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2026 JAN 08 04:19 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
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THE SUPERIOR COURT OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

SARAH LEE

No.

Plaintiff,

**COMPLAINT FOR DAMAGES**

vs.

CITY OF SEATTLE a Washington  
Governmental entity, HAROLD D.  
SCOGGINS, in his official and individual  
capacities; ANDREA SCHEELE in her official  
and individual capacities.

1. **WHISTLEBLOWER violations of RCW 42.41 and SMC 4.20.800**
2. **RETALIATION violations of RCW 49.60. et seq. and/or Hostile Working Environment**
3. **WRONGFUL TERMINATION against PUBLIC POLICY in violation of RCW 42.56**
4. **PUBLIC RECORDS ACT violations of RCW 42.56 et seq.**
5. **PERSONNEL FILE EMPLOYEE INSPECTION violations of RCW 49.12.240-261**

Defendants.

COMES NOW, Plaintiff, by and through her attorneys of record, Beverly G. Grant, and Jeffrey Bradley of Beverly Grant Law Firm, P.S., alleges as follows and submits the following Complaint for Damages.

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**I. INTRODUCTION**

1.1 Plaintiff brings this case with five causes of action against Defendants because she engaged in specific whistleblower protected activity including opposing unlawful behavior, unsafe practices, harassment, and discrimination and suffered retaliation which included professional sabotage, meeting exclusions, ostracism, other adverse employment actions, and ultimately termination of her employment.

**II. PARTIES**

2.1 Plaintiff Sarah L. Lee (herein “Plaintiff”) at all times material hereto was over the age of eighteen (18), a resident of Pierce County, Washington and employed as a Director of Human Resources for the City of Seattle – Seattle Fire Department. Plaintiff, before her employment with the Seattle Fire Department, was employed as an Assistant City Attorney in the Employment Section of the Seattle City Attorney’s Office.

2.2 Plaintiff Sarah has resided in Washington State since November 1982. Plaintiff graduated from Henry Foss High School in 1990. Plaintiff attended and graduated from the University of Puget Sound with a Bachelor of Arts degree in Politics and Government, and minor in Public Administration in 1994. Plaintiff attended and graduated from Seattle University of Law School with a Juris Doctorate Degree in 1997.

2.3 Defendant City of Seattle is a municipality created under the laws of the State of Washington. The Seattle City Council is its governing body. The City of Seattle (“COS”) is an employer within the definition of RCW 49.60.040(1). Defendant City of Seattle has continuously had at least (15) employees and over 12,000 employees.

1           2.4     Defendant Harold Scoggins is the Fire Chief for the City of Seattle – Seattle  
2 Fire Department. He is the designated appointed authority of Seattle Fire Department (“SFD”)  
3 in accordance with SMC 4.04.030. Defendant Harold Scoggins, on information and belief, at  
4 all times material hereto, was a resident of King County, Washington and is employed by  
5 Defendant City of Seattle. All acts performed by Defendant Scoggins were performed on  
6 behalf of Defendant City of Seattle in his individual and official capacities and on behalf of  
7 his marital community and spouse, Abigail Scoggins. Defendant Scoggins served as one of  
8 Plaintiff’s direct supervisors. Plaintiff would interact with him daily, weekly, for purposes of  
9 providing the City with cogent advice based upon City codes, policies, and procedures.

10           2.5     Defendant Andrea Scheele is a Safety Civil Service Commission (“PSCSC”).  
11 She is the designated appointed authority of the Public Safety Civil Service Commission and  
12 Civil Service Commission in accordance with SMC 4.08.050.B. Defendant Andrea Scheele,  
13 on information and belief, at all times material hereto, was a resident of King County,  
14 Washington and is employed by Defendant City of Seattle. All acts performed by Defendant  
15 Scheele were performed on behalf of Defendant in her individual and official capacities and  
16 on behalf of her marital community and spouse, “John Doe” Scheele and/or “John Doe.”  
17 Defendant Scheele’s responsibilities include; directing activities instructed by the  
18 Commission, and managing department staff, preparing and approving department budget,  
19 preparing initial recommendation subject to the Commission’s final approval examination  
20 processes, supervising examination, determining questions of applicant eligibility, all of  
21 which are subject to review and modification by the Commission. Plaintiff Lee interacted with  
22 Defendant Scheele on a bi-weekly basis either in huddles and/or meetings.

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**III. JURISDICTION AND VENUE**

3.1 Jurisdiction is proper in this Court pursuant to RCW 2.08.010 because Plaintiff's claims arise under Washington state law.

3.2 Venue is proper in King County Superior Court pursuant to RCW 4.12.020(2) and RCW 4.12.020(3) because King County is where this cause of action arose, Defendants regularly conduct business, and where Defendants reside.

3.3 On October 30, 2025, Plaintiff executed a tort claim form with an attached tort claim narrative to the Seattle City Clerk's Office as required by RCW 4.96.020 and SMC 5.24.005. The City Clerk received the form and narrative on November 4, 2025. More than sixty (60) days have elapsed since the filing and receipt of Plaintiff's tort claim.

**IV. FACTS**

4.1 Plaintiff alleges that the Defendants' unlawful employment practices, misconduct, acts and/or omissions were intentional and were done with malice and /or with reckless indifference to Plaintiff's rights as protected by the Washington State Constitution, Washington laws, and Seattle Municipal Codes.

4.2 Plaintiff further alleges that the unlawful employment practices, misconduct, acts and/or omissions continue to the present time against Plaintiff including post-termination retaliation and against other current City employees.

4.3 Plaintiff further alleges that because of the Defendants' unlawful acts, she suffered, and continues to suffer harms and losses, which include economic and non-economic damages.

1           4.4     Plaintiff Sarah Lee is a dedicated, experienced and resolute trial attorney with  
2 30 years of legal experience in the areas of employment law, complex civil litigation,  
3 professional malpractice, labor arbitration, administrative law, and as prior public sector  
4 counsel.

5           4.5     Plaintiff's public service, legal experience started in May 1991 during college,  
6 with the Washington State Attorney General's Office, in the Consumer Protection Division  
7 as a Work-Study Consumer Representative, she mediated hundreds of complaints between  
8 individuals and businesses, assisted in consumer investigations for unfair and deceptive trade  
9 practices by unscrupulous businesses, and worked with the Washington State Department of  
10 Licensing to identify and report unlicensed collection agencies who were preying upon people  
11 residing in Washington. Plaintiff remained employed as Consumer Representative until her  
12 graduation from the University of Puget Sound in May 1994.

13           4.6     Plaintiff has tried over sixty (60) jury trials to verdict, including employment  
14 discrimination/harassment, catastrophic injury, professional malpractice, water trespass, and  
15 public records cases.

16           4.7     Beyond litigation and trial, Plaintiff's public service experience includes prior  
17 service as an Administrative Law Judge pro tem for the Office of Administrative Hearings,  
18 court-appointed arbitrator, court-appointed mediator, and Commissioner for the Tacoma  
19 Human Rights Commission.

20           4.8     Plaintiff also has been active in various equity-focused initiative across  
21 Washington State including specialty bar judicial evaluations, service on WSBA Professional  
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1 Responsibility Committee, WSBA Diversity Committee, Washington State Association for  
2 Justice, and City of Seattle Race and Social Justice Initiative as a co-lead.

3 4.9 In July 2018, Defendant City of Seattle hired Plaintiff for the position of  
4 Assistant City Attorney in the Employment Section of the Seattle City Attorney's Office.

5 4.10 As an Assistant City Attorney for the City of Seattle, from July 2018 through  
6 December 1, 2021, Plaintiff: provided strategic legal guidance to departments including the  
7 Police Department, Seattle City Light, Office of Civil Rights, Finance and Administrative  
8 Services, Office of Emergency Management, Department of Neighborhood and Seattle Fire  
9 Department, handling matters involving employment policies, collective bargaining,  
10 litigation, and equity-focused legal reform. She led consecutive, successful verdicts for the  
11 city in complex trials with proficient opposing counsel. She also achieved a successful  
12 decision upholding termination of a former SPD officer in a public safety civil service  
13 commission case, civil arbitration victories, and dismissals of federal employment cases at  
14 summary judgment on behalf of the City of Seattle.

15 4.11 From October 1, 2020, through December 7, 2021, Plaintiff reported to her  
16 immediate supervisors, Anne Vold and Zahraa Wilkinson. Anne Vold authored Plaintiff's  
17 2021 annual evaluation.

18 4.12 Plaintiff worked for the Seattle Attorney's Office until Seattle Fire Department  
19 recruited her to be its Human Resources Director in October 2021. After conducting multiple  
20 rounds of interviews with Plaintiff and other applicants, the Seattle Fire Department selected  
21 Plaintiff as its Director of Human Resources. December 7, 2021, was Plaintiff's last day with  
22 the Seattle City Attorney's Office.

1           4.13   On December 8, 2021, Plaintiff started working for the Seattle Fire  
2 Department. Plaintiff's job responsibilities included but were not limited to:

- 3           A) Managing internal and external workplace investigations conducted by SFD  
4           investigators and outside investigators retained by contract/agreement.
- 5           B) Supervising employee recruitment and hiring of uniformed and professional  
6           staff members in accordance with City personnel rules, collective bargaining  
7           agreements, municipal codes, and employment laws.
- 8           C) Administering City mandated performance management includes performance  
9           evaluations and personal improvement plans in accordance with City personnel  
10          rules, collective bargaining agreements, municipal codes, and employment laws.
- 11          D) Overseeing disability management including reasonable accommodation and  
12          workers compensation matters in accordance with City personnel rules,  
13          collective bargaining agreements, municipal codes, and employment laws.
- 14          E) Analyzing and recommending disciplinary and corrective action decisions in  
15          accordance with City personnel rules, collective bargaining agreements,  
16          municipal codes, and employment laws.
- 17          F) Representing SFD at City hearings, meetings, and work groups.
- 18          G) Provides directions on all employee relations issues and workplace concerns.
- 19          H) Ensures consistent administration of disciplinary policies and procedures in  
20          accordance with City personnel rules, collective bargaining agreements,  
21          municipal codes, and employment laws.

22           4.14   Plaintiff provided the Department's senior management with vital information  
and critical material on laws, policies, rules, and regulations that they were sworn to comply  
and enforce for the best interests of the Department and the City.

          4.15   On February 3, 2023, Seattle Fire Department Executive Director of  
Administration, Helen Fitzpatrick, Plaintiff's immediate supervisor, rated Plaintiff overall as  
"Exceeds Expectations" in the 2022 Annual Review for work performance noting:

- 1 • “She brings a wealth of knowledge to the role of HR Director and a strong  
2 work ethic.”
- 3 • “Her focus on updating/improving personnel practices is of tremendous benefit  
4 to the department.”
- 5 • “Sarah had to hit the ground running when she started with the SFD in  
6 December 2021. 2022 started out with the loss of the EEO investigator which  
7 forced her to essentially perform two jobs for nearly a year.”
- 8 • “Sarah has been an excellent addition to the SFD Leadership Team.”
- 9 • “The volume of work in HR over the past year is unprecedented with vaccine  
10 mandate related complaints and claims, department wide impacts of significant  
11 EEO investigations, employee hiring processes and employee separations and  
12 the ongoing adjustment to alternative work arrangements.”

13 4.16 “Exceeds Expectations” is the highest possible rating a supervisor or manager  
14 can give their employee. It is described as “Performance consistently exceeds the ‘fully  
15 performing’ standard in an exemplary and impactful way.”

16 4.17 On February 28, 2024, Helen Fitzpatrick rated Plaintiff overall as “Exceeds  
17 Expectations” in the 2023 Annual Review for work performance noting:

- 18 • “Sarah has been instrumental this year in helping the department navigate a  
19 particularly challenging rule to PSCSC Rule 10.03. She researched and made a  
20 compelling argument why the rule change was not beneficial to the department.  
21 While the PSCSC did not ultimately did not adopt all of Sarah’s recommended  
22 changes, the outcome was better for her intervention.”
- “Sarah has also worked to improve processes related to investigations ADA  
accommodations, EEO policies, and changes of rules, policies, and procedures.”
- “Sarah is diligent about applying an equity lens to department policymaking and  
advocates for change in areas that have historically been overlooked.”
- “She is committed to ensuring all SFD employees are treated fairly and  
equitably.”

- 1 • “Sarah communicates with many internal and external constituents daily on a  
2 wide variety of topics from changing HR policies to union grievances and  
3 investigation to disability accommodation.”
- 4 • “She keeps employees informed regarding HR processes, monitors  
5 performance evaluations in E3, serves as the department lead for the Workday  
6 project, alternative work agreements and training opportunities.”

7 4.18 On April 30, 2025, Helen Fitzpatrick rated Plaintiff overall as “Exceeds  
8 Expectations” in the 2024 Annual Review for work performance noting:

- 9 • “Sarah demonstrates strong analytical skills in troubleshooting and resolving  
10 the many complex, unique and unanticipated Human Resource issues that arise  
11 in the SFD.”
- 12 • “She is actively engaged in strengthening relationships and communication  
13 with SFD’s labor partners to help achieve our common goals.”
- 14 • “Sarah delivers quality work and holds herself and the HR Division to very  
15 high standards.”
- 16 • 2024 was a particularly challenging year as a key individual [the EEO  
17 investigator Jyl Shaffer] in the HR Division was not performing at an  
18 acceptable level resulting in a month’s long performance improvement plan  
19 and eventual separation. This contributed to what is already an extremely  
20 heavy workload for Sarah.”
- 21 • “She pays close attention and communicates to leadership on issues and  
22 policies that could potentially compromise the integrity of the department and  
the city.”
- “She has been a critical resource in helping SFD navigate through ongoing  
legal issues related to emergency responses, HR investigations, and other  
matters the department is facing.”
- “Sarah fully supports the City’s Race and Social Justice Initiative with her  
commitment to fostering and maintaining workforce equity.”
- Sarah is an engaged leader of the Human Resources team and a resolute  
member of the SFD Leadership Team.

- “The work of the Human Resources Division doesn’t always receive recognition but is a critical function of the SFD. Sarah effectively leads the work of the team to support the SFD’s nearly 1,200 employees. She takes the initiative to improve and update SFD HR processes.”

4.19 Plaintiff was selected for the Executive Leadership Academy and nominated for the “Civilian of the Year” Award in 2024.

4.20 Plaintiff received along with her HR team and payroll team an Administrative Citation, “for excellence and proficiency in the performance of duty” for work involving implementation of Defendant City of Seattle’s human resources information system – Workday.

**V. FIRST CAUSE OF ACTION:  
WHISTLEBLOWER VIOLATIONS OF RCW 42.41 & SMC 4.20.800  
AGAINST ALL DEFENDANTS**

5.1 Plaintiff adopts by reference the preceding paragraphs as though they were alleged herein. Plaintiff further asserts the following:

5.2 During Plaintiff’s employment with the Defendant, Plaintiff reported multiple instances of unsafe conduct in the Fire Department by firefighters that posed a risk to public safety.

5.3 In 2025, the frequency of Plaintiff’s whistleblowing activity increased because of the 2024 incidents and evolved to include various City of Seattle upper management.

5.4 Sometime near March 31, 2025, Plaintiff reported public safety concerns to her: immediate supervisor, Helen Fitzpatrick, SFD Executive Director of Administration. Her concerns were about a firefighter dispatcher who responded to 911 calls while visibly and

1 audibly inebriated. Plaintiff recommended a fit for duty evaluation and communicated with  
2 the dispatcher's chain of command to arrange the evaluation.

3 5.5 The dispatcher's chain of command did not communicate back.

4 5.6 On April 8, 2025, Helen Fitzpatrick informed Plaintiff that the dispatcher was  
5 on administrative leave for the next three scheduled shifts.

6 5.7 Plaintiff again recommended to Helen Fitzpatrick that the dispatcher undergo  
7 a fit for duty evaluation to ensure that he can perform the essential functions of his job safely.

8 5.8 Plaintiff reviewed the dispatcher's personnel file. The file revealed that the  
9 dispatcher had a long-standing pattern of alcohol abuse that negatively affected his work  
10 performance for years and that SFD's upper management including Helen Fitzpatrick, and  
11 Fire Chief Harold Scoggins had known about this dispatcher's history.

12 5.9 On or about August 13, 2025, Plaintiff learned that the dispatcher had worked  
13 while again inebriated on August 10, 2025. Plaintiff again recommended to Helen Fitzpatrick  
14 that a fit for duty be conducted and also informed her that she (Plaintiff) would be opening an  
15 investigation as to why this dispatcher was able to continue to show up for work and work a  
16 24-hour shift while visibly and audibly intoxicated.

17 5.10 Plaintiff informed the dispatcher's Local 27 union executive board members  
18 Dallas Baker and Kenny Stuart telephonically of both incidents, the fit for duty  
19 recommendation, and upcoming investigation.

20 5.11 Within a few weeks of the August 13, 2025, communications, Plaintiff had  
21 discovered after the fact that the dispatcher had "retired."  
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1           5.12 Helen Fitzpatrick and Defendant Harold Scoggins knew about the dispatcher's  
2 plans to retire but did not tell Plaintiff.

3           5.13 Defendants repeatedly ignored the recommendations made by Plaintiff to their  
4 detriment and the public. This practice created a hostile working environment for Plaintiff  
5 causing her severe and unwanted emotional trauma and stress for which she seeks damages.  
6 to be proven at the time of trial.

7           5.14 In late August 2025, Plaintiff was informed that two, partially filled, alcohol  
8 cans were found in the locker of a firefighter driver.

9           5.15 This firefighter driver had struggled with alcohol addiction during his SFD  
10 career. Plaintiff had previously arranged a fit for duty evaluation in 2023, and the firefighter  
11 driver received in-patient and outpatient treatment.

12           5.16 Despite treatment, the firefighter driver continued to struggle with his  
13 addiction, and it resulted in him exhausting all paid and unpaid protected leave.

14           5.17 The firefighter driver continued to take unauthorized leave and received  
15 corrective action in December 2024.

16           5.18 After learning about the cans of alcohol and continued unauthorized leave,  
17 Plaintiff informed Helen Fitzpatrick that the firefighter driver had no protected leave and it  
18 was against SFD policy and City policy to allow to take leave the firefighter driver did not  
19 have.

20           5.19 Plaintiff also reported to Helen Fitzpatrick that Local 27 Executive Board  
21 Member Liam Roney had orchestrated the firefighter driver's unauthorized leave with a sham  
22 vacation "borrowing" scheme, which was against SFD and City policy.

1           5.20 Plaintiff informed Defendant Harold Scoggins about the partially filled cans  
2 of alcohol found in the firefighter driver’s locker.

3           5.21 Plaintiff informed Assistant Chief of Operations, Bryan Hastings, who was  
4 also second in command, about the partially filled cans of alcohol in the firefighter driver’s  
5 locker.

6           5.22 Plaintiff implored Assistant Chief Hastings to not allow this firefighter to drive  
7 SFD fire engines because the firefighter driver was drinking alcohol while at work and  
8 driving, which posed serious safety and liability issues for SFD specifically and the City.

9           5.23 The Defendants City of Seattle and Harold Scoggins are aware of the  
10 ramifications on the public and its employees for failing to take corrective action towards a  
11 city employee who violates City policies and state laws. Less than 5 years prior, Defendant  
12 City of Seattle had paid a record setting \$65.75 million dollar settlement in January 2019 to a  
13 lawyer Brooke Taylor and her family because a SFD ambulance driver drove through a red  
14 light in April 2016 without stopping or slowing down and collided into Taylor’s automobile.  
15 This automobile injury settlement was and still is the largest automobile collision settlement  
16 in Washington state history. Defendant Harold Scoggins was SFD’s fire chief at the time of  
17 the collision.

18           5.24 Assistant Chief Hasting’s constant responses to Plaintiff’s repeated safety  
19 concerns were Seattle Fire District had a driver’s shortage and that he would need “to look at  
20 options” with the staffing lieutenant. During Plaintiff’s employment and to her knowledge,  
21 Assistant Chief Hastings never changed his stance.  
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1           5.25 Defendant Harold Scoggins, Helen Fitzpatrick, and Assistant Chief of  
2 Operations Bryan Hastings refused to take any mitigation efforts after Plaintiff's  
3 recommendations and reported safety concerns.

4           5.26 The firefighter driver continued the drive SFD fire engines after Plaintiff was  
5 wrongfully terminated.

6           5.27 On or about November 4, 2025, Seattle Police responded to a call from an SFD  
7 employee who had observed the firefighter driver at work while under the influence of  
8 alcohol.

9           5.28 On June 13, 2023, SFD firefighter driver Alan Heddings backed the fire engine  
10 he was driving into firefighter Shayna Pichler pinning her body up against Station 10's  
11 apparatus door frame at chest height.

12           5.29 Firefighter driver Alan Heddings was unaware he had backed the fire engine  
13 into Shayna Pichler and continued to back the fire engine an additional 1-2 feet, which caused  
14 Pichler's body to rotate and lift off the ground.

15           5.30 Another firefighter had to open the passenger front door and tell driver Alan  
16 Heddings to pull the fire engine forward.

17           5.31 As a result of SFD Alan Heddings actions and/or omissions, the female  
18 firefighter, sustained serious personal injuries.

19           5.32 In fact, on May 25, 2025, Firefighter Driver Heddings had at least 8  
20 preventable collisions. Yet, Heddings received no suspension. Despite these incidents no  
21 progressive discipline was ever initiated. Heddings merely was told "don't do it again."  
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1 Instead, at Defendant Scoggins' direction a Driver Instructor position was created and  
2 authorized by Defendant Scoggins that it be given to Heddings.

3 5.33 Washington State Labor and Industries investigated the incident, and Plaintiff  
4 was aware of the investigation.

5 5.34 SFD received a monetary citation because of the investigation.

6 5.35 On May 13, 2024, Defendant City of Seattle was served Shayna Pichler's  
7 signed claim form.

8 5.36 Defendant City of Seattle did not settle Shayna Pichler's tort claim within 60  
9 days of receipt.

10 5.37 On November 1, 2024, Shayna Pichler filed her Complaint for Damages and  
11 Summons against Defendant City of Seattle, Seattle Fire Department, and "John Does" 1-5 in  
12 King County Superior Court.

13 5.38 King County Superior Court issued a Case Schedule Order and assigned  
14 Shayna Pichler's Complaint for Damages case number 24-2-25461-7 SEA.

15 5.39 In May 2025, Plaintiff learned that firefighter driver Alan Heddings had two  
16 subsequent preventable collision incidents after the June 13, 2023, backing incident.

17 5.40 Plaintiff reviewed Alan Hedding's personnel file and focused on his history of  
18 preventable collisions. Alan Hedding's preventable collision history is significant with  
19 multiple preventable collisions.

20 5.41 Plaintiff noticed the two most recent preventable collisions after June 13, 2023,  
21 did not have the required Form 250 corrective action documentation.

1           5.42 Plaintiff reported the missing Form 250 forms for the two subsequent  
2 preventable collisions to Helen Fitzpatrick and recommended to her that Alan Heddings not  
3 drive due to his prior history and continuing preventable collisions. Helen Fitzpatrick  
4 suggested to Plaintiff that she speak with Assistant Chief Bryan Hastings.

5           5.43 Plaintiff personally met with Assistant Chief Hastings in his office and  
6 discussed Alan Heddings, history of preventable collisions, the open and active lawsuit  
7 regarding the Pichler preventable collision, and the two subsequent preventable collisions,  
8 which were missing Form 250 documentation.

9           5.44 Assistant Chief Hasting is responsible for managing preventable collisions of  
10 firefighter drivers at SFD and signs off on every preventable collision Form 250 corrective  
11 action notice.

12           5.45 Plaintiff strongly recommended Assistant Chief Hastings not allow Alan  
13 Heddings to drive any SFD fire apparatus and act as a driver instruct at recruit firefighter  
14 school due to his extensive history of preventable collisions and the serious injury to Shayna  
15 Pichler of which there was an active lawsuit against Defendant City of Seattle and Seattle Fire  
16 Department.

17           5.46 Assistant Chief Hastings said he was reluctant to pulling Alan Heddings out  
18 of his assignment as firefighter driver because of SFD's driver shortage.

19           5.47 In August 2025, a firefighter filed a union grievance against Defendant Seattle  
20 Fire Department for not being paid for overtime when the firefighter's lunch and/or meal  
21 break was interrupted by work.  
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1           5.48 Plaintiff informed Defendant Harold Scoggins, Assistant Chief Bryan  
2 Hastings, Assistant Chief of Fire Prevention Timothy Munnis, and Helen Scoggins that if any  
3 SFD employee was on a lunch and/or rest break that was interrupted by work, SFD was  
4 obligated by law to pay the employee the full-half hour for interrupted rest and/or meal breaks.

5           5.49 Defendant Harold Scoggins voiced his strong objection to paying SFD  
6 employees for interrupted lunch and/or rest breaks. He admitted that the amount of back pay  
7 and penalties for years of non-payment of interrupted meals and/or rest breaks would be  
8 substantial.

9           5.50 Plaintiff asserts that her continuous advocacy for compliance with state  
10 regulations regarding injured workers resulted in her termination. Further, the defendants'  
11 reluctance to address backpay and penalties for noncompliance and issues pertaining to  
12 employees' medical leave and worker's compensation created a continuous hostile working  
13 environment for her.

14           5.51 On or about September 2, 2025, Plaintiff met with Helen Fitzpatrick and  
15 Andrew Camus, Manager of the City's Worker's Compensation Unit, the new SFD Disability  
16 Captain, and Assistant City Attorney Karen Khloe regarding SFD internal worker's  
17 compensation-related policies and procedures which were inconsistent and contrary to state  
18 L&I regulations, in the area of submission of forms by injured employees. Andrew Camus  
19 was concerned about confusion and undue pressure being placed on injured employees to  
20 complete certain forms by a certain time frame.  
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1           5.52 Karen Khloe reviewed SFD’s forms, policies, and procedures regarding  
2 injured or ill employees (Policies and Operating Guideline 3006) and the plan was for her to  
3 send over proposed revisions to SFD for change and implementation.

4           5.53 Plaintiff informed Defendant Harold Scoggins about the meeting and then after  
5 receiving the proposed revisions from Karen Khloe to Scoggins.

6           5.54 Plaintiff informed Defendant Harold Scoggins, she had sent him the proposed  
7 revisions and stated that he questioned whether SFD had to comply with legal’s  
8 recommendations.

9           **Moving Female Deputy Chief to Smaller Office**

10          5.55 In July 2025, Plaintiff was informed that Defendant Harold Scoggins and  
11 Assistant Chief Bryan Hastings had moved a female deputy chief’s office, which was larger,  
12 to a much smaller office in an obscure location, the Mezzanine, and relocated a lower ranked  
13 male staffing lieutenant to the female chief’s former office.

14          5.56 The female deputy chief had previously expressed concerns about insurance  
15 coverage for medical treatment of her significant other, which was publicized.

16          5.57 Plaintiff had just reviewed a lawsuit complaint recently filed by another female  
17 firefighter at another local fire department, which alleged the firefighter was being subjected  
18 to unlawful discriminatory treatment based on her gender and sexual orientation.

19          5.58 The lawsuit was filed by the same law firm which SFD had litigated against  
20 three separate times for alleged disability discrimination and ADA failure to accommodate.  
21 Plaintiff was the central point person for those three lawsuits.

1           5.59    On August 4, 2025, Plaintiff reported her concerns about SFD’s relocation of  
2 a female deputy chief to a smaller office to accommodate a lower ranked male lieutenant to  
3 Helen Fitzpatrick.

4           5.60    Plaintiff specifically mentioned to Helen Fitzpatrick the recent case that was  
5 filed by the same law firm SFD had litigated against for the recruit injury cases. She provided  
6 the case, *Moffatt v. Eastside Fire & Rescue*, King County Superior Court Case No. 25-2-  
7 21758-6.

8           5.61    Helen Fitzpatrick told Plaintiff that she was hesitant to discuss Plaintiff’s  
9 concerns to Defendant Harold Scoggins.

10          5.62    In June 2024, City of Seattle Public Safety Civil Service Commission (PSCSC)  
11 – Exams Unit was administering written tests for Battalion Chief promotional applicants.

12          5.63    During the written test, exam unit personnel claimed they saw two black SFD  
13 captains being disruptive.

14          5.64    Defendant Andrea Scheele contacted Plaintiff about the alleged incident  
15 during the written examination.

16          5.65    Plaintiff informed Defendant Scheele that if PSCSC was seeking some type of  
17 corrective action to be taken against the captains, that it would need to be investigated by  
18 SFD, as that was within the parameters with City personnel rules, SFD policy, collective  
19 bargaining agreements and PSCSC’s own rules of procedure.

20          5.66    At that time, Defendant Scheele did not raise any issues to Plaintiff about  
21 whether the alleged conduct affected their eligibility to finish the promotional process or  
22 somehow be disqualified from the promotional process.

1           5.67 Plaintiff was aware that PSCSC’s rules govern the test/examination process.

2           5.68 Based on Plaintiff’s discussion with Defendant Scheele, Plaintiff opened an  
3 investigation file to determine whether corrective action was warranted by the alleged conduct  
4 of the two captains.

5           5.69 Plaintiff received three written statements from exams unit personnel from  
6 Defendant Scheele.

7           5.70 Plaintiff reviewed the captains’ shift scheduled and saw that one of the  
8 captain’s was out on protected medical leave and based on the nature of the leave, stayed the  
9 investigation until the captain returned to full duty, pursuant to City ordinances, personnel  
10 policies and state laws.

11           5.71 When one captain returned to full duty in March 2025, the other captain was  
12 out on similar type of leave. Plaintiff emailed Defendant Scheele about delays, the protected  
13 leaves, and hiring of a new workplace investigator to replace the one who separated in January  
14 2025.

15           5.72 A new investigator was subsequently hired and assigned by Plaintiff to  
16 investigate the alleged June 2024 incidents involving the two Black captains.

17           5.73 On August 6, 2025, Plaintiff spoke with SFD HR Manager Midori (“Dori”)  
18 Towler in Towler’s office. Dori Towler informed Plaintiff that she was part of the promotional  
19 development committee process and was in a meeting with PSCSC exam unit personnel.

20           5.74 Dori Towler told Plaintiff that Yoshiko Mastui was vocally adamant about  
21 not having the two Black captains serve on any of their promotional development committees.  
22

1           5.75   Dori Towler stated she received an email from Yoshiko Matsui which inquired  
2 whether the current roster of promotional developmental committee applicants, which  
3 included the two Black captains, participated in any pending investigations or which SFD had  
4 concerns about. Towler stated that just because Yoshiko doesn't like the two captains, which  
5 was not a good reason to exclude them from the committee.

6           5.76   Plaintiff requested Dori Towler to forward the email and that Plaintiff would  
7 respond.

8           5.77   Plaintiff reviewed the email, which was also sent to Helen Fitzpatrick. On  
9 August 7, 2025, Plaintiff responded to the email informing Yoshiko Matsui that merely being  
10 involved in an investigation should not bar or disqualify any SFD member from committee  
11 consideration and that this was based on due process principles and workplace investigation  
12 principles. Plaintiff stated she did not have any concern about any of the applicants being on  
13 the promotional committee.

14           5.78   On August 8, 2025, PSCSC exams unit manager Mike Nelson responded to  
15 Plaintiff's email and thanked her for sharing her perspective about the eligibility of members  
16 for the committee. Mike Nelson claimed that SFD historically shared investigation  
17 information with the unit.

18           5.79   Plaintiff responded to Mike Nelson's email emphasizing that Plaintiff was not  
19 basing her answer merely on perspectives but based on SFD and City policies. Plaintiff also  
20 informed Mike Nelson that one of the Black captains made a discrimination complaint against  
21 Yoshiko Matsui and warned him that there was a risk by PSCSC that in excluding that  
22 member, it could be seen as further discrimination and retaliation.

1           5.80    On September 9, 2025, Plaintiff emailed Helen Fitzpatrick and Defendant  
2 Harold Scoggins a written response regarding PSCSC’s repeated requests for information  
3 about pending investigations and involvement of promotion committee applicants.

4           5.81    Plaintiff cited SFD Policy 3003, SFD Policy 3011, and City Personnel Rule  
5 1.1.7 language, which explicitly required 1) investigation information be kept confidential as  
6 permitted by law; and 2) inform all witnesses and involved parties that retaliation during an  
7 investigation was prohibited.

8           5.82    Plaintiff had previously recommended to Defendant Harold Scoggins that  
9 promotion committee selection process needed to be more transparent because multiple SFD  
10 employees who were members of the Seattle Black Firefighters Association had expressed  
11 that the committee selection process was discriminatory and inequitable.

12           5.83    In October 2024, Plaintiff received a complaint from a female fighter of color  
13 employee who was working in the Fire Prevention Division – New Construction Unit. This  
14 employee alleged acts of race discrimination, gender discrimination against her immediate  
15 supervisors and chain of command.

16           5.84    Plaintiff opened an investigation and conducted intake interviews of other  
17 female employees who were working and/or assigned to work in the New Construction Unit.

18           5.85    Plaintiff conducted several intake interviews of complainants and witnesses  
19 who alleged their chain of command were treating the female employees less favorably than  
20 male employees in the unit in terms of acting pay, workload, and other tangible items.

1           5.86 After conducting the interviews intake, Plaintiff worked with the City  
2 Attorney's Office to retain an outside investigator and have City Human Resources  
3 Investigation Unit facilitate further interviews and document gathering.

4           5.87 The allegations of misconduct involved Assistant Chief of Fire Prevention  
5 Timothy Munnis, whom Plaintiff had interacted with frequently as that division had more  
6 than one-third of SFD's professional staff situated there.

7           5.88 Between October 2024 and September 2025, Assistant Chief Tim Munnis  
8 would verbally make fun and/or complain about the witnesses and reporting parties to  
9 Plaintiff.

10          5.89 Plaintiff communicated both verbally and in writing to Assistant Chief Tim  
11 Munnis to stop speaking negatively about the witnesses and reporting parties because his  
12 conduct could be construed as retaliatory and be seen as further evidence of discriminatory  
13 intent.

14          5.90 Assistant Chief Tim Munnis continued to berate witnesses and parties and  
15 complain about the investigation to Plaintiff. The hostile work environment intensified and  
16 emotionally affected Plaintiff.

17          5.91 Plaintiff reported Assistant Chief Tim Munnis' actions in person to Defendant  
18 Harold Scoggins who told Plaintiff that he (Defendant Scoggins) would speak to Munnis about  
19 her concerns.

20          5.92 In September 2025, Defendant Harold Scoggins expressed support for  
21 Assistant Chief Munnis' actions. Plaintiff informed Scoggins that the investigation was not  
22 finished and that anti-retaliation and confidentiality obligations still applied.

1           5.93    In late July 2025, Plaintiff reported to Helen Fitzpatrick that the fire prevention  
2 investigation was missing critical records that Plaintiff had previously provided to the City  
3 Attorney’s Office but had not been received by the outside investigator.

4           5.94    In August 2025, Plaintiff reported to Helen Fitzpatrick that HRIU did not apply  
5 the correct policies which Plaintiff had provided to HRIU personnel and the outside  
6 investigator.

7           5.95    Plaintiff further reported the report contained ad hominem opinions and was  
8 not objective, thorough, and complete as required by SFD and City policies. Specifically,  
9 Plaintiff: a) identified factual errors and stereotypical racial tropes in the report concerning  
10 Jane Doe 1; b) missing intake documents and incomplete evidence incorporation as the report  
11 did not incorporate Department policies and relief solely on City Personnel Rule 1.1.; c)  
12 Plaintiff consistently emphasized the need for thorough investigations as mandated by  
13 Department and City ordinances and policies.

14           5.96    Plaintiff also reported her concerns about the objectivity of the report and  
15 HRIU’s management of the investigation to City Human Resources Director Kimberly  
16 Loving in an email.

17           5.97    During Plaintiff’s employment tenure at SFD the frequency and seriousness of  
18 complaints of sexual harassment and gender discrimination by female firefighters sharply  
19 increased, which resulted in multiple investigations and disciplinary recommendation which  
20 match the gravity of the misconduct.

21           5.98    Plaintiff repeatedly informed and stressed to Defendant Harold Scoggins,  
22 Helen Fitzpatrick and all of the other Assistant Chiefs, the necessity of taking prompt,

1 remedial corrective action to stop ongoing alleged discrimination and/or harassment and  
2 prevent further discrimination, harassment and retaliation from occurring to female  
3 firefighters making the allegations, as mandated by law.

4 5.99 In 2022, Plaintiff recommended to Scoggins, Fitzpatrick and the Assistant  
5 Chiefs that a Captain who had been alleged to have sexually harassed a younger, female  
6 firefighter to be placed on paid administrative leave so that she wouldn't fear him stalking  
7 and/or otherwise communicating with her.

8 5.100 In 2023, Plaintiff reported and recommended two male firefighters who threw  
9 another female firefighter's personal items in the garbage either reimburse her as they had  
10 previously agreed to in writing or be subject to corrective action because their conduct  
11 violated SFD and City policies.

12 5.101 Plaintiff continued making her recommendation for over two additional years  
13 into August 2025.

14 5.102 On or about May 2, 2025, Plaintiff recommended another male Captain should  
15 be placed on paid administrative leave pending an allegation by a female lieutenant that the  
16 male Captain was creating a hostile work environment for her because she was the only female  
17 at the fire station.

18 5.103 On May 28, 2025, during a meeting with Seattle Firefighter Women's  
19 Alliance, Plaintiff informed the group, which included Scoggins and Fitzpatrick that the law  
20 required her to take prompt, remedial corrective action after Alliance members expressed their  
21 concerns about additional discrimination, harassment, and retaliation of members who made  
22 discrimination and harassment complaints.

1           5.104 Plaintiff further alleges that Defendant Harold Scoggins had an overall  
2 preference to support male firefighters and officers over female firefighters and officers in the  
3 terms and conditions of their employment.

4           5.105 In late July or early August 2025, Plaintiff met with Assistant Chiefs and  
5 Defendant Harold Scoggins in his office to explain why she had placed the Captain on paid  
6 administrative leave. Prior to her meeting, she observed that Defendant Harold Scoggins and  
7 the Assistant Chiefs were huddled in a private closed-door meeting without her. Upon her  
8 entrance, Plaintiff felt hostility towards her by Defendant Harold Scoggins and the Assistant  
9 Chiefs, Munnis, Hastings. Assistant Chief Lombard remained silent.

10           5.106 Plaintiff informed Defendant Harold Scoggins that Assistant Chief Hastings  
11 previously had agreed (while on a team's meeting with a battalion and deputy chief) to have  
12 the Captain placed on paid administrative leave. However, at this same meeting, Hastings  
13 denied that he had given permission to Plaintiff Sarah Lee to place the Captain on  
14 administrative leave.

15           5.107 Hastings became belligerent, raised his hands, shook his head strenuously, and  
16 intensified his voice, yelling at Plaintiff stating that he never agreed to that. Plaintiff  
17 emphasized that previously he had given his permission and that the law obligated SFD to  
18 take prompt, remedial, corrective action to stop the alleged harassment and/or discrimination,  
19 and to prevent any further discrimination, harassment, and retaliation.

20           5.108 Plaintiff reminded Hastings of a second time where two other people on the  
21 teams meeting had heard him give permission.  
22

1           5.109 Plaintiff also provided the chiefs with written copies of (a) EEOC guidance  
2 regarding prompt, corrective, remedial measures, and (b) copy of a 9<sup>th</sup> Circuit court of appeals  
3 opinion, *Fried vs. Wynn Las Vegas*, No. 20-15710, which illustrated what the measures should  
4 look like in a hostile work environment claim. Defendant Harold Scoggins and the assistant  
5 Chiefs believed that officers who were male or a Captain or above should not be placed on  
6 administrative leave.

7           5.110 Plaintiff reported her concerns to Helen Fitzpatrick about Defendant Harold  
8 Scoggins's decision not to speak with another female deputy chief after she had witnessed a  
9 homicide outside of SFD headquarters in 2025. Plaintiff stated that when trauma impacts male  
10 firefighters, Scoggins is quick to do a wellness check-in with them.

11           5.111 During every investigation which involved gender discrimination, sexual  
12 harassment, and sexual assault, Plaintiff continued to report to the Defendant Harold Scoggins  
13 and assistant chiefs and Fitzpatrick the obligation to protect those who allege that they are  
14 being sexually harassed, retaliated, and/or discriminated against.

15           5.112 Plaintiff intervened to prevent Assistant Chief Hasting from engaging in racial  
16 discrimination for Administrative Staff Assistant and Administrative Specialist positions in  
17 Operations. Hastings tried to circumvent HR hiring policies and EEO policies by influencing  
18 the hiring panel decision to select a white, male applicant who had been a temporary employee  
19 rather than the acting ASA, a Black woman who had been employed with SFD for years.

20           5.113 Plaintiff interacted and ensured there was no injection of bias with the final  
21 hiring panel so that every applicant received a fair opportunity for the position.  
22

1           5.114 Plaintiff intervened a second time to prevent Assistant Chief Hastings from  
2 manipulating the hiring panel to hire his preferred candidate who was a temporary employee.  
3 The acting Administrative Specialist, a Black woman, had also been with SFD for over 10  
4 years. Plaintiff reconstructed a new hiring panel for a second round of interviews so that every  
5 applicant received the same opportunity to be considered for the position.

6           5.114 In August 2025, plaintiff made a public records request to obtain investigation  
7 report records of SFD employees who lodged complaints and/or were the subject of  
8 complaints, as well as lists of all HRIU complaints it received from 2022 through August  
9 2025.

10           5.115 Plaintiff requested the information in order to ascertain whether a PSCSC  
11 exams unit employee had self-reported the black captain's race discrimination complaint,  
12 whether statements the former EEO investigator had said to Plaintiff regarding Helen  
13 Fitzpatrick were true regarding Plaintiff, to understand how many of complaints received by  
14 HRIU are fully investigated.

15           5.116 In September 2025 when Plaintiff was placed on paid administrative leave  
16 pending separation, she requested copies of her personnel files from SFD and from the City  
17 Attorney's Office in accordance with RCW 49.12.260.

18           5.117 The policy underlying Washington's whistleblower statute for local  
19 government employees, RCW 42.41.010 is that they should be encouraged to disclose  
20 improper governmental actions of local government officials and employees.  
21  
22

1           5.118 The purpose of RCW 42.41 is to protect local government employees who  
2 made good faith reports to appropriate governmental bodies and provide remedies to  
3 employes who are subjected to retaliation for having made such reports.

4           5.119 Washington's whistle-blower provisions are intended to encourage those with  
5 knowledge of institutional wrongs to come forward to safeguard the public.

6           5.120 Seattle Municipal Code 4.20 is City of Seattle's Whistleblower Ordinance.  
7 Two of its primary purposes is to encourage employees to report in good faith assertions of  
8 improper governmental action and to provide employees with a clear process for making  
9 reports; and provide City employees protection from retaliatory action for making a good faith  
10 report or being perceived as making a report, or cooperating or being perceived as cooperating  
11 in any subsequent inquiry or investigation.

12           5.121 Plaintiff alleges that she engaged in whistleblower activity as defined in RCW  
13 42.41 and SMC 4.20 as previously asserted in paragraphs 4.2, and 5.1 through 5.109.

14           5.122 These practices created a hostile working environment for Plaintiff causing her  
15 severe and unwanted emotional trauma and stress for which she seeks damages. to be proven  
16 at the time of trial.

17                           **VI. SECOND CAUSE OF ACTION:**  
18                           **RETALIATION AND/OR HOSTILE WORK ENVIRONMENT**  
19                           **VIOLATIONS OF RCW 49.60. ET SEQ AGAINST ALL DEFENDANTS**

20           6.1 Plaintiff adopts the preceding paragraphs by reference as fully alleged and  
21 further states the following facts:

22           6.2 Plaintiff was excluded from SFD executive team meetings after informing the  
team of SFD's legal obligation to pay SFD employees for interrupted meals and/or rest breaks.

1           6.3     Defendant Harold Scoggins made condescending comments to Plaintiff about  
2 how she did not understand past practice of fire service working conditions and the fact she  
3 was a lawyer was of little significance considering his years of being a fire service leader.

4           6.4     Defendant Harold Scoggins made ongoing, derogative comments about  
5 injured employees who had not yet returned to full duty and light duty in Plaintiff's presence,  
6 which were unwelcome and offensive.

7           6.5     One comment made by Defendant Harold Scoggins was, "I know what we can  
8 do to get them back to duty, we should all line them up and then whack them with a 2x4:"

9           6.6     In 2025, Defendant Harold Scoggins, Assistant Chief Hastings, and Helen  
10 Fitzpatrick did not inform Plaintiff about the multiple shootings that occurred next to SFD  
11 Headquarters where bullets had penetrated the building at the time SFD employees were there  
12 working their shifts.

13          6.7     Defendant Harold Scoggins, and Helen Fitzpatrick would have meetings with  
14 Local 27 members that Plaintiff should have been present as part of her job responsibilities  
15 but not tell Plaintiff.

16          6.8     Defendant Harold Scoggins and Helen Fitzpatrick permitted Local 27 board  
17 members to disparage Plaintiff to other SFD employees and make false statements about what  
18 Plaintiff had said with respect to investigations involving discrimination and/or sexual  
19 harassment.

20          6.9     Helen Fitzpatrick allowed the former EEO investigator to be insubordinate to  
21 Plaintiff even though the investigator's conduct was expressly prohibited by SFD and City  
22 policies and personnel rules.

1           6.10 Defendant Harold Scoggins and the executive leadership team would have  
2 secret team huddles before Plaintiff joined them for meetings.

3           6.11 Defendant Andrea Scheele deliberately made untrue and stigmatizing  
4 statements about Plaintiff's relationship with PSCSC members.

5           6.12 Defendant Andrea Scheele retaliated against Plaintiff by having Plaintiff  
6 excluded as PSCSC's main contact because Plaintiff refused to violate SFD and City policies  
7 regarding investigation confidentiality, anti-retaliation, and due process rights for the two  
8 Black captains who had applied to be on PSCSC's promotional development committee.

9           6.13 Helen Fitzpatrick had separate meetings with HRIU meetings and made  
10 negative comments about Plaintiff's reported concerns about the objectivity and completeness  
11 of the fire prevention investigation report.

12           6.14 Defendants retaliated against Plaintiff by terminating her employment because  
13 she refused to turn a blind eye to significant and serious unsafe acts which endangered SFD  
14 employees and the public.

15           6.15 Defendants retaliated against Plaintiff by terminating her employment because  
16 she kept holding employees accountable to SFD policies, City personnel rules, and  
17 Washington laws, which all employees are required to follow.

18           6.16 Defendant Harold Scoggins and Helen Fitzpatrick retaliated against Plaintiff  
19 by telling other HR employees that Plaintiff was going to be fired and walked out before  
20 September 9, 2024.

21           6.17 Defendants retaliated against Plaintiff by excluding her from meetings and  
22 ultimately terminating her employment because she was proactively working to stop Assistant

1 Chief Tim Munnis from continuing his acts of retaliation against the female employees who  
2 had reported alleged discrimination, harassment and retaliation against him or had participated  
3 in the investigation where he was a subject.

4 6.18 Defendants retaliatory conduct conveyed to SFD employees, union board  
5 members, and other City employees that is okay to isolate, circumvent, ignore, and disregard  
6 Plaintiff and her protected activities.

7 6.19 In August 2025 and early September 2025, Plaintiff found her protected  
8 activities met with open disdain and hostility by Defendants, which caused Plaintiff to have  
9 increased migraine headaches and insomnia.

10 6.20 Defendants further retaliated against Plaintiff after she made public records  
11 requests by intentionally and unreasonably delaying the production of requested records,  
12 which were readily producible and unlawfully withholding the critical records Plaintiff  
13 specifically requested as time sensitive and included requests for HRIU lists of investigations,  
14 SFD personnel investigations, prior employment settlements against the city for  
15 discrimination and harassment claims, and prior employment discrimination and harassment  
16 complaints made by former and current City employees. These records have yet to be fully  
17 produced even though it is more than four months since the initial requests were made to City  
18 Human Resources, and the City Attorney's Office.

19 6.21 Defendants further retaliated against Plaintiff after she made requests for her  
20 complete personnel file to Seattle Fire Department and the City Attorney's Office in  
21 accordance with amended RCW 49.12.250, by intentionally and unreasonably withholding  
22 and delaying the production of requested records, which were readily producible.



1           7.2     Defendant wrongfully terminated Plaintiff because she engaged in protective  
2 activities from reporting unlawful and unsafe practices by SFD employees, which endangered  
3 the public, refused to violate laws and policies regarding employee promotion, workplace  
4 investigations involving protected classes and sexual harassment as alleged herein.

5           7.3     These practices created a hostile working environment for Plaintiff causing her  
6 severe and unwanted emotional trauma and stress for which she seeks damages to be proven  
7 at the time of trial.

8                                   **VIII.   FOURTH CAUSE OF ACTION:  
9                                   PUBLIC RECORDS ACT VIOLATIONS OF RCW 42.56 ET SEQ  
10                                  AGAINST DEFENDANT CITY OF SEATTLE**

11           8.1     Plaintiff adopts the preceding paragraphs by reference as fully alleged and  
12 further states the following facts:

13           8.2     Defendants' acts and omissions in failing or refusing to permit Plaintiff timely  
14 access to requested records constitutes a violation of Washington's Public Records Act  
15 (PRA), RCW 42.56 tense.

16           8.3     These practices created a hostile working environment for Plaintiff, causing  
17 her severe and unwanted emotional trauma and stress for which she seeks damages. to be  
18 proven at the time of trial.

19                                   **IX.   FIFTH CAUSE OF ACTION FIVE:  
20                                  PERSONNEL FILE EMPLOYEE INSPECTION VIOLATIONS OF  
21                                  RCW 49.12.240-261 AGAINST DEFENDANT CITY OF SEATTLE**

22           9.1     Plaintiff adopts the preceding paragraphs by reference as fully alleged and  
further states the following facts:

