No. 16-15360

In the United States Court of Appeals for the Ninth Circuit

NATIONAL ABORTION FEDERATION (NAF),

Plaintiff–Appellee,

v.

THE CENTER FOR MEDICAL PROGRESS, *ET AL.*,

Defendants–Appellants.

Appeal from the United States District Court
For the Northern District of California
Case No. 3:15-cv-03522-WHO
The Honorable William H. Orrick

AMICI CURIAE BRIEF OF ATTORNEYS GENERAL OF ALABAMA, ARIZONA, ARKANSAS, GEORGIA, LOUISIANA, MICHIGAN, MISSOURI, MONTANA, NEBRASKA, OKLAHOMA, SOUTH CAROLINA, TEXAS, UTAH, AND WISCONSIN IN SUPPORT OF DEFENDANTS–APPELLANTS' PETITION FOR PANEL REHEARING AND REHEARING *EN BANC*

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STATEMENT OF AMICI CURIAE

The Attorneys General of Alabama, Arizona, Arkansas, Georgia, Louisiana, Michigan, Missouri, Montana, Nebraska, Oklahoma, South Carolina, Texas, Utah, and Wisconsin hereby submit this brief to respectfully urge the Court to grant panel rehearing or rehearing *en banc*.[1] The Panel's affirmance of the unprecedented preliminary injunction ("PI") restricting disclosure of information to law enforcement is contrary to Supreme Court case law, sets a harmful precedent for this Circuit, and is an issue of major importance that warrants rehearing. As Judge Callahan wrote in her pointed dissent:

> [O]ur system of law and order depends on citizens being allowed to bring whatever information they have, however acquired, to the attention of law enforcement. This case is no exception and the district court erred in preventing Defendants from showing the tapes to law enforcement agencies.
>
> Similarly, the injunction violates this strong public policy by requiring that if a law enforcement agency contacts Defendants and seeks materials covered by the injunction, Defendants must notify NAF of the request and allow NAF time to respond. These conditions inherently interfere with legitimate investigations.

[1] All parties have consented to the filing of this brief. No party's counsel authored this brief in whole or in part, and no person or party other than named Amici or their offices made a monetary contribution to this brief's preparation or submission.

Callahan Dissent at 3.

The Attorneys General join in the arguments urged in the Petition for Panel Rehearing and Rehearing *En Banc* ("Petition"). As their respective states' chief law enforcement or chief legal officers, the Attorneys General have a strong interest in ensuring that the public can freely communicate with law enforcement. They therefore write separately to emphasize the harms from the PI restricting such communications. Moreover, the particular facts of this case—that a trade association obtained injunctive relief restricting disclosure to law enforcement of communications occurring at its trade conferences—only underscores that the Panel majority has opened the door to a wide variety of prior restraints on communications with law enforcement.[2] The Attorneys General therefore strongly support rehearing by the Panel or *en banc* to correct this unprecedented decision.

[2] It is undisputed that law enforcement was not involved in collecting the materials and information at issue, and this case solely involves persons who wish to communicate to law enforcement information pertinent to potential wrongdoing.

SUMMARY OF ARGUMENT

This appeal involves a prior restraint—a gag order—imposed under penalty of the District Court's contempt powers. The party seeking this extraordinary remedy must establish the elements for injunctive relief—likelihood of success on the merits, likelihood of suffering irreparable harm in the absence of preliminary relief, that the balance of the equities tips in its favor, and that an injunction is in the public interest. *Garcia v. Google, Inc.*, 786 F.3d 733, 740 (9th Cir. 2015) (*en banc*); *see also Winter v. Nat. Res. Def. Council*, 555 U.S. 7, 22-23 (2008). It is also fundamental that a preliminary injunction "must be tailored to remedy the *specific harm alleged*," and "[a]n overb[roa]d injunction is an abuse of discretion." *Park Vill. Apartment Tenants Ass'n v. Mortimer Howard Trust*, 636 F.3d 1150, 1160 (9th Cir. 2011).[3]

The two Circuit Judges on the Panel split 1-1 on whether the District Court improperly enjoined Defendants–Appellants (collectively, "CMP") from freely communicating with law enforcement. The majority

[3] Here, the Court is under an obligation to review more closely than abuse of discretion because the District Court granted an injunction implicating CMP's First Amendment rights. *San Antonio Cmty. Hosp. v. S. Cal. Dist. Council of Carpenters*, 125 F.3d 1230, 1233-34 (9th Cir. 1997).

decision cited no authority supporting the District Court's restriction on disclosure to law enforcement. In a strong dissent, Judge Callahan cited *S.E.C. v. Jerry T. O'Brien, Inc.*, 467 U.S. 735 (1984), and opinions from the Fifth and Tenth Circuits, for the proposition that "'when a person communicates information to a third party ***even on the understanding that the communication is confidential***, he cannot object if the third party conveys that information or records thereof to law enforcement authorities.'" Callahan Dissent at 1 (quoting *O'Brien*, 467 U.S. at 743 (emphasis added)).

Judge Callahan had it right. NAF failed to meet its burden to obtain an injunction restricting CMP's communications to law enforcement based on at least two of the necessary injunctive-relief factors. ***First***, NAF did not prove—and neither the District Court nor the panel majority found—that there was a likelihood of irreparable harm from CMP's disclosure of the enjoined material to law enforcement. Nonetheless, the injunction restricts that very activity. ***Second***, NAF did not meet its burden to show that restricting CMP's communications with law enforcement is in the public interest. Law enforcement must be able to receive information from the public to

investigate potential wrongdoing effectively. As Judge Callahan recognized in dissent, this interest includes not just investigations into criminal activity but any matter that law enforcement has an interest in investigating.

Further, this unprecedented injunction sets a dangerous precedent. The Panel majority's reasoning allows persons or groups who wish to shut down whistleblowers and shield information from law enforcement to impede investigations by first requiring anyone privy to such information to enter into confidentiality agreements and then later enforcing those agreements through injunctive relief. A price-fixing cartel, for example, could make its members sign confidentiality agreements and then obtain a gag order to restrict disclosure. Judicial enforcement of these types of restrictions could delay, limit, or altogether prevent law enforcement from receiving important investigative leads.

ARGUMENT

I. THE PANEL ERRED IN AFFIRMING AN UNPRECEDENTED INJUNCTION RESTRICTING CMP'S ABILITY TO FREELY COMMUNICATE WITH LAW ENFORCEMENT

A. NAF Did Not Show Likelihood Of Irreparable Harm From CMP's Disclosure to Law Enforcement

NAF did not show the required likelihood of irreparable harm to justify enjoining disclosure to law enforcement. An injunction "must be narrowly tailored 'to affect only those persons over which [the Court] has power,' . . . and to remedy only the specific harms shown by the plaintiffs, rather than 'to enjoin all possible breaches of the law.'" *Price v. City of Stockton*, 390 F.3d 1105, 1117 (9th Cir. 2004).[4] NAF had to "prove a 'causal connection' between the irreparable injury [it] faces and the conduct [it] hopes to enjoin." *See Garcia*, 786 F.3d at 748 (Watford, J., concurring in the judgment) (citing *Perfect 10, Inc. v. Google, Inc.*, 653 F.3d 976, 982 (9th Cir. 2011)).

Any argument that NAF was likely to suffer irreparable harm from disclosure to law enforcement fails on this record both legally and

[4] *See also State of Nebraska Dep't of Health & Human Servs. v. Dep't of Health & Human Servs.*, 435 F.3d 326, 330 (D.C. Cir. 2006) (recognizing that "'[a]n injunction must be narrowly tailored to remedy the specific harm shown'" and collecting cases).

factually. Legally, *O'Brien* forecloses a party from claiming irreparable injury from a government agency issuing subpoenas for information. *See Blinder, Robinson & Co. v. S.E.C.*, 748 F.2d 1415, 1419 (10th Cir. 1984) (citing *O'Brien*, 467 U.S. at 743-44); *cf. Google, Inc. v. Hood*, 822 F.3d 212, 228 (5th Cir. 2016) (challenge to CID unripe). Indeed, the PI is unprecedented. None of the Panel majority, the District Court, or NAF has cited a single case that supports a finding of irreparable injury in these circumstances or supports enjoining disclosure of information to law enforcement under similar facts, yet NAF still obtained this extraordinary relief.[5]

Factually, the harm NAF identified was "harassment and death threats" from the public directed at individuals appearing in publicly released videos. (Dkt. No. 234-3 at 23.) NAF predicted that its employees and members would continue to suffer such harm if CMP

[5] The sole case cited by NAF (Dkt. No. 292-3 at 25) was *Vringo, Inc. v. ZTE Corp.*, No. 14-4988, 2015 WL 3498634 (S.D.N.Y. June 3, 2015), which involved private litigation and did not specifically analyze the law enforcement issue. NAF did not re-urge that case on appeal. It is therefore unsurprising that neither the District Court nor panel decision cited it. *See* AG Panel Amicus 25 n.13.

released video and audio recorded at NAF's conferences. (*Id.*) The District Court accepted that showing in granting the PI. (*See* ER36).

However, NAF did not show, or even suggest, that "harassment and death threats" are likely to result from disclosure ***to law enforcement***. Nor did the District Court ever find a likelihood of such harm from disclosure to law enforcement. (See ER35-38.) Moreover, as Judge Callahan observed in dissent, "disclosure to a law enforcement agency is not a disclosure to the public." Callahan Dissent at 3; *see also* AG Panel Amicus 13-14 (collecting cases). Law enforcement regularly handles highly sensitive materials, such as the identity of informants, information regarding gangs and organized crime, and the location of domestic violence victims. If law enforcement cannot be trusted to handle information that risks bodily harm or even death if it falls into the wrong hands, then it simply cannot do its job. No evidence in the record suggests that law enforcement cannot maintain this information's confidentiality and disclose it only pursuant to a legitimate government purpose.

For all of these reasons, NAF did not show a likelihood of irreparable harm and cannot justify enjoining disclosure by CMP to

government officers or agencies that are empowered to investigate wrongdoing (whether pursuant to subpoenas or voluntarily).

B. NAF Did Not Show That The Public Interest Favors Restricting CMP's Disclosure To Law Enforcement

Restricting communications and disclosure to law enforcement agencies is also contrary to the public interest. In light of this, the Panel majority erred for three reasons in affirming the unprecedented PI. First, public policy strongly favors the unimpeded flow of communication and information between the public and law enforcement. Second, the PI places meaningful restrictions on CMP's ability to disclose information to law enforcement. And third, the panel decision not only affirmed an unprecedented injunction, but in doing so also placed practically no limitations on the ability to enjoin disclosure to law enforcement based on contractual provisions. For each of these reasons, the PI should be reversed or at least narrowed. *See Winter*, 555 U.S. at 23 (reversing injunction where "any [likelihood of irreparable] injury is outweighed by the public interest").

1. Public Policy Strongly Favors Free Communication Between the Public and Law Enforcement

Law enforcement's ability to effectively investigate potential wrongdoing is in no small part dependent on the public's willingness

and ability to freely communicate and share information. The District Court correctly recognized here that "public policy may well support the release" of records to law enforcement. (ER33); *see also Lachman v. Sperry-Sun Well Surveying Co.*, 457 F.2d 850, 853 (10th Cir. 1972) ("It is public policy . . . everywhere to encourage the disclosure of criminal activity . . . ."). Given this strong public policy, it is unsurprising that none of the Panel majority, the District Court, or NAF has cited a single case that supports enjoining disclosure to law enforcement under similar facts. *See supra* 7 & n.5.

The Panel majority erred, however, by affirming the District Court's too-narrow construction of that public policy—recognizing only the need to ensure disclosure of information that may "show criminal wrongdoing." (ER33); Panel Decision at 6-7 ¶ 14. The policy interest here goes beyond criminal activity and includes any matter—civil or criminal—in which a government agency has a legitimate investigatory interest. *See Ctr. for Competitive Politics v. Harris*, 784 F.3d 1307, 1317 (9th Cir. 2015) (noting that "the Attorney General has a compelling interest in enforcing the laws of California"); *United States v. Inst. for College Access & Success*, 27 F. Supp. 3d 106, 115, n.8

(D.D.C. 2014) (presuming compelling interest exists where "agency seeking the information is conducting an investigation pursuant to its statutory authority"). Indeed, *O'Brien* itself involved an investigation by the S.E.C., which is by definition civil, not criminal. *See* 467 U.S. at 737-38 (discussing procedural history of investigation).

As Judge Callahan's dissent noted, whether the information at issue here contains evidence of crimes "is of little moment as the duties of Attorneys General and other officers to protect the interests of the general public extend well beyond actual evidence of a crime." Callahan Dissent at 2. On rehearing, this Court should recognize the important public policy contravened by restricting CMP's free communication with law enforcement and that the public policy extends beyond information regarding definite criminal wrongdoing.

2. The Preliminary Injunction Restricts CMP's Communications with Law Enforcement

The PI imposed material restrictions on CMP's ability to disclose information to law enforcement; it limited CMP's ability to make such disclosures to instances where a subpoena has been issued and NAF receives prior notice and an opportunity to challenge the subpoena or the scope of the information CMP intends to produce. (See ER40-41;

Dkt. No. 132 at 1-2.) This doubly restricts law enforcement. It gives a potential investigative target (or persons closely aligned with a potential target) influence over the investigation and precludes law enforcement from receiving and evaluating the full slate of information CMP would otherwise disclose.

The Supreme Court has recognized that outside parties should not be able to interfere with disclosures pursuant to a law enforcement subpoena. In *O'Brien*, the Court stated it is "[e]specially debatable" that a person "may obtain a restraining order preventing voluntary compliance by a third party with an administrative subpoena" and noted that it has "never before expressly so held." *O'Brien*, 467 U.S. at 749; *see also Chen Chi Wang v. United States*, 757 F.2d 1000, 1004 (9th Cir. 1985) ("[T]here is no constitutional requirement that a federal administrative agency notify 'targets' of nonpublic investigations when the agency issues subpoenas to third parties.").

The *O'Brien* Court also squarely rejected the notion that prior notice to persons other than the investigative subpoena recipient is a workable requirement, as this would permit investigative targets to

impede investigations. *O'Brien*, 467 U.S. at 749-51.[6] By requiring CMP to notify NAF before making any disclosures to law enforcement, and allowing NAF the opportunity to negotiate or challenge the law enforcement request, the PI puts NAF in the position of influencing what information law enforcement agencies receive and when they receive it—a result directly contrary to *O'Brien*.

The Panel majority's decision failed to acknowledge the broad policy against court orders restraining voluntary information sharing with law enforcement that *O'Brien* plainly recognized. Callahan Dissent at 1 & n.1 (noting policy and citing *O'Brien* and cases from Fifth and Tenth Circuits). In contexts involving whistleblowers or confidential informants, injunctive relief empowering a party to inhibit

[6] Attorney General investigations regularly seek materials from sources other than investigative targets. A more expansive approach is essential for gathering evidence, following leads, and corroborating claims. *See, e.g.*, *CUNA Mut. Ins. Soc. v. Attorney General*, 404 N.E.2d 1219,1222 (Mass. 1980) (rejecting "argument that the Attorney General may issue a C.I.D. only to a person being investigated").

information sharing with law enforcement would severely harm law enforcement's ability to investigate effectively.[7]

The restrictions placed on CMP have detrimentally affected the progress of at least one state investigation. CMP recorded hundreds of hours of raw audio and video footage related to NAF conferences. (ER8.) Within those materials, CMP has identified 47 hours of video and 100 hours of audio recordings responsive to the Arizona subpoena, including contextual information necessary for the information to be sufficiently meaningful. NAF takes a starkly different position, refusing to consent to CMP's disclosure of responsive materials except for snippets of materials specifically involving conversations with Arizona abortion providers or other companies identified by Arizona in the course of negotiations with NAF regarding Arizona's subpoena. NAF is thus

[7] Although subpoenas have been issued here, whether a subpoena has been issued is ultimately secondary to the policy interest of ensuring persons can share information about potential wrongdoing ***with law enforcement***. Subpoena requests are limited to what law enforcement believes may exist and may not encompass the full scope of relevant information in an informant's possession. If a third party is allowed to affect whether a willing informant can share all the information the informant possesses, law enforcement may not be able to obtain possible evidence of wrongdoing and neither will it even know to ask for certain information.

imposing its own relevance standard on a third party's response to a law enforcement subpoena. This imposition is especially inappropriate for two reasons. First, NAF does not know—nor should it know—the persons, entities, or conduct being confidentially investigated by the Arizona Attorney General's Office. Second, the Arizona Attorney General's Office is not in a position to know what other information it would learn if it had access to the full, responsive audio and video files.

As long as the current PI is in place, NAF can continue screening information and wielding influence over government investigations. There is no evidence that NAF sought any restrictions regarding information provided to or obtained by the FBI or the California Department of Justice, yet NAF has objected to disclosures pursuant to a congressional subpoena and subpoenas from Arizona and Louisiana. Allowing NAF to choose which government agencies can access CMP's information (and what information they can get) directly conflicts with the Supreme Court's reasoning in *O'Brien*, 467 U.S. at 749-51, and imperils the effectiveness of law enforcement's investigative process.

3. The Panel Majority Decision Opens Up A Wide Range of Prior Restraints on Disclosure to Law Enforcement.

The Panel majority decision creates a harmful precedent on a topic of great importance because it not only affirmed an unprecedented injunction, but also opened the door to a wide range of prior restraints on disclosure to law enforcement by whistleblowers. The Panel majority articulated hardly any limitations on its ruling, and the District Court's stated limitations do not limit the harmful future effects of its analysis.

First, the Panel majority decision should have focused on whether the District Court properly issued a prior restraint on speech, particularly one that relates to disclosure to law enforcement. Instead, the panel majority focused on the legality of CMP's actions. Panel Decision at 5 ¶ 11; *see also id.* at 4-5 ¶ 9. But that is not the pertinent issue as it concerns the PI's restrictions on CMP's information sharing with law enforcement. Likewise, the lengths of CMP's actions to gain entry to NAF's conferences are not bases for restricting communications with law enforcement. (*See* ER39-40.) Indeed, if anything, the facts of this case—a trade association obtaining injunctive relief restricting disclosure to law enforcement of communications occurring at its trade conferences—shows the breadth of this injunction. Communications at

trade conferences (which are necessarily industry-wide affairs) are hardly the type of information that is generally recognized as the most private, and the Panel's decision therefore opens the door to a wide variety of prior restraints on disclosure to law enforcement.

Second, the Panel decision again focused on the wrong issue when it concluded (at ¶ 12) that the PI placed no direct restrictions on law enforcement. The PI places direct restrictions on CMP. *See* AG Panel Amicus 8 (PI's restrictions on CMP "'substantially interfere[] with [its] ability to communicate freely with law-enforcement agencies conducting official investigations.'" (quoting Brief for Appellants at 19)). And, as discussed at length above, those restrictions are meaningful limitations, which *O'Brien* specifically rejected. *See supra* Part I(B)(2). It was therefore emphatically NAF's burden to meet the test for injunctive relief, which it clearly did not with respect to enjoining disclosure to law enforcement.

Third, the Panel majority's factual distinctions regarding *O'Brien* do not persuasively distinguish that case. Panel Decision at 6 ¶ 13. The analysis in *O'Brien* applies more broadly than just "investigations in which a target is unaware of an ongoing investigation and still

possesses materials that would be the subject of a subpoena or potential investigation." *Id.* The Supreme Court in *O'Brien* focused on 1) the "burdensome[ness]" of a disclosure requirement on both the administrative agency and the courts and 2) the "substantial[] increase [in] the ability of persons who have something to hide to impede legitimate investigations" by "discourage[ing] the recipients from complying" and then "further delay[ing] disclosure . . . by seeking intervention." *O'Brien*, 467 U.S. at 749-50. These concerns apply here, and *O'Brien* is on point.

Fourth, the District Court's review of the recordings provides no adequate basis for overriding the strong public policy of permitting open communication with law enforcement. *See* Panel Decision at 6-7 ¶ 14. The District Court (like NAF) was without full knowledge of what law enforcement is confidentially investigating (civilly or criminally). Similarly, the District Court's conclusion that public disclosures by CMP have been "misleading" is irrelevant to whether CMP should be restrained from communicating with law enforcement, which has the right to conduct its own independent analysis.

In sum, the PI establishes a harmful precedent that invites third parties to insert themselves improperly into law enforcement investigations. By enforcing the confidentiality agreements and restricting CMP's ability to freely communicate with law enforcement, the PI placed NAF in the position of negotiating with law enforcement about the relevance of information a third party (CMP) wishes to disclose. The reasoning in the Panel majority and District Court decisions would allow any group desiring to shield its communications from law enforcement (and in particular conspiring bad actors) to merely (1) enter into confidentiality agreements and (2) use the courts to enforce the agreements and thereby short circuit or otherwise delay government investigations. A price-fixing cartel, for example, could make its members sign confidentiality agreements and then seek to enforce those agreements if a member sought to share information with law enforcement. This plainly would be an absurd result and contrary to the public interest law enforcement is sworn to protect. Accordingly, the PI should be recognized as conflicting with an important public interest and reversed.

CONCLUSION

For the reasons stated herein and also in the Petition, the Attorneys General urge the Panel or the Court *en banc* to grant rehearing and to reverse the PI or, alternatively, narrow it to remove any restrictions concerning communication with law enforcement.

April 24, 2017

Respectfully Submitted,

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CERTIFICATE OF COMPLIANCE

This brief complies with the length limits permitted by Ninth Circuit Rule 29-2(c)(2). The brief is 3,675 words excluding the portions exempted by Fed. R. App. P. 32(f), if applicable. The brief's type size and type face comply with Fed. R. App. P. 32(a)(5) and (6).

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on April 24, 2017. All participants in the case are registered CM/ECF users and will be served by the appellate CM/ECF system.

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