3) on March 27, 1999, and began that same date (if not before) providing legislative leaders and members defamatory 14-page packets (Exhibit 4) of disinformation alleging me to have vile motives, defective character, and no veracity. Bulmer continued widely circulating his packet of lies about me, unbeknownst to me until I read in the June 7, 1999, issue of *Judicial News* (published by this Court's administrative staff) Bulmer's May 3, 1999 "Media Release"and 14-page packet of disinformation, several pages of which are malicious lies about my character and veracity. (Exhibit 5). The publisher of the Court's *Judicial News* refused my request to publish my corrections.

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Justice Richard Sanders participated in the panel that heard oral arguments in former Judge Anderson's judicial discipline case on February 9, 1999 (and presumably participated in the panel's "straw poll" conference immediately following it), but on April 1, 1999, he notified this Court's Clerk that he had retained Kurt Bulmer to represent him in an unrelated grievance being prosecuted against Justice Sanders by the ODC. (Exhibits 6 and 7). As a result, Justice Sanders recused from former Judge Anderson's judicial disciplinary case.

Justice Sanders and Kurt Bulmer appear to have maintained their client-lawyer relationship continuously from at least April 1999 to present. Exhibit 8 to this Motion is the Sanders-Bulmer Petition for Fees and Costs (without its own 34 exhibits) filed February 23, 2000, that details their successful defense of the ODC charges, and Exhibit 9 is the nearly-two-years-late responsive Order filed just three days ago, January 29, 2002, denying their Petition for Fees and Costs.

While Bulmer was representing Justice Sanders and undoubtedly conferring from time to time with him, Bulmer was defending Judge Anderson. A few days after Bulmer received an amended Formal Complaint, filed August 23, 1999, from the ODC against Justice Sanders, Bulmer filed for former Judge Anderson with the Commission on Judicial Conduct ("CJC") an Answer on August 31, 1999, to its second Statement of Charges filed August 9, 1999, against Anderson. In that Answer, Anderson and Bulmer denied one of the serious counts against Anderson by accusing me, Doug Schafer, of basically fabricating evidence and

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corrupting witnesses as part of a personal vendetta against Anderson. (Pages 1 and 9-12 are included as Exhibit 10.) None of that was true, and the CJC had investigated the matter for 19 months before bringing those charges after concluding that it could support them by clear and convincing evidence.

During the period that Bulmer was most actively representing Justice Sanders, whose disciplinary hearing on ODC's charges was held December 13 and 14, 1999, Bulmer was simultaneously negotiating with ODC for a stipulation to lawyer discipline for former Judge Anderson's dishonesty and other fraudulent misconduct. By letter of February 4, 2000, Bulmer urged the WSBA Disciplinary Board members to approve the Stipulation to Two-Year Suspension by once again maligning the motives and integrity of Anderson's grievant, Doug Schafer, providing to them his Legislative 14-page packet of disinformation and malicious lies. (Exhibit 11) Counsel for ODC cooperatively (perhaps *complicity*; Exhibit 12) included in the formal record transmitted both to the Disciplinary Board and to this Court for final approval Bulmer's letter and packet of lies (even though by then ODC had admitted a month earlier that it lacked evidence to support, and so effectively withdrew, its strategic 1999 allegations that I had made false statements–Exhibit 13). Though Justice Sanders was then being actively represented by Kurt Bulmer in his continuing dispute with the ODC over fees and costs incurred in his disciplinary case, Justice Sanders participated in the Court's approval on May 4, 2000 of the Stipulation that Kurt Bulmer had negotiated with

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the ODC for former Judge Anderson. (Exhibit 1 indicates that only "Justices Johnson, Alexander and Talmadge recused in the matter."

Shortly after this Court approved the Stipulation to Two-Year Suspension of Anderson's law license as orchestrated by Bulmer and the ODC, I spoke with Justice Sanders by phone. In the course of that conversation, I expressed my dismay that the ODC had submitted to the Disciplinary Board and to this Court as part of the record supporting Anderson's discipline a copy of Bulmer's 14-page packet of disinformation that so maliciously and falsely denigrated me. Justice Sanders reassured me that I should not be concerned about Bulmer's diatribe for, he said (in substance), "when a lawyer stipulates to discipline with the ODC, we don't bother reading the record." I found that comment not at all comforting, though not at all surprising.

Because of the approximately three-year client-lawyer relationship that has existed between Justice Sanders and Kurt Bulmer, and because of the latter's extraordinarily evil maliciousness toward me that had he publishes at every opportunity, Justice Sanders' impartiality might reasonably be questioned.

Prior Contact in December 1997. At the disciplinary hearing I testified (TR2 at pages 478-79) that in December 1997 I had provided to Justice Sanders various documents concerning the investigation of Superior Court Judge Grant Anderson. On December 23, 1997, I had obtained public documents at the CJC's office

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indicating that a federal criminal investigation was probing into William Hamilton and Judge Grant Anderson. The next day I phoned Justice Sanders and after I apprised him of what I had discovered, he invited me to fax the papers to him at his home. I then faxed him 31 pages. (My fax cover and confirmation slips to him and Justice Johnson are Exhibit 11.) I did so believing that this Court ought to be made aware when a sitting superior court judge is a target of a federal criminal investigation. I had been confident that Justice Sanders would be disqualified from adjudicating Judge Anderson's misconduct charges brought by the CJC because of Justice Sanders' then ongoing battle with the CJC over the propriety of his 1996 anti-abortion rally speech. He had publicly degraded the CJC's members only months earlier, saying, "Many of these panel members are laypeople who were appointed by Governor Lowry. We can make a legal argument to laypeople, but they don't even know where the law library is, much less even look up a case." Seattle Post Intelligencer, May 13, 1997, article starting on page A1.

On the same day, December 24, 1997, that I spoke with and faxed 31 pages to Justice Sanders, I did the same with Justice Charles Johnson. Since his then recently departed law clerk, Donald W. Black, as an associate at Ogden Murphy Wallace, PLLC, was actively pursuing Ocean Beach Hospital's fraud claim against Judge Anderson, William Hamilton, and their colleagues, and since I suspected that Justice Johnson personally knew Judge Anderson from their many years of practicing law together in the Tacoma area, I regarded it as not inappro-

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priate to inform him for the same reasons that I informed Justice Sanders.

Justice Sanders' Baggage from his Hawkins Case. Justice Richard Sanders is burdened with having been, in 1979, a model mercenary lawyer willing to expose innocent people to death or serious injury to achieve his client's stated objective. In *Hawkins v. King County*, 24 Wn. App. 338, 602 P.2d 361 (1979), the court of appeals held that a lawyer Richard Sanders had *no duty* to disclose in a bail hearing the information he possessed of his client Michael Hawkins' psychotic dangerousness when seeking Michael's release from incarceration on his personal recognizance. Shortly after that release, Michael attacked and repeatedly stabbed his own mother and then attempted suicide, causing the amputation of both legs. Two years later, Michael (through a guardian) and his mother Frances brought a million-dollar-plus claim[1] against Richard Sanders alleging his misconduct, including his failure to inform the bail hearing judge of Michael's psychotic dangerousness to himself and others.

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[1] Lawyer Kelly Corr (then with the law firm Bogle & Gates), Richard Sanders' counsel in the *Hawkins* case, lists his defense of the "million dollar plus" claim against Sanders as one of his significant career cases on his current Internet website, http://www.corrcronin.com/Attorneys/Corr.htm, as follows:

> **Hawkins v. Sanders, et al.**- Defense of a million dollar plus legal malpractice claim based on a novel theory; *i.e.*, that a criminal defense lawyer should have voluntarily disclosed his client's mental problems at a bail hearing. Summary judgment for our client; affirmed on appeal. 24 Wn. App. 338 (1979). Analyzed in 21 Tort & Ins. L.J. 355 (1986). Lead counsel.

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The appellate court exonerated the lawyer Richard Sanders, holding:

> [p. 343] "We believe that the duty of counsel to be loyal to his client and to represent zealously his client's interests overrides the nebulous and unsupported theory that our rules and ethical code mandate disclosure of information which counsel considers detrimental to his client's stated interest."
>
> [p. 344] "[T]he obligation to warn, when confidentiality would be compromised to the client's detriment, must be permissive at most, unless it appears beyond a reasonable doubt that the client has formed a firm intention to inflict serious personal injuries on an unknowing third person." [The court's discussion of the landmark *Tarasoff* case is omitted.] In the instant case, Michael Hawkins' potential victims, his mother and sister, knew he might be dangerous and that he had been released from confinement ..... Thus, no duty befell Sanders to warn Frances Hawkins of a risk of which she was already fully cognizant."[2]

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[2] The Court's assertion that Michael's only ***potential victims*** were his mother and sister is contradicted by the facts reported in the first paragraph of the Statement of Facts in the Appellant's Brief, at page 3:

> "Michael Hawkins was arrested after assaulting a young girl on the University of Washington campus, under the belief that she was an old girl friend of his named "Thelma." He chased and grabbed the girl, refusing to let her go despite her denial that she was "Thelma." The police arrived and arrested Michael. After his arrest it was discovered that he was in possession of a quantity of marijuana. Although assault charges were not filed, Michael was held on the drug charge."

Michael clearly frequented the University of Washington neighborhood, for after stabbing his mother and himself his suicide attempt was to jump from the 45th Street Bridge which is adjacent to the UW campus. Thus, it would have been apparent that many innocent coeds and others were ***potential victims*** of Michael's psychotic dangerousness. On the all too common practice of judges misstating the facts so as to justify their preferred conclusions, see Anthony D'Amato, *The Ultimate Injustice: When a Court Misstates the Facts*, 11 Cardozo L. Rev. 1313 (1990) (Professor D'Amato says, at pg.1345, "even demonstrably false things can be stated as factually accurate in a judicial opinion because the reader typically

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I discussed the national significance of the *Hawkins* case in my Reply Brief at page 7. In 1986, the *Hawkins* case was described as "the only reported case of an attorney being sued for failing to disclose the dangerous threats of a client." Marc L. Sands, *The Attorney's Affirmative Duty to Warn Foreseeable Victims of a Client's Intended Violent Assault*, 21 Tort & Insurance L.J. 355, 365 (1986). The national significance of this case is illustrated by its continuing to be regularly cited (as an impediment) in current literature by legal scholars calling for exceptions to the duty of confidentiality to permit lawyer reporting of child abuse and elder abuse/exploitation. Robert H. Aronson, *What About the Children? Are Family Lawyers the Same (Ethically) as Criminal Lawyers? A Morality Play*, 1 J. Inst. Stud. Leg. Eth. 141 (1996) (citing *Hawkins* in footnote 8 on 147); Patrick Emery Longan, *Middle-class Lawyering in the Age of Alzheimer's: the Lawyer's Duties in Representing a Fiduciary*, 70 Fordham L. Rev. 901 (2001) (citing *Hawkins* in footnote 35 on 911 as "finding that no cause of action exists against a lawyer who knew client was dangerous but still helped client to be released from jail, after which the client assaulted his mother").

The Appellant's Brief (the cover and pgs 3-10 are Exhibit 15) in *Hawkins*, at page 9, quotes from Richard Sanders' deposition testimony the following question and his model-mercenary-lawyer answer to it:

Q. All right. Would you answer the question. Would you, as a lawyer, in

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would not question the accuracy of what a judge reports as the facts.")

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representing a defendant, feel free to use your legal skills to get a defendant released into society when you have information from a psychiatrist that the man is dangerous to himself and others:

A. Yes.

Reasonable folks might find that indifference to the public's safety irreconcilable with Justice Sanders' famous remarks, "Nothing is, nor should be, more fundamental in our legal system than the preservation and protection of innocent human life," that he made at an anti-abortion rally in January 1996 and that became immortalized in *Discipline of Sanders*, 135 Wn.2d 175, 955 P.2d 369 (1998).

Contrary to Justice Sanders' conduct described in the *Hawkins* case and his defensive arguments in that case, I have argued that there are some policies —such as the protection of innocent human life and the maintenance of judicial system integrity—that should trump a lawyer's duty of blind loyalty to a dangerous or lawless client. In *Hizey v. Carpenter*, 119 Wn.2d 251, 30 P.2d 646 (1992), this Court appeared to criticize the Court of Appeals opinion in *Hawkins*, saying, at 264-65:

> Washington courts have at times assumed, without squarely addressing, the relevance of either an alleged or established violation of the CPR or RPC. *See*, *e.g.*, *Hawkins v. King Cy*., 24 Wn. App. 338, 602 P.2d 361 (1979) (holding duty under CPR to be loyal and to represent zealously client's interest overrides other ethics rules mandating disclosure of information which counsel considers detrimental to his client's stated interest).

It seems reasonably questionable whether Justice Sanders would impartially reconsider the wisdom of, and possibly agree with other members of this Court to

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renounce, the *Hawkins* case considering the fact that it dismissed against him personally a million-dollar-plus claim and essentially legitimized his own balancing of policies that subordinated the safety interests of unknown and uncounted innocent people to the stated interests of his dangerous mentally ill client.

5. Grounds for Relief, and Argument:. The applicable rules that describe when a judge ought to "come forth and recuse himself" or herself are discussed under item 3, above. The application of those rules to the facts as described in item 4, above, requires no further argument, simply the application of honest common sense.

February 1, 2002 Respectfully submitted,

Douglas A. Schafer

Douglas A. Schafer, WSBA No. 8652

CERTIFICATE OF SERVICE

I certify that I am providing this Motion to my co-counsel and that today I caused a copy of this Motion to be sent by first class mail, postage paid, to:

Christine E. Gray, Disciplinary Counsel
Washington State Bar Association
2101 - 4th Ave., 4th Floor
Seattle, WA 98121-2330

Douglas A. Schafer

February 1, 2002

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Links to Exhibits

(All exhibits are in PDF format--some are small, some large.)

Exhibit 1 117KB Supreme Order 5/4/99 Approving Anderson's Bar Stipulation.

Exhibit 2 117KB Bulmer's 5/22/96 Ltr to Bar Counsel Shankland.

Exhibit 3 55KB Bulmer's 5/29/96 Lobbyist Registration.

Exhibit 4 248KB Bulmer's 3/27/99 Legislative ltr and Packet of Lies.

Exhibit 5 601KB OAC's publication in *Judicial News* of Bulmer's Lies.

Exhibit 6 61KB Clerk Merritt's 1/02/02 e-mail re: J. Sanders' 4/01/96 recusal.

Exhibit 7 59KB Bulmer's 4/19/96 ltr on his representation of J. Sanders.

Exhibit 8 510KB Bulmer-Sanders' 2/29/00 Petition for Fees and Costs.

Exhibit 9 198KB D-Board Chair's 1/19/02 Order denying Bulmer-Sanders' Pet.

Exhibit 10 411KB Bulmer-Anderson's 8/30/99 Answer to 2d set of CJC Charges.

Exhibit 11 228KB Bulmer's 2/04/00 ltr to Discip. Board filing his Packet of Lies.

Exhibit 12 377KB Bar Counsel Ende's "Summary" to D-Bd of Anderson misconduct forwarding as Doc. 25 Bulmer's 2/04/00 letter and Packet of Lies.

Exhibit 13 52KB Bar Counsel Gray's admission to lack of evidence supporting Bar's strategic and malicious claims that Schafer had been dishonest.

Exhibit 14 76KB Schafer's 12/24/97 fax slips to J. Sanders and J. Johnson.

Exhibit 15 468KB Pages fm Appellant's Brief in 1979 *Hawkins* case.

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