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FILED
MAR 19 2010
THOMAS R FALLQUIST
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

JEANETTE IVAN,

Plaintiff,

v.

ADAMS COUNTY,

Defendant.

No. **10201101-8**

COMPLAINT FOR DAMAGES

COMES NOW the plaintiff, by and through her attorneys of record and alleges as follows:

I. PARTIES & JURISDICTION

1.1. Plaintiff is an individual currently residing in King County, Washington. At all times relevant hereto, plaintiff was employed by defendant Adams County.

1.2. Defendant Adams County is organized under the laws of the State of Washington. It includes its agents and employees, including but not limited to employees of Adams County Sheriff's Office.

1.3. The conduct occurred in Adams County, Washington where the plaintiff worked and the defendant conducted business. Pursuant to RCW 36.01.050(1), all actions against any county may be commenced in the superior court of such county, or in the superior court of either of the two nearest judicial districts. Jurisdiction and venue are proper

1 in Spokane County as it is one of the two nearest judicial districts to Adams County.

2 1.4. A tort claim was filed in this matter pursuant to RCW 4.96 et seq., and sixty
3 (60) days have passed without resolution of the claim.

4 **II. STATEMENT OF FACTS**

5 2.1. Plaintiff was employed as a dispatcher with the Adam County Sheriff's
6 Office. In January 2007, plaintiff was tased at work by CO Robert Reynolds. Plaintiff
7 reported the tasing to her supervisor. He thought it was humorous.
8

9 2.2. Others heard about the incident and plaintiff's complaint and the tasing
10 became a widespread "joke" in the workplace. From the time of the initial tasing until she
11 resigned in May 2009, plaintiff suffered ongoing harassment by both co-workers and
12 supervisors. Most prevalent and disturbing was the continued use of tasers to frighten and
13 intimidate plaintiff. On a frequent basis, and occasionally several times in a day, tasers were
14 pointed at her as a threat. On several occasions, the Jail Commander touched a taser to
15 plaintiff's back or fired one at her at close range. On one day in particular, he pointed it at
16 the back of plaintiff's head and asked her "are you scared bitch?" Undersheriff John Hunt
17 was in the room and witnessed this incident, but did nothing.
18

19 2.3. In February 2009, plaintiff put her complaints in the form of an inter-office
20 memo and gave it to her supervisor, the 911 Coordinator. Undersheriff Hunt responded,
21 telling her he needed names and specifics. Plaintiff had provided names, dates, and specifics
22 several times over the previous two years and been retaliated against because of her
23 complaints. Plaintiff referred Hunt to her prior complaints, which he took as a refusal to
24 cooperate and took no action.
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e. Attorneys fees and costs pursuant to RCW 49.60 and RCW 49.48.030,
et. seq.

V. PRAYER FOR RELIEF

Judgment against defendant for damages set forth in this complaint, and for attorneys' fees and costs, pre-judgment interest and such other relief as the Court deems just and equitable.

DATED this 16th day of March, 2010.

SCHROETER, GOLDMARK & BENDER



REBECCA J. ROE, WSBA #7560
Counsel for Plaintiff