

**TED H. GATHE PLLC
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360-281-0868**

September 25, 2026

Ms. Eileen Quiring O'Brien
PO Box 87177
Vancouver, WA 98687

Sent by e-mail and first-class mail

Re: Formal Privacy Demand

Dear Ms. O'Brien:

I represent Greg and Gayle Kimsey in their capacity as private citizens residing in Clark County, Washington.

My reason for contacting you is to formally demand the immediate removal of the Kimsey's residential address and Gayle Kimsey's personal telephone number from materials that were published on your campaign website as well as disseminated through social media platforms YouTube and Instagram.

The material that was disseminated included an audio recording of a telephone message from Mr. Kimsey acting in his capacity as Clark County Auditor. The message left was in response to a posting on social media by you regarding allegations that a certain individual who was registered to vote was not a citizen. Mr. Kimsey's response included a request that a formal complaint be filed so that the matter could be addressed through appropriate election procedures.

I want to make it clear that this demand has nothing to do with the issue of voter eligibility or Mr. Kimsey's response to that issue which is a legitimate matter of public concern and the performance of his official duties. Rather, it is specifically directed at the public disclosure and dissemination of his and his wife's private residential address and personal phone number.

Neither Greg or Gayle Kimsey consented to the publication of such personal identifying information on your campaign website and disseminated through Facebook and Instagram. Accordingly, on their behalf, I am formally demanding the following:

1. Immediately remove the Kimsey's residential address and Gayle Kimsey's personal telephone number from your campaign website and any other on-line materials under your control.
2. Remove or request removal of each social-media publication that you have posted, authorized or caused to be distributed containing their residential address and/or personal phone number.
3. Refrain from publishing, reposting or otherwise disseminating their residential address and/or phone number in the future.
4. Preserve all records concerning the acquisition, publication, authorization and dissemination of this information, including the original contact form submission, audio recording, webpages, social-media posts and related communications; and
5. Provide written confirmation within the next three business days that the requested removals have been completed.

Washington's anti-doxxing statute, RCW 4.24.792, specifically addresses the publication of a person's home address and telephone number as constituting personal identifying information. The statute authorizes a cause of action to recover compensatory and punitive damages, statutory damages of \$5,000 per violation, court costs and attorneys fees as well as the ability to obtain injunctive relief.

This is not an insignificant or trivial matter. Publication of the personal identifying information referenced herein has caused both Mr. and Mrs. Kimsey and Mrs. Kimsey in particular emotional and economic distress including the need to change phone numbers and concerns about her personal security and safety. Nor is the publication and dissemination of this information protected speech. There is no legal or rational justification for publishing and disseminating such personal identifying information of the spouse of an elected official. Doing so evidences a reckless disregard for what harm could result from its dissemination.

Please provide written confirmation of compliance with the actions requested herein within three business days of receipt of this letter.

Sincerely,
Ted H. Gathe PLLC

By: Ted H. Gathe
tedgathe@gmail.com
360-281-0868

C: Clients

