

Snohomish County Superior Court
Sonya Kraski
Snohomish County Clerk
Everett WA

FILED

2013 NOV -4 AM 11:33

13-2-08358-1



CL16303455

SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASH

Rept. Date	Acct. Date	Time
11/04/2013	11/05/2013	11:35 AM
Receipt/Item #	Tran-Code	Docket-Code
2013-02-31187/01	1100	FFFR
Cashier: EKH		

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

Paid By: Law Offices of, Judith A. Lonng
with a. Lonng
Attention Account: \$240.00

JULIE JAMISON,
Plaintiff,

v.

CITY OF LAKE STEVENS d/b/a LAKE
STEVENS POLICE DEPARTMENT, and
RANDY CELORI, individually and as its
agent,
Defendants.

NO. 13 2 08358 1

SUMMONS [20 days]

TO DEFENDANT: City of Lake Stevens
Norma Scott, City Clerk
City Hall
1812 Main Street
Lake Stevens, WA 98258

A lawsuit has been started against you in the above-entitled court by Julie Jamison, Plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where Plaintiff is entitled to what

1 he/she asks for because you have not responded. If you serve a notice of appearance on the
2 undersigned person, you are entitled to notice before a default judgment may be entered.

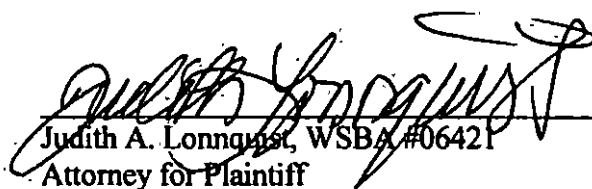
3 You may demand that the Plaintiff file this lawsuit with the court. If you do so, the demand
4 must be in writing and must be served upon the person signing this summons. Within fourteen (14)
5 days after you serve the demand, the Plaintiff must file this lawsuit with the court, or the service on
6 you of this summons and complaint will be void.

8 If you wish to seek the advice of any attorney in this matter, you should do so promptly so
9 that your written response, if any, may be served on time.

10 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of
11 Washington.

12 DATED this 1st day of November, 2013

14 LAW OFFICES OF
15 JUDITH A. LONNQUIST, P.S.

16 
17 Judith A. Lonquist, WSBA #06421
18 Attorney for Plaintiff

FILED

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SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASH

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

JULIE JAMISON,

Plaintiff,

NO. 13 2 08358 1

v.

SUMMONS [20 days]

CITY OF LAKE STEVENS d/b/a LAKE
STEVENS POLICE DEPARTMENT, and
RANDY CELORI, individually and as its
agent,

Defendants.

TO DEFENDANT: Randy Celori
13423 47th Dr. S.E.
Snohomish, WA 98296

A lawsuit has been started against you in the above-entitled court by Julie Jamison, Plaintiff. Plaintiff's claim is stated in the written complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the complaint by stating your defense in writing, and by serving a copy upon the person signing this summons within twenty (20) days after the service of this summons, excluding the day of service, or a default judgment may be entered against you without notice. A default judgment is one where Plaintiff is entitled to what

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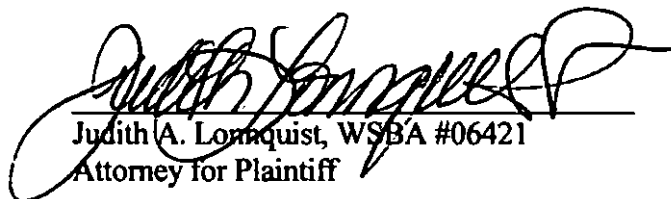
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17 Judith A. Lonquist, WSBA #06421
18 Attorney for Plaintiff

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

JULIE JAMISON,

Plaintiff,

v.

CITY OF LAKE STEVENS d/b/a LAKE
STEVENS POLICE DEPARTMENT, and
RANDY CELORI, individually and as its
agent,

Defendants.

NO. **13 2 08358 1**

COMPLAINT FOR
DAMAGES AND OTHER
RELIEF

INTRODUCTION

This action is brought pursuant to common law and RCW 49.60 to redress acts of retaliation. Plaintiff seeks lost pay, benefits and employment opportunities, emotional distress damages, attorneys' fees and costs, injunctive and other relief.

I. JURISDICTION AND VENUE

1. Defendant City does business in Snohomish County. On information and belief, Defendant Celori resides in Snohomish County. Plaintiff resides in Snohomish County, and her workplace where the acts complained herein occurred is in Snohomish County.

2. This court has jurisdiction pursuant to common law and Chapter 49 RCW.

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II. PARTIES

3. Plaintiff is a single woman residing in Snohomish County, Washington. At all relevant times, she has worked and is still working as a law enforcement employee of Defendant's Police Department ("LSPD").

4. Defendant City of Lake Stevens is a municipality operating as a local government subject to the laws of Washington. It employs more than eight employees and has its principal office in Lake Stevens, Washington. It operates a police department in Lake Stevens, Washington, where, at all relevant times, Plaintiff was employed.

5. Until November 2012, Defendant Celori served as the Chief of Police, and was Plaintiff's ultimate supervisor.

III. STATEMENT OF CLAIMS

6. On September 13, 2006, Plaintiff was hired by LSPD as a police officer. On November 13, 2006, she was assigned as a full-time Detective, receiving a 3% pay increase.

7. On January 14, 2008, Plaintiff was promoted to the rank of Sergeant, overseeing investigations and continued to receive the 3% specialty pay. In late 2009, Defendant Celori began to include Plaintiff in command staff meetings and told her that he intended to promote her into the next vacant commander's position.

8. On or about September 5, 2011, Plaintiff met with Defendant Celori to report what she in good faith perceived to be sexual harassment by a male LSPD employee. Defendant Celori placed Plaintiff on home assignment during the initial phase of a subsequent investigation instead of placing her harasser on leave as is the normal practice

1 in such situations. Defendant Celori conducted the investigation "in house," thereby also
2 failing to insure unbiased inquiry. On or about September 8, 2011, the subject of
3 Plaintiff's sexual harassment complaint was notified of the complaint and investigation.
4 Defendant Celori informed Plaintiff that she should have no contact with anyone with
5 knowledge of her complaint, including her family members, friends, and subordinate
6 officers. Defendant Celori also instructed Plaintiff that, if contacted by the subject of her
7 complaint, she should call 9-1-1.
8

9 9. Two weeks after her complaint, Chief Celori assigned Plaintiff to supervise four
10 additional positions, increasing her workload and overburdening her. Whereas other
11 sergeants supervised only three officers, Plaintiff was assigned six subordinates with
12 widely diverse duties.
13

14 10. On November 9, 2011, Plaintiff spoke to Chief Celori regarding the six candidates
15 who had applied to fill detective positions she supervised. Plaintiff ranked the candidates
16 and provided justifications for her rankings.
17

18 11. On November 10, 2011, Defendant Celori informed Plaintiff that her complaint
19 was "not sustained."
20

21 12. Thereafter, Defendant Celori conducted Plaintiff's first evaluation in the 5+ years
22 he had supervised her, rating her lower than expected or warranted.
23

24 13. On November 18, 2011, Defendant Celori announced that he had selected two
25 officers to fill the detective openings in Plaintiff's unit. Defendant Celori selected
26 Plaintiff's last choice officer and did not choose her first choice of candidate. Both of the
officers Defendant Celori chose to become Plaintiff's direct reports had stated to

1 members of the department that they did not want to work with Plaintiff because of her
2 recent harassment complaint.

3
4 14. On January 31, 2012, Defendant Celori unilaterally changed Plaintiff's schedule
5 and hours of work.

6 15. On July 19, 2012, Plaintiff's then attorney sent a letter to LSPD describing its
7 treatment of Plaintiff as retaliation and warning that publication of the investigation
8 report would be considered another act of retaliation against the Plaintiff.

9
10 16. Less than a month after learning that Plaintiff had hired an attorney to help her
11 address acts of retaliation by Defendants, Defendant Celori informed Plaintiff that he
12 planned to discontinue her Detective Sergeant position and create an Operations Sergeant
13 position. Plaintiff volunteered to take on the Operations Sergeant role, but Defendant
14 Celori posted the position without speaking to her regarding her proposal.

15
16 17. Plaintiff was the most qualified applicant for the Operations Sergeant position.
17 She was the only candidate that had supervised most of the positions slated to be
18 overseen by the Operations Sergeant. After conducting pre-employment tests and
19 interviews for the Operations Sergeant position, Defendants opted not to fill the position
20 rather than giving it to Plaintiff.

21
22 18. On November 13, 2012, LSPD notified Plaintiff that her Detective Sergeant
23 position would end in thirty days and that she would return to a patrol sergeant position,
24 losing the 3% increase and other perquisites of the position.

25
26 19. That same month, Defendant Celori resigned his position and was replaced by
Acting Chief Lorentzen. On November 26, 2012, Plaintiff sent a written complaint to

1 Lorentzen, detailing the retaliation she had experienced. She provided supplementation
2 on December 2, 2012. On December 13, 2012, Because Plaintiff had the least seniority of
3 the patrol sergeants, she was assigned to graveyard shift. As a result, she must work
4 undesirable shifts such as nights and holidays. Plaintiff remains on the night shift.
5

6 20. As a result of the harassment and retaliation, and Defendant's failure to redress it,
7 Plaintiff suffered and continues to suffer severe emotional distress.

8
9 **COUNT I**

10 Defendants have retaliated against Plaintiff, and continue to retaliate against her,
11 in violation of RCW 49.60.210.

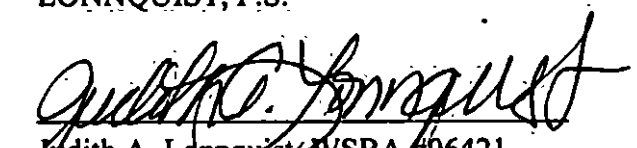
12 WHEREFORE, Plaintiff respectfully requests the following relief:

- 13
- 14 A. Back pay and other economic damages;
 - 15 B. Emotional distress damages;
 - 16 C. Pre-judgment interest;
 - 17 D. Reasonable attorney's fees and litigation expenses pursuant to RCW
18 49.48.030 and/or RCW 49.60.030(3);
 - 19 E. Injunctive relief;
 - 20 F. Tax relief;
 - 21 G. Costs;
 - 22 H. Such other relief as the Court deems appropriate.
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Dated this 31st day of October, 2013.

LAW OFFICES OF JUDITH A.
LONNQUIST, P.S.



Judith A. Lonquist, WSBA #06421
Wendy L. Lilliedoll, WSBA #37743

Attorneys for Plaintiff