

FILED
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KING COUNTY
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CASE #: 25-2-14362-7 SEA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

No.

**COMPLAINT FOR SEXUAL
ABUSE, NEGLIGENCE, AND
OTHER DAMAGES**

A.A., A.A.2, A.A.3, A.C., A.E., A.F., A.H.,
A.H.2, A.H.3, A.J., A.K., A.L., A.M., A.N.,
A.P., A.P.2, A.P.3, A.R., A.S., A.S.2, A.S.3,
A.W., B.A., B.A.2, B.B., B.E., B.F., B.H.,
B.H.2, B.K., B.K.2, B.K.3, B.N., B.R., B.U.,
B.U.2, B.V., B.W., C.A., C.B., C.C., C.C.2,
C.C.3, C.C.4, C.D., C.F., C.G., C.H., C.H.2,
C.J., C.K., C.L., C.L.2, C.M., C.M.2, C.M.3,
C.Q., C.R., C.R.2, C.S., C.T., C.V., C.W.,
C.Y., D.B., D.B.2, D.F., D.H., D.H.2,
D.H.3, D.J., D.K., D.L., D.M., D.P., D.R.,
D.S., D.S.2, D.S.3, D.S.4, E.B., E.B.2,
E.C., E.H., E.S., E.S.2, E.W., E.W.2, F.A.,
F.A.2, F.P., F.S., G.B., G.F., G.R., G.W.,
H.B., H.D., H.G., H.H., H.Y., I.A., I.B.,
I.M., J.B., J.B.2, J.B.3, J.B.4, J.C., J.C.2,
J.D., J.D.2, J.D.3, J.D.4, J.F., J.F.2, J.F.3,
J.F.4, J.G., J.G.2, J.G.3, J.G.4, J.H., J.H.2,
J.H.3, J.H.4, J.I., J.K., J.K.2, J.L., J.L.2,
J.L.3, J.M., J.M.2, J.M.3, J.M.4, J.N., J.O.,
J.O.2, J.P., J.P.2, J.P.3, J.P.4, J.Q., J.S.,
J.S.2, J.S.3, J.S.4, J.S.5, J.S.6, J.S.7, J.S.8,
J.S.9, J.S.10, J.T., J.T.2, J.W., J.W.2,
J.W.3, J.W.4, K.A., K.F., K.H., K.M.,
K.M.2, K.P., K.P.2, K.P.3, K.S., K.S.2,
K.S.3, K.S.4, K.T., L.C., L.D., L.F., L.H.,
L.K., L.R., L.S., L.S.2, L.S.3, L.W., M.B.,
M.C., M.C.2, M.D., M.F., M.G., M.G.2,
M.H., M.H.2, M.J., M.K., M.L., M.M.,

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 1

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P.M., P.O., P.T., P.W., Q.B., R.A., R.A.2,
R.A.3, R.B., R.B.2, R.C., R.D., R.D.2, R.G.,
R.G.2, R.G.3, R.J., R.L., R.L.2, R.M.,
R.M.2, R.N., R.N.2, R.P., R.R., R.R.2,
R.R.3, R.S., R.S.2, R.S.3, R.W., R.W.2,
S.B., S.C., S.C.2, S.C.3, S.D., S.E., S.G.,
S.K., S.K.2, S.L., S.M., S.M.2, S.P., S.V.,
T.B., T.C., T.D., T.E., T.F., T.H., T.J., T.K.,
T.K.2, T.L., T.M., T.M.2, T.M.3, T.N., T.P.,
T.R., T.R.2, T.V., T.W., T.W.2, T.W.3,
U.H., V.M., V.P., V.P.2, V.S., V.S.2, V.T.,
W.H., W.M., W.M.2, W.W., Z.H., Z.K.,
individuals,

Plaintiffs,

v.

THE STATE OF WASHINGTON and its
agencies, DEPARTMENT OF CHILDREN,
YOUTH, AND FAMILY, DEPARTMENT
OF SOCIAL AND HEALTH SERVICES,
and JUVENILE REHABILITATION
ADMINISTRATION,

Defendants.

Youth is a moment and condition of life when a person may be most susceptible to influence and psychological damage, but its signature qualities are all transient, as youth are malleable and have a heightened capacity to transform who they are and how they walk through life.

State v. Carter, Washington Supreme Court, 548 P.3d 935 (2024).

I. INTRODUCTION

1.1 This is a negligence case against the State of Washington arising from the sexual abuse and degradation of countless children and teenagers placed in its care in numerous juvenile detention facilities over decades.

1.2 The State of Washington and its agencies are responsible for the rehabilitation of children adjudged delinquent. When the State imprisons these children in detention facilities and removes them from their families and their communities, the State is entrusted with caring for and protecting these completely dependent youth.

1.3 The youth adjudged delinquent and sentenced to a detention facility are among Washington State's most vulnerable. They are disproportionately Black or brown and they are disproportionately impoverished. They are also disproportionately subject to abuse and neglect as children. Washington State's assistant secretary for juvenile rehabilitation reported in 2019 that nearly 80% of all youth in Defendants' juvenile facilities had been the subject of abuse or neglect investigations prior to their incarceration.¹ 40% of the youth have spent time in foster care prior to juvenile incarceration.²

1.4 However, as the facts of this Complaint lay bare, the State failed in its basic responsibility to keep imprisoned or detained children free from bodily harm.

¹Allegra Abramo, WASHINGTON "STATE-RAISED" INMATES FROM FOSTER CARE URGE BETTER YOUTH SUPPORT; JUVENILE JUSTICE INFORMATION EXCHANGE (2019), <https://jjie.org/2019/12/10/washington-state-raised-inmates-from-foster-care-urge-better-youth-support/> (last visited May 12, 2025).

² *Id.*

1 The length, breadth, and depravity of the abusive acts done to Plaintiffs demonstrates
2 that the sexual abuse was neither the result of a momentary lapse in supervision nor
3 a matter of a few “bad apples” among detention staff. Rather, the facts show an
4 institutional failure that was caused by and maintained through willful, and at times
5 even nefarious, disregard for the well-being and safety of the vulnerable children in
6 the State’s care.

7 1.5 This culture of abuse has been well-documented and known to
8 Defendants for decades. As a result of chronic mismanagement, overcrowding,
9 inadequate supervision, and negligent hiring practices, children and teenagers
10 incarcerated by the State of Washington have been subject to a culture of fear,
11 violence, and sexual abuse for decades. The State’s juvenile prison system has a
12 longstanding track record of both staff sexually abusing residents, as well as
13 residents sexually abusing other residents. When abuse was reported, staff punished
14 the children with physical violence, threats of violence against the prisoner or their
15 family members, threats to add time to their sentences, or to further deprive them of
16 basic human needs, including the use of solitary confinement, among other
17 retaliatory acts.

18
19 1.6 Several of the staff people named faced criminal prosecution or were the
20 subject of other civil actions. Nevertheless, upon information and belief, similar abuse
21 of children in Washington’s detention facilities continues to this day. Over the last
22 decade, the number of child abuse claims filed against the State of Washington has
23 more than doubled.

1.7 Plaintiffs gave notice of these claims to the State of Washington's Office of Risk Management. Over 60 days have elapsed since each named Plaintiff provided such notice. During that time, the State has declined to resolve any of the Plaintiffs' claims, forcing them to file the instant lawsuit.

II. PARTIES

2.1 The Defendant in this case is the State of Washington and its agencies, including the Department of Children, Youth and Families (“DCYF”), the Department of Social and Health Services (“DSHS”), Juvenile Rehabilitation Administration, and the juvenile detention facilities for which they are responsible (collectively, “Defendants”). The State of Washington, its agencies, and its sub-agencies were charged with care of Plaintiffs, and with the responsibility to investigate these facilities for conditions dangerous to the welfare of children placed there, including Plaintiffs.

2.2 The Plaintiffs in this action are 295 adults who the State removed from their homes and placed in prisons or other detention facilities while they were children and were sexually abused in these facilities. Plaintiffs' ages when abused range from nine to 17. The dates of their abuse while imprisoned span over five decades from 1970 to the 2020s.

2.3 The perpetrators of the sexual abuse include more than 200 different state employees at 22 facilities across the state. The State employed these abusers as counselors, guards (including the head of security of Green Hill), kitchen staff, recreational staff, teachers, interns, dentists, doctors, nurses, maintenance men,

1 drivers, foremen of the Department of Natural Resources, and in other positions –
2 including the superintendent of Green Hill. In some instances, these staff members
3 allowed other inmates to sexually assault Plaintiffs.

4 **III. JURISDICTION AND VENUE**

5 3.1 Under article IV, section 6 of the Washington State Constitution, the
6 Superior Court, King County, has universal original jurisdiction over this lawsuit.
7 Jurisdiction is also proper under RCW 2.08.010 and RCW 4.92.010.

8 3.2 Venue lies within King County, Washington under RCW 4.92.010,
9 because it is the county in which multiple Plaintiffs reside and where many of the
10 claims arose in whole or in part.

11 **IV. STATUTE OF LIMITATIONS**

12 4.1 Plaintiffs' claims were filed within three years, or sooner, from when they
13 learned that the State of Washington and its agencies breached the applicable
14 standards of care and/or owed them duties which caused their injuries and/or
15 discovered the causal connection between the abuse and the injuries for which this
16 suit was brought. *See* RCW 4.16.340.

17 **V. BACKGROUND INFORMATION**

18 *Caging men like animals, penning them within walls, then expecting them to become*
19 *better men is fallacious.*

20 – Earl Warren, Former Chief Justice of the United States Supreme Court, 1931

21 The History of the Incarceration of Children in Washington State

1 5.1 The State of Washington first began calling for the incarceration of
2 children in 1890. The State dubbed the facility the Washington State Reform School
3 and intended it to provide for the “keeping and reformatory training of all youths
4 between the ages of 11 and 18.”³

5 5.2 The following year, the legislature passed the first law for juvenile
6 offenders, which permitted the State to remove children from their parents and
7 guardians and commit them to the State’s care.⁴

8 5.3 Nearly a decade later, the legislature set out its objective in maintaining
9 the “Juvenile Court” system. The goal was to provide for the children’s “aid,
10 encouragement, help, and assistance”⁵ and to meet the needs of children charged with
11 violating criminal laws as well as children facing “a range of social, economic, and
12 familial problems.”⁶ The system’s “broad scope was based on the belief that most
13 juvenile offenders have more in common with a dependent or neglected child than
14 with an adult [convicted of a crime.]”⁷ As such, the system was charged with the
15 responsibility to protect children rather than to punish them.⁸

16
17 5.4 Under the 1913 law, all children found delinquent or dependent were
18 “considered wards of the state.”⁹ This development occasioned the State’s role as the
19

20
21 ³ Wash. Sess. Laws 1889-90. RCW 72.16.010.

22 ⁴ Wash. Sess. Laws 1891.

23 ⁵ Wash. Sess. Laws 1905.

24 ⁶ *State v. S.J.C.*, 183 Wn. 2d 408, 415, 352 P.3d 749 (2015).

⁷ *Id.*

⁸ *Id.*

⁹ Wash. Sess. Laws 1913 (ch. 160)

1 common guardian of the community, or the *parens patriae*, and its duty to provide for
2 the “custody, care, guardianship, and control” over these children.¹⁰

3 5.5 Specifically, the “Juvenile Court Act” permitted the State to take
4 custody of children who had been convicted of certain crimes, those deemed to be
5 “incorrigible,” and children subject to “neglect, cruelty, or depravity” by their
6 parents.¹¹

7 5.6 After taking custody of these children, the State could commit them “to
8 the care of some reputable citizen of good moral character, or to the care of some
9 training school or industrial school.”¹²

10 5.7 Since the late 1880s, the legislature has imposed on the State an
11 obligation to investigate “any and all complaints made against” any of the school’s
12 employees and to call for their removal “for good and sufficient reason.”¹³ This
13 development further emphasized the State’s role as the protector of the children in
14 its care.

15 5.8 In 1951, the legislature passed the “Youth Protection Act,” which
16 established the creation of the Division of Children and Youth Services.¹⁴ This state
17 department was designated “the power to acquire, establish, maintain, and operate”
18

21 ¹⁰ *Id.*

22 ¹¹ *Id.*

23 ¹² *Id.*

¹³ Wash. Sess. Laws 1889-90.

¹⁴ Wash. Sess. Laws 1951.

1 facilities for the “care, custody, education, and treatment” of children in schools,
2 homes, farms, and forest camps.¹⁵

3 5.9 The State later renamed two of these juvenile prisons: “Green Hill
4 School,” located in Chehalis, and “Maple Lane School,” located in Grand Mound, both
5 of which are at the center of multiple Plaintiffs’ claims.¹⁶

6 5.10 In 1977, the State passed the Juvenile Justice Act of 1977,¹⁷ which
7 became effective January 1, 1978. This law marked a sea change in the State’s
8 approach to juveniles accused of criminal activity. While it reinforced that the State
9 must provide rehabilitation and treatment for young offenders, the law explicitly
10 stated its intent that punishing juveniles and holding them accountable were of equal
11 importance.¹⁸ Washington’s Supreme Court has contrasted the adult criminal system
12 where “punishment is the paramount purpose” to the juvenile system’s twin goals:
13 “to establish a system of having primary responsibility for, being accountable for, and
14 responding to the needs of youthful offenders, and to hold juveniles accountable for
15 their offenses.”¹⁹

16 5.11 The 1977 law further introduced presumptive sentencing. With the
17 enhanced emphasis on punitive measurements and sentencing guidelines, the
18 number of children incarcerated in Washington exploded.
19

20
21 ¹⁵ *Id.*

22 ¹⁶ Wash. Sess. Laws 1955; RCW 72.16.010 (Green Hill school); RCW 72.20.010 (Maple Lane school).

23 ¹⁷ RCW 13.40.010.

24 ¹⁸ For a robust history of Washington’s juvenile justice law, see Jeffrey Day, *Juvenile Justice in Washington: A Punitive System in Need of Rehabilitation*, U. Puget Sound L. Rev. 1992.

¹⁹ *State v. Chavez*, 163 Wn. 2d 262, 267–68, 180 P.3d 1250 (2008)

1 5.12 By the 1980s, the number of youth prisons included: Green Hill School,
2 Maple Lane School, Naselle Youth Camp, Cedar Creek Youth Camp, Mission Creek
3 Youth Camp, Echo Glen, Cascadia Diagnostic Center, Lakeland Village, Rainier
4 School, Yakima Valley School, Interlake School, Fircrest School, Francis Haddon
5 Morgan Center, the Child Study and Treatment Center, and the Secondary School of
6 Western State Hospital.²⁰

7 5.13 Each of these institutions were placed under the Department of Social
8 and Health Services (“DSHS”) for the rehabilitation and care of the wards placed
9 there.²¹

10 5.14 In 2017, the legislature created the Department of Children, Youth, and
11 Families (“DCYF”), which took over responsibility for the youth prison and foster care
12 systems.²²

13 5.15 In approximately 2019, Juvenile Rehabilitation moved from the
14 Rehabilitation Administration in the Department of Social and Health Services to the
15 newly created DCYF.

16 5.16 The State of Washington acknowledges that its agencies are “legally
17 responsible for these youth” and that they must “retain them in safe custody.” It
18 further agrees that this responsibility extends to “the acts and omissions of [state]
19 employees, and agents in exercising and carrying out that authority.”
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21
22

²⁰ Wash. Sess. Laws 1979; RCW 72.05.010.

²¹ *Id.*

²² Wash. Sess. Laws 2017.

1 5.17 Despite the enormous amount of taxpayer dollars used to run and
2 manage the juvenile prison system, the State has continuously failed to rehabilitate
3 these young people or to keep them safe. Instead, Defendants have continually broken
4 their promises to these vulnerable children and to Washington's citizens. These
5 betrayals have ruined lives and made all Washington citizens less safe.

6 5.18 The childhood sexual abuse of Plaintiffs by State actors occurred at the
7 following juvenile prisons and detention facilities, in addition to several foster or
8 group homes under State contract or supervision:

9 a. Echo Glen Children's Center is located in King County, Washington. At
10 all times relevant, Echo Glen Children's Center has been a medium/maximum
11 security prison that imprisons boys and girls.

12 b. Green Hill School is located in Lewis County, Washington. At all times
13 relevant, Green Hill School has been a state-operated medium/maximum security
14 prison that imprisons boys and young men.

15 c. Naselle Youth Camp was located in Pacific County, Washington. At
16 times relevant, Naselle Youth Camp was a state-operated medium security prison
17 that imprisoned boys and girls. Before its closure in 2022, Naselle Youth Camp
18 partnered with the Washington State Department of Natural Resources and
19 Department of Fish and Wildlife to facilitate work programs for the inmates.
20
21
22
23

1 d. Maple Lane School was located in Thurston County, Washington. At
2 times relevant, Maple Lane School was a state-operated medium/maximum security
3 prison that originally imprisoned boys and girls, depending on the time frame. It
4 closed in 2011 before re-opening in 2016 for adults.

5
6 e. Mission Creek Youth Camp was located in Mason County, Washington.
7 At times relevant, Mission Creek Youth Camp was a state-operated minimum
8 security detention facility that imprisoned youth on land leased from the Washington
9 State Department of Natural Resources, which facilitated a work program for the
10 child inmates. In 2005, it re-opened as the Mission Creek Corrections Center for
11 Women.

12 f. Indian Ridge Youth Camp was located in Snohomish County. At times
13 relevant, Indian Ridge Youth Camp was a state-operated minimum security
14 detention facility on land leased from the Washington State Department of Natural
15 Resources. The State imprisoned children here before transitioning it to an adult
16 facility.

17
18 g. Cascadia Juvenile Reception and Diagnostic Center was located in
19 Pierce County, Washington. At times relevant, Cascadia Juvenile Reception and
20 Diagnostic Center was a state-operated detention facility used to house children
21 found to be delinquent or convicted of a crime and detained at the facility for
22 observation.

1 h. Sunrise Community Facility is located in Grant County, Washington. At
2 times relevant, Sunrise Community Facility is and was a state-operated minimum
3 security juvenile detention facility.

4 i. Woodinville Community Facility is located in King County, Washington.
5 At times relevant, Woodinville Community Facility is and was a state-operated
6 minimum security juvenile detention facility.

7 j. Parke Creek Community Facility is located in Kittitas County,
8 Washington. At times relevant, Parke Creek Community Facility is and was a state-
9 operated minimum security juvenile detention facility.

10 k. Oakridge Community Facility is located in Pierce County, Washington.
11 At times relevant, Oakridge Community Facility is and was a state-operated
12 minimum security juvenile detention facility.

13 l. Canyon View Community Facility is located in Chelan County,
14 Washington. At times relevant, Canyon View Community Facility is and was a state-
15 operated minimum security juvenile detention facility.

16 m. Touchstone Community Facility is located in Thurston County,
17 Washington. At times relevant, Touchstone Community Facility is and was a state-
18 operated minimum security juvenile detention facility.

1 n. Twin Rivers Community Facility is located in Benton County,
2 Washington. At times relevant, Twin Rivers Community facility is and was a state-
3 operated minimum security juvenile detention facility.

4 o. Spruce Street Inn was located in King County, Washington. At times
5 relevant, Spruce Street Inn was a state-contracted group home for wards of the State
6 of Washington.

7 p. Camp Outlook was located in Franklin County, Washington. At times
8 relevant, Camp Outlook was a minimum security juvenile facility that housed
9 juveniles between the ages of 14 to 19 for a “boot camp” style program.

10 q. Ridgeview Community Facility is located in Yakima County,
11 Washington. At all times relevant, Ridgeview Community Facility is and was a state-
12 operated minimum security juvenile detention facility.

13 r. Fort Worden Juvenile and Treatment Center was located in Jefferson
14 County, Washington. From 1958 to 1971, it was a state-operated juvenile detention
15 facility that served as a center to diagnose youth adjudged delinquent and to securely
16 house youth committed to residency by the juvenile courts.

17 s. Forest Ridge Lodge was located in Kitsap County, Washington. At all
18 relevant times, it was a state-contracted secure facility for youth adjudged
19 delinquent.

1 t. Jessie Dyslin's Boys Ranch was located in Pierce County, Washington.
2 At all relevant times, it was a state contracted secure facility for you adjudged
3 delinquent or "at risk".

4 u. Cushman House was located in Pierce County, Washington. At all
5 times relevant, it was a state-contracted group home for youth.
6

7 **The State's Broken Promises**

8 5.19 The State claims to have "zero tolerance" policy for any form of sexual
9 abuse or harassment of the children in its care. It has recognized the permanent
10 impact this abuse has on the children, as well as the repercussions for the families
11 and communities to which they return after completing their sentences.

12 5.20 As defined under federal regulations governing the Prison Rape
13 Elimination Act ("PREA"), 34 U.S.C. 30301 *et seq.*, as well as under State policy,
14 sexual abuse of juvenile inmates includes any of the following:

15 a. Contact between the penis and the vulva or the penis and the anus,
16 including penetration, however slight;

17 b. Contact between the mouth and the penis, vulva, or anus;

18 c. Contact between the mouth and any body part where the staff member,
19 contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

20 d. Penetration of the anal or genital opening, however slight, by a hand,
21 finger, object, or other instrument, that is unrelated to official duties or where the
22

1 staff member, contractor, or volunteer has the intent to abuse, arouse, or gratify
2 sexual desire;

3 e. Any other intentional contact, either directly or through the clothing, of
4 or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is
5 unrelated to official duties or where the staff member, contractor, or volunteer has
6 the intent to abuse, arouse, or gratify sexual desire;

7 f. Any attempt, threat, or request by a staff member, contractor, or
8 volunteer to engage in the activities described in paragraphs (1)-(5) of this section;

9 g. Any display by a staff member, contractor, or volunteer of his or her
10 uncovered genitalia, buttocks, or breast in the presence of an inmate, detainee, or
11 resident, and

12 h. Voyeurism by a staff member, contractor, or volunteer.²³

13
14 5.21 Undue familiarity, which is also prohibited, is defined as conversations
15 between staff and youth that is unnecessary and “related to personal relationship or
16 purpose rather than legitimate treatment or custody.”

17 5.22 State policy requires that staff immediately report and escalate any
18 “knowledge, suspicion, or information” they receive about “an incident of sexual abuse
19 or sexual harassment,” including retaliatory actions against the children or staff
20 neglect that may contribute to sexual abuse, harassment, or retaliation. They must
21 also document all allegations and report them to Child Protective Services (“CPS”).
22

23 ²³ 28 C.F.R. 115.6.

1 5.23 State policy further requires that inmates be provided multiple methods
2 for reporting sexual abuse and harassment.

3 5.24 Plaintiffs filed multiple public records requests seeking any
4 documentation from the State of Washington evidencing compliance with these
5 policies. By and large, the requests revealed that CPS – with rare exception – did not
6 receive any reports from facility staff, or at least did not document any such reports,
7 despite the widespread and largely open and obvious nature of the abuse of the child
8 inmates.

9 5.25 Plaintiffs' claims further reveal the State's unofficial and internal policy,
10 which calls for the punishment of children who are sexually abused by staff when
11 staff believes the child or teenager may report them. In multiple case, Plaintiffs
12 subjected to abuse were warned and threatened by the staff people abusing them or
13 their colleagues that any report of the abuse would result in penalty to the abused
14 child. In many cases, staff threatened that they would respond to any report by
15 accusing the Plaintiff of rape.
16

17 5.26 These practices are in direct conflict with federal law under PREA, as
18 well as the laws of the State of Washington pre-dating PREA. Washington's criminal
19 statutes recognize that people under the age of 18 cannot consent to sexual contact
20 with individuals who abuse their supervisory positions of the minor to engage in
21 sexual contact.²⁴
22

23 ²⁴ RCW 9A.44.093; *State v. Fiser*, 99 Wn.App. 714, 995 P.2d 107 (2000).

1 5.27 Other laws, passed specifically to criminalize the custodial sexual
2 misconduct at issue in this lawsuit, recognize that “[c]onsent of the victim is not a
3 defense.”²⁵ These laws recognize that the power imbalance between prison staff and
4 incarcerated individuals makes these relationships inherently coercive and an
5 understanding that such relationships in the carceral setting undermine
6 rehabilitative goals.

7 5.28 Nevertheless, multiple Plaintiffs were subject to punishment, including
8 time in solitary confinement for attempting to report sexual abuse. In other instances,
9 staff called Plaintiffs liars or even began to abuse them themselves once sexual abuse
10 was reported. The most common reaction of staff was to do absolutely nothing.

11 5.29 Staff people also abused their supervisory positions to give the children
12 small, but highly valued items, such as extra phone calls, additional time out of their
13 cells, or extra food to coerce and reward compliance with the staff’s sexual demands.
14 In other instances, the staff bribed their victims with illicit and addictive substances,
15 including opioids, cigarettes, marijuana, and methamphetamines to coerce
16 compliance. Because the abusers typically controlled the levels of privileges that the
17 youth received, they were able to increase or decrease these privileges depending on
18 the level of compliance of the Plaintiffs.

19 5.30 The wide-spread practice of staff trafficking in drugs to children and
20 teenagers has become commonplace at facilities like Green Hill School, where
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23 ²⁵ RCW 9A.44.160.

1 approximately ten 9-1-1 calls were made each month between November 2023 and
2 February 2024 in response to fentanyl drug overdoses experienced by child inmates.

3 5.31 When other state agencies attempted to investigate staff drug
4 trafficking at Green Hill in 2023, administrators refused to cooperate and forced the
5 Joint Narcotics Enforcement Team to serve a warrant. The resulting search revealed
6 that Green Hill's administrators tolerated this behavior and failed to report
7 numerous drug seizures to police in recent years. Instead, administrators allowed
8 staff to store fentanyl pills, marijuana, vape pens, and Xanax in their lockers. The
9 search warrant turned up approximately 140 of such items that had never been
10 turned over to appropriate investigators.

11 5.32 While only Green Hill has been subject to a search warrant for this
12 purpose, Plaintiffs claims demonstrate that these practices were common across
13 State facilities.

14 5.33 Available documentation, in addition to Plaintiffs' accounts, show that
15 staff traded this contraband with the children in exchange for exposing themselves
16 or to coerce other sex acts.
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STATE OF WASHINGTON
DEPARTMENT OF SOCIAL AND HEALTH SERVICES
P.O. Box 45010, Olympia, Washington 98504-5010

INCIDENT REPORT

Date: March 29, 2019

TO: Marybeth Queral, Assistant Secretary
Rehabilitation Administration

FROM: Harvey Perez, Director
Division of Institution Programs

SUBJECT: Naselle Youth Camp – Staff alleged of sexual misconduct

ISSUE: On March 20th, a youth tested positive for opioids and when questioned where he got the opioids (Oxycodone) he stated he got them from a staff in return for the youth exposing himself to the staff, specifically his penis. This youth was given a UA because of a call from a community facility that another youth stated he would regularly get cigarettes and drugs from this youth.

5.34 The State of Washington has suggested that the recent issues in its facilities have resulted from the legislature's decision to hold offenders up to the age of 25 in juvenile facilities. However, Plaintiffs' claims, which date back to 1968 and the vast majority of which predate the JR-to-25 mandate passed in 2018, refute this narrative and instead reveal that these failures are deeply ingrained and systemic in Washington's juvenile prison system.

5.35 Publicly available information demonstrates that the abuse the Plaintiffs in this lawsuit sustained is not an anomaly.

1 5.36 In 2009, a guard at Echo Glen, Robert Health Fox, pleaded guilty to first-
2 degree custodial sexual misconduct after raping a female inmate. The investigation
3 revealed that there were no security cameras in the area where the assault occurred,
4 and no unannounced staff rounds during the night shift. Additionally, others had
5 made claims about Fox's inappropriate behavior without recourse. In response to
6 Fox's guilty plea, Defendants distanced themselves from Fox, referring to him as a
7 "depraved individual".

8 5.37 That same year, 2009, Green Hill kitchen staffer Deanna Witters, who
9 went by "DeeDee," pleaded guilty to two counts of custodial misconduct. Witters
10 testified, "[i]t's the culture out there [at Green Hill], it happens all the time."

11 5.38 In May 2015, Kaila Jandoc –a counselor at Woodinville Community
12 Facility and responsible for chaperoning the inmates– was charged with custodial
13 sexual misconduct after her sexually explicit text messages to a teenage resident
14 surfaced. The resulting investigation revealed she had used the state-owned van and
15 her own car to have sex with the teenager.

16 5.39 In 2016, the community facility administrator for Twin Rivers
17 Community Facility, Mindy Stoker, pleaded guilty to attempted assault and custodial
18 sexual misconduct. The evidence showed that Stoker abused the boy during outings
19 and trips away from the facility and at the facility.

20 5.40 In response to Stoker's crimes, Defendants stated they had "zero
21 tolerance for this type of behavior" and that "100 percent of our staff and youth have
22

1 been trained on the importance of ensuring appropriate boundaries and reporting
2 questionable behavior related to staff or other residents.”

3 5.41 Nevertheless, in 2016, at least two other Green Hill staffers pleaded
4 guilty to custodial sexual misconduct charges, including counselors Erin Stiebritz
5 (née Snodgrass) and Katherine Kimbel. Stiebritz also abused several Plaintiffs.

6 5.42 In response to these charges, Defendants publicly emphasized their
7 commitment to “the standards set forth in the Prison Rape Elimination Act (PREA),”
8 claiming that “staff members are trained on compliance, and youth are provided with
9 information on PREA.”

10 5.43 In another statement, John Clayton – the head of Washington’s Juvenile
11 Rehabilitation Administration in 2016 – echoed this commitment and called the
12 violation of rules by staff “surprising.”

13 5.44 A 2019 Federal PREA Audit at Green Hill tested this claimed “zero
14 tolerance” policy. The audit found that Defendants failed to adhere to multiple
15 policies designed to protect inmates from sexual abuse by staff. These deficiencies left
16 inmates “highly vulnerable” to sexual abuse. Among them, the Audit found Green
17 Hill’s inmate-to-staff ratios were “out of compliance on every shift, every day.”

18 5.45 The Audit emphasized compliance with PREA was achieved only “on
19 paper, but not in practice.”
20
21
22
23

Supervision and monitoring

Auditor Overall Determination: Does Not Meet Standard

Auditor Discussion

sexual abuse. At the end of the corrective action period, GHS has a 2018 staffing plan that covers all PREA required elements of 115.313 on paper, but not in practice.

5.46 The Audit revealed that Green Hill failed to deploy video monitoring and periodic unannounced rounds to deter, prevent, and detect sexual abuse and harassment of the inmates by staff. In particular, it found an absence of adequate video monitoring in staff offices, laundry rooms, and the health center – all areas where Plaintiffs reported sexual abuse at Green Hill and other state-operated facilities.

5.47 Under federal standards, state officials are to monitor video recordings at juvenile detention facilities to prevent and detect sexual abuse. However, Green Hill administrators reported an agreement among staff that “cameras would not be viewed to ‘check up on staff,’ rather viewed when there was an incident or allegation.” The Audit noted that this practice is non-compliant and, though Green Hill stated it would make a correction, no documentation was received confirming the change.

Supervision and monitoring

Auditor Overall Determination: Does Not Meet Standard

Auditor Discussion

During the PREA audit, it was reported by management that there is a union agreement, made when the cameras were installed that said the cameras would not be viewed to "check up on staff", rather viewed when there was an incident or allegation. This does not meet the standard of using video monitoring to prevent and detect sexual abuse. During corrective action, a correction was made stating that this is no longer the case; however, this auditor did not receive documentation confirming this.

5.48 The 2019 Audit further found Green Hill administrators failed to implement adequate programs to train the children in confinement about how to report sexual abuse. It also reported that Green Hill's failed to implement policies designed to ensure the referral of sexual abuse allegations for appropriate investigation. Instead, as evidenced by many Plaintiffs' claims, the facility staff conducted their own inadequate investigations and dismissed claims without escalating the abuse to CPS or appropriately documenting the allegations.

5.49 The most recent audit of the State's compliance with the federal PREA law in 2022 at Green Hill also found troubling deficiencies. The audit found serious PREA violations, which put youth at risk for sexual abuse in 2022 including:

5.49.1 DCYF continued to employ a staff member who the agency found had sexually abused an incarcerated youth. Demonstrating a brazen disregard for the young people under its care, DCYF knowingly continued to permit this predatory staff member access to youth at Green Hill.

5.49.2 Despite repeated warnings and findings of non-compliance in its previous audit, DCYF again failed to have adequate staffing for safe supervision of the imprisoned youth. Perhaps even worse, the

1 auditors found that DCYF staff attempted to cover this up
2 through misleading records.

3 5.49.3 The agency did not consider prior incidents of sexual harassment
4 in determining whether to hire or promote or employees.

5 5.49.4 DCYF did not provide a resident who was sexually abused by a
6 staff member with a victim advocate as is required by law.

7 5.49.5 Failure to train medical staff on PREA requirements – a notable
8 shortcoming given the many claims of sexual abuse against
9 doctors, nurses, and other medical personnel.

10 5.49.6 At least one instance of retaliation against a staff member who
11 cooperated in a sexual abuse investigation against a co-worker.

12 5.50 In 2023, two different staff people, Angel Misner and Emily Baker, were
13 arrested for sexual misconduct with inmates at Green Hill School. The investigation
14 noted that some of the misconduct took place in supply closets at Green Hill where
15 there are no cameras. Police arrested a third employee for allegedly selling
16 methamphetamines and other contraband to inmates.

17 5.51 In 2024, two other Green Hill employees were arrested; one for
18 facilitating an attack on a teenage inmate and the other for possession of a controlled
19 substance in a correctional facility.

20 5.52 In 2022, a cook at Parke Creek Community Facility named Dawn
21 McLaughlin was arrested for seven counts of custodial misconduct after sexually
22 abusing a 16-year-old inmate in approximately 2019 when McLaughlin was 44. The

1 resulting investigation revealed that the abuse occurred in a “blind spot” in the
2 kitchen not covered by surveillance cameras and during times the kitchen was not
3 regularly patrolled by other staff people. McLaughlin later admitted to the sexual
4 relationship during a recorded phone call according to the police report.

5 5.53 The concurrent DYCF investigation of McLaughlin, which was turned
6 over to the Kittitas County Sheriff’s Office, uncovered evidence that McLaughlin had
7 sexually assaulted up to three other inmates and “one other male juvenile had a
8 sexual relationship with a former counselor” at Parke Creek Community Facility. The
9 investigator reported that this abuse occurred in the freezer or a staff office, neither
10 of which were covered by cameras. The investigation further found McLaughlin had
11 brought in contraband for the boys.

12 5.54 In 2021, a long-time DCYF counselor from Naselle Youth Camp named
13 Michael Nolan – who abused Plaintiffs in this suit – was charged with five different
14 sex felonies involving the sexual exploitation of additional children in the State’s care.

15 5.55 The criminal and civil cases alleged that Nolan used a Native American
16 heritage program, called Native Brotherhood, as a pretext to have one-on-one time
17 with the boys in his care. He used sweat lodge practices and other activities to coerce
18 the boys to skinny-dip with him at the nearby river. Reports show that Nolan went
19 on these excursions without bringing a radio with him and failed to document the
20 one-on-one encounters. Despite these repeated violations of protocol, staff did not
21 escalate his behavior for review, which allowed it to continue. Three Plaintiffs in this
22 case were abused by Nolan: D.S.3; E.W.2; and J.O.

1
2 5.56 From 2016 to 2018, three Green Hill employees – Samantha
3 Washington, Katherine Kimbrel, and Erin Stiebritz (nee Snodgrass) - pled guilty to
4 various sexual misconduct charges.

5 5.57 These recent criminal charges are nothing new to Defendants. Each of
6 the four facilities – Green Hill School, Echo Glen Children’s Center, Maple Lane
7 School, and Naselle Youth Camp – have been the center of multiple criminal and civil
8 lawsuits for child sex abuse and harassment claims over the last several decades.
9 These claims allege abuse at the State’s juvenile prisons and detention facilities
10 throughout all relevant time periods.

11 5.58 In addition to inadequate supervision, this culture is perpetuated by
12 negligent hiring policies. Among them, State policy allows for the hiring of individuals
13 to work with children in the State’s facilities even where they have been convicted of
14 the following crimes: assault of a child in the third degree, custodial assault, luring,
15 and animal cruelty. A staff person may also continue employment in a juvenile prison
16 or detention facility even after being found to have violated a sexual assault
17 protective order, a vulnerable adult protective order, a no contact order, or where they
18 have engaged in stalking or the solicitation of prostitution.

19
20 5.59 As a result of these practices and policies, employees of all ranks
21 perpetuated the abuse against Plaintiffs, including the head of security, guards, and
22 correctional officers; physicians, dentists, and nurses; teachers; maintenance and
23 kitchen staff; drivers, and case managers; in addition to counselors assigned to each

1 inmate, including those tasked with working with children facing drug and alcohol
2 problems as well as children coping with previous sexual abuse.

3 5.60 The abuse at the center of this lawsuit occurred between 1968 and 2022
4 and affected children as young as nine years old and through the age of 18.

5 5.61 In many instances, the same employee repeatedly abused the children
6 over many years.

7 5.62 For example, Dr. Isaac Pope, a physician at Green Hill School, who was
8 investigated both criminally and by the Washington Medical Commission, regularly
9 assaulted his patients by performing medically unnecessary rectal “examinations” for
10 his own sexual gratification and perpetuating other abuses against them, including
11 seven Plaintiffs here.

12 5.63 Mr. Prestiguard, a counselor at Naselle, sexually abused Plaintiffs C.T.
13 and T.R. in the early 2000s.

14 5.64 A counselor at Echo Glen known as “O.T.” sexually abused Plaintiffs
15 A.M., R.A., and R.P. in the late 1990s and early 2000s.

16 5.65 Mr. Webb, a Naselle staff member who supervised girls on work detail,
17 sexually abused both A.W. and K.A. in approximately 2005 to 2006.

18 5.66 A counselor at Naselle, Mr. Gilkey, sexually abused B.W., age 15, and
19 J.P.3, age 14, during the late 1980s and early 1990s.

20 5.67 Victoria Matlock sexually abused D.B.2, L.F., and S.E. while working as
21 a counselor at Naselle in the 2000s.

5.68 Michael Ennis, a counselor at Naselle sexually abused D.S.4, E.S., and T.W in the 1980s and 1990s.

5.69 An art teacher at Green Hill known to her students as “Joanne” sexually abused A.K., J.B.2, J.S.5, and U.H. during the years 1978 to 1982.

5.70 A counselor named Crystal Mobbs sexually abused four Plaintiffs, L.S., L.W., P.W., and V.S.2 at Green Hill during 2008 and 2009.

5.71 However, the abuse sustained by Plaintiffs was not by a small handful of rogue employees. Rather, the Plaintiffs were abused by over 200 different perpetrators, evidencing a culture through Washington's juvenile system seemingly tolerant of sexualizing and dehumanizing these child inmates.

5.72 In addition to the negligence that pervaded these juvenile detention facilities, the same State actors and agencies negligently placed some Plaintiffs in unsafe foster homes where they were subject to the same culture of abuse and then conducted negligent investigations of sexual abuse they were subjected to.

VI. PLAINTIFFS' ALLEGATIONS

6.1 Due to Defendants' negligence in allowing this culture of sexual abuse to flourish and in failing to protect the children in their custody, including Plaintiffs, Plaintiffs suffered physical, emotional, and psychological trauma, leading to significant anguish and distress that they will be forced to live with for the rest of their lives.

6.2 At all times relevant, Plaintiffs were wards of the State and incarcerated or detained at facilities that the Defendants operated or contracted with. At all times

relevant, Defendants had a special, custodial relationship with Plaintiffs, which required the Defendant to take reasonable steps to protect them from foreseeable harm. At all times relevant, those foreseeable harms included sexual abuse.

6.3 Each Plaintiff endured sexual abuse, harassment, and/or exploitation as a result of the State's negligence. The negligence resulted in or allowed for the following abuses, as well as others, to be inflicted on Plaintiffs. The descriptions below are merely summaries and do not include every single act of abuse endured by Plaintiffs. All dates and ages are approximate.

6.4 Plaintiff A.A.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Early 1990s; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Two male staff members, names unknown
Details of Abuse	A white male staff member sexually assaulted A.A. multiple times in A.A.'s cell while he was in the "hole". The staff member orally and manually stimulated A.A.'s penis then forced A.A to do the same to him; he also digitally penetrated A.A.'s rectum and raped A.A. On one occasion, the staff member brought another male staff member to A.A.'s cell and the two sexually abused A.A.

	simultaneously. The staff member told A.A. that no one would believe him if he reported the abuse.
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6.5 Plaintiff A.A.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	Early to mid-1990s; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Volt, a male counselor and Mrs. Wiseman, a female counselor/supervisor
Details of Abuse	Two counselors in Cougar Lodge, Mr. Volt and Mrs. Wiseman, repeatedly sexually abused A.A.2. Mr. Volt was a tall white man who had brown hair and a mustache, wore glasses, and appeared to be in his fifties. Mrs. Wiseman was heavyset white woman who often wore glasses, appeared to be in her fifties or sixties, and worked as a staff supervisor. Mr. Volt gained A.A.2's trust and took over as A.A.2's "counselor". He met with A.A.2 alone for extended periods of time. During these "counseling" sessions Volt sexually abused A.A.2 by performing oral sex on him and manually

	stimulating the boy's genitals and by coercing A.A.2 to do the same. Supervisor Mrs. Wiseman also met with A.A.2 in her office regularly and sexually abused him. Wiseman validated A.A.2's feelings, praised A.A.2 for his progress in the program, and gave him candy. After earning A.A.2's trust, she started sexually abusing him. Wiseman orally and manually stimulated A.A.2's penis, coerced him to digitally penetrate her vagina and perform oral sex on her, and manipulated him into having vaginal sex. Wiseman rewarded A.A.2 with food, cigarettes, and extra smoking breaks.
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6.6 Plaintiff A.A.3

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	Early 2000s; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female counselor, name unknown
Details of Abuse	A female counselor sexually abused A.A.3. The counselor was a tall, slim, white woman who had blue eyes and

	appeared to be in her late thirties or early forties. She gave A.A.3 special treatment including frequently calling him into her office outside of their scheduled counseling sessions, bringing him cigarettes and food, and allowing him extra time out of his cell. On multiple occasions, she kissed A.A.3, coerced him into touching her breasts, exposed her genital area, orally and manually stimulated his penis, and coerced him into having vaginal sex. When A.A.3 resisted her advances, she warned that reporting the abuse would get them both into trouble.
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6.7 Plaintiff A.C.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2013; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Krista/Krystal (spelling approximate), a female staff member
Details of Abuse	A female staff member named Krista or Krystal sexually abused A.C. multiple times. Krista, a short, white woman with visible tattoos, crooked teeth, and dark burgundy hair

	appeared to be in her thirties. In the first few weeks of A.C.'s incarceration, Krista groped his buttocks and told him intimate personal details like her favorite type of underwear. Once, while Krista was speaking with A.C. in her office, she kissed him and forcibly performed oral sex on him. Krista regularly took A.C. to a spot near the recreation building not monitored by cameras where she kissed and groped him.
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6.8 Plaintiff A.E.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1978 to 1979; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male guard, name unknown and a female art teacher, likely Joanne.
Details of Abuse	Two staff members sexually abused A.E. While A.E. was housed in Hickory Cottage, a white male guard who appeared to be in his forties monitored A.E.'s showers and rubbed A.E.'s genital area over his clothing during weekly cell checks.

	A white female art teacher who had brown hair and appeared to be in her thirties encouraged A.E. to touch her breasts so he could accurately draw them during art class.
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6.9 Plaintiff A.F.

Current Residence	Grant County, Washington
Approximate Dates of Abuse and Age	1982 to 1985; 11 years old and 14 years old
Location(s) of Abuse	Nellum's Home (spelling approximate) Echo Glen Children's Center
Perpetrator, if known	Nellum's Home: Foster mother's son, name unknown Echo Glen: Two male staff members, names unknown
Details of Abuse	<u>Nellum's Home</u> The son of A.F.'s foster mother, who was between ages 18 and 25, raped A.F. multiple times. He threatened to make sure A.F. was kicked out of the home with nowhere else to go if she reported the abuse. <u>Echo Glen Children's Center</u> Two male staff members sexually abused A.F. While she was housed in Toutle Cottage, an older male staff member who was heavysset with reddish-gray hair and poor oral hygiene orally and vaginally raped A.F. multiple times in

	the "quiet room". The staff member told A.F. no one would believe her if she reported the abuse. After A.F. was transferred to another cottage at the facility, a tall, slim, male staff member orally and vaginally raped A.F. multiple times. He threatened to drown A.F. in the nearby lake if she reported the abuse and rewarded her silence with extra food and cigarettes.
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6.10 Plaintiff A.H.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1996 to 1997; 13 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Spalding, a female corrections officer and a male medical staff member, name unknown
Details of Abuse	Two staff members repeatedly sexually abused A.H. Spalding, a female corrections officer who worked in Chelan Cottage, was a thin white woman with brown hair who appeared to be in her twenties. A.H. was required to wear shackles around his wrists and ankles that were connected to his waist whenever he left his cell. Spalding

oversaw the process of getting the shackles on and off. Spalding began grooming A.H. while they were alone in his cell. She talked to him about inappropriate sexual topics. Later, Spalding manually stimulated A.H.'s penis under his clothes. Spalding continued to sexually abuse A.H., which seemed to be daily, in his cell for a few months. She performed oral sex on A.H. and coerced A.H. to grope her breasts and genital area over her clothing. Spalding warned A.H. that no one would believe him if he reported the abuse.

A white male medical professional who appeared to be in his forties sexually abused A.H. during multiple "medical exams". To A.H., the first couple exams felt like standard protocol until the medical professional instructed him to pull down his pants to expose his genitals and began touching A.H.'s penis and testicles until A.H. appeared aroused. The abuse further escalated in the subsequent exams to involve the medical professional manually stimulating A.H.'s penis until he ejaculated and performing invasive rectal exams that included repeatedly digitally penetrating A.H., sometimes with multiple

	fingers. The medical professional assured A.H. that everything that happened during these exams was normal procedure.
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6.11 Plaintiff A.H.2

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	Early 2000s; 14 years old
Location(s) of Abuse	Naselle Youth Camp Maple Lane School
Perpetrator, if known	Naselle: Mr. Bloom (spelling approximate), a male counselor Maple Lane: Coach, a male staff member
Details of Abuse	<u>Naselle Youth Camp</u> Mr. Bloom, a male counselor who worked the night shift, sexually abused A.H.2 multiple times. Bloom was a heavyset white man who always wore glasses, a hat, a button-up shirt, and shorts, and appeared to be in his forties. A.H.2 struggled with wetting the bed, so Bloom assisted A.H.2 with changing the sheets and accompanied A.H.2 to the shower. On several occasions, Bloom forced A.H.2 to masturbate in the shower while Bloom watched

1 and masturbated simultaneously. Bloom threatened to
2 make A.H.2's time "harder", send A.H.2 to another facility,
3 or send A.H.2 to the "hole" if he reported the abuse. Bloom
4 rewarded A.H.2's silence with CDs, sodas, snacks, and
5 extra time out of his cell.

6 Maple Lane School

7 A short, white male staff person who was referred to as
8 "Coach" sexually abused A.H.2 repeatedly.

9 In Birch Lodge, A.H.2 was placed on suicide watch and
10 Coach was assigned to monitor him. Coach allowed A.H.2
11 to have special privileges in exchange for sexual favors.
12 Coach coerced A.H.2 to masturbate while Coach watched
13 and, eventually, Coach coerced A.H.2 to manually
14 stimulate Coach's penis.

15 When A.H.2 transferred back to Olympic Lodge, Coach
16 continued to abuse him. On multiple occasions, Coach
17 accompanied A.H.2 on trips to the recreation building
18 where he forced A.H.2 to orally and manually stimulate
19 Coach's penis and did the same to A.H.2. Coach then
20 coerced another inmate, A., to participate in the abuse; he
21 forced A.H.2 and A. to orally and manually stimulate each
22

	other's genitals while he watched. A. bravely reported the abuse to the staff, but did not mention Coach's name, only A.H.2's name. The State failed to properly investigate this report. A prudent investigation would have revealed that Coach was putting money in A.H.2's commissary to buy his cooperation.
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6.12 Plaintiff A.H.3

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1979 to 1980; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male corrections officer, name unknown
Details of Abuse	A male corrections officer groomed and sexually assaulted A.H.3 multiple times. The officer was a Hispanic male with a heavy build who had a streak of white in his black hair and appeared to be in his late thirties or early forties. The officer chatted and played guitar with A.H.3 in his cell and the officer's office. The officer began testing A.H.3, touching him on the back and asking him if the contact bothered him. After several guitar session in the office, the

	officer forced A.H.3 to perform and receive oral sex. The officer rewarded A.H.3 with extra food.
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6.13 Plaintiff A.J.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	Early 1980s; 14 years old
Location(s) of Abuse	Woodinville Community Facility
Perpetrator, if known	Larry Bosi (spelling approximate), a male staff member
Details of Abuse	Larry Bosi, a tall, white male staff member who wore thick glasses and appeared to be in thirties, sexually assaulted A.J. multiple times. When Bosi drove A.J. to visit his father, Bosi exposed and manually stimulated his penis while manually stimulating A.J.'s penis over his clothing. He then forced A.J. to remove his clothing and forcibly performed oral sex on him.

6.14 Plaintiff A.K.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1979 to 1980; 16 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Joanne, a female art teacher and Jan, a female staff member
Details of Abuse	Joanne, an art teacher, and Jan, a female staff member, sexually abused A.K. multiple times. Joanne was a tall, slim white woman with curly brown hair who appeared to be in her fifties. She sexually abused A.K. after class. Joanne groped and fondled A.K.'s genitals, performed oral sex on him, and coerced him into having vaginal sex. She warned A.K. to keep the abuse a secret and rewarded him with money. Jan was a short white woman with short, sandy-brown hair who appeared to be in her late fifties to early sixties and worked in the laundry room. A.K. met Jan on work detail in the laundry. Jan coerced A.K. into engaging in oral and vaginal sex with her. She then threatened to report A.K. for making romantic advances towards her if he reported the abuse. She also rewarded A.K. with money.

6.15 Plaintiff A.L.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	Late 1980s; 15 years old

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Roger, a male staff member and two other male staff members, names unknown
Details of Abuse	Three male staff members sexually assaulted A.L. First, a white male staff member with a beard who appeared to be in his fifties, orally, anally, and vaginally raped A.L. in her cell in Copalis Cottage and in a room near the swimming pool multiple times. Another staff member, a Latino man with a mullet hairstyle who wore glasses and Brut cologne and appeared to be in his forties, raped A.L. while simultaneously choking her over a dozen times in her Toutle Cottage cell. A third staff member, a white man named Roger who had a beard and mustache and appeared to be in his forties sexually assaulted A.L. in Kalama Cottage. While escorting inmates to Alcoholics Anonymous meetings and other outings off campus, Roger isolated A.L. from the others, gave her drugs and cigarettes, and orally, vaginally, and anally raped her. In addition to the men who sexually assaulted her, A.L. was subjected to a culture of abuse while incarcerated at

	Echo Glen. Male staff members routinely rubbed their penises while overseeing her strip searches, and an older, white, balding male doctor groped her breasts during an exam.
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6.16 Plaintiff A.M.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	Early 2000s; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Maple Lane School
Perpetrator, if known	Echo Glen: Chris Cosage (spelling approximate), a male counselor; "O.T.", a male counselor; and two male counselors, names unknown Maple Lane: Ivy, a male group facilitator
Details of Abuse	<u>Echo Glen Children's Center</u> Four different counselors sexually abused A.M. First, Chris Cosage, a middle-aged white man with short hair who often wore matching sweatsuits and Jordans, brought his own clothing to the facility and encouraged A.M. and other inmates to try them on. He took them to an isolated room and convinced them to remove their clothing so that they

1 were fully naked. At times, Cosage pulled A.M. and the
2 other inmates close to his body and forced them to feel his
3 erection. When A.M. complained to other staff about
4 Cosage's behavior, he was transferred to another cottage
5 and is unaware of any investigation taking place
6
7 Once there, A.M. was targeted by an older white male
8 counselor known as "O.T." O.T. forced A.M. sit on his lap
9 during group. He also forced A.M. to masturbate and
10 manually stimulate O.T.'s penis. A.M. observed O.T.
11 abusing several other boys in this way. Additionally, two
12 white male counselors, one with long hair who appeared to
13 be in his thirties and the other with short hair and tattoos
14 on his arms, individually forced A.M. to masturbate them
15 on multiple occasions.

16 Maple Lane School

17 "Ivy", an older man with short hair and freckles who
18 facilitated sex offender group therapy, sexually abused
19 A.M. and several other male inmates. Ivy forced A.M. to
20 attend these group therapy sessions even though A.M. was
21 not incarcerated for a sexual offense. While in group, Ivy
22 made the boys talk about their sexual interests and

	desires. He also forced them to touch each other's genitals, undress in front of each other, do exercises and wrestle with one another, lick each other, place their tongues in each other's ears, and proposed other sexual contact between them. Ivy took photographs during these events. On one occasion, Ivy forced A.M. to perform oral sex on him. After Ivy was finished with the photoshoots, a second counselor collected the digital camera. When A.M. was released, Ivy gave him a few of these photographs.
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6.17 Plaintiff A.N.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1990 to 1991; 13 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Ms. Ennis (spelling approximate), a female staff member; Mr. Lund, a male staff member; and two female nurses, names unknown.
Details of Abuse	Several staff members sexually abused A.N. Ms. Ennis was a tall, white woman with blonde hair who appeared to be in her thirties. On information and belief,

	Ennis sexually abused A.N.'s cellmate. When this cellmate he left the facility, Ennis turned her attention to A.N. Ennis orally and manually stimulated A.N.'s penis and forced him to touch her breasts and genital area multiple times in the shower and in A.N.'s cell. Mr. Lund, a male staff member, abused A.N. in the TV room. Lund was a heavyset white man with a light brown mustache; he taught A.N. wrestling moves and used that "horseplay" as an opportunity to violate A.N. by grabbing A.N.'s butt, chest, and testicles multiple times. Additionally, two nurses abused A.N. when he went to the nurses' office seeking care for frequent headaches. The nurses claimed they needed to check something for "medical purposes," then squeezed his testicles and penis multiple times.
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6.18 Plaintiff A.P.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Early to mid-1990s; 17 years old
Location(s) of Abuse	Naselle Youth Camp Green Hill School

	Maple Lane School
Perpetrator, if known	Naselle: Mrs. Ennis, a female counselor and a female kitchen staff member, name unknown Green Hill: Samantha, a female staff member and three female staff members, names unknown Maple Lane: Ms. Hodges, a female cosmetology teacher and a female counselor, name unknown
Details of Abuse	<u>Naselle Youth Camp</u> Mrs. Ennis, A.P.'s assigned counselor, groomed him. Mrs. Ennis was tall, fit, white woman with light hair who appeared to be in her late twenties to early thirties. She was married to another counselor on staff. During their weekly one-on-one sessions, Mrs. Ennis inappropriately told A.P. about her sex life. A female kitchen employee in her fifties engaged in a coercive sexual relationship while A.P. worked with her in the kitchen. She was a short, chubby, white woman with dark hair. She groped A.P.'s genital area over his clothing and encouraged him to do the same to her in the facility's walk-in freezer. <u>Green Hill School</u>

Four female staff members groomed and sexually abused A.P.

A.P.'s assigned counselor Samantha, a tall Black woman in her mid to late twenties coerced A.P. into a pseudo-romantic relationship that included sexual abuse, which occurred dozens of times and in numerous locations at the facility, but primarily took place in A.P.'s cell. The sexual abuse included oral and manual stimulation of each other's genitals and vaginal sex. To reward and coerce his compliance, Samantha supplied A.P. with cigarettes, marijuana, and alcohol, and allowed him to have extra time for phone calls. Samantha knew the individuals on A.P.'s call list and when she was not on site she often called in and requested to speak with A.P., saying she was one of the friends or family members on the list.

A female staff member in the kitchen also coerced A.P. into a sexual relationship. She was a heavysset redheaded white woman who appeared to be in her thirties. The sexual abuse occurred in the facility's kitchen, included manually stimulating each other's genitals and vaginal sex, and

1 occurred more than a dozen times. This kitchen staff
2 member often brought A.P. cigarettes.

3 A female staff member stationed in the Intensive
4 Management Unit (IMU) also pursued a coercive sexual
5 relationship with A.P. She was a short white woman with
6 an average build, short gray hair, and likely in her forties
7 or fifties. Though the two mostly interacted when A.P. was
8 either in the IMU or making food deliveries, the female
9 staff member occasionally came to A.P.'s cottage to see
10 him. The female staff member exposed her breasts to A.P.
11 and encouraged him to grope them, coerced A.P. into
12 digitally penetrating her, masturbated A.P., and had
13 vaginal sex with A.P.

14 An older female staff member that worked in the laundry
15 room at the facility also sexually abused A.P. The abuse
16 included touching and groping each other over their
17 clothing.
18

19 Maple Lane School

20 Two female staff members groomed and sexually abused
21 A.P.

	The first of these was A.P.'s cosmetology teacher, who was likely named Ms. Hodges, a Black woman that appeared to be in her thirties or forties. Hodges invited A.P. to stay in her classroom to help clean up after class ended for the day. After isolating him, she engaged him in a coercive sexual relationship that included mutual masturbation on numerous occasions. She provided him with food from outside the facility to coerce and reward his compliance. A short white female counselor in her forties that worked in A.P.'s lodge developed an inappropriate interest in him and began meeting with him when he was alone in the laundry room or brought him into the staff office. The counselor masturbated A.P. and A.P. digitally penetrated her vagina.
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6.19 Plaintiff A.P.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Late 1990s to early 2000s; 14 years old
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Echo Glen: A male PE teacher, name unknown

	Naselle: A male PE teacher, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> A Physical Education (PE) teacher, a white man who often wore a hat and appeared to be in his forties, sexually abused A.P.2. in the gymnasium bathroom urinal. There, he grabbed A.P.2's penis. A.P.2 pushed him away and left the bathroom. About a week later, the PE teacher attempted to repeat this abuse and again approached A.P.2 at the urinal. However, A.P.2 courageously stepped back and told the PE teacher to leave him alone. A.P.2 protected himself by never going back to the gymnasium. <u>Naselle Youth Camp</u> Another PE teacher targeted A.P.2 at Naselle. This PE teacher was a white man with hairy arms, an average build, and appeared to be in his forties. Again, this PE teacher abused A.P.2 in the gym bathroom. There, the teacher pulled out his own penis and placed A.P.2's hand on it. A.P.2 pulled his hand away and threatened to hurt the PE teacher if he did it again.

6.20 Plaintiff A.P.3

Current Residence	Spokane County, Washington
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Approximate Dates of Abuse and Age	2003; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	“Arnold”, a female corrections officer
Details of Abuse	Arnold, a female corrections officer, sexually abused A.P.3 multiple times. Arnold was a large white woman with gray-brown hair and appeared to be in her forties. During nighttime count and after lockdown, Arnold sexually abused A.P.3 in his cell and in the showers. Arnold orally and manually stimulated A.P.3’s penis and forced him to perform oral sex on her. Arnold threatened to increase his sentence by adjusting his community risk assessment (CRA) score if he reported the abuse. She also promised to help him get out early to gain his compliance.

6.21 Plaintiff A.R.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1996 to 2000; 14 years old
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Maple Lane: Two female staff members, names unknown

	Green Hill: Kelly, a female counselor; Linda, a female counselor; Eric Nicholson, a male counselor; Shannon, a female nurse; Jan, a female staff member; and Ms. Brown, a female teacher
Details of Abuse	<u>Maple Lane School</u> Two female staff members sexually abused A.R. One, a red-headed white woman who appeared to be in her mid to late-twenties, began grooming A.R. by allowing him extra time out of his cell, additional time for phone calls, and giving him extra meals, cigarettes, marijuana, and lighters. She abused A.R. in his cell multiple times; she orally and manually stimulated his penis then coerced him into having vaginal sex. She warned A.R. not to tell anyone about the abuse. The other staff member, a tall white woman with brown hair who often acted as security in the auto mechanics shop and school area, groomed A.R. by being more lenient about rules, bringing A.R. food from outside of the facility, flirting, and sharing inappropriate personal details with him. She abused A.R. in various locations around the facility's grounds that were not monitored by cameras; the

1 abuse included orally and manually stimulating each
2 other's genitals and having vaginal sex multiple times.

3 Green Hill School

4 Several staff members sexually abused A.R. The staff
5 members who sexually abused him may have gone by the
6 following names: Kelly, Linda, Eric Nicholson, Nurse
7 Shannon, Jan, and Ms. Brown.

8 Kelly, a white woman with blond-brown hair who often
9 wore cowboy boots, and appeared to be around thirty,
10 worked as a rotating counselor or "rover". Kelly provided
11 A.R. with cigarettes, marijuana, chewing tobacco, and
12 pornographic magazines in exchange for orally and
13 manually stimulating each other's genitals and vaginal sex
14 on multiple occasions in various locations.

15 Linda, a short white woman who appeared to be in her
16 forties, worked as a counselor in Hawthorne Cottage.

17 Linda and A.R. manually stimulated each other's genitals
18 and had vaginal sex in the staff office and in A.R.'s cell;
19 Linda rewarded A.R. with extra phone time.

20 Eric Nicholson, A.R.'s assigned counselor in Hawthorne
21 cottage, was a tall, heavysset, Black former basketball
22

1 player. Nicholson often wrestled with A.R. and other
2 inmates. During this “wrestling”, Nicholson “accidentally”
3 grabbed A.R.’s genital area, rubbed his groin up against
4 A.R. and dry humped him. Nicholson was extremely
5 lenient with A.R., allowed him special privileges like extra
6 time on the phone, gave him cigarettes and, on one
7 occasion, alcohol.

8 Shannon, a white woman with silver-blond hair who may
9 have been a nurse, formed a coercive sexual relationship
10 with A.R. during his job transporting staff members
11 around the facility. They orally and manually stimulated
12 each other’s genitals and had vaginal sex multiple times in
13 the transport vehicle behind the infirmary.

14 Jan, a white woman who appeared to be in her mid-forties,
15 worked in the facility’s laundry room and was known to
16 bring in contraband for inmates in exchange for sexual
17 favors. Jan coerced A.R. into engaging in sexual activity
18 with her for pornography, cigarettes, marijuana, lighters,
19 and snack foods. Jan orally and manually stimulated
20 A.R.’s genitals and had vaginal sex with him in the
21 laundry room and in the transport vehicle.
22

Ms. Brown, a white woman who taught an art class sexually abused A.R. after he became her assistant. Ms. Brown and A.R. orally and manually stimulated each other's genitals and had vaginal sex multiple times in her classroom.

During his incarceration, A.R. reported some general details about the sexual abuse to a trusted male counselor who may have gone by Mike Brown. Brown was skeptical of the allegations; he advised A.R. to report the abuse to a staff member with more authority. A.R. feared retaliation; he did not report the abuse again. No staff or other Washington State employee ever followed up with A.R. about the abuse.

6.22 Plaintiff A.S.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2011 to 2013; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Kendra Lynch, a female counselor

Details of Abuse

Kendra Lynch, a female counselor in Spruce Cottage, groomed and sexually abused A.S. Lynch was a white woman with an average build, blue eyes, and long curly hair. Lynch singled out A.S. for special attention and frequently touched and flirted with him. Lynch found A.S. masturbating in his cell and exposed her breasts to him. Lynch continually harassed A.S. and directed him to expose his penis and masturbate while she watched. She also took him to a pool locker room and coerced him into having vaginal sex with her. She rewarded him with many forms of contraband including violent videogames, pornography, lighters, outside food, and time on the phone in his cell. She also provided him with extra food.

6.23 Plaintiff A.S.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1998 to 2000; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Griggs, a male staff member

Details of Abuse	Mr. Griggs, a male staff member, sexually abused A.S.2. Griggs was a heavysset, bald Black man who wore glasses and appeared to be in his fifties. On a weekly basis, while they were in the game room, Griggs manually stimulated A.S.2's penis and made sexual comments, like how A.S.2 was "built like a brick house." Additionally, Griggs routinely threatened A.S.2 and told him not to tell anyone about the abuse. He also rewarded A.S.2 with extra food and snacks.
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6.24 Plaintiff A.S.3

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1985; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Elsie Clark, a female counselor
Details of Abuse	Elsie Clark, a female staff member, repeatedly sexually abused A.S.3. Clark was a short, stocky white woman who had round features, short hair, appeared to be in her mid-thirties, walked with a limp, and often worked the swing shift in Chinook Cottage. Clark manipulated A.S.3 into

	complying with her sexual demands by telling him that she had the authority to determine his release date. Clark orally and manually stimulated A.S.3's penis and coerced him to touch her breasts in his cell and in a doorway in the pool building.
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6.25 Plaintiff A.W.

Current Residence	Grays Harbor County, Washington
Approximate Dates of Abuse and Age	2006; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Webb, a male staff member
Details of Abuse	Mr. Webb, a male staff member, sexually abused A.W. while on a work detail with a small group of female inmates. Webb smacked and groped A.W.'s bottom multiple times. A.W. also observed Webb grope another inmate's breasts over her shirt.

6.26 Plaintiff B.A.

Current Residence	Okanogan County, Washington
Approximate Dates of Abuse and Age	1985 to 1987; 16 years old

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Ollie Thurman, a male counselor; Phil Wright, a male recreational officer; and a female volunteer, name unknown
Details of Abuse	Three individuals sexually abused B.A. B.A.'s assigned counselor, Ollie Thurman, was a tall Black man with a medium build who wore glasses. After lockdown, Thurman took B.A. from his cell to a staff office. There, Thurman orally and manually stimulated B.A.'s penis, digitally penetrated B.A.'s rectum, forced B.A. to perform oral sex, and anally raped him. Thurman abused B.A. multiple times and threatened to place B.A. in the "IMU" (Intensive Management Unit) if he reported the abuse. During the same period, a recreational officer likely named Phil Wright, sexually abused B.A. Wright, a short, older white man, directed B.A. to clean an abandoned art building. There, Wright orally and manually stimulated B.A.'s penis and forced B.A. to perform oral sex on him. Wright also threatened to place B.A. in the "IMU" if he reported the abuse.

	Later, B.A. was also sexually abused by a female volunteer, a short white woman with blonde hair and blackened teeth who appeared to be in her late twenties. She coerced B.A. into giving and receiving oral sex and forcibly raped B.A. She continued to abuse him regularly for nearly a year and rewarded him by smuggling whiskey and marijuana into the facility.
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6.27 Plaintiff B.A.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1996; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A male counselor sexually abused B.A.2. The counselor, a white man with white hair and a beard, primarily wore blue jeans and a flannel, appeared to be in his sixties. The counselor met with B.A.2 one-on-one in his office purportedly to teach B.A.2 anger management. The counselor hypnotized B.A.2 as part of this “treatment”. The sessions began with breathing exercises, then B.A.2

	slipped into a hypnotic state. While B.A.2 was hypnotized, the counselor ejaculated into B.A.2's hand.
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6.28 Plaintiff B.B.

Current Residence	Grays Harbor County, Washington
Approximate Dates of Abuse and Age	2005 to 2007; 15 years old
Location(s) of Abuse	Green Hill School Maple Lane School
Perpetrator, if known	Green Hill: A female staff member, name unknown Maple Lane: Mr. Austinburg (spelling approximate), a male counselor
Details of Abuse	<u>Green Hill School</u> A white female staff member with short blonde hair who appeared to be in her thirties sexually assaulted B.B. In the laundry room, the staff member remarked that there were no cameras there and performed oral sex on B.B. <u>Maple Lane School</u> Mr. Austinburg, B.B.'s assigned counselor, groomed and sexually abused him. Austinburg, a thin white man with red hair who appeared to be in his forties, met with B.B. weekly for one-on-one counseling sessions. During the

	sessions, he groomed B.B. and asked him about his sexual experiences and eventually anally raped B.B. in the office. Austinburg threatened to increase B.B.'s sentence if B.B. reported the abuse.
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6.29 Plaintiff B.E.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Early to mid-1990s; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Schwizer (spelling approximate), a female counselor
Details of Abuse	Ms. Schwizer, B.E.'s assigned counselor, sexually abused him. Schwizer, a short white woman with long hair and bangs, sometimes wore glasses, and appeared to be in her thirties or forties. Schwizer took B.E. to the on-site recreation building under the guise of teaching him how to play billiards after hours, when no one else was in the recreation building. Schwizer manually stimulated his penis, performed oral sex on him and coerced him to manually stimulate her genital area. Schwizer threatened to extend B.E.'s sentence if he reported the abuse.

6.30 Plaintiff B.F.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2004 to 2006; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male counselor, name unknown, possibly Jesse or Jerry
Details of Abuse	A male counselor who may have gone by Jesse or Jerry or something similar sexually abused B.F. The counselor, a tan, stocky white man with a buzzcut and light eyes became B.F.'s assigned counselor in Kalama Cottage and met with B.F. weekly for one-on-one counseling sessions. He began grooming B.F. by giving her cigarettes. The counselor groped B.F.'s breasts and genital area and coerced B.F. to orally and manually stimulate his penis. He told B.F. she would get in more trouble if she reported the abuse.

6.31 Plaintiff B.H.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1981; 16 years old

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Counselor Jerry B., went by Mr. B
Details of Abuse	Jerry or "Mr. B", a male counselor in Quinault Cottage, repeatedly sexually abused B.H. Mr. B, a short white man with a protruding belly, appeared to be in his late thirties or early forties. Because she was pregnant, staff required B.H. to stay in her cell, isolated from the other inmates. In her cell, Mr. B rubbed B.H.'s belly, kissed her, orally and manually stimulated her vagina, and exposed his penis. Mr. B rewarded and coerced B.H.'s compliance and silence with extra food, time out of her cell, and small gifts. He also threatened that he had the power to take her privileges away at any time.

6.32 Plaintiff B.H.2

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	1983 to 1984; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mrs. Jensen, a female counselor and Dale Kelponen (spelling approximate), a male D.N.R. supervisor

Details of Abuse

Two staff members sexually harassed and abused B.H.2.

The first, Dale Kelponen a thin white man who wore glasses and appeared to be in his late forties Department of Natural Resources (D.N.R.) supervisor on B.H.2's work crew Kelponen permitted B.H.2 to sit in the front seat of the crew bus while he drove. There, Kelponen grabbed and squeezed B.H.2's genitals over his clothing and commented on the inadequate size of his testicles. Kelponen also grabbed at B.H.2's waistband, acting as if he was going to pull down B.H.2's pants to expose his genitals to the other inmates. Kelponen rewarded B.H.2's compliance and silence with food from McDonalds.

A female counselor, who may have gone by Mrs. Jensen, watched B.H.2 shower and aggressively dried his naked body with a towel. B.H.2 observed Jensen assaulting other inmates in a similar manner. B.H.2 reported these details to a counselor who may have been named Coleman, but, to B.H.2's knowledge, neither staff member was investigated.

6.33 Plaintiff B.K.

Current Residence

King County, Washington

Approximate Dates of Abuse and Age	Mid to late 1980s; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Steve, a male staff member
Details of Abuse	Steve, a male staff member, sexually abused B.K. Steve, a tall, thin, Black man, appeared to be in his late twenties. On multiple occasions, Steve entered B.K.'s cell, forcibly groped B.K.'s genitals and buttocks over his clothing, and then Steve exposed and masturbated himself. Steve threatened to send B.K. to the isolation unit if B.K. resisted.

6.34 Plaintiff B.K.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1974 to 1976; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	Due to physically and emotionally abusive and neglectful conditions at Echo Glen, B.K.2 escaped the facility and ran away to Montana. Washington State tracked her down and

	sent a male officer to transport B.K.2 back to Echo Glen. This male officer sexually assaulted B.K.2 on the plane ride back to Washington. He handcuffed B.K.2, sat her in the window seat, and groped her breasts during the plane ride.
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6.35 Plaintiff B.K.3

Current Residence	Grays Harbor County, Washington
Approximate Dates of Abuse and Age	2007 to 2009; 15 years old
Location(s) of Abuse	Alpine House Group Home – Olympia, WA Maple Lane School
Perpetrator, if known	Alpine House: David, a male staff member Maple Lane: A male counselor, name unknown
Details of Abuse	<u>Alpine Group Home</u> David, a male staff member, sexually abuse B.K.3 multiple times. David was a tall white man with an average build and dark, medium length hair who appeared to be in his thirties. David manually stimulated B.K.3's penis, forced B.K.3 to perform oral sex on David and manually stimulate David's penis. He threatened to get B.K.3 into more trouble if he did not comply. After B.K.3 transferred to

another group home, he reported the abuse to his Washington state social worker. To B.K.3's knowledge, David was not investigated.

Maple Lane School

B.K.3's assigned counselor in Laurel Cottage sexually abused him. The counselor was a balding white male who appeared to be in his forties. B.K.3 was required to meet with the counselor in the staff office for weekly counseling sessions. During the session, the counselor manually stimulated B.K.3's penis over his clothing in exchange for tokens, a currency used by inmates at the facility. He also warned B.K.3 that no one would believe him if he reported the abuse.

6.36 Plaintiff B.N.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	Early 1990s; 17 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Two male staff members, names unknown

Details of Abuse	Two male staff members sexually harassed and abused B.N. The first, a tall man of indeterminate ethnicity with a military-style haircut, gained B.N.'s trust by asking her about her offense history and her infant children. On multiple occasions, after lights out, he entered her cell and digitally penetrated her vagina. The second, a slender white man with a faint mustache and a receding hair line, sexually harassed B.N. when she transferred to a different cottage. He frequently grabbed her behind whenever she walked by.
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6.37 Plaintiff B.R.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	Early 1990s; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male corrections officer, name unknown
Details of Abuse	A white male corrections officer sexually abused B.R. He was thin with long brown hair who appeared to be in his

thirties and often wore a fedora hat and a long leather coat.

In their first interaction, the officer order B.R. to remove his clothing and change into the facility-provided garments in front of other inmates in an intimidating manner.

Multiple times afterward, the officer entered B.R.'s cell, alone, using the excuse that B.R.'s room was not up to standard and forced him to stay behind while other inmates went out for recreation time. Once alone, the officer forced B.R. to perform oral sex and manually stimulate his penis. The officer also manually stimulated B.R.'s penis and digitally penetrated B.R.'s rectum. The officer threatened to hold the other inmates back from recreation time, causing them to become B.R.'s "enemies", if he did not comply.

6.38 Plaintiff B.U.

Current Residence	Benton County, Washington
Approximate Dates of Abuse and Age	2016 to 2019; 16 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	A female kitchen staff member, name unknown; Jordan, a female staff member; and John, a male staff member
Details of Abuse	Three staff members sexually abused and harassed B.U. The staff members also failed to intervene when B.U. reported that another resident sexually abused him. The first perpetrator was an Ecuadorian female kitchen staffer who coerced B.U. into a nonconsensual “relationship”. She was slim with long red hair and a thick accent. Over the three years that B.U. worked in the kitchen, she groomed B.U., giving him nicotine chew and extra food. She coerced him to engage in multiple sex acts, including reciprocal oral sex, manual stimulation, and vaginal sex. If B.U. declined her advances, she threatened to report him to security for touching her. The second perpetrator was a Black woman with a light complexion who worked in the Hawthorne and Maple Cottages and may have gone by Jordan. She initiated inappropriate conversations with B.U. about how different white guys were compared to Black guys and about B.U.’s sexual experiences. She performed oral sex on B.U. in the

walk-in fridge. Afterward, she threatened to get him into trouble if he told anyone.

The third perpetrator was a white male staff member who may have gone by John. He had a white beard and short hair, wore glasses, and appeared to be in his fifties. “John” groomed B.U. by allowing him to have special privileges and giving him a vape. He often made inappropriate comments about B.U.’s body and, during strip searches, groped B.U.’s penis. If B.U. resisted, John threatened to plant contraband in B.U.’s room, which would result in extra time added to his sentence.

B.U.’s cellmate also anally raped B.U. When B.U. reported the sexual assaults to staff, they failed to provide him with any protection. Instead, the abuse continued for two more weeks before staff moved B.U. to another cell.

6.39 Plaintiff B.U.2

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1986 to 1987; 15 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	A male corrections officer, name unknown
Details of Abuse	A white male corrections officer sexually abused B.U.2. The officer was tall and slim with light brown hair who appeared to be in his forties and worked the night shift. Approximately once or twice a month, the officer entered B.U.2's cell at night and sexually assaulted him – forcing him to engage in reciprocal oral sex and manual stimulation. The officer threatened to find B.U.2 after his release and harm B.U.2 and his family if B.U.2 ever disclosed the abuse to anyone.

6.40 Plaintiff B.V.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2000; 16 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	Karen, a female staff member – landscaping maintenance.
Details of Abuse	Karen, a tall, slender, white female staff member with dark hair and dark eyes who appeared to be in her forties, sexually abused B.V. B.V. served on the landscaping crew, which Karen oversaw. She was known for hiding vodka

and nicotine chew around the grounds for her crew to find and consume. Karen sexually abused B.V. on multiple occasions, usually after he had consumed the vodka she supplied. Karen pulled him into a more secluded area covered by foliage where she kissed him, orally and manually stimulated his penis, and coerced him to digitally penetrate her vagina and have vaginal sex. Karen threatened to report B.V. for raping her if he reported the abuse.

6.41 Plaintiff B.W.

Current Residence	Skagit County, Washington
Approximate Dates of Abuse and Age	1988; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Gilkey, a male counselor and another male counselor, name unknown
Details of Abuse	Mr. Gilkey, a heavysset Black man in his fifties or sixties, sexually abused B.W. During a routine room check in Eagle Lodge, Mr. Gilkey entered B.W.'s cell, sat on his bed, and told B.W. to strip. Mr. Gilkey manually stimulated

	B.W.'s penis then suggested B.W. perform oral sex on him; B.W. declined. Mr. Gilkey continued to abuse B.W. over the next several months. A white male counselor also sexually abused B.W. The counselor was in his fifties with a slim build. He forced B.W. to manually stimulate his penis during strip searches. The counselor threatened that B.W. would not be released if he reported the abuse.
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6.42 Plaintiff C.A.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1999 to 2001; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Echo Glen: A male staff member, name unknown Naselle: Two male staff members, names unknown
Details of Abuse	<u>Echo Glen Children's Center</u> A white male staff member repeatedly took C.A. to the bathroom and sexually abused him. There, the staff member manually stimulated C.A.'s penis then forced C.A. to do the same to him. On information and belief, the staff

member abused C.A.'s friend at Echo Glen in the same manner.

Naselle Youth Camp

Two white male staff members abused C.A. separately, but in the same manner. The abuse occurred in the bathroom and in an area next to the day room. Nearly every time one of the staff members came on shift, they orally and manually stimulated C.A.'s penis. They forced C.A. to do the same to them, although C.A. recalls only one of the staff members making him reciprocate oral sex. To reward him, the staff gave C.A. a job in the kitchen, which was considered the best job at the facility. Both staff members threatened that if C.A. told anyone, he would lose that job and lose his visitation privileges.

6.43 Plaintiff C.B.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1996 to 1997; 14 years old
Location(s) of Abuse	Naselle Youth Camp

Perpetrator, if known	A female counselor and a male staff member, names unknown
Details of Abuse	A female counselor sexually abused C.B. The counselor worked in C.B.'s Lodge and was a white woman with dark hair who appeared to be in her twenties or early thirties. She entered C.B.'s cell when he was locked down to comfort him with snacks and emotional support. Once the counselor gained C.B.'s trust, she began sexually abusing him. On multiple occasions, the counselor manually stimulated C.B.'s penis and coerced him to grope her breasts in his cell. C.B. was also sexually harassed by a male staff member, a heavysset black man who often wore glasses and appeared to be in his forties to fifties. C.B. recalled that the male staff member became more aggressive towards him after sexual encounters with the female staff member took place. The male staff member frequently threatened to transfer C.B. to Green Hill where the staff member suggested the inmates would rape C.B.

6.44 Plaintiff C.C.

Current Residence	Pierce County, Washington
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Approximate Dates of Abuse and Age	1989; 17 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Hunter, a male counselor
Details of Abuse	Mr. Hunter, a male counselor, sexually abused C.C. multiple times. Hunter was a bald, muscular, white man. When C.C. was held in the “box,” Hunter entered alone, blocked the window, and threatened C.C., saying that he would give him infractions and prevent him from being released if he did not cooperate. Hunter then forced C.C. to manually stimulate his penis. On multiple occasions, Hunter also anally raped C.C. Twice, C.C. told another staff member that he did not want Hunter as his counselor anymore because he was “hurting him in ways that he should not be.” Both times, the staff member ignored his report, and no action was taken against Hunter.

6.45 Plaintiff C.C.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Late 1980s; 16 years old

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Debbie, a female kitchen staff supervisor
Details of Abuse	Debbie, a female kitchen supervisor, sexually abused C.C.2. Debbie was a heavysset white woman with short hair. Debbie orally and manually stimulated C.C.2's penis dozens of times in the walk-in refrigerator. Debbie rewarded C.C.'s compliance with candy, cigarettes, and cologne.

6.46 Plaintiff C.C.3

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2007 to 2008; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A male counselor sexually abused C.C.3. The counselor was a tall white man who had a mustache and appeared to be in his fifties to early sixties. The abuse started when the counselor accused C.C.3 of skipping his medication and sent him to the "hole." There, the counselor sexually abused C.C.3 under the guise of conducting strip-searches.

	During these “searches” he manually stimulated C.C.3’s penis, exposed himself and once tried to anally rape C.C.3, but C.C.3 was able to fight him off. The counselor threatened to make C.C.3’s time at the facility miserable if he reported the abuse.
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6.47 Plaintiff C.C.4

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A white female staff member groomed and sexually abused C.C.4 in Alder Cottage. The staff member was short with long brown hair who appeared to be in her thirties. She monitored the inmates in Alder while they completed their daily tasks and spent time in their cells watching movies on VCR players. The staff member brought in food and snacks for C.C.4 to earn his trust and entice him into engaging in long conversations in which she told him intimate details about her personal life. She brought in

	pornographic VHS tapes and watched them in C.C.4's cell with him. If he refused to watch the videos, she told him that she would no longer bring him snacks and other gifts and that he would get into trouble. While watching the pornographic videos in C.C.4's cell, she orally and manually stimulated his penis and coerced him to perform oral and vaginal sex.
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6.48 Plaintiff C.D.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1995 to 1996; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Carla Johnson, a female staff member
Details of Abuse	Carla Johnson, a heavyset woman of Asian descent in her late twenties or early thirties who had the South Korean flag tattooed on her calf, sexually assaulted C.D. repeated. Johnson groomed C.D. with compliments and extra food and drinks. Johnson entered C.D.'s cell after lights out, kissed him, manually stimulated his penis and performed

	oral sex on him. Several times, Johnson coerced C.D. into having vaginal sex. Johnson continued to harass C.D. after his release. She called his home and parked her car nearby. Eventually she convinced C.D. to meet up with her and coerced C.D. into performing sexual acts in her vehicle several times after his release.
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6.49 Plaintiff C.F.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1997; 17 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Jones, a female counselor
Details of Abuse	Ms. Jones, C.F.'s assigned counselor, sexually abused him. Jones met with C.F. regularly for one-on-one counseling sessions and used this time alone with C.F. to groom and sexually abuse him. Jones performed oral sex on C.F. and coerced him to manually stimulate her breasts, buttocks, and genital area in the staff office and in C.F.'s cell. Jones

	encouraged C.F. to continue to maintain contact with her after his release.
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6.50 Plaintiff C.G.

Current Residence	Grays Harbor County, Washington
Approximate Dates of Abuse and Age	1995 to 1997; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A white male staff member sexually abused C.G. The staff member was balding, smelled of cigarette smoke, and appeared to be in his sixties. The staff member brought C.G. into the laundry room, retrieved three pornographic magazines from a locked cabinet, and gave them to C.G. The staff member then exited the room, leaving C.G. locked inside. When the staff member returned, he cornered C.G. and lightly stroked C.G.'s penis. C.G. was able to free himself from the staff member's grasp and left the room. C.G.'s experience at Green Hill also included severe mistreatment and neglect. After the sexual abuse occurred,

	C.G. purposefully fought with another child inmate with the goal of getting away from the staff member who abused him. C.G. was taken to solitary where he was stripped of his clothing, handcuffed using a belly chain and shackles, and left in a cell for weeks to months at a time without being allowed to shower.
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6.51 Plaintiff C.H.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	2014 to 2015; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male corrections officer, name unknown
Details of Abuse	A male corrections officer who worked the night shift anally raped C.H. Late at night, C.H. signaled from his cell that he needed to use the bathroom and the single officer on duty remotely opened the door from the control booth. While in the bathroom, C.H. heard someone enter the bathroom along with the tell-tale noise of an officer – keys jingling. The officer shoved his body up against C.H.’s backside and told C.H. not to look back or say anything.

	The officer then anally raped him while whispering obscene things into his ear. C.H. kept his eyes closed during the entire assault but could feel that the officer/assailant had a large belly and was significantly bigger than him.
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6.52 Plaintiff C.H.2

Current Residence	Jefferson County, Washington
Approximate Dates of Abuse and Age	Mid 1970s; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Mr. Abbot, a male corrections officer
Details of Abuse	Abbot, a male corrections officer, repeatedly abused C.H.2 while he was in isolation. Abbot was balding, possibly of Italian descent, and appeared to be in his sixties. On multiple occasions, Abbot entered C.H.2's cell and made sexual comments about his body. Abbot then grabbed C.H.2's penis, rubbed his own penis on C.H.2, attempted to perform oral sex on C.H.2., and then anally raped C.H.2. The assault ended when C.H.2 began yelling.

	Whenever escorting C.H.2 to the shower, Abbot followed C.H.2 from behind and prodded him forward by sticking a key in C.H.2's anus. While C.H.2 showered, Abbot forced him to masturbate. Abbot threatened to drug C.H.2 and rape him while he was unconscious. C.H.2 reported Abbot's conduct to other staff members. Staff ignored C.H.2's reports and took no action against Abbot.
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6.53 Plaintiff C.J.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2003; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually assaulted C.J. The staff member was of Hispanic descent, appeared to be in his late twenties to early thirties, and worked in the facility's kitchen. C.J. obtained a job working at the commissary, located near the kitchen, in the last few months of her sentence. C.J. saw the staff member periodically during her workday, but the two never interacted until he

	sexually assaulted her. He pulled her into a nearby bathroom where he forced her to perform oral sex and raped her. He assaulted her a second time about one week later in the same manner. The staff member warned C.J. not to report the abuse. She was released from the facility shortly after the second assault.
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6.54 Plaintiff C.K.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2008 to 2009; 17 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male physician, name unknown
Details of Abuse	A white male physician sexually abused C.K. The physician had gray hair and a receding hairline, wore glasses, and appeared to be in his forties. C.K. was pulled from his cell and taken to medical for a medically unnecessary prostate “exam”. C.K. was asked to sign a form permitting the exam. When C.K. questioned the form, the doctor threatened to send him to solitary confinement if he did not sign. The doctor digitally penetrated C.K.’s

	rectum, a wholly inappropriate exam to do on a teenage boy with no medical purpose.
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6.55 Plaintiff C.L.

Current Residence	Mason County, Washington
Approximate Dates of Abuse and Age	2008; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female medical provider, name unknown
Details of Abuse	A white female medical provider sexually abused C.L. during a medical exam at the on-site infirmary. The medical provider was petite and appeared to be in her sixties. During the exam, the provider instructed C.L. to pull down his pants for part of the exam. When C.L. developed an erection, the provider told C.L. that this was a normal response. She then manually stimulated his penis and testicles while asking C.L. about his sexual development and how often he masturbated. The provider implied that if C.L. told anyone about the details of the exam, he could get into trouble.

6.56 Plaintiff C.L.2

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1996; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Lalone, a female gym teacher and a female staff member, name unknown
Details of Abuse	Two female staff members sexually abused C.L.2. The first, a gym teacher named Lalone, was an athletic woman of Hispanic descent with dark hair, appeared to be in her late thirties. Lalone coerced C.L. to have vaginal sex with her multiple times. On information and belief, Lalone sexually abused other inmates in the facility as well. The second female staff member who sexually abused C.L.2 was a white woman with red hair and blue eyes who appeared to be in her thirties and worked in the Evergreen Lodge. The staff member coerced C.L.2 to have vaginal sex with her.

6.57 Plaintiff C.M.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2013; 16 years old

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Patty, a female counselor
Details of Abuse	C.M.'s assigned counselor in Bitch Cottage, Patty, sexually abused him. Patty was an older, heavysset woman with a wart on her face, and shoulder-length wavy brown hair. During their weekly one-on-one counseling sessions, Patty manually stimulated C.M.'s penis. Eventually, C.M. made a formal request to change his counselor, which was granted. No staff made any inquiries as to why C.M. requested a new counselor.

6.58 Plaintiff C.M.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1995 to 1997; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Virginia, a female counselor
Details of Abuse	Virginia, a white female counselor, sexually abused C.M.2. Virginia appeared to be in her sixties. While Virginia was not C.M.2's assigned counselor, she repeatedly called C.M.2 into her office for one-on-one counseling sessions.

	There, under the pretense of discussing C.M.2's past trauma, Virginia sexually abused C.M.2. On multiple occasions, Virginia manually stimulated and digitally penetrated C.M.2's vagina and forced C.M.2 to masturbate while Virginia watched. C.M.2 was especially vulnerable during this time because she was pregnant. When C.M.2 resisted, Virginia threatened to take C.M.2's privileges, add time to her sentence, and separate her from her baby after she gave birth.
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6.59 Plaintiff C.M.3

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1984; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Bosley (spelling approximate), a male counselor and a male staff member, name unknown
Details of Abuse	Two male staff members sexually assaulted C.M.3. Mr. Bosley, C.M.3's assigned counselor, was a balding, heavyset white man who appeared to be in his forties. Bosley frequently came to C.M.3's cell to conduct "room

	inspections". During these inspections, Bosley implied that he could facilitate C.M.3 being released early in exchange for sexual favors. On several occasions, Bosley orally and manually stimulated C.M.3's penis, coerced C.M.3 to do the same to him, and anally raped C.M.3 in his cell and in the locker rooms. Another male staff member also sexually assaulted C.M.3. He invited C.M.3 to assist him with maintenance projects and forced C.M.3 to perform oral sex on him.
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6.60 Plaintiff C.Q.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1978 to 1979; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Roberts, a female staff member
Details of Abuse	A white female staff member sexually abused C.Q. The staff member had blonde hair and appeared to be in her late twenties to early thirties. She primarily worked the night shift and may have gone by "Roberts". She sexually abused C.Q. in his cell multiple times a week after

	lockdown. She entered C.Q.'s cell while he was asleep, pulled aside his bedding and his bottoms down to expose his penis, and repeatedly told C.Q. to relax while she masturbated him. Each time, Roberts stopped right before C.Q. ejaculated. She told C.Q. that if he reported the abuse to anyone, she would deny the allegations and ensure his privileges were taken away.
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6.61 Plaintiff C.R.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2002; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Syd (AKA Sydney), a male D.N.R. crew foreman
Details of Abuse	Syd, a male D.N.R. foreman, sexually abused C.R. Syd was a thin Native American man with graying black hair and a thick mustache who always wore glasses, overalls, and a flannel shirt and appeared to be in his sixties. One morning, while out on a work site, C.R. left the crew to retrieve a small chainsaw from the bus that transported the inmates with Syd following close behind her. While

C.R. looked for the chainsaw, Syd began smoking a cigarette. He offered it to C.R., and she took a drag which resulted in her feeling nauseated and lightheaded. C.R. almost fainted, but Syd caught her in time. He then proceeded to kiss C.R.'s neck and roughly grabbed her vaginal area over her jeans. He then licked his fingers, slipped his hand down the front of her pants, and digitally penetrated her while she was half-conscious. Syd pulled away from her when they heard the other crew members approaching the bus and told her not to tell anyone or the other girls might become angry with her for being a snitch. C.R. met with her counselor and put in a request to be taken off work detail to be away from D.N.R. staff.

6.62 Plaintiff C.R.2

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2003; 12 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female counselor and four male staff members, names unknown

Details of Abuse

A white female counselor sexually abused C.R.2. She was stocky and appeared to be in her seventies. She initially showed C.R.2 favoritism, allowing him extra time out of his cell and extra dessert. Multiple times a week, the counselor came into C.R.2's cell to sexually abuse him. She performed oral sex on him and manually stimulated his genitals and forced him to do the same to her. She also inserted objects into C.R.2's rectum, and coerced C.R.2 to have vaginal sex.

On a few occasions, the counselor brought in a male staff member to participate in the sexual abuse. The male staff member had a medium build, black hair, and appeared to be in his late twenties to early thirties. The male staff member forced C.R.2 to perform oral sex on him, inserted objects into C.R.2's rectum, and anally raped C.R.2 while the counselor masturbated. Both staff members told C.R.2 that no one would believe him if he reported the abuse.

Three other male staff members who appeared to be in their thirties sexually abused C.R.2 One of the staff members was older and had brownish-gray hair, another had short black hair, and the third had brownish-blond

	hair. The three staff members simultaneously orally and anally raped C.R.2.
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6.63 Plaintiff C.S.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2006 to 2010; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Echo Glen: Diane, a female counselor Naselle: Ms. Porter, a female staff supervisor
Details of Abuse	<u>Echo Glen Children's Center</u> Diane, C.S.'s assigned counselor, sexually abused him. Diane was a heavysset white woman with short blond hair and blue eyes who appeared to be in her forties. Diane sexually abused C.S. during their weekly counseling sessions multiple times. She exposed her breasts to C.S. and forced him to grope them, kissed him, and coerced him to have vaginal sex. If C.S. expressed any hesitation, denied her sexual advances, or refused to attend their counseling sessions, Diane threatened to give C.S. a higher Community Risk Assessment (CRA) score, which reflected

poorly on C.S. and could delay his release. Diane also threatened to have C.S. transferred to a more secure facility if he reported the abuse.

Naselle Youth Camp

Ms. Porter, a female staff supervisor, sexually abused C.S. Ms. Porter was a slim white woman with dark blond hair and green eyes who appeared to be in her late thirties or early forties. Porter frequently took C.S. and another inmate out of their cells to go on walks around the facility grounds and allowed them to play basketball. Eventually, she only took C.S. out on these excursions and sexually abused him. In multiple locations at the facility, Porter orally and manually stimulated C.S.'s penis, forced C.S. to orally stimulate and digitally penetrate her genitals, and coerced him to have vaginal sex.

6.64 Plaintiff C.T.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2003; 16 years old
Location(s) of Abuse	Naselle Youth Camp

Perpetrator, if known	Mr. Prestigaurd (spelling approximate), a male counselor
Details of Abuse	Mr. Prestiguard, a white male counselor, sexually abused C.T. Prestiguard had a shaved head, a mustache and a prosthetic leg and appeared to be in his fifties. Multiple times a week, Prestiguard visited C.T. in her cell at night. There, under the guise of "counselling" her, Prestiguard fondled C.T.'s backside and genitals and attempted to force C.T. to perform oral sex on him.

6.65 Plaintiff C.V.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1998 to 2000; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	The white male head counselor in Kittitas Cottage sexually abused C.V. He sexually abused C.V. in the facility's pool bathroom and in the counselor's office at Kittitas. On multiple occasions, the counselor orally and manually stimulated C.V.'s penis, forced C.V. to orally and manually stimulate his penis, and anally raped C.V. The counselor

	promised to provide C.V. with snacks and candy if he kept the abuse secret.
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6.66 Plaintiff C.W.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1993; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male kitchen staff member sexually abused C.W. He was a lean Black man who appeared to be in his forties or fifties. C.W. worked for the kitchen delivering trays to the segregation unit alongside the staff member. While alone in the segregation unit, on several occasions, the staff member pressed his genitals into C.W.'s back then orally and manually stimulated C.W.'s penis. The staff member told C.W. that no one would believe him if he reported the abuse and, instead, C.W. would be locked up in the segregation unit.

6.67 Plaintiff C.Y.

Current Residence	Pierce County, Washington
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Approximate Dates of Abuse and Age	2004; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Miss H, a female counselor
Details of Abuse	C.Y.'s counselor, who may have gone by "Miss H," was a heavyset woman with short brown hair who appeared to be in her thirties and wore masculine clothing. C.Y. worked a part-time job with a Naselle electrician who occasionally took her off-site to run errands. Miss H insisted that C.Y. participate in lengthy and invasive strip searches after each shift, regardless of whether she had left the facility. During those strip searches, Miss H groped C.Y.'s breasts and genitals, and told her to "keep this between us." In exchange for her silence, Miss H gave C.Y. hair gel and allowed her to continue working.

6.68 Plaintiff D.B.

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	1994 to 1995; 13 years old
Location(s) of Abuse	Echo Glen Children's Center

Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A female staff member sexually abused D.B. multiple times in different locations at the facility. The staff member was a Black woman with medium-length, braided hair and freckles on her nose who appeared to be in her mid-twenties. The staff member exposed herself to D.B. and encouraged him to fondle and suck on her breasts, performed oral sex on D.B. and pressured him to have vaginal sex with her, but D.B. was able to resist her.

6.69 Plaintiff D.B.2

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	2002 to 2005; 16 years old
Location(s) of Abuse	Naselle Youth Camp Sunrise Group Home
Perpetrator, if known	Naselle: Ms. Matlock, a female staff member Sunrise: Darrell, a male staff member
Details of Abuse	<u>Naselle Youth Camp</u> Ms. Matlock, a female staff member, repeatedly sexually abused D.B.2 dozens of times over two periods of incarceration. Matlock was a white woman with curly

1 brown hair who appeared to be in her thirties or forties.
2 Matlock typically worked at night and often accompanied
3 D.B.2 to his cell or an isolation unit in Eagle Lodge. There,
4 Matlock removed her clothing, sat on D.B.2's chest, and
5 forced D.B.2 to perform oral sex on her by rubbing her
6 genitals on his face. D.B.2 reported the abuse to another
7 staff member, Jane Ennis, but she did not believe him and
8 apparently, did nothing to protect D.B.2 or to report the
9 abuse.
10 During D.B.2's second incarceration at the facility, Matlock
11 continued abusing him. D.B.2 did his best to avoid
12 Matlock, however, in retaliation, she sent him to isolation
13 with handcuffs and ankle chains. Matlock visited D.B.2 in
14 isolation every few days for several weeks and, again,
15 forced him to perform oral sex on her. D.B.2 courageously
16 told his counselor, Mr. Bloom, about the abuse, but again,
17 Mr. Bloom did not believe him and provided him with no
18 help.
19

20 Sunrise Group Home

21 Darrell, a male staff member, sexually abused D.B.2 while
22 collecting his urine for urinalysis (UA) testing. Darrell was
23

	a balding white man who wore glasses and appeared to be in his mid-forties to early fifties. Once, when D.B.2 failed to provide a UA sample, Darrell bartered sexual favors with him. Darell told D.B.2 that he would provide the urine sample for him if D.B.2 performed oral sex on him. D.B.2 reported the abuse to his counselor, Dennis, but again, he was not believed.
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6.70 Plaintiff D.F.

Current Residence	Klickitat County, Washington
Approximate Dates of Abuse and Age	1988 to 1989; 13 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A male counselor sexually abused D.F. The counselor was a white man with gray hair who appeared to be in his fifties and claimed to be a chess champion. The counselor regularly allowed a few inmates, including D.F., to stay up late to play chess with him after lockdown. On multiple occasions, the counselor orally and manually stimulated D.F.'s penis and digitally penetrated D.F.'s rectum while

	telling D.F., "This doesn't hurt you". The counselor threatened to never allow D.F. to see his family again if he reported the abuse and rewarded D.F.'s silence and compliance with extra food.
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6.71 Plaintiff D.H.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1993 to 1996; 16 years old
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Maple Lane: Ms. Murray, a female staff member Green Hill: Nicole a female staff member and Samantha, a female staff member
Details of Abuse	<u>Maple Lane School</u> Ms. Murray, a female staff member, sexually abused D.H. Murray was a heavysset Black woman in her thirties or forties. Murray frequently braided D.H.'s hair and used this to gain his trust. Murray coerced D.H. to join her in a supplies closet. There, she performed oral and vaginal sex and told D.H. to keep the abuse secret. <u>Green Hill School</u>

	Nicole and Samantha, two female staff members, sexually abused D.H. separately. Nicole was a white woman who appeared to be in her late twenties to early thirties. Nicole coerced D.H. to have vaginal sex with her in the staff office. Samantha was a tall, slim Black woman who appeared to be in her late twenties and styled her hair in long braids. Samantha coerced D.H. to have vaginal sex with her after she caught him masturbating in his cell.
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6.72 Plaintiff D.H.2

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	Late 1970s; 12 years old
Location(s) of Abuse	Cascadia Juvenile Reception and Diagnostic Center Naselle Youth Camp
Perpetrator, if known	Cascadia: A male staff member, name unknown Naselle: A male staff member, name unknown
Details of Abuse	<u>Cascadia Juvenile Reception and Diagnostic Center</u> A male staff member sexually abused D.H.2 The staff member, a former boxer, was a white man who appeared to be in his sixties, had a “boxer’s face” – a flat nose that

1 looked like it had been broken multiple times and
2 “cauliflower” ears – and worked in the recreation area. The
3 staff member took D.H.2 to a room connected to the
4 recreation area and told D.H.2 to remove his clothing. The
5 staff member then manually stimulated D.H.2’s genital
6 area. After, the staff member threatened to send D.H.2 to
7 the “hole” if he reported the abuse.

8 Naselle Youth Camp

9 A male staff member in Cougar Lodge sexually abused
10 D.H.2. The staff member was a muscular white man with
11 dark, curly hair who appeared to be in his thirties. Late at
12 night, D.H.2 woke up to the staff member kneeling at the
13 side of his bed. D.H.2 found that his blankets were pulled
14 down and his penis was exposed. He knew that his genitals
15 had been manipulated by the staff member in some way
16 and was terrified.
17

18 6.73 Plaintiff D.H.3

19 Current Residence	Mason County, Washington
20 Approximate Dates of Abuse and Age	1995 to 1996; 14 years old
21 Location(s) of Abuse	Naselle Youth Camp

Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member who worked as a physical education teacher and coach at the facility sexually abused D.H.3. The staff member was a middle-aged, heavysset white man. The staff member groomed and sexually abused D.H.3 frequently. The staff member orally and manually stimulated D.H.3's penis, forced D.H.3 to do the same to him, and anally raped D.H.3 dozens of times. On a few occasions, the staff member tried to coerce D.H.3 to reciprocate the anal sex, but D.H.3 was unable to maintain an erection. The staff member normalized the abuse and forced D.H.3 to verbalize how much he enjoyed each act. He threatened to keep D.H.3 incarcerated indefinitely if he resisted or reported the abuse and rewarded him with special privileges, tobacco, and extra food for his compliance.

6.74 Plaintiff D.J.

Current Residence	Los Angeles County, California
Approximate Dates of Abuse and Age	1992 to 1993; 15 years old

Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mr. Moluzzo, a male staff member and Ms. Flumang, a female counselor (spellings approximate)
Details of Abuse	Mr. Moluzzo and Ms. Flumang, two staff members, sexually abused D.J. Mr. Moluzzo was a short Italian American man who wore glasses and appeared to be in his thirties. Moluzzo accused D.J. of smoking in his cell bathroom and, out of fear, D.J. denied the allegation. Moluzzo grabbed onto D.J.'s testicles over his clothing and squeezed them hard, causing D.J. significant pain. Moluzzo threatened to kill D.J. if he smoked tobacco in his cell again. Ms. Flumang, a counselor, was a white woman with long hair and glasses who appeared to be in her thirties. Flumang began grooming D.J. after his transfer to Pine Cottage and manipulated him into believing the two were in a romantic relationship that included sending each other love letters. Flumang often kept D.J. in his cell when the other inmates left the cottage and, once the unit was empty, she entered D.J.'s cell and sexually abused him. Flumang manually stimulated D.J.'s penis and coerced

	him to have vaginal sex. Flumang rewarded him with gifts like cigarettes and candy.
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6.75 Plaintiff D.K.

Current Residence	Bannock County, Idaho
Approximate Dates of Abuse and Age	2020 to 2022; 17 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Becky Teubner, a female science teacher
Details of Abuse	Becky Teubner, a short white female science teacher who appeared to be in her sixties, sexually abused D.K. She isolated D.K. and confided in D.K. about her use of sex toys during a class. She then manually stimulated D.K.'s penis over his clothing, telling him she would not need sex toys if she had the "real thing." D.K. broke away from Teubner's grasp when another staff member approached. Through the remainder of the class, Teubner used her hands and face to make sexual gestures at D.K. Immediately after class, D.K. reported the abuse to a male staff member who brought the assault to the attention of a PREA representative. Shortly after reporting the abuse, D.K. was

	transferred to a group home and Teubner returned to the facility after a three-day administrative leave.
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6.76 Plaintiff D.L.

Current Residence	Clallam County, Washington
Approximate Dates of Abuse and Age	1977 to 1980; 14 years old
Location(s) of Abuse	South Kitsap Group Home Mission Creek Youth Camp Green Hill School
Perpetrator, if known	South Kitsap & Green Hill: John Lewis, a male staff member Mission Creek: Patrick Zock, a male staff member
Details of Abuse	<u>South Kitsap Group Home</u> John Lewis, a tall, white man with dark curly hair who appeared to be in his late twenties or early thirties and was one of three adults who managed the group home, sexually abused D.L. Lewis took D.L. on multiple overnight trips to a campsite located in Seabeck, Washington. On these trips, Lewis provided D.L. with marijuana and alcohol before forcibly performing oral sex

1 on him. Lewis rewarded D.L. with frequent weekend home
2 visits.

3 Mission Creek Youth Camp

4 Patrick Zock, a male counselor, sexually abused D.L. Zock
5 was a short, chubby white man with blond hair who
6 appeared to be in his late thirties to early forties and drove
7 a red muscle car. Zock also had a close friendship with
8 John Lewis, the man who previously abused D.L. Zock
9 performed oral sex on D.L. in the staff office and on day
10 trips off-site at a nearby campsite after providing D.L. with
11 marijuana and alcohol. Zock rewarded D.L. with new
12 clothing, extra free time, money, and cigarettes. Zock
13 threatened to take away D.L.'s visitation privileges and
14 delay his release if D.L. reported the abuse.

15 Green Hill School

16 John Lewis added his name to D.L.'s visitor list and
17 continued to sexually abuse him. Green Hill staff allowed
18 Lewis to enter the facility and come to D.L.'s cell to speak
19 with him one-on-one. Lewis provided D.L. with marijuana
20 in exchange for leaving the facility on day trips where
21 Lewis performed oral sex on D.L.
22

6.77 Plaintiff D.M.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1986 to 1987; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused D.M. under the guise of conducting strip searches after family visits. The staff member was a slender white man with thinning dark hair, a mustache, and glasses who appeared to be in his forties. The staff member always “searched” D.M. for contraband in D.M.’s cell or in the bathroom. At first, these searches included patting D.M. down over his clothes but then escalated to the staff member manually stimulating D.M.’s penis while asking D.M. if the touching “felt good.” On several occasions, he forced D.M. to manually stimulate his penis as well. The staff member told D.M. that no one would believe him if he reported the abuse and that D.M. would be sent to isolation.

6.78 Plaintiff D.P.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2011 to 2012; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male counselor and a male bus driver, names unknown
Details of Abuse	Two male staff member sexually abused D.P. D.P.'s assigned counselor, a tall, slender white man with sandy-brown hair who appeared to be in his late thirties to early forties, repeatedly sexually abused D.P. during their one-on-one counseling sessions. The counselor orally and manually stimulated D.P.'s penis, forced D.P. to do the same to him, and attempted to anally rape D.P. The counselor threatened to send D.P. to the "hole" if he reported the abuse and rewarded his silence and compliance with free time, new shoes, and extra snacks. A male bus driver also sexually harassed D.P. The bus driver was a bald Black man with a protruding belly who appeared to be in his fifties. Multiple times, when D.P. got on the bus, the driver purposefully brushed his hand against D.P.'s hips and butt.

6.79 Plaintiff D.R.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2016 to 2017; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Isaac Pope, M.D., a male physician
Details of Abuse	D.R. was forced to participate in a medically unnecessary “exam” performed by Dr. Isaac Pope, a tall Black man who wore glasses and appeared to be in his fifties or sixties. During this “exam,” Dr. Pope manually stimulated D.R.'s penis for an extended period.

6.80 Plaintiff D.S.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1993 to 1997; 14 years old
Location(s) of Abuse	Indian Ridge Youth Camp Parke Creek Community Facility Canyon View Community Facility
Perpetrator, if known	Indian Ridge: A female counselor and a male staff member, names unknown Parke Creek: A female staff member, name unknown Canyon View: A male staff member, name unknown

Details of Abuse	<u>Indian Ridge Youth Camp</u> Two staff members, D.S.'s assigned counselor and a male staff member, sexually abused D.S. and provided him with methamphetamine to coerce and reward his compliance. D.S.'s counselor was a slim white woman who had dark hair and appeared to be in her thirties. The counselor orally and manually stimulated D.S.'s penis and coerced him to have vaginal sex in her office during their counseling sessions. The other staff member, a white man who appeared to be in his late twenties, regularly selected D.S. to help with cleaning after lockdown. During this time, the staff member orally and manually stimulated D.S.'s penis, forced D.S. to do the same to him, digitally penetrated D.S.'s rectum and anally raped him. The staff member threatened D.S. that bad things would happen if D.S. reported the abuse. <u>Parke Creek Community Facility</u> A blonde, white female staff member who appeared to be in her forties sexually abused D.S. After grooming D.S. with extra attention and cigarettes, she orally and manually
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stimulated D.S.'s penis and coerced him to perform oral and vaginal sex. She warned that both of them would get in trouble if D.S. reported the abuse.

Canyon View Community Facility

A heavysset male staff member with dark hair who appeared to be in his thirties sexually abused D.S. He manually stimulated D.S.'s penis while collecting a urine sample and in the dining room. The staff member threatened to transfer D.S. to a worse facility if he reported the abuse.

6.81 Plaintiff D.S.2

Current Residence	Lewis County, Washington
Approximate Dates of Abuse and Age	1988; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Rick, a male staff member
Details of Abuse	Rick, a male staff member, sexually abused D.S.2 multiple times in the gymnasium. Rick was a short white man with blond hair and a beard who wore glasses, corduroy pants, and flannel shirts. Rick manually stimulated D.S.2's penis

	and forced D.S.2 to perform oral sex. D.S.2 reported the abuse to Mrs. D., a female staff member, but she did not believe him and did nothing.
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6.82 Plaintiff D.S.3

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2011 to 2012; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Michael Nolan, a male counselor
Details of Abuse	Michael Nolan, a male counselor in Mariner Lodge, sexually abused D.S.3. Nolan developed a special interest in D.S.3 and sought opportunities to be alone with him. Nolan often used the privacy of D.S.3's cell to slide his hand up the leg of D.S.3's shorts and manually stimulate D.S.3's testicles and inquired about D.S.3's masturbation habits and sexual interests. Nolan took D.S.3 to an isolation room to conduct "strip searches" on a weekly basis. Once D.S.3 was naked, Nolan further humiliated him by demanding that D.S.3 lift his genitals then turn around, bend over, and spread his butt

	cheeks. On several occasions, Nolan tried to coerce D.S.3 to perform oral sex on him. Over time, Nolan became more forceful by pushing D.S.3's head down towards his penis and rubbing his penis on D.S.3's face. Nolan used threats of transfer to Green Hill School and promises of extra points to manipulate and control D.S.3.
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6.83 Plaintiff D.S.4

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1987; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Ennis, a male staff member
Details of Abuse	Mr. Ennis, a male staff member, sexually abused D.S.4. Ennis was a tall, muscular white man with red hair who appeared to be in his thirties. Ennis asked D.S.4 to help clean up after a physical altercation occurred in the showers. After D.S.4 finished cleaning, Ennis inspected his naked body to look for any "injuries" and digitally penetrated D.S.4's rectum. Ennis implied that he would provide D.S.4 with cigarettes, increase D.S.4's security

	level, and allow D.S.4 to move into a single cell in exchange for sexual favors. Ennis also threatened to send D.S.4 to isolation and delay D.S.4's release if he reported the abuse. About a month before D.S.4's release, Ennis entered his cell in the isolation unit and forced D.S.4. to perform oral sex on him.
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6.84 Plaintiff E.B.

Current Residence	Sacramento County, California
Approximate Dates of Abuse and Age	2010 to 2013; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Green Hill School
Perpetrator, if known	Echo Glen: Travis/Trevor, a male counselor Green Hill: Katie, a female staff member
Details of Abuse	<u>Echo Glen Children's Center</u> E.B.'s assigned counselor, who may have gone by Travis or Trevor, groomed and sexually abused him. Travis/Trevor was a white man with brown hair with a skin condition and appeared to be in his late twenties to early thirties. During counseling sessions, Travis/Trevor shared sexually explicit photos of himself with E.B., engaged him in

inappropriate conversation, and eventually manually stimulated E.B.'s legs, thighs, and genitals. Travis/Trevor instructed E.B. to keep the abuse secret.

Green Hill School

Katie, a white female staff member, groomed and sexually abused E.B. Katie had brown hair, a nose piercing and appeared to be in her mid-twenties. Katie periodically came to visit E.B. in his cottage where she provided him with extra food, hygiene products, cigarettes, and chewing tobacco. After gaining E.B.'s trust, Katie gave him a cell phone containing nude photos of herself. Katie orally and manually stimulated E.B.'s penis and coerced him to perform oral and vaginal sex on her multiple times in E.B.'s cell and in the facility's gymnasium. She instructed E.B. to keep these encounters secret.

6.85 Plaintiff E.B.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1992 to 1994; 14 years old
Location(s) of Abuse	Cushman House Parke Creek Community Facility

Perpetrator, if known	Cushman: Paul, a male staff member and Cornell/Cordell, a male staff member Parke Creek: A male staff member, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> Two male staff members, Paul and Cornell, sexually abused E.B.2. Paul, a white man who appeared to be in his thirties or forties, physically and sexually abused E.B.2 in his room during the nightshift. Throughout E.B.2's stay, Paul entered E.B.2's room late at night and woke him by tossing him from the bed and, on multiple occasions, manually stimulated E.B.2's genitals and digitally penetrated E.B.2's rectum. Cornell, a Black man who also appeared to be in his thirties or forties, also regularly entered E.B.2's room and orally and anally raped him, in addition to forcing him to engage in manual stimulation of the man's genitals. <u>Parke Creek Community Facility</u> A white male staff member who wore glasses and appeared to be in his thirties sexually abused E.B.2. The State permitted this staff member to take the boys off-site for trips, including for hikes, to restaurants, and to AA

	Meetings, without another staff member. During these trips, when E.B.2 needed to use the restroom, the staff member followed him and orally and manually stimulated E.B.2's penis.
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6.86 Plaintiff E.C.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2010; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A tall Black male staff member who appeared to be in his early to mid-thirties pushed E.C. into the "Quiet Room" and demanded she undress and perform oral sex on him. When E.C. refused, the staff member threatened to beat her if she told anyone. E.C. immediately sought out a female staff member and reported the abuse. Within an hour of reporting, the male staff member confronted E.C., groped her breasts under her clothing, and punched her in the face. E.C. is unaware of any investigation or disciplinary action taking place.

6.87 Plaintiff E.H.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1972 to 1974; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Kenny, a male counselor
Details of Abuse	Mr. Kenny, a male counselor in the Mariner Unit, repeatedly sexually assaulted E.H. Kenny was a white bearded, heavyset man who often wore glasses. The State permitted Kenny to take groups of boys to his home near Naselle for weekend fishing trips. Kenny's physical affection toward E.H. quickly escalated to sexual touching. On multiple fishing trips, Kenny manually stimulated E.H.'s penis and forced E.H. to do the same to him.

6.88 Plaintiff E.S.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1992 to 1999; 11 years old
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Echo Glen: A male staff member, name unknown

	Naselle: Mr. Ennis, a male counselor; Mr. Larson, a male counselor; Mr. Londen (spelling approximate), a male physical education instructor; and Ms. Hahn (spelling approximate), a female counselor
Details of Abuse	<u>Echo Glen Children's Center</u> A male staff member sexually assaulted E.S. while searching for a missing tool on a D.N.R. project site. All boys on the site were required to participate in a strip search to locate the missing item. During E.S.'s search, the staff member manually stimulated E.S.'s penis while the staff member masturbated himself; he told E.S. no one would believe him if he reported the incident. <u>Naselle Youth Camp</u> Multiple staff members sexually abused E.S. Two male counselors, Mr. Ennis, a tall white man with red hair and a muscular frame, and Mr. Larson, a short, heavyset white man who wore glasses, forced E.S. to perform oral sex on each of them and threatened to increase E.S.'s sentence if he did not comply. Mr. Londen, a male physical education instructor, anally raped E.S. in the gymnasium showers.

	Ms. Hahn, E.S.'s assigned counselor, called E.S. into her office and manually stimulated his penis over his clothing then coerced him to digitally penetrate her vagina.
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6.89 Plaintiff E.S.2

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1999; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Jen, a female staff member
Details of Abuse	Jen, a female staff member, groomed and sexually abused E.S.2. Jen was a white woman with dirty blonde hair who appeared to be in her thirties. Jen approached E.S.2 while he was on cleaning duty in the administration building, made a flirtatious comment, and offered to start hiding cigarettes for him in the building. On several occasions, Jen called E.S.2 into the bathroom and coerced him to grope her breasts and buttocks while she manually stimulated E.S.2's penis and her genitals simultaneously. Jen instructed E.S.2 to keep the abuse secret and implied that he could lose his job at the administration building if

	he reported her behavior. The abuse ended after E.S.2 lost his job when staff discovered tobacco in his possession.
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6.90 Plaintiff E.W.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1973 to 1975; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A male counselor sexually abused E.W. The counselor was a white man with a buzzcut who appeared to be in his late thirties to early forties. The counselor worked in Eagle Lodge, where E.W. was housed, and was often present during auto class. The State permitted the counselor to take E.W. off-site to do yard work at the counselor's home, which was about a 15-minute drive away from campus. After E.W. completed his assigned tasks, the counselor invited E.W. inside his home and coerced E.W. to take a shower with him. The counselor orally and manually stimulated E.W.'s penis then forced E.W. to manually

	stimulate his penis in the shower. After, the counselor forced E.W. to perform oral sex and anally raped him.
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6.91 Plaintiff E.W.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2000-2005; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female nurse, name unknown and Michael Nolan, a male counselor.
Details of Abuse	A female nurse and a male counselor sexually abused E.W.2. The nurse was a heavysset white woman with dirty blonde hair and green eyes who appeared to be in her thirties. The first incident occurred during a required physical exam. The nurse orally and manually stimulated E.W.2's penis during the exam. On a few other occasions, the nurse called E.W.2 back to the infirmary for additional "exams". She, again, orally and manually stimulated E.W.2's penis and coerced him to digitally penetrate her vagina. If E.W.2 resisted the abuse, the nurse threatened to tell other staff that he made threats to kill and rape her.

As a reward, she allowed him to have extra time out of his cell and provided him with chewing tobacco.

Michael Nolan, a male counselor who facilitated the Native Brotherhood group, also sexually abused him. Nolan spent excessive amounts of alone time with E.W.2 and many other inmates. On one occasion, he encouraged a group of inmates to strip down and swim in a nearby body of water while he watched. Nolan approached E.W.2 in his cell and informed E.W.2 that he knew about the nurse abusing him, then demanded sexual favors in exchange for gifts like cigarettes, candy, and extra food. Nolan forcibly manually stimulated E.W.2's penis and, on several occasions, forced E.W.2 to masturbate while he watched. Nolan attempted to perform oral sex on E.W.2 only stopping when E.W.2 began crying. Nolan told E.W.2 that the rest of the staff at the facility had Nolan's back, so if E.W.2 reported the abuse, no one would believe him. Nolan also threatened to physically assault E.W.2.

6.92 Plaintiff F.A.

Current Residence	Thurston County, Washington
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Approximate Dates of Abuse and Age	2009 to 2010; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused F.A. The staff member was a bald, heavysset Black man who appeared to be in his mid-thirties and worked the nightshift. The staff member often allowed F.A. to leave her cell at night to keep him company during his shift. He frequently made sexually suggestive comments to her and expressed interest in dating her if she was not at the facility. He repeatedly entered her cell, groped and fondled her breasts and genitals, and smacked her buttocks. F.A. reported the abuse to staff, but they ignored her complaints, and the abuse and harassment continued. Eventually, F.A. was interviewed about the abuse. However, the interviewers instructed F.A. to keep the interview and the staff person's abuse strictly private. F.A. was released shortly afterward.

6.93 Plaintiff F.A.2

Current Residence	Douglas County, Oregon
Approximate Dates of Abuse and Age	1980s; 14 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male D.N.R. crew foreman, name unknown.
Details of Abuse	A male D.N.R. foreman sexually abused F.A.2. The foreman was a Black man who appeared to be in his thirties. He enlisted other inmates on the crew to intimidate F.A.2 into participating in sexual acts under the threat of physical assault and being sent to isolation. On multiple occasions, the foreman forced F.A.2 to masturbate in front of him and another inmate then forced the two inmates to perform oral sex on each other.

6.94 Plaintiff F.P.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	Mid-1970s; 10 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Lori (spelling approximate), a female staff member

Details of Abuse	Lori, a female staff member from Guam who had long, red hair, repeatedly sexually abused F.P. On multiple occasions, the State permitted Lori to take F.P. off-site on weekend trips to Lori's home or to campsites. During these trips and in F.P.'s cell at the facility, Lori forced F.P. to orally stimulate and digitally penetrate her vagina and performed oral sex on him.
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6.95 Plaintiff F.S.

Current Residence	Multnomah County, Oregon
Approximate Dates of Abuse and Age	1982 to 1984; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Gregory, a male counselor and Mr. Harrison, a male counselor
Details of Abuse	Mr. Gregory and Mr. Harrison, two male counselors, sexually abused F.S. Gregory was a slender white man with gray hair who appeared to be in his forties. On several occasions, Gregory gave F.S. "driving lessons" on the way to the D.N.R. worksite by having F.S. sit on his lap and steer the vehicle. Gregory often took a group of two or

three boys, along with F.S., to his home or a nearby swimming pool. During many of these outings, Gregory orally and manually stimulated F.S.'s penis, digitally penetrated F.S., and forced F.S. to perform oral sex on him. Harrison was a tall, barrel-chested, balding white man who had brown hair and appeared to be in his late thirties to early forties. After a visit to Gregory's home, Harrison drove F.S. back to the facility. During the drive, Harrison told F.S. that he had heard about the sexual relationship he had with Gregory. Harrison pulled the car over and attempted to anally rape F.S.

6.96 Plaintiff G.B.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1999 to 2003; 14 years old
Location(s) of Abuse	Naselle Youth Camp Maple Lane School
Perpetrator, if known	Naselle: A male corrections officer and a female counselor, names unknown Maple Lane: Five male corrections officers and two female staff members, names unknown

Details of Abuse

Naselle Youth Camp

Two staff members sexually abused G.B. A tall, bald, white corrections officer sexually abused G.B. multiple times in his cell under the guise of a search. The officer orally and manually stimulated G.B.'s penis, forced G.B. to do the same to him, digitally penetrated G.B.'s rectum, and anally raped him. The officer threatened to kill G.B. if he ever reported the abuse.

A heavysset white female counselor orally and manually stimulated G.B.'s penis and coerced him to have vaginal sex in his cell, the bathroom, and the office. She rewarded G.B. with special privileges including home-cooked meals, pornographic magazines, and marijuana.

Maple Lane School

Multiple staff members groomed and abused G.B. A Black male staff member in Pacific Lodge orally and manually stimulated G.B.'s penis, forced G.B. to do the same to him, and raped G.B. One time, another staff member joined in the abuse. One of the men raped G.B. while the other watched and masturbated.

In Rainier Lodge, a white male corrections officer with an English accent orally and manually stimulated G.B.'s penis and raped him. The officer threatened to kill G.B. if he reported the abuse and rewarded him with extra time out of his cell. Two other staff members, both white men, abused G.B. in the same manner.

A white female counselor with black hair groomed G.B. during their one-on-one counseling sessions. On several occasions, in G.B.'s cell, she orally and manually stimulated his penis and coerced him to have vaginal sex. She rewarded him with extra phone calls, food, and drugs.

A white female English teacher who had gray hair and wore glasses abused G.B. in her classroom. On days where she played a movie for the class, she sat next to G.B. at his desk and manually stimulated his penis. The teacher rewarded G.B. with candy, cigarettes, marijuana, and anything else he requested.

6.97 Plaintiff G.F.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	2010; 16 years old

Location(s) of Abuse	Green Hill "Satellite" at Maple Lane School
Perpetrator, if known	A male physician, name unknown
Details of Abuse	A large Black male physician with graying hair and glasses sexually assaulted G.F under the guise of a medical exam. At the time of G.F.'s incarceration, Green Hill School experienced a bed shortage. The State sent G.F. and other boys to Maple Lane School calling it "Green Hill Satellite". As a part of the intake process, G.F. was required to complete a physical exam. During this exam, the physician digitally penetrated G.F.'s rectum repeatedly. The doctor also groped G.F.'s genitals and forcibly tugged at his penis, causing G.F. immense pain. In a follow-up visit, the doctor suggested G.F. masturbate before bed and complimented G.F.'s physique.

6.98 Plaintiff G.R.

Current Residence	Whatcom County, Washington
Approximate Dates of Abuse and Age	2015 to 2016; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Ms. Cook, a female staff member

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 137

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Details of Abuse	Ms. Cook, a female staff member, sexually abused G.R. Cook was a heavyset Black woman who appeared to be in her late forties. G.R. initially encountered Cook when she instructed him to pass along a letter to another inmate, with whom Cook had a romantic relationship. While school was in session, Cook supervised G.R. and the other inmate while they were playing basketball in the enclosed court where no other staff were present. There, Cook orally and manually stimulated both inmates' penises.
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6.99 Plaintiff G.W.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1994 to 1995; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Chrisy Colton, a female teacher
Details of Abuse	Ms. Chrisy Colton, a female English teacher, sexually abused G.W. Colton was a slim white woman who has red hair and appeared to be in her forties. Over a period of two years, Colton's requests for massages during class escalated to her asking G.W. to stay after class. On several

	occasions, when G.W. remained after class let out, Colton manually stimulated G.W.'s penis and coerced him to manually stimulate her breasts, genitals, and backside and, eventually, to have vaginal sex with her. Colton, as a reward, did not require G.W. to complete homework assignments and brought him extra food. She also threatened to get him in more trouble if he reported the abuse.
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6.100 Plaintiff H.B.

Current Residence	Klamath County, Oregon
Approximate Dates of Abuse and Age	1970 to 1971; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mr. Morgan, a male staff member
Details of Abuse	Mr. Morgan, a male staff member, sexually abused H.B. numerous times. Morgan was a thin white man with long, unkempt hair who appeared to be in his late twenties, smelled strongly of patchouli, and worked the later shift in H.B.'s cottage. Morgan orally and manually stimulated H.B.'s penis and forced H.B. to manually stimulate his

	penis in H.B.'s cell and in the unit's isolation cell. Morgan threatened to leave H.B. in the isolation cell indefinitely if he did not comply. H.B. reported the abuse to his assigned counselor, Anita Baker. Baker did not believe H.B. and told him she knew he was lying and spreading false information. Morgan's abuse continued and further escalated. He anally raped H.B. multiple times before H.B. was released.
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6.101 Plaintiff H.D.

Current Residence	Benton County, Washington
Approximate Dates of Abuse and Age	1994 to 1996; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Dan, a male counselor and Lou, a male staff member
Details of Abuse	Dan and Lou, two male staff members, sexually abused H.D. Dan, H.D.'s assigned counselor, was a balding white man with facial hair who appeared to be in his thirties and claimed to be a former Seattle Seahawks football player. During the majority of their counseling sessions, Dan manually stimulated H.D.'s breasts and genitals.

	Lou was a white man who had salt and pepper hair and a full beard, appeared to be in his fifties, and worked in the gymnasium and recreation area. On multiple occasions, Lou pressed his groin against H.D. and groped her breasts over her clothing while they were in the gym and the weight room.
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6.102 Plaintiff H.G.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1992 to 1996; 14 years old
Location(s) of Abuse	Echo Glen Children's Center Jessie Dyslin Boys Ranch
Perpetrator, if known	Echo Glen: Missy Lalone, a female staff member, a male physician, name unknown; and Jim, a male staff member Jessie Dyslin: A male staff member, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> Three staff members sexually abused H.G. Missy Lalone, a female staff member, was a tall, athletic white woman who had brown hair with blonde extensions and appeared to be in her late twenties. After gaining H.G.'s trust by engaging him in long conversations and allowing him extra time out

of his cell, Lalone repeatedly sexually abused him in the director's office. Lalone orally and manually stimulated H.G.'s penis and coerced H.G. to manually stimulate her breasts and genitals, digitally penetrate her vagina, and engage in vaginal sex. Lalone told H.G. that, if he reported the abuse, he would get into more trouble, and no one would believe him.

A tall white male physician with brown hair who appeared to be in his mid-forties performed two unnecessary and invasive rectal exams on H.G.

Jimmy, a counselor, was a slim white man with gray hair and hunched shoulders who appeared to be in his sixties. On multiple occasions, when Jimmy was alone with H.G., he forced H.G. to manually stimulate his penis. Jimmy threatened to place H.G. in the lockdown cottage indefinitely if he reported the abuse.

Jessie Dyslin's Boys Ranch

A male staff member sexually abused H.G. The staff member was a heavysset, middle-aged white man. He gained H.G.'s trust by playing games with him and giving him extra time out of his cell. The staff member squeezed

	H.G.'s buttocks while collecting a urine sample for testing. He threatened to send H.G. to another facility if H.G. reported the incident.
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6.103 Plaintiff H.H.

Current Residence	Whatcom County, Washington
Approximate Dates of Abuse and Age	2000 to 2002; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Norman, a male woodshop teacher
Details of Abuse	Norman, a male woodshop teacher, sexually abused H.H. multiple times a week. Norman was a tall, slim white man who appeared to be in his sixties. Norman encouraged H.H. during class, gained H.H.'s trust, and called H.H. to his office. There, Norman kissed H.H., orally and manually stimulated H.H.'s penis, forced H.H. to do the same to him, and anally raped H.H. He threatened to send H.H. to the IMU if H.H. did not participate.

6.104 Plaintiff H.Y.

Current Residence	King County, Washington
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Approximate Dates of Abuse and Age	2012; 17 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A male counselor sexually abused H.Y. multiple times in an isolation room. The counselor was a white man with brownish-blond hair who appeared to be in his mid-thirties. The counselor manually stimulated H.Y.'s genitals and anus when he was confined to the isolation room. Even when H.Y. was not confined to the room, the counselor repeatedly harassed H.Y. by leering at him and grabbing H.Y.'s butt and genitals under the guise of "wrestling". The counselor threatened to transfer H.Y. to Green Hill if he reported the abuse and rewarded H.Y.'s compliance with candy, chips, and extra phone time.

6.105 Plaintiff I.A.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	1994 to 1995; 11 years old
Location(s) of Abuse	Echo Glen Children's Center

Perpetrator, if known	Dan, a male staff member
Details of Abuse	Dan, a male staff member, repeatedly sexually abused I.A. Dan was a white man with brown hair, a receding hairline, and a mustache who often wore long-sleeved flannel shirts and appeared to be in his mid to late forties. While I.A. was in isolation, Dan stripped I.A. of his clothing and shackled his ankles and wrists to a bench to complete a "cavity search" of I.A.'s mouth and rectum. Dan orally and manually stimulated I.A.'s penis and, for brief periods, freed I.A.'s wrists from the restraints so I.A. could perform the same acts on him.

6.106 Plaintiff I.B.

Current Residence	Skagit County, Washington
Approximate Dates of Abuse and Age	2007 to 2009; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Mike, a male corrections officer and two other male corrections officers, names unknown
Details of Abuse	Three corrections officers sexually harassed and abused I.B. in the "IMU". The three officers were former military

and discussed their experiences in the different branches frequently. One of the three officers, Mike, was a tall white man with a beard and a full tattoo sleeve. Another officer had numerous tattoos covering his neck and arms, often wore a camouflage hat, and chewed tobacco. The third officer was short, thin, and frequently wore a hat. These officers were known to patrol the entire Green Hill facility and oversaw the IMU. These officers subjected the inmates in their care to humiliating rituals and random punishments, which included terrorizing them by removing all their personal items from their cells, leaving them naked without any bed or blankets for comfort, and pulling them around the facility by their genitals. The officers abused I.B. in this manner multiple times. I.B. reported the abuse to his counselor, Ben Lupo, but no action was taken and the abuse continued until I.B. was returned to the general population.

6.107 Plaintiff I.M.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1999 to 2000; 12 years old

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused I.M. The staff member was a tall Black man with short hair who was well-liked by the other inmates. During recreation time in the yard, I.M. went to retrieve a stray ball when the staff member groped her buttocks and genital area, claiming he needed to ensure she was safe. On another occasion, the male staff member cornered I.M. and kissed her, forcibly pushing his tongue into her mouth.

6.108 Plaintiff J.B.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	1980 to 1981; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Two male staff members, names unknown
Details of Abuse	Two male staff members sexually abused J.B. at separate times but in the same manner. When J.B. was in isolation, she repeatedly woke up to staff members touching her genitals. Once she was awake, the staff members forced

	her to perform oral sex on them, then vaginally raped her. The staff members threatened to keep J.B. at the facility indefinitely if she reported the abuse and rewarded her with cigarettes
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6.109 Plaintiff J.B.2

Current Residence	Skagit County, Washington
Approximate Dates of Abuse and Age	1979 to 1981; 14 years old
Location(s) of Abuse	Echo Glen Children's Center Green Hill School
Perpetrator, if known	Echo Glen: Mike Hawkins, a male staff member Green Hill: Joanne, a female art teacher
Details of Abuse	<u>Echo Glen Children's Center</u> Mike Hawkins, a male staff member, sexually assaulted J.B.2. Hawkins was a white man with shoulder-length dark curly hair who appeared to be in his forties. Hawkins took J.B.2 out to the nearby lake on a fishing trip where he orally and manually stimulated J.B.2's penis. Hawkins offered to continue taking J.B.2 on outings if he remained compliant. On another occasion, Hawkins entered J.B.2's cell and manually stimulated J.B.2's penis. He attempted

to force J.B.2 to orally and manually stimulate his penis. Hawkins threatened to make J.B.2's life at the facility more difficult and take away J.B.2's privileges if he did not comply. When J.B.2 refuted Hawkins' advances, he placed J.B.2 in an isolated holding cell for several days before J.B.2 transferred to another facility.

Green Hill School

Joanne, a female art teacher, sexually abused J.B.2. Joanne was a white woman who appeared to be in her fifties. Joanne led J.B.2 to a storage room and, on another occasion, to the men's bathroom where she kissed J.B.2 and orally and manually stimulated his penis. Joanne instructed J.B.2 to keep the abuse secret. To escape the abuse, J.B. transferred out of Joanne's art class.

6.110 Plaintiff J.B.3

Current Residence	Mason County, Washington
Approximate Dates of Abuse and Age	Mid-1990s; 13 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male dentist, name unknown

Details of Abuse

A male dentist drugged and sexually assaulted J.B.3. The dentist was a middle-aged white man with a receding hairline and thick glasses. J.B.3 was sent to the on-site dentist's office to address his tooth pain. The dentist gave J.B.3 a liquid substance and instructed him to drink it to numb the pained area. Shortly after, J.B.3 began to lose consciousness, but while he was still lucid, he observed the dentist maneuver J.B.3's body so that he was bent over the dental chair. The dentist pulled down J.B.3's pants and raped him. After J.B.3 regained consciousness, he informed numerous staff members about the assault but was ignored and placed in a higher security cottage, presumably in retaliation. J.B.3 experienced rectal bleeding for several days after the assault and developed an infection. J.B.3 was taken to the infirmary for treatment and, again, reported the assault to several staff members and, was again, ignored.

6.111 Plaintiff J.B.4

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1978; 16 years old

Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused J.B.4. The staff member was a white man with brown hair who appeared to be in his thirties and worked the night shift. On multiple occasions after lockdown, the staff member retrieved J.B.4 from her cell and brought her to the dining room where he provided her with ice cream and snacks before he orally and manually stimulated her vagina and coerced her to perform oral sex on him.

6.112 Plaintiff J.C.

Current Residence	Douglas County, Washington
Approximate Dates of Abuse and Age	1989 to 1992; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused J.C. multiple times. The staff member was a tall, middle-aged white man with frizzy hair and a long mustache who wore glasses, smelled like Old Spice, and worked the night shift. The staff

	member entered J.C.'s room at night and manually stimulated J.C.'s penis. The staff member exposed himself to J.C. and tried to escalate the abuse, but J.C. was able to fight him off. The staff member threatened to keep J.C. in his cell indefinitely and get J.C. fired from his job if J.C. reported the abuse and gave J.C. cigarettes and matches to reward and induce his silence.
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6.113 Plaintiff J.C.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1993 to 1994; 13 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A female staff member sexually abused J.C.2. The staff member was a white woman with a strong build and dirty blonde hair who appeared to be in her thirties. She frequently engaged J.C.2 in sexually explicit conversations where she inquired about his sexual experiences and preferences in her private office. On several occasions, the staff member required J.C.2 to assist her with making

	popcorn for everyone in the unit. While in the kitchen, the staff member stood inappropriately close behind J.C.2 and reached down J.C.2's pants to grope his genitals, often squeezing them which caused J.C.2 significant pain. To ensure J.C.2 did not report her behavior, the staff member allowed him to have extra time out of his cell, extra phone time, and facilitated his transfer to a group home.
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6.114 Plaintiff J.D.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1983 to 1984; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mr. Miller, a male counselor
Details of Abuse	Mr. Miller, an older white male counselor who often wore glasses, sexually abused J.D. Miller groomed J.D. by gifting him cigarettes and candy. On multiple occasions, Miller isolated J.D. in his office and manually stimulated J.D.'s penis then forced J.D. to do the same to him. Miller threatened to prevent J.D. from seeing his family indefinitely if he did not participate in the abuse.

6.115 Plaintiff J.D.2

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1988 to 1989; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mrs. Morane (spelling approximate), a female staff member
Details of Abuse	Mrs. Morane, a heavyset female staff member with thinning auburn hair, sexually abused J.D.2. On multiple occasions, Morane entered J.D.2's cell and manually stimulated his penis. She rewarded him with cigarettes.

6.116 Plaintiff J.D.3

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	1999; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Penny, a female counselor
Details of Abuse	Penny, a female staff member, sexually abused J.D.3. Penny was a white woman with red hair who appeared to be in her late twenties to early thirties and oversaw J.D.3's

	cafeteria cleaning detail. She gained J.D.3's trust by gifting him extra hygiene items and candy. While J.D.3 cleaned, she rubbed her body up against him. Penny also oversaw transporting J.D.3 to other areas in the facility and sexually abused him during transport. Penny coerced J.D.3 to expose his genitals and manually stimulated his penis, then coerced him to manually stimulate her breasts and genitals. Penny told J.D.3 no one would believe him if he reported the abuse and threatened that his disclosure would result in him remaining at the facility indefinitely.
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6.117 Plaintiff J.D.4

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1994 to 1995; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male physician and four male inmates, names unknown
Details of Abuse	Upon arriving at the facility, J.D.4 and several other boys were required to remove their clothing and stand in a circle. An older white male doctor stood in a circle and made jokes and comments about the size of their genitalia

	under the guise of "examining" them. The doctor then took each inmate back for individual "medical exams". During J.D.4's exam, the doctor digitally penetrated his rectum and "milked" his prostate until J.D.4 ejaculated then told J.D.4 that he needed to collect a semen sample. Later, four Black male inmates raped J.D.4 in the communal showers.
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6.118 Plaintiff J.F.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1998 to 2001; 13 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Miranda "Missy" Ross, a female counselor; Miss Gilman, a female staff member; and multiple other staff members, names unknown
Details of Abuse	Multiple staff members sexually abused J.F. Miranda "Missy" Rose was a tall, conventionally attractive female counselor who appeared to be in her mid-twenties. Missy gave J.F. gifts and manipulated him into maintaining a sexual relationship with her for over a year. Missy kissed J.F., performed oral sex on him, and coerced him to

perform oral sex on her and to engage in vaginal and anal sex. Missy did not threaten J.F. directly, but several male staff members told him that Missy would be disappointed if J.F. made up inappropriate stories about her.

Miss Gilman, female staff member who appeared to be of Asian descent, spied on J.F. while he was changing clothes in his cell. When J.F. noticed her, Gilman asked him why he was exposing himself to her. Within minutes, J.F. was accused of sexual misconduct.

On multiple occasions, J.F. was sent to isolation when he acted out. There, multiple staff members spanked his bare buttocks, fondled his genitals, and forced him to expose himself. One female staff member tied J.F. to a chair and promised to release him if she could perform oral sex on him. A middle-aged white male corrections officer manually stimulated J.F.'s penis several times while J.F. was in isolation.

6.119 Plaintiff J.F.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1993; 17 years old

Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Ms. Conswella/Consuela (spelling approximate), a female counselor
Details of Abuse	Ms. Conswella, J.F.'s assigned counselor, sexually abused him multiple times. Conswella was a white woman with freckles and shoulder length hair who appeared to be in her late forties. J.F. was required to meet with her at least once per week for counseling sessions. During their sessions, Conswella pressed her breasts up against his back, manually stimulated his penis, and coerced him to have vaginal sex with her. Conswella did not allow J.F. to have his personal mail and threatened to keep him at the facility indefinitely if he reported the abuse. She rewarded his silence and compliance by allowing him to transfer to a group home earlier than his expected release date.

6.120 Plaintiff J.F.3

Current Residence	Ferry County, Washington
Approximate Dates of Abuse and Age	2000 to 2001; 15 years old
Location(s) of Abuse	Ridgeview Community Facility

Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused J.F.3. The staff member was a white man with brown hair and facial hair who appeared to be in his forties and worked the night shift. J.F. and the other boys in his wing tried to only go to the bathroom at night in groups because of this staff member, but he often singled out one boy, sometimes J.F.3, and made the other boys go back to their cells. When the staff member was alone with J.F.3 in the bathroom, he forced J.F.3 to perform oral sex on him, manually stimulate his penis and ejaculated on J.F.3. The staff member threatened to increase J.F.3's sentence and implied that he knew where J.F.3 and his family lived.

6.121 Plaintiff J.F.4

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1983; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Mr. Gottfried, a male teacher

Details of Abuse	Mr. Gottfried, a male teacher, sexually abused J.F.4. Gottfried was a balding white man with a thick mustache who appeared to be in his thirties. Gottfried oversaw J.F.4 the student editor, and a group of inmates that worked on the Green Hill newspaper. Gottfried forcibly performed oral sex on J.F.4 and digitally penetrated his rectum. After the assault, J.F.4 was removed from the student editor position.
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6.122 Plaintiff J.G.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1991 to 1992; 16 years old
Location(s) of Abuse	Spruce Street Inn
Perpetrator, if known	Mike, a male staff member
Details of Abuse	Mike, a male staff member, sexually abused J.G. multiple times. Mike was a tall Black man who appeared to be in his late thirties to early forties. After transporting J.G. from the juvenile hall to Spruce Street Inn late one night, Mike provided J.G. with a meal then started the intake process. He asked J.G. a few questions then took him to

	the laundry room and instructed him to remove his clothing. Initially, J.G. thought he was being strip searched. Then Mike manually stimulated J.G.'s penis and forced J.G. to perform oral sex on Mike and manually stimulate Mike's penis. Mike abused J.G. in the laundry room late at night several more times. Mike rewarded J.G. with desserts and other special privileges and offered to provide J.G. with "extra protection" if J.G.'s father compensated him.
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6.123 Plaintiff J.G.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1986 to 1987; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A middle-aged white male staff member in Moolock Lodge repeatedly sexually abused J.G.2 under the guise of strip searches in J.G.2's cell, the staff office, and a storage room. On several occasions, the staff member manually stimulated J.G.2's penis, forced J.G.2 to orally and

	manually stimulate his penis, and violently anally raped J.G.2. The staff member warned J.G.2 that he would be outed as a homosexual if he reported the abuse and noted that staff would not believe him anyway. As a reward for his compliance, the staff member supplied J.G.2 with cigarettes and matches.
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6.124 Plaintiff J.G.3

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	2003 to 2005; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff member and a male physician, names unknown
Details of Abuse	A female staff member and a physician sexually abused J.G.3. The staff member was a blonde, white woman with blue eyes who appeared to be in her thirties. On multiple occasions, she isolated J.G.3 in his cell, orally and manually stimulated his penis, and coerced him to perform oral and vaginal sex.

	The physician, a heavysset white man, called J.G.3 to the infirmary multiple times for "medical exams", which were not exams and served no medical purpose. Instead, at these appointments, the physician manually stimulated J.G.3's penis and digitally penetrated his anus.
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6.125 Plaintiff J.G.4

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2000 to 2001; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Jamie/Amy, a female corrections officer
Details of Abuse	A female corrections officer sexually abused J.G.4. The officer was a white woman with dirty blond hair who occasionally wore glasses. She appeared to be in her late twenties to early thirties and may have gone by the name Jamie, Amy, or something similar. J.G.4 encountered her while he was housed in Hawthorne Cottage with cellmate C.W., a large eighteen-year-old Black male who was affiliated with a gang and was engaged in a sexual relationship. She often visited their cell to engage in sexual

	acts with C.W. while J.G.4 remained in the cell. As time went on, Jamie coerced C.W. to physically intimidate J.G.4 into engaging in sexual acts with her in their shared cell after having sex with C.W. The sexual acts included oral and vaginal sex. She sexually abused J.G.4 without C.W. present twice, once in the staff office and once in J.G.4's cell. This abuse also included oral and vaginal sex.
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6.126 Plaintiff J.H.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Mid-1970s to early 1980s; 11 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Efrat (spelling approximate), a female staff member and Craig Wilson, a male counselor
Details of Abuse	Efrat and Craig Wilson, two staff members, sexually abused J.H. Efrat was a young woman with black hair and purple glasses who appeared to be of Indian descent. Efrat sexually abused J.H. multiple times a week over a period of several years and the abuse often included J.H.'s friend and fellow inmate, C. Efrat abused J.H. and C. out on

1 walks in the woods surrounding the facility and in the on-
2 site swimming pool. The abuse started with her exposing
3 her genitals to them and escalated to her forcing J.H., C.,
4 or both boys to digitally penetrate her vagina and perform
5 oral sex on her and, in exchange, she masturbated and
6 performed oral sex on them. Over time, the abuse
7 escalated to vaginal sex and continued until J.H. was
8 released from the facility. Efrat threatened to get J.H. into
9 more trouble if he reported the abuse.
10
11 A male counselor J.H. knew as Craig Wilson also sexually
12 abused J.H. at least once per month in J.H.'s cell. Wilson
13 was a white man in his late thirties or early forties with
14 messy long hair he often styled in a ponytail. Wilson
15 manually stimulated J.H.'s penis, forced J.H. to do the
16 same to him, and digitally penetrated J.H.'s anal cavity.
17 Wilson told J.H. that he was going to hell and threatened
18 to throw J.H. into the hole if J.H. did not participate in the
19 abuse. He advised J.H. to never disclose the abuse to
20 anyone if he did not want to end up in prison and be raped
21 by other adult inmates. Wilson further convinced J.H. that
22 he had the power to facilitate J.H.'s release and rewarded

	J.H.'s silence and compliance with money for the commissary. When J.H. was finally released, he was placed in Wilson's custody. The abuse escalated to forced oral sex and anal rape while J.H. lived with Wilson and continued for about one year.
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6.127 Plaintiff J.H.2

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	1995 to 1996; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A muscular white male staff member who appeared to be in his thirties sexually abused J.H.2 in the bathroom and in J.H.2's cell. On several occasions, the staff member manually stimulated J.H.2's penis, forced J.H.2 to perform oral sex on him and manually stimulate his penis. He also digitally penetrated J.H.2's anus and attempted to anally rape him. The staff member promised to facilitate his transfer to a group home if J.H.2 kept the abuse secret.

6.128 Plaintiff J.H.3

Current Residence	Skagit County, Washington
Approximate Dates of Abuse and Age	1978; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male physician and a female teacher, names unknown
Details of Abuse	Two staff members, a male physician and a female teacher, sexually abused J.H.3. The physician was a slim white man who appeared to be in his fifties. On multiple occasions, the physician conducted "medical exams" – which served no medical purpose - where he instructed J.H.3 to remove his clothing, manually stimulated J.H.3's genitals, and repeatedly digitally penetrated J.H.3's anus. The home economics teacher, a white woman with long, blonde hair who appeared to be in her thirties, coerced J.H.3 to stay after class and forced him to perform and receive oral sex, digitally penetrated his anus, and coerced him to engage in vaginal sex. Additionally, the teacher forced J.H.3 to engage in sexual acts with a female student. She forced the two to perform oral sex on each other and engage in vaginal sex then joined the two in the

	acts. She threatened to increase J.H.3's sentence if he did not participate.
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6.129 Plaintiff J.H.4

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1995 to 1999; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Green Hill School
Perpetrator, if known	Echo Glen: Mr. Todd, a volunteer clergy member and a male staff member, name unknown Green Hill: Multiple male staff members, names unknown; a male physician, name unknown; and Dordy (spelling approximate), a male staff member
Details of Abuse	<u>Echo Glen Children's Center</u> Mr. Todd, a volunteer clergy member, sexually abused J.H.4 during bible study. Todd was a short white man with a crew-cut hairstyle who spoke with a lisp and stutter and appeared to be in his mid-twenties to early thirties. J.H.4 had bible study with Todd near the day room, and, during their sessions, Todd touched J.H.4's genitals over his pants and rubbed J.H.4's leg. Todd tried to reach under J.H.4's

1 waistband but J.H.4 was able to terminate the encounter
2 and go back to his cell.

3 Other staff members, including a large, heavyset man who
4 carried several keys, also abused J.H.4 in Chinook Cottage.
5 They restrained J.H. and then grabbed and squeezed his
6 testicles.

7 Green Hill School

8 Multiple staff members sexually abused J.H.4. A tall, thin
9 Black male staff member sexually abused J.H.4 during a
10 strip search when he first arrived at the facility. The staff
11 member turned J.H.4 around and aggressively grabbed
12 J.H.4's penis and testicles from behind while making
13 inappropriate sexual comments about J.H.4's genitals.

14 A Black male physician who wore glasses and had short,
15 grey hair, sexually abused J.H.4 during a medically
16 unnecessary hernia exam. Notably, the examination did
17 not take place in the doctor's office or medical clinic, but
18 rather in an area where the inmates made their phone
19 calls. During the exam, the doctor forcibly inserted his
20 thumbs into J.H.4's anus.
21

	Dordy, a male staff member who worked the evening shift, was a thin white man with dark brown hair and a mustache. Dordy often searched J.H.4 when he entered his cell and roughly touched his butt, penis, testicles, the sides of his genitals, and his thighs.
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6.130 Plaintiff J.I.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2012 to 2013; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Bobbie (spelling approximate), a female staff member
Details of Abuse	Bobbie, a female staff member, sexually abused J.I. Bobbie was a heavysset white woman who smoked cigarettes and appeared to be in her thirties. During a strip search, Bobbie instructed J.I. to lift his testicles. J.I., clearly uncomfortable being strip searched by a female staff member, hesitated. Bobbie grabbed J.I.'s entire genital area and lifted it up for him. On another occasion, Bobbie groped J.I.'s genitals over his pants. Bobbie threatened to lie and tell the program manager of Maple Cottage that

	J.I. groped her butt, which would result in J.I. being sent to isolation, if he caused her more trouble.
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6.131 Plaintiff J.K.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	2014; 17 years old
Location(s) of Abuse	Green Hill School Touchstone Community Facility
Perpetrator, if known	Green Hill: A male staff member, name unknown Touchstone: A female staff member, name unknown
Details of Abuse	<u>Green Hill School</u> A white male staff member with brown hair and a beard who appeared to be in his forties sexually assaulted J.K. On multiple occasions, the staff member orally and manually stimulated J.K.'s penis, forced J.K. to perform oral sex, and raped J.K. After the final assault, the staff member left J.K. naked and alone in a cell for nearly a week. <u>Touchstone Community Facility</u> A white female staff member who had curly dark brown hair, green or hazel eyes, and appeared to be in her thirties

	sexually assaulted J.K. In the bathroom, the woman instructed him to pull down his pants, performed oral sex on him and coerced him to have vaginal sex. The woman also took J.K. off campus and coerced him to have vaginal sex with her.
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6.132 Plaintiff J.K.2

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	1991 to 1993; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A male counselor sexually assaulted J.K.2 under the guise of a strip search. The counselor was a tall, thin, white man with short brown hair who appeared to be in his late twenties to early thirties and may have gone by Ross. The counselor conducted a strip search after J.K.2 completed a family visit. The counselor manually stimulated J.K.2's penis, forced J.K.2 to manually stimulate the counselor's penis, and digitally penetrated J.K.2's anus.

6.133 Plaintiff J.L.

Current Residence	Okanogan County, Washington
Approximate Dates of Abuse and Age	Early 1990s; 12 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Two male counselors and a female counselor, names unknown
Details of Abuse	Three staff members sexually abused J.L. One of J.L.'s assigned counselors, a short white man with curly brown hair and glasses who appeared to be in his mid-twenties, sexually assaulted J.L. while on a walk on the facility grounds. The counselor isolated J.L. on the walk and forced J.L. to orally and manually stimulate the counselor's penis and attempted to anally rape him. The counselor stopped when J.L. cried out in pain. He threatened to increase J.L.'s sentence if he reported the abuse and rewarded J.L.'s silence with football trading cards. A tall, lanky, white male staff member with dark hair and brown eyes who appeared to be in his thirties worked the night shift in J.L.'s cottage and sexually assaulted him in the bathroom. After J.L. requested to use the bathroom,

the man entered his cell, slipped his hand down J.L.'s pants, and manually stimulated J.L.'s penis. J.L. pushed him away and the staff member warned him to never say anything.

Another of J.L.'s other assigned counselors, a thin white woman with short blond hair who wore cat-eye style glasses and appeared to be in her late twenties to early thirties, groomed and sexually abused him in the staff office during their weekly counseling sessions and in his cell. She coerced J.L. to grope her breasts and orally stimulate her nipples and she manually stimulated his penis. She induced and rewarded J.L.'s compliance and silence by allowing J.L. to have his Walkman.

6.134 Plaintiff J.L.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2002 to 2006; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jerry, a male counselor

Details of Abuse	Jerry, J.L.2's assigned counselor in Toutle Cottage, sexually abused her. Jerry, an older, bald, white man with glasses required J.L.2 to meet with Jerry for one-on-one counseling sessions. Curiously, he often conducted these "sessions" late at night when he was working the graveyard shift. Jerry took J.L.2 out on late night walks and gave her candy to gain her trust. He then became physically affectionate with her and gave her close hugs, touched her thighs and her skin just below her waistline, and, while swimming, manually stimulated her genital area under her swimsuit.
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6.135 Plaintiff J.L.3

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1998; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male physician, name unknown
Details of Abuse	A middle-aged white male physician with graying hair sexually abused J.L.3 under the guise of a medical exam. When J.L.3 reported to the infirmary, the physician

	instructed him to pull his pants down. The physician held his face close to J.L.3's penis and sniffed it. He then held and stroked J.L.3's penis while moaning. The physician completed the exam pretending it was a routine procedure.
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6.136 Plaintiff J.M.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2002 to 2004; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	John, a male counselor
Details of Abuse	John, a male counselor, groomed and sexually abused J.M. John was a slim, middle-aged white man who was bald, wore glasses. John conducted sexually abusive strip searches on J.M. multiple times a day. Under the guise of conducting these "searches", John fondled and groped J.M.'s genitals and buttocks. On at least one occasion, another male staff member (name unknown) also participated in the abuse. John also provided pornography to J.M.

6.137 Plaintiff J.M.2

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	2009 to 2011; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Denise, a female counselor
Details of Abuse	Denise, J.M.2's assigned counselor in Hawthorne Cottage, groomed and sexually abused him. Denise was a thin white woman who had short, light-colored hair and appeared to be in her sixties. J.M.2 met with Denise for counseling sessions multiple times a week. During these sessions, Denise manually stimulated J.M.2's penis, primarily over his clothing, but she periodically slipped her hand under his waistband to stroke his genitals. She often spoke to J.M.2 while she was in the control booth through a speaker in his cell in the mornings before everyone else woke up. Denise brought in pornographic magazines and outside food for J.M.2 and informed him of upcoming cell searches.

6.138 Plaintiff J.M.3

Current Residence	Franklin County, Tennessee
Approximate Dates of Abuse and Age	1995 to 1999; 15 years old

Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A white female staff member with medium-length, brown hair who appeared to be in her fifties and worked as a cook at the facility sexually abused J.M.3 multiple times. She gained J.M.3's trust by gifting him cigarettes and extra food then sexually abused him on a weekly basis in a bathroom and in a walk-in storage closet. She kissed J.M.3, exposed her breasts and genitals, masturbated herself, manually stimulated his penis, coerced him to digitally penetrate her vagina, and solicited him for sex. When J.M.3 resisted, the staff member assured him that no one would get into trouble and told him that he liked it. She warned him that she would increase his sentence if he reported the abuse. Although another staff member witnessed the abuse and asked J.M.3 about it, she apparently never took any action to report the abuse or protect J.M.3 because the abuse continued until he left the facility.

6.139 Plaintiff J.M.4

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A female teacher, name unknown
Details of Abuse	A female teacher with long, brown hair and glasses who appeared to be in her forties sexually abused J.M.4 multiple times a week for several months. The teacher often whispered comments on his maturity and musculature and licked his ear under the guise of helping him with schoolwork during class. She also leaned over J.M.4, rubbed her breasts on his back and manually stimulated his genitals.

6.140 Plaintiff J.N.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1981 to 1983; 14 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	A female staff member, name unknown

Details of Abuse

A female staff member sexually abused J.N. multiple times. The staff member was a stocky white woman with dark hair who appeared to be in her late twenties to early thirties. Her main role at the facility was to transport inmates, including J.N., to the nearby supplies store using a facility bus once or twice a month. When J.N. was the only inmate on these trips, she sexually abused him. The staff member kissed J.N., coerced him to orally and manually stimulate her breasts and genitals, orally and manually stimulated J.N.'s penis, and solicited him for sex, which he was able to refuse. She threatened to report that J.N. raped her if he tried to report her abuse. She rewarded and coerced his compliance with cigarettes, candy, and leniency from other staff members.

6.141 Plaintiff J.O.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2017; 16 years old
Location(s) of Abuse	Naselle Youth Camp

Perpetrator, if known	Michael Nolan, a male counselor and a female staff member, name unknown
Details of Abuse	Two staff members sexually abused J.O. Michael Nolan was a Native American male counselor who was physically fit, often wore bandanas, and appeared to be in his thirties. Nolan coerced J.O. and other male inmates to swim naked with him in the lake near the sweat lodge. Nolan removed his clothing as well, exposing his penis to the boys. He rewarded J.O. with cigarettes and marijuana; he also threatened to have other inmates physically assault J.O. if he reported the abuse. The other perpetrator worked in the kitchen; She was a slim white woman with light-colored hair of average height who appeared to be in her forties and often wore red lipstick. She gained J.O.'s trust by giving him cigarettes and extra snacks. In the bathroom, the staff member performed oral sex on J.O., coerced him to digitally penetrate her vagina, and solicited sex from him. She told J.O. to keep the abuse secret.

6.142 Plaintiff J.O.2

Current Residence	Pierce County, Washington
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COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 181

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
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TELEPHONE: 206.957.9510

Approximate Dates of Abuse and Age	1985 to 1989; 15 years old
Location(s) of Abuse	Maple Lane School Echo Glen Children's Center
Perpetrator, if known	Maple Lane: "Dr. Jelly Fingers", a male medical professional and a female staff member, name unknown Echo Glen: A male physician, name unknown
Details of Abuse	<u>Maple Lane School</u> Two staff members sexually abused J.O.2 multiple times. The first, a medical professional, nicknamed "Dr. Jelly Fingers", was a frail-appearing white man likely in his fifties. He called J.O.2 to the infirmary multiple times a month for a period of several years for "medical exams". During the "exams", "Dr. Jelly Fingers" digitally penetrated J.O.2's anus and manually stimulated his penis while the man rubbed his own erect penis over his clothing. On one occasion, this man exposed his penis and masturbated while pressing his penis up against J.O.2's penis. On another occasion, he forcibly performed oral sex on J.O.2. The female staff member was a blonde, white woman who appeared to be in her thirties and worked the night shift in

the Laurel housing unit on weekend days. She often stood outside J.O.2's cell and encouraged him to masturbate while she watched in exchange for extra snacks. On one occasion, the staff member followed J.O.2 into the bathroom and manually stimulated his penis while he showered. She also frequently cornered J.O.2 in the kitchen and orally and manually stimulated J.O.2's penis. The staff member promised to get J.O.2 released early to induce and reward his compliance.

Echo Glen Children's Center

A white male physician who appeared to be in his forties to fifties sexually abused J.O.2 multiple times under the guise of "medical exams". During the "exams", the physician massaged J.O.2's buttocks and manually stimulated his penis.

6.143 Plaintiff J.P.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1993; 14 years old
Location(s) of Abuse	Echo Glen Children's Center

Perpetrator, if known	Two male staff members, names unknown
Details of Abuse	Two male staff members sexually abused J.P. in his cell. One staff member had a large frame and hands, and the other was overweight. On multiple occasions, after lights out, the men entered J.P.'s cell and took turns sexually abusing J.P., including manually stimulating J.P.'s penis.

6.144 Plaintiff J.P.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1980 to 1981; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Baker, a male counselor
Details of Abuse	Baker, a male counselor in Madrona Cottage, sexually abused J.P.2 dozens of times in his cell. Baker was an older, heavysset white man of average height who had gray hair. Baker manually stimulated J.P.2's penis and digitally penetrated his anus. Baker threatened to make J.P.2's life at the facility hell if he reported the abuse. Nevertheless, J.P.2 courageously reported the abuse to the

	superintendent in Madrona Cottage, but no action was taken to protect J.P.2.
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6.145 Plaintiff J.P.3

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1994 to 1996; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Gilkey, a male counselor and Mr. Brumps (spellings approximate), a male counselor
Details of Abuse	Two male counselors, Mr. Gilkey and Mr. Brumps, sexually abused J.P.3 multiple times. Mr. Gilkey, an anger management counselor, was a short, heavysset Black man who often wore glasses and appeared to be in his fifties. Gilkey sexually abused J.P.3 multiple times a week in his cell. Gilkey forced J.P.3 to masturbate while he watched, manually stimulated J.P.3's penis, and forced J.P.3 to manually stimulate his penis. If J.P.3 resisted the abuse, Gilkey threatened to send him to the "hole" and rewarded J.P.3's compliance with candy, food, and extra free time.

	Mr. Brumps, J.P.3's assigned counselor, was a white man who often wore a hat, glasses, and appeared to be in his thirties or forties. J.P.3 met with Brumps for weekly counseling sessions. During these sessions, Brumps wrestled with J.P.3, overpowered him, and manually stimulated J.P.3's penis. Brumps threatened to send J.P.3 to the "hole" and take away his family visits if he resisted the abuse and encouraged J.P.3's compliance by promising to get J.P.3 released early.
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6.146 Plaintiff J.P.4

Current Residence	Union County, Oregon
Approximate Dates of Abuse and Age	1991 to 1994; 12 years old
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Echo Glen: Multiple staff members, names unknown Naselle: A male staff member, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> A heavyset male staff member who wore glasses sexually abused J.P.4 multiple times in his cell. The staff member masturbated in front of J.P.4 and coerced him to

masturbate simultaneously. He rewarded J.P.'s compliance by allowing him to have frequent access to the TV remote. Other staff at the facility consistently abused him during searches including squeezing J.P.4's genitals to subdue him while he was pinned against the wall with a mattress.

Naselle Youth Camp

A white male staff member, who often smelled like alcohol and appeared to be in his twenties to thirties, sexually abused J.P.4. The staff member stood at the entrance to J.P.4's cell and masturbated in front of J.P.4 multiple times a week.

6.147 Plaintiff J.Q.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Miss Kelley, a female counselor and a female staff member who may have gone by Tracy or Joyce
Details of Abuse	Two female staff members sexually abused J.Q. multiple times. Miss Kelley, J.Q.'s assigned counselor, was a tall,

	heavysset, blonde woman. She gained J.Q.'s trust by giving him extra attention and engaging him in conversation. On multiple occasions, Miss Kelley cornered J.Q. in his cell, removed his clothing, orally and manually stimulated his penis, and coerced him to engage in vaginal sex. A woman who worked in the laundry, who may have been named Tracy or Joyce, engaged J.Q. in a coercive sexual relationship. The staff member was a thin blonde woman who appeared to be in her mid-thirties. She coerced J.Q. to participate in oral, vaginal, and anal sex with her. After his release, she contacted him in an attempt to continue the sexual "relationship".
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6.148 Plaintiff J.S.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2005 to 2006; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A white male staff member sexually abused J.S. in a special housing unit while he was recovering from an

	injury. The staff member gained J.S.'s trust by giving him candy and playing cards games. On multiple occasions, the staff member brought J.S. into his office where he, initially, tried to coerce J.S. to manually stimulate his penis. J.S. resisted, so the staff person forcibly performed oral sex on him. The staff member promised to help J.S. get released early if he did not report the sexual abuse.
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6.149 Plaintiff J.S.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1993 to 1997; 14 years old
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Maple Lane: Mr. Shavers, a male counselor and Miss Sweeney, a female staff member Green Hill: Willy, a male staff member (all spellings approximate)
Details of Abuse	<u>Maple Lane School</u> Two staff members, Mr. Shavers and Miss Sweeney, sexually abused J.S.2. Mr. Shavers was a heavysset man with a large, white beard who was missing the tips of three

fingers on one of his hands. Shavers sexually abused J.S.2 while they played checkers and during strip searches. While the two played checkers, Shavers rubbed J.S.2's thighs and manually stimulated J.S.2's penis under the table. He promised to give J.S.2 a 2-liter bottle of soda if he won the game. When Shavers conducted strip searches, he isolated J.S.2 in his cell where he digitally penetrated J.S.2's anus and forcibly performed oral sex on him. Miss Sweeney was a muscular woman who worked as the gym coordinator. She sexually abused J.S.2 while swimming in the on-site pool. On one occasion, she forcibly performed oral sex on J.S.2. On another occasion, she manually stimulated his penis then forced him to have vaginal sex with her.

Green Hill School

Willy, a tall, dark-skinned, male staff member, sexually abused J.S.2 repeatedly. Willy wore his hair in a short afro and typically wore sweaters with slacks and glasses. Willy informed J.S.2 upon his arrival that he knew Mr. Shavers, the male counselor who abused J.S.2 at Maple Lane. Willy

	entered J.S.2's cell on a weekly basis after lockdown and manually stimulated J.S.2's penis.
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6.150 Plaintiff J.S.3

Current Residence	Luna County, New Mexico
Approximate Dates of Abuse and Age	1991 to 1992; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male physician, name unknown
Details of Abuse	A balding white male physician who appeared to be in his late thirties to early forties sexually assaulted J.S.3 multiple times under the guise of screening J.S.3 for rectal cancer. During these "screenings", the physician instructed J.S.3 to remove his clothing and squat and cough. Then, the physician manually stimulated J.S.3's penis while digitally penetrating his anus.

6.151 Plaintiff J.S.4

Current Residence	Lane County, Oregon
Approximate Dates of Abuse and Age	1994; 14 years old
Location(s) of Abuse	Maple Lane School

Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A Black male staff member who worked the night shift, wore glasses, occasionally had facial hair, and appeared to be in his thirties repeatedly sexually assaulted J.S.4. The staff member noticed J.S.4 stayed up late to read most nights. He groomed J.S.4 by bringing him books and snacks and engaging him in conversation. After gaining J.S.4's trust, on multiple occasions, the staff member entered J.S.4's cell, forced J.S.4 to perform and receive oral sex, and anally raped him.

6.152 Plaintiff J.S.5

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1982; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Jody, a female staff member; Joanne, a female teacher; and multiple other staff members, names unknown (spellings approximate).
Details of Abuse	Multiple staff members, including two female staff members named Jody and Joanne, sexually assaulted

	J.S.5. Jody, a white woman with red hair and glasses who appeared to be in her mid-twenties, visited J.S.5's cell after lockdown and coerced him to have sexual intercourse with her. Joanne, a white female teacher, had an average build, strawberry-blonde hair, and appeared to be in her forties to fifties. On multiple occasions, Joanne kept J.S.5 after class and coerced him to have sexual intercourse with her. J.S.5 was also subjected to invasive strip searches conducted by both men and women in a private office. On multiple occasions, J.S.5 was also required to participate in abusive and medically unnecessary "rectal exams" conducted by an on-site healthcare provider.
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6.153 Plaintiff J.S.6

Current Residence	Stevens County, Washington
Approximate Dates of Abuse and Age	1999-2000; 14 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member, name unknown

Details of Abuse	A male staff member who ran the Alcoholics Anonymous meetings sexually abused J.S.6. The staff member was a white man with a heavy build who had brown hair and eyes and wore one earring. He groomed J.S.6 by giving her extra food and took her out on walks around the facility alone. On the walks, the staff member groped her buttocks and breasts, pressed his body up against her, and forced her to manually stimulate his penis.
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6.154 Plaintiff J.S.7

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1980 to 1983; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Group home in Elma
Perpetrator, if known	Echo Glen: A female counselor, name unknown Group Home: Don, a male counselor
Details of Abuse	<u>Echo Glen Children's Center</u> A white female counselor with brown hair who appeared to be in her thirties sexually abused J.S.7. The counselor routinely entered the boys' bathroom when J.S.7 was showering alone. There, she looked at J.S.7's naked body

and, on multiple occasions, she forced him to masturbate while she watched. If he resisted, she threatened to send him to isolation.

Elma, WA Group Home

Don, a male counselor, sexually abused J.S.7. Don was a large white man who appeared to be in his late thirties and lived in the group home. Don's invited J.S.7 to Don's room to "watch movies". During the movies, Don orally and manually stimulated J.S.7's penis and forced J.S.7 to perform oral sex on him. To induce and reward J.S.7's silence, Don gave him money and threatened that J.S.7 would be required to remain at the group home longer if he reported the abuse. Don also convinced J.S.7 that no one would believe him anyway. Prior to Don abusing J.S.7, Don was likely abusing another boy at the group home because J.S.7 also noticed that this boy spent hours alone in Don's room "watching movies" as well.

6.155 Plaintiff J.S.8

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	2018 to 2019; 16 years old

Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male security officer and multiple other staff members, names unknown
Details of Abuse	A short, white male security officer who appeared to be in his twenties and worked the night shift sexually abused J.S.8. On multiple occasions, after lockdown, the officer pulled J.S.8 out of his cell and brought him to the laundry room. There, the officer kissed J.S.8, orally and manually stimulated J.S.8's penis, and coerced J.S.8 to do the same to him. J.S.8 was also subjected to abusive and sexualized strip searches by multiple staff members.

6.156 Plaintiff J.S.9

Current Residence	Kittitas County, Washington
Approximate Dates of Abuse and Age	2006 to 2007, 15 years old
Location(s) of Abuse	Twin Rivers Community Facility
Perpetrator, if known	Ms. Chelsea/Kelsey Hawk (spelling approximate), a female counselor
Details of Abuse	Ms. Hawk, a female counselor whose first name may have been Chelsey or Kelsey, sexually abused J.S.9 repeatedly.

	Ms. Hawk was a white woman who appeared to be in her twenties. Hawk brought J.S.9 to isolated areas at the facility where she kissed him, orally and manually stimulated J.S.9's penis, coerced him to digitally penetrate her vagina and perform oral sex on her, and solicited vaginal sex from him. Hawk also abused J.S.9 in isolated rooms at a nearby mental health clinic and the library. Hawk told J.S.9 not to tell anyone about the abuse. She threatened to blame J.S.9 if he reported the abuse. To reward and induce his compliance, Hawk was more lenient with him and provided him with snacks.
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6.157 Plaintiff J.S.10

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998 to 2000; 15 years old
Location(s) of Abuse	Spruce Street Inn
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A tall, heavysset white male staff member who had short hair and appeared to be in his forties sexually abused J.S.10. The staff member entered J.S.10's room and

	masturbated while he manually stimulated J.S.10's penis. On another occasion, he orally and manually stimulated J.S.10 then forced J.S.10 to do the same to him. He threatened to ensure J.S.10 would not go home and would, instead, be returned to the King County Juvenile Facility if J.S.10 reported the abuse.
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6.158 Plaintiff J.T.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2006 to 2007; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Joe, a male counselor
Details of Abuse	Joe, J.T.'s assigned counselor in Chinook Cottage, sexually assaulted him. Joe was a balding, heavyset white man with white hair and a beard who appeared to be in his sixties. On multiple occasions, Joe entered J.T.'s cell to speak to him about "good behavior". During these conversations, Joe rubbed J.T.'s thighs and groped J.T.'s genitals over his clothing.

6.159 Plaintiff J.T.2

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1981 to 1984; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Donita/Danita O'Connell (spelling approximate), a female staff member and Barbara, a female staff member
Details of Abuse	Two female staff members, who the State permitted to take J.T.2 alone off-campus, sexually abused J.T.2. Donita O'Connell was a heavyset white woman with long, straight brown hair who appeared to be in her early thirties. O'Connell was present for many of J.T.2's counseling sessions. O'Connell often selected J.T.2 to accompany her on trips off campus to a store. During these trips, on multiple occasions, O'Connell pulled over near a fast-food restaurant and sexually abused J.T.2 in the transport vehicle. She masturbated in front of J.T.2, orally and manually stimulated J.T.2's genitals and anus, and coerced J.T.2 to grope her breasts, digitally penetrate her vagina and anus, perform oral sex on her, and have sexual

	intercourse. She told J.T.2 to keep the abuse secret or they would both get in trouble. Barbara, a tall white female staff member who had short hair and appeared to be in her mid-thirties, also sexually abused J.T.2 while on trips to a store at the same location and in a similar manner as O'Connell.
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6.160 Plaintiff J.W.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1994 to 1996; 12 years old
Location(s) of Abuse	Echo Glen Children's Center Spruce Street Inn
Perpetrator, if known	Echo Glen: Brandy, a female staff member and a female staff member, name unknown Spruce Street: A female staff member, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> Two staff members sexually abused J.W. Brandy, a white female staff member who appeared to be in her thirties and worked in the computer room at the school, often asked J.W. to stay after class for tutoring. During those

times, Brandy orally and manually stimulated J.W.'s penis.

The other staff member was a white woman with long hair who worked the night shift in Wenatchee Cottage and oversaw letting the inmates out of their cells to use the restroom. When J.W. requested to use the restroom, she flirted with him and offered him marijuana. She followed him into the bathroom and performed oral sex on him then coerced him to perform oral sex on her, digitally penetrate her vagina, and have vaginal sex.

Spruce Street Inn

A female staff member sexually abused J.W. The staff member was a short Asian woman with long hair who smoked cigarettes. She groomed J.W. by showering him with compliments and allowing him to smoke cigarettes. She coerced him to have vaginal sex with her in his room.

6.161 Plaintiff J.W.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998 to 1999; 16 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A female kitchen staff member sexually abused J.W.2. The staff member was a short white woman with long brown hair who spoke with an Eastern European accent. While J.W.2 worked in the kitchen, she forcibly rubbed her breasts and buttocks against J.W.2's body dozens of times. She also manually stimulated J.W.2's genitals over his clothing. She rewarded him with extra food. When J.W.2 repeatedly refused her advances, she had him placed in solitary confinement.

6.162 Plaintiff J.W.3

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2003; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Thaun or "T", a male corrections officer
Details of Abuse	A corrections officer named Thaun, who was known by the juvenile inmates as "T", groomed and sexually abused J.W.3. Thaun was a thin man of Filipino or other Asian descent likely in his late twenties to early thirties. Thaun

	coerced J.W.3 to perform oral sex on him multiple times in exchange for additional visitation time and extra phone privileges. Thaun abused J.W.3 in a storage closet and in a transport vehicle.
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6.163 Plaintiff J.W.4

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1986 to 1991; 13 years old
Location(s) of Abuse	Naselle Youth Camp Green Hill School
Perpetrator, if known	Naselle: A female staff member, name unknown and Mr. Hansen, a male D.N.R. crew foreman Green Hill: Bob Williams, the superintendent and two male interns, Steve-O and Jahel
Details of Abuse	<u>Naselle Youth Camp</u> Two staff members groomed and sexually abused J.W.4. The first, a white female case manager met with J.W.4 twice a week. She had fair skin, dark hair and appeared to be in her twenties. She began grooming J.W.4 by bringing him food, cigarettes, marijuana, and romance novels, talking to him about her personal life, and allowing him

extra visitation time. She used these rewards as leverage along with threats of increasing his sentence to coerce him into an abusive sexual relationship. On multiple occasions, she orally and manually stimulated J.W.4's penis and coerced him to digitally penetrate her vagina and perform oral sex on her. She threatened J.W.4 that if he reported the abuse, she would deny any allegations and ensure he was punished.

The second staff member was a white Department of Natural Resources (D.N.R.) foreman, Mr. Hansen. Hansen had red hair and brown eyes, and he oversaw J.W.4's work crew. Mr. Hansen repeatedly sexually abused J.W.4 on the job. The abuse included groping J.W.4's genitals and buttocks, giving J.W.4 shirtless backrubs, and attempting to manually stimulate J.W.4's penis. He provided J.W.4 with extra food and tobacco and threatened to fire J.W.4 from the job if he reported the abuse.

Green Hill School

Superintendent Bob Williams and two college students he hired for the summer sexually abused J.W.4. Williams was a Black man who typically wore suits, had a mustache, and

appeared to be around fifty. Williams sexually abused J.W.4 in his office multiple times a month. Williams used the promise of sending J.W.4 to a group home as leverage to prevent J.W.4 from reporting the abuse and threatened to charge J.W.4 with assault if he refused. Williams orally and manually stimulated J.W.4's penis and forced J.W.4 to do the same to him.

One summer, Williams hired a group of college-aged interns to work at Green Hill. Two of these students, who may have gone by Steve-O and Jahel, sexually abused J.W. multiple times. In the gymnasium, both interns orally and manually stimulated J.W.4's penis and forced J.W.4 to do the same to them and rewarded him with marijuana.

6.164 Plaintiff K.A.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	2005 to 2006; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Webb, a male staff member

Details of Abuse

Mr. Webb, a male staff member, sexually abused K.A. Mr. Webb was a heavyset white man with gray hair and a beard who appeared to be in his forties to fifties. Webb oversaw K.A. on work crew at various locations near the facility. Webb was known for his erratic and inappropriate around the girls on the work crew. Webb frequently exposed his penis to urinate within view of K.A. and the other girls, verbally harassed them with demeaning epithets, and made comments about the size of his penis. When the crew started working at a nearby fish hatchery, Webb's behavior escalated. He rubbed his erect penis on K.A., groped her buttocks, and coerced K.A. and the other girls on the crew to touch each other's breasts and genitals. If K.A. refused to comply with Webb's demands, he retaliated by tearing her cell apart under the guise of searching for contraband. Webb told K.A. that nothing would happen if she reported the abuse. While K.A. told her counselor at Naselle that Webb made her uncomfortable, her counselor advised her not to say anything more. After K.A. told her grandmother about the abuse, the staff appeared to retaliate against her: they

	woke K.A. in the middle of the night, stripped her clothes off, and put her into solitary confinement.
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6.165 Plaintiff K.F.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1990; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A white male staff member who appeared to be in his forties sexually abused K.F. in the shower and his cell. On multiple occasions, the staff member groped K.F.'s buttocks and penis, digitally penetrated K.F.'s anus, and forced K.F. to perform oral sex and manually stimulate the man's penis. The staff member warned K.F. not to report the abuse. To encourage his compliance, the man promised K.F. additional time out of his cell.

6.166 Plaintiff K.H.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	2002; 17 years old

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Isaac Pope, M.D., a male physician
Details of Abuse	Dr. Pope, a Black male physician who had gray hair and appeared to be in his fifties, sexually assaulted K.H. under the guise of a medical exam. After Dr. Pope had K.H. undress, bend over, and spread his buttocks apart, Dr. Pope digitally penetrated K.H.'s anus and manually stimulated K.F.'s penis. When K.F. tried to leave, Dr. Pope instructed him to stay quiet and in position.

6.167 Plaintiff K.M.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2001; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Hightower, a male counselor
Details of Abuse	Mr. Hightower, a male counselor sexually assaulted K.M. on multiple occasions in and outside of her cell. Hightower was a tall Black man with a muscular build and shaved head who appeared to be in his early forties. He kissed her body, manually stimulated her genitals, and digitally

	penetrated her vagina. He encouraged her to attend exercise classes and join the D.N.R. crew. Mr. Hightower used K.M.'s extracurricular activities as an opportunity to sexually assault her outside her cell.
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6.168 Plaintiff K.M.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1974 to 1976; 14 years old
Location(s) of Abuse	Foster Care
Perpetrator, if known	Giles Blue, a male case worker
Details of Abuse	The State of Washington and its agencies placed K.M.2 in its foster care system in the 1970s. In each home, she was subject to abuse and neglect for which the State is responsible. Additionally, due to the State's failure to protect her from these abuses, she was forced to run away, which resulted in her intermittent incarceration at Remann Hall in Tacoma, Washington. She was repeatedly sexually abused while incarcerated at Remann Hall. During this time, the State assigned a case worker to her case named Giles Blue. Blue often transported K.M.2

	between foster homes, to or from Remann Hall, and sometimes took her out for ice cream. On at least three of these trips, Blue ordered K.M.2 to remove her pants and underwear while seated in the backseat. He then molested her while masturbating himself.
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6.169 Plaintiff K.P.

Current Residence	Whatcom County, Washington
Approximate Dates of Abuse and Age	1993; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member who worked the night shift groomed and sexually abused K.P. On multiple occasions, while other inmates were on lockdown at night, the staff member entered K.P.'s cell where he gave K.P. shoulder rubs, manually stimulated K.P.'s penis, and forced K.P. to do the same to him. He rewarded K.P. with extra phone privileges and threatened to physically harm K.P. or throw him in isolation if K.P. reported the abuse.

6.170 Plaintiff K.P.2

Current Residence	Umatilla County, Oregon
Approximate Dates of Abuse and Age	1981; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A white male staff member sexually abused K.P.2. The staff member had dark, curly hair, green or hazel eyes, and facial hair. He gave K.P.2 candy and cigarettes to gain her trust then took her to the woods surrounding the facility and to a nearby shed. There, the man forced K.P.2 to perform and receive oral sex, digitally penetrated her vagina and anus, and vaginally and anally raped her. He threatened that K.P.2 would get into more trouble if she reported the abuse.

6.171 Plaintiff K.P.3

Current Residence	Multnomah County, Oregon
Approximate Dates of Abuse and Age	2015 to 2017; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Emma, a female staff member

Details of Abuse	Emma, thin white female staff member who appeared to be in her early to mid-twenties, sexually abused K.P.3. On several occasions, K.P.3 and a group of inmates watched as Emma manually stimulated her genital area. She then coerced the boys to manually stimulate her genital area. During a basketball game in the gymnasium, Emma rubbed her bottom up against K.P.3's groin then cornered him and groped his penis over his pants. Later, she visited K.P.3 in Skagit Cottage and told him she could not stop herself from touching him.
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6.172 Plaintiff K.S.

Current Residence	Benton County, Washington
Approximate Dates of Abuse and Age	2005 to 2007; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused K.S. multiple times. The staff member was a Black man with light-colored eyes who appeared to be in his thirties to forties and had a flirtatious personality. At first, he "flirted" with K.S., gave

her inappropriate long-lasting hugs and groped her bottom. Later, on multiple occasions, he entered K.S.'s cell and forced her to orally and manually stimulate his penis, digitally penetrated her vagina, performed oral sex on her, and raped her. The staff member threatened to delay her release from the facility, take away her visitation privileges, and throw her in isolation if she tried to refute his advances. He rewarded and induced her compliance with snacks, cigarettes, more time out of her cell, and access to a cell phone.

6.173 Plaintiff K.S.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1982; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female art teacher and two female staff members, names unknown
Details of Abuse	Multiple female staff members sexually abused and harassed K.S.2. A female art teacher with dark hair and freckles who may have been of Hispanic descent and was

likely in her thirties often had K.S.2 help her with cleaning up her classroom. She regularly brought in food and marijuana for K.S.2. While alone in the classroom, on several occasions, she kissed K.S.2, orally and manually stimulated his penis, and coerced him to grope her breasts and manually stimulate her genitals over her underwear. In addition to being sexually abused by the art teacher, K.S.2 was also sexually harassed whenever he went to the laundry room by two white female staff members, an overweight woman who appeared to be in her thirties and a petite older woman. Both women gave K.S.2 candy, made sexual comments about his body, groped his bottom, and grazed their hands against his groin area while walking by, pretending the physical contact was accidental.

6.174 Plaintiff K.S.3

Current Residence	Mason County, Washington
Approximate Dates of Abuse and Age	1970 to 1972; 15 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Donald Smith, head of security and Mr. Rasmussen, a male biology teacher
Details of Abuse	Two male staff members, Donald Smith and Mr. Rasmussen, sexually abused K.S.3. Donald Smith, the head of security at Green Hill, was white with dark hair who appeared to be in his forties or fifties. On multiple occasions, Smith manually stimulated K.S.3's penis, forced K.S.3 to orally and manually stimulate Smith's penis, digitally penetrated K.S.3's anus, and raped him in various locations at the facility including interview rooms, isolation rooms, closets, and in K.S.3's cell. Smith threatened to delay K.S.3's release if he reported the abuse. Smith rewarded K.S.3 with cigarettes, candy, and extra time out of his cell. Mr. Rasmussen, a biology teacher, was a balding white man with red hair who wore glasses and appeared to be in his late thirties. The State permitted Rasmussen to take inmates off-site on biology-related field trips. During one of these trips, Rasmussen sexually abused K.S.3. Rasmussen orally and manually stimulated K.S.3's penis and forced K.S.3 to do the same to him, digitally penetrated K.S.3's

	anus, and anally raped K.S.3. Rasmussen also assaulted K.S.3 in his classroom. Rasmussen threatened to delay K.S.3's release if he reported the abuse and rewarded his compliance with candy and gum.
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6.175 Plaintiff K.S.4

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2001; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Rich/Rick, a male counselor and Bobbie Blankenship, a female staff member
Details of Abuse	Two staff members sexually abused K.S.4. The first was his assigned counselor Rich (or Rick), a white man with reddish-brown hair who had a gap between his front teeth and appeared to be in his thirties. During their weekly one-on-one counseling sessions, Rich performed oral sex on K.S.4 and forced K.S.4 to manually stimulate Rich's penis. The second staff member, Bobbie Blankenship, was a white woman with dark brown, curly hair who appeared to be in her thirties. K.S.4 noticed Blankenship watching him

	while he was naked in the shower multiple times. K.S.4 called her out and she instructed him to come to her office acting disrespectfully. There, she orally and manually stimulated his penis and coerced him to have sexual intercourse with her while she digitally penetrated his anus. Not long after this, Blankenship told K.S.4 he was being transferred to another unit.
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6.176 Plaintiff K.T.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2016 to 2017; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Isaac Pope, M.D., a male physician
Details of Abuse	Dr. Pope, a tall Black male physician who appeared to be in his sixties to seventies, sexually assaulted K.T. during an intake physical “exam.” Dr. Pope placed his hand on K.T.’s thigh and told K.T. that he lacked reflexes. Dr. Pope then manually stimulated K.T.’s testicles for several minutes and digitally penetrated K.T.’s anus, claiming he was checking for prostate cancer.

6.177 Plaintiff L.C.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1982 to 1983; 16 years old
Location(s) of Abuse	Echo Glen Children's Center Group Home in Lake Forest Park, WA
Perpetrator, if known	Echo Glen: A male staff member, name unknown Group Home: Blaine, a male staff member
Details of Abuse	<u>Echo Glen Children's Center</u> A white male staff member who worked the night shift, had short hair, and appeared to be in his thirties sexually abused L.C. He approached L.C. after marijuana was found hidden in her shoes. He promised to get her out of trouble and enable her to keep her family visits if she complied with his requests. On multiple occasions, the staff member exposed his penis to her, instructed her to remove her clothing, forced her to perform oral sex on him and manually stimulate his penis. He also manually stimulated her breasts and genital area. The staff member threatened to have her visitation privileges taken away if she refused to comply and threatened to send her to

	isolation if she reported the abuse. On information and belief, the staff member was also abusing L.C.'s roommate.
	<u>Group Home</u>
	Blaine, a white male staff member with blonde hair and a round face, sexually assaulted L.C. after gaining her trust. Blaine entered L.C.'s room manually stimulated her genitals, forced her to do the same to him, and raped her.

6.178 Plaintiff L.D.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	2004 to 2005; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Tom, a male kitchen staff member
Details of Abuse	Tom, a Black man with longer hair who appeared to be in his forties, worked in the kitchen with L.D. On multiple occasions during their weekend shifts, Tom followed L.D. into the walk-in freezer. There, Tom manually stimulated L.D.'s penis and forced L.D. to perform oral sex on Tom and manually stimulate Tom's penis. Other staff members were present and working in the kitchen while Tom

	assaulted L.D., yet they did nothing to protect L.D. Tom rewarded L.D. with chewing tobacco and threatened to get him in more trouble if he reported the abuse.
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6.179 Plaintiff L.F.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2010 to 2011; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mrs. Matlock, a female counselor; Gregory Johnson, a male counselor; Mr. Bennett, a male teacher; Mr. Smith, a male counselor; and Mr. Poirrier, a male gym teacher.
Details of Abuse	Multiple staff members sexually abused L.F. L.F.'s first assigned counselor, Mrs. Matlock, a middle-aged white woman sexually abused L.F. in her office in Harbor Lodge during their one-on-one counseling sessions. Matlock hugged and kissed L.F., forced L.F. to grope her breasts, and manually stimulated L.F.'s penis. Matlock used humiliation tactics to ensure compliance, including forcing L.F. to get down on all fours and ordering him to bark like a dog. When L.F. refused to comply with her

1 demands or resisted her abuse, Matlock took away his
2 earned privileges.

3 His subsequent assigned counselor, Gregory Johnson, also
4 sexually abused him. Johnson, a white man with a
5 ponytail and glasses, appeared to be in his sixties, and
6 walked with a limp. Johnson subjected L.F. to sexually
7 abusive strip searches. During these overly lengthy
8 “searches” Johnson made sexually explicit comments and
9 stimulated L.F.'s genitals. During their counseling
10 sessions, Johnson gave L.F. back rubs and smacked his
11 butt. Johnson rewarded L.F.’s compliance and silence
12 about the abuse with extra phone calls.

13 A white male teacher named Mr. Bennett also sexually
14 abused L.F. Bennett was tall, wore glasses and appeared
15 to be in his late thirties or early forties. Bennett forced L.F.
16 to manually stimulate Bennett’s penis at the teacher’s
17 desk while the rest of the class watched a movie. Bennett
18 warned L.F. that no one would believe him if he reported
19 the abuse because L.F. was a criminal. Later, Bennett
20 again called L.F. up to his desk while a movie played and
21 offered to give L.F. a higher grade if L.F. manually
22

1 stimulated Bennett's penis again. L.F. briefly touched
2 Bennett's penis but was able to successfully refuse.
3 Another counselor in Harbor Lodge, Mr. Smith, sexually
4 abused L.F. under the guise of conducting strip searches.
5 Smith was a balding white man with red hair and glasses
6 who appeared to be in his forties. Smith was missing a
7 finger on one of his hands and may have served in the
8 military. Several times after family visits, Smith brought
9 L.F. into an isolated room under the guise of doing a strip
10 search and sexually abused him. The abuse included Smith
11 rubbing L.F.'s penis, forcing L.F. to manually stimulate
12 Smith's penis, and forcing L.F. to perform oral sex on him.
13 On one occasion, Smith penetrated L.F.'s anal cavity with
14 either his fingers or his penis. Smith often told L.F., "you
15 don't want to see what happens next," to intimidate L.F.
16 and keep him from reporting the abuse.
17
18 L.F. was also sexually harassed by a gym teacher, Mr.
19 Poirrier, a bald man of Samoan descent who appeared to
20 be in his late thirties. The harassment included Poirrier
21 making sexually explicit comments directed at L.F.

22 6.180 Plaintiff L.H.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2000 to 2002; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Greg, a male counselor
Details of Abuse	Greg, a Black male counselor in Yakima Cottage who appeared to be in his early thirties, sexually abused L.H. multiple times. During their one-on-one counseling sessions, Greg groped L.H.'s breasts and digitally penetrated L.H.'s vagina and anus. Greg threatened to send L.H. back to her previous place of incarceration and have her placed in isolation. On information and belief, Greg sexually abused other inmates in Yakima Cottage.

6.181 Plaintiff L.K.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2011 to 2014; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jasmine, a female staff member and Bob, a male security officer.

Details of Abuse

Two staff members, Jasmine and Bob, sexually abused L.K. Jasmine, a Black female staff member who appeared to be in her late twenties, periodically supervised inmates during the day in their cottages. Jasmine showed L.K. sexually explicit photos of herself on her cell phone and manually stimulated L.K.'s penis. Jasmine warned L.K. to keep the interactions secret.

Bob, a tall white male security officer who was bald and appeared to be in his fifties, abused L.K. repeatedly while transporting L.K. in a facility van. The abuse in the van typically included Bob manually stimulating L.K.'s penis and digitally penetrating L.K.'s anus. Once, Bob assaulted L.K. in the same manner while L.K. was restrained with zip ties in an isolation room. To reward and induce L.K.'s compliance, Bob gave him extra food and bought him new clothing items.

6.182 Plaintiff L.R.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2005 to 2006; 14 years old
Location(s) of Abuse	Maple Lane School

Perpetrator, if known	Ms. Flores, a female counselor and Ms. Shoemaker, a female counselor
Details of Abuse	Two female counselors, Ms. Flores and Ms. Shoemaker, abused L.R. multiple times. Ms. Flores was petite, likely in her late thirties and of Hispanic descent. Flores groomed L.R. by flirting with him and providing him with cigarettes and drugs. In L.R.'s cell, Flores orally and manually stimulated his penis and coerced him to digitally penetrate her vagina and perform oral sex on her. To encourage his compliance and silence, she promised she could get him released early. She discouraged him from reporting the abuse warning that no one would believe him. Ms. Shoemaker, a short white woman who appeared to be in her twenties, also flirted with L.R. and provided him with drugs. On multiple occasions, Shoemaker performed oral sex on L.R. and coerced him to perform oral and vaginal sex in his cell. Shoemaker also took sexually explicit photos of underage L.R. and, on information and belief, shared the photos with others. Shoemaker also

	discouraged L.R. from reporting the abuse, telling him that no one would believe him anyway.
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6.183 Plaintiff L.S.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2008 to 2009; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Crystal, a female counselor
Details of Abuse	Crystal, a white heavysset female counselor with long hair, sexually assaulted L.S. dozens of times. She groomed L.S.: sending him secret notes, allowing special privileges like taking the staff phone to his cell, and giving L.S. contraband including marijuana, chewing tobacco, cigarettes, and pills. Through this system of rewards, Crystal coerced L.S. to engage in a sexual relationship with her that included oral and vaginal sex on many occasions.

6.184 Plaintiff L.S.2

Current Residence	King County, Washington
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Approximate Dates of Abuse and Age	2006 to 2008; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mario Sweet, a male staff member
Details of Abuse	Mario Sweet, a heavysset male counselor who appeared to be in his early thirties and claimed to be a former football player, groomed and sexually abused L.S.2. Mario groomed L.S.2 extensively and shared that they were from the same part of town, bonded with her over music, and brought her CD's, chips, and candy bars. When Mario performed room checks, he frequently asked L.S.2 to expose her breasts and, on one occasion, he coerced her to engage in oral and vaginal sex with him. Twice, he removed her from her classroom at school and brought her to the recreation room where he coerced her to engage in oral and vaginal sex.

6.185 Plaintiff L.S.3

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	1996 to 1997; 12 years old
Location(s) of Abuse	Echo Glen Children's Center

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 227

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member in Klickitat Cottage sexually abused L.S.3. The staff member was a slim white man with brown hair who appeared to be in his late twenties to early thirties and often wore a baseball hat. On multiple occasions, the staff member exposed his genitals to L.S.3, forced L.S.3 to orally and manually stimulate his penis, and fondled L.S.3's penis and buttocks over his clothing. He threatened to increase L.S.3's sentence or transfer him to a higher security unit if he did not comply or if he reported the abuse.

6.186 Plaintiff L.W.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2009 to 2010; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Crystal Mobbs, a female counselor and Mike Rule, a male staff member
Details of Abuse	Crystal Mobbs, a counselor in Hawthorne Cottage, sexually assaulted L.W. Mobbs was a heavysset white

woman with dyed black hair who appeared to be in her thirties. On several occasions, Mobbs kissed L.W., manually stimulated L.W.'s penis, and coerced L.W. to digitally penetrate her vagina in her office. Mobbs often exposed her breasts to L.W. and other inmates during room checks. In exchange for L.W.'s compliance, Mobbs gave him food, drugs, and access to a cell phone. After his release, Mobbs found L.W.'s Facebook profile and sent him private messages. Upon information and belief, the State investigated Mobbs for sexual misconduct, but the findings and consequences she faced (if any) remain unknown to Plaintiffs.

Mike Rule, a short white male staff member, abusively conducted a strip search of L.W., which included attempting to digitally penetrate L.W.'s anus.

6.187 Plaintiff M.B.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	2002 to 2004; 15 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Dr. Hopper, a male physician
Details of Abuse	A physician named Dr. Hopper repeatedly sexually abused M.B. Dr. Hopper was a tall white man with short hair who appeared to be in his thirties. On multiple occasions, Dr. Hopper called M.B. to the infirmary for "medical exams". During these "exams", Dr. Hopper closely examined M.B.'s genitals and anus, instructed M.B. to masturbate to ensure he was "progressing properly", and manually stimulated M.B.'s penis until M.B. ejaculated while claiming these actions were normal protocol. When M.B. questioned this, Dr. Hopper threatened to send M.B. to the "hole" and delay his release. M.B., fearful of retaliation, complied and did not report the abuse. Dr. Hopper promised to keep M.B. safe from getting in trouble with the staff until his release date and assured M.B. that he would be released from the facility on time.

6.188 Plaintiff M.C.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1998 to 2000; 16 years old

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 230

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Location(s) of Abuse	Indian Ridge Youth Camp
Perpetrator, if known	Leslie, a female staff member and multiple other staff members, names unknown
Details of Abuse	Multiple staff members sexually abused M.C. One staff member was a tall white woman in her fifties who worked in the laundry. She had short, dyed blonde hair and her husband, who was very muscular, also worked at the facility. Leslie coerced M.C. into a non-consensual sexual relationship that included vaginal sex and other sexual acts in her laundry room office. Leslie rewarded M.C. with cigarettes, chewing tobacco, and soda. Multiple staff members also sexually humiliated M.C. under the guise of strip searches. When M.C.'s parents visited, he, along with a group of other inmates, were required to endure a pat down then a strip search where an officer touched each boy's genitals in front of the entire group while making derogatory comments about their genitals and manhood. M.C. confided in his mother about these abusive communal strip searches, and she complained to the facility. Staff informed her that that was just the way things were done. After his mother's

	complaints, on information and belief, the State gave M.C. higher doses of drugs from staff, which made his mind foggy, in retaliation.
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6.189 Plaintiff M.C.2

Current Residence	Macon County, Illinois
Approximate Dates of Abuse and Age	1999; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Two male staff members, names unknown
Details of Abuse	Multiple staff members sexually abused M.C.2. The first, a stocky and heavy-set white male staff who often wore a baseball cap and appeared to be in his fifties, gave M.C.2 a teddy bear. He then forced M.C.2 to masturbate and ejaculate onto the bear while he watched from M.C.2's cell door. If M.C.2 refused, the staff member kept him locked down in his cell for several hours at a time. He also told M.C.2 that no one would believe him if he reported the abuse.

	The second abuser appeared to be of Asian descent and was middle-aged. He forced M.C.2 to masturbate in the shower while he watched.
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6.190 Plaintiff M.D.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1981 to 1984; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Clifford Young, a male counselor
Details of Abuse	Clifford Young, M.D.'s assigned counselor in Elm Cottage, groomed and sexually abused him. Young, a balding white man who often wore fur coats and shiny shoes met with M.D. weekly. During these sessions, Young groomed M.D. He asked about M.D.'s sexual experiences and sexual development while making sexual jokes to normalize his increasingly inappropriate behavior. Young groped and manually stimulated M.D.'s penis and coerced M.D. to manually stimulate Young's penis. Young rewarded M.D. with cigarettes and special privileges, while threatening to

	keep M.D. at the facility indefinitely if he reported the abuse or did not participate. When the State released M.D. from Green Hill, it permitted Young to transport M.D. alone to the Woodinville Community facility. Instead of driving straight to Woodinville, Young instead brought M.D. to his home, anally raped him, forced M.D. to perform oral sex on him, and forcibly performed oral sex on M.D.
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6.191 Plaintiff M.F.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1982; 11 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Brandenburg (spelling approximate), a female counselor and Miss Barbara, a female teacher
Details of Abuse	Two female staff members sexually abused M.F. Brandenburg, a white female counselor with short hair who wore glasses and appeared to be in her thirties to forties, coerced M.F. into an abusive sexual “relationship”. Brandenburg frequently visited M.F.'s cell in the early

	mornings. There, she groped his genital area, manually stimulated his penis, and coerced him to engage in vaginal sex multiple times. M.F. was also sexually abused by his math teacher Miss Barbara, a white woman with an accent who appeared to be in her thirties or forties. Miss Barbara used her hands and feet to grope M.F.'s penis over his pants.
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6.192 Plaintiff M.G.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1994 to 1998; 15 years old
Location(s) of Abuse	Indian Ridge Youth Camp Maple Lane School Twin Rivers Community Facility
Perpetrator, if known	Indian Ridge: A female staff member, name unknown Maple Lane: A female staff member and a male physician, names unknown Twin Rivers: A male resident, name unknown
Details of Abuse	<u>Indian Ridge Youth Camp</u> A white female staff member with sandy blonde hair who appeared to be in her forties and worked in the kitchen

sexually abused M.G. in the walk-in freezer multiple times. M.G. met the staff member after he obtained a job in the kitchen. In the walk-in freezer, the staff member exposed her genitals to M.G., kissed him, coerced him to manually stimulate her breasts and genitals and digitally penetrate her vagina, manually stimulated M.G.'s penis, and solicited him for oral sex. The staff member told M.G. not to report the abuse and stressed that no one would believe him if he came forward.

Maple Lane School

Two staff members sexually abused M.G. One staff member was a slim, blonde, white woman who appeared to be in her twenties. To gain M.G.'s trust, the staff member brought him extra food and allowed him to have more time out of his cell. She often visited his cell to pay extra attention to him. There, she rubbed M.G.'s leg, exposed her genitals to him and coerced him to manually stimulate her breasts and her genitals, and orally and manually stimulated M.G.'s penis.

The other staff member was a tall, older male physician.

The physician called M.G. to the infirmary multiple times

for "prostate exams" then told M.G. not to report the abuse and stressed that no one would believe him if he came forward.

Twin Rivers Community Facility

A male resident coerced M.G. to perform oral sex on him in exchange for cigarettes. He threatened to physically assault M.G. if he told anyone.

6.193 Plaintiff M.G.2

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1997 to 2000; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Natalia Kovzum (spelling approximate), a female kitchen staff member
Details of Abuse	Natalia Kovzum, a female kitchen staff member, sexually abused M.G.2. She was a thin, blonde woman of Russian descent with blue eyes, gold teeth, and a thick Russian accent, appeared to be in her late thirties, and worked as a cook at the facility. M.G.2 met Kovzum after he was assigned to work in the kitchen. Kovzum allowed M.G.2 to

	do whatever he wanted while working and brought him homemade food. She manually stimulated his penis, kissed him, and coerced him to manually stimulate her breasts and digitally penetrate her vagina. Kovzum frequently reminded M.G.2 that, if he reported the abuse, they would both get in trouble.
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6.194 Plaintiff M.H.

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	2014; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A female staff member sexually abused M.H. The staff member was a heavyset woman likely of Hispanic descent who had black hair and appeared to be in her thirties or forties. The staff member took M.H. to the laundry room where she performed oral sex on M.H., coerced M.H. to digitally penetrate her vagina, performed oral sex on her, and engaged in vaginal sex. Afterward, she told M.H. to keep the abuse secret.

6.195 Plaintiff M.H.2

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1999; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused M.H.2 weekly. The staff member was a middle aged, short, bald, white man with an arm tattoo who was known for organizing fights among the inmates and taking bets on potential winners. One night, the staff member called M.H.2 over to a storage closet and offered to give M.H.2 a pack of cigarettes, a lighter, and marijuana in exchange for a sexual favor. When M.H.2 declined the offer, the staff member threatened to punch himself in the face and blame M.H.2 so that M.H.2 would catch another charge if he did not participate. On multiple occasions, in the storage closet and in the showers, the staff member orally and manually stimulated M.H.2's penis, forced M.H.2 to do the same to him, and anally raped M.H.2. The staff member continued to threaten M.H.2 saying, "Snitches get stitches."

6.196 Plaintiff M.J.

Current Residence	Grant County, Washington
Approximate Dates of Abuse and Age	2022; 17 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Valerie Valdez, a female staff member
Details of Abuse	Valerie Valdez, a female staff member of indeterminate ethnicity, sexually assaulted M.J. Valdez was tall with long brown hair, green or hazel eyes, and a crooked front tooth. Her husband also worked at Naselle, and they may have been originally from Florida. Valdez often visited M.J. in his cell and while he was in isolation. She grabbed at his buttocks, flirted with him, and lent him her mobile phone. Approximately six months after his arrival at Naselle, Valdez began hiding marijuana and narcotics for M.J. in the field behind campus. When M.J. went to retrieve the drugs, Valdez coerced him into a sexual relationship with her. On multiple occasions, she performed oral sex on M.J. and pressured him to engage in vaginal sex in the field behind campus and in M.J.'s cell in Moolock Lodge.

6.197 Plaintiff M.K.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998 to 1999; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Ms. Gribbon, a female staff member and a male staff member, name unknown
Details of Abuse	A male staff member sexually assaulted M.K. during a strip search while Ms. Gribbon, another staff member, watched. The male staff member was a tall white man with dark features and appeared to be in his late thirties to early forties and may have been Russian or Eastern European. Ms. Gribbon was a tall, slender, white woman who had light blond hair and appeared to be in her late forties to early fifties. Gribbon stopped M.K. as he was coming back to Cougar Lodge from recreation time and escorted him to an isolated room. Gribbon instructed M.K. to remove his clothing for a strip search and contraband check. M.K. turned away from Gribbon, squatted down low and coughed. The male staff member entered the room and informed M.K. that he

	needed to check M.K.'s anal cavity. He put on gloves then repeatedly digitally penetrated M.K.'s anus, starting with one finger then inserting a second finger. He attempted to insert a third finger but stopped after M.K. shouted in pain. He then put M.K. on lockdown in his cell. Gribbon visited him and told him not to say anything about the incident. Gribbon then punished M.K. by taking a phase away from him, resulting in M.K. losing privileges.
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6.198 Plaintiff M.L.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1990 to 1991; 14 years old
Location(s) of Abuse	Naselle Youth Camp Forest Ridge Lodge
Perpetrator, if known	Naselle: Two male staff members, names unknown Forest Ridge: A male staff member, name unknown
Details of Abuse	<u>Naselle Youth Camp</u> Two male staff members sexually abused M.L. The first was a white male who appeared to be in his late forties who assaulted M.L. while transporting him to obtain his food handler's permit. On the trip, the staff

member masturbated in front of M.L. then manually stimulated M.L.'s penis. He then purchased McDonald's fast food for M.L.

The second was a tall, blonde, middle-aged white man who abused M.L. while he was in an isolation cell. The man orally and manually stimulated M.L.'s penis, digitally penetrated M.L.'s anus, and anally raped him. When M.L. reported the abuse to staff, he was physically abused in response.

Forest Ridge Lodge

A tall, slender white male staff member with graying hair sexually abused M.L. under the guise of teaching him how to drive. The staff member promised to help M.L. obtain his driver's license in exchange for sexual favors. On multiple occasions, the staff member performed oral sex on M.L. and forced M.L. to do the same in return, digitally penetrated M.L.'s anus and coerced M.L. to do the same to him, and raped M.L.

6.199 Plaintiff M.M.

Current Residence	King County, Washington
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Approximate Dates of Abuse and Age	2004 to 2008; 14 years old
Location(s) of Abuse	Naselle Youth Camp Green Hill School
Perpetrator, if known	Naselle: Mr. Moonin (spelling approximate), a male staff member Green Hill: "Ken", a male counselor
Details of Abuse	<u>Naselle Youth Camp</u> Mr. Moonin, a white staff member, sexually abused M.M. Moonin had graying brown hair, a beard, often wore a baseball hat, and appeared to be in his late forties. He often supervised the inmates while they were outdoors and used this time to isolate and "wrestle" with M.M. Moonin groped and squeezed M.M.'s genitals over his clothing and made sexual comments. He rewarded M.M. with extra freedom and snacks. <u>Green Hill School</u> A male counselor, who may have been named Ken groomed and sexually assaulted M.M. Ken gave M.M. tobacco products and allowed him extra access to the internet. After gaining M.M.'s trust, Ken invited him and his cellmate to his office. Ken closed the blinds and the door;

	Ken exposed himself to the two inmates and forced M.M. to perform oral sex on him.
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6.200 Plaintiff M.N.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	2012 to 2013; 14 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Isaac Pope, M.D., a male physician
Details of Abuse	Dr. Pope, a tall Black male physician who had gray hair and appeared to be in his sixties, sexually abused M.N. multiple times under the guise of medical exams. Initially, M.N. went to the infirmary to be cleared to play sports at the facility. During the first "exam", Dr. Pope manually stimulated M.N.'s penis. Shortly after, Dr. Pope called M.N. back to the infirmary for a second exam where he digitally penetrated M.N.'s anus while manually stimulating M.N.'s penis. M.N. reported the two incidents to his counselor, Samantha, who dismissed his concerns and told M.N. that he was overreacting. Dr. Pope called M.N. to the infirmary a third time and, again, manually

	stimulated M.N.'s penis. On this occasion, M.N. spoke up and told Dr. Pope that these were not normal exams. Dr. Pope advised M.N. to comply with his direction if he wanted to continue to play any sports and avoid going to isolation. M.N. remained silent out of fear of retaliation.
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6.201 Plaintiff M.O.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1996 to 2000; 14 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Jim, a male staff member
Details of Abuse	Jim, M.O.'s assigned case worker, sexually abused him. Jim was a short white man with white hair who wore glasses and appeared to be in his late fifties to early sixties. On multiple occasions in various locations in and around the facility, Jim exposed his penis to M.O., forced M.O. to orally and manually stimulate his penis, and performed the same acts on M.O. During the final assault, Jim expressed wanting to further escalate the sexual abuse, scaring M.O. As a result, M.O. purposefully acted

	out to get in trouble and placed in isolation to keep his distance from Jim and avoid further abuse.
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6.202 Plaintiff M.P.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2011 to 2014; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Cindy Blue, a female program manager; Katy Neiva, a female security officer; Amy Ferri, a female kitchen staff member; Erin Stiebritz, a female staff member (all spellings approximate)
Details of Abuse	Four different female staff members sexually abused M.P. Initially, M.P. met Blue at Naselle Youth Camp, where she began grooming him. Blue was a short, thin, woman of Caucasian and Native American descent who appeared to be in her fifties. After M.P. transferred to Green Hill, Blue began a position as the program manager of Birch Cottage at Green Hill. There, Blue began to get physical with M.P. For example, Blue often rubbed her bottom

1 against M.P.'s groin and grazed her hand over M.P.'s
2 genitals. Blue threatened to delay M.P.'s release and take
3 away his earned privileges if he refused her advances.
4 Security officer and close friend of Blue, Katy Neiva, was a
5 tall white woman with dark hair who appeared to be in her
6 thirties. Neiva also rubbed her butt up against or grazed
7 her hand over M.P.'s groin. She rewarded M.P.'s
8 compliance with extra privileges and promises of an early
9 release.
10 Amy Ferri, a middle-aged white woman with blonde-brown
11 hair worked alongside M.P. in the kitchen. Ferri
12 encouraged M.P. to grope her breasts and manually
13 stimulated his penis nearly every day they worked
14 together.
15 Erin Stiebritz was a heavysset white woman who appeared
16 to be in her thirties with a history of sexual misconduct
17 with inmates at Green Hill. She targeted M.P. shortly after
18 he started a job at the recreation building. On multiple
19 occasions, Stiebritz approached M.P. in the recreation
20 building where she orally and manually stimulated his
21 penis and coerced him to have vaginal sex with her
22

	without a condom. Stiebritz continued to contact M.P. for years after his release from Green Hill.
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6.203 Plaintiff M.P.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1994 to 1996; 12 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Mac, a counselor; Mr. Olsen, a maintenance worker; Ms. Sackwriter (spelling approximate), a corrections officer
Details of Abuse	Three staff members sexually abused M.P.2. Mr. Mac, M.P.2's assigned counselor, a middle-aged tall, thin white man with long, brown hair, sexually abused M.P.2 during their counseling sessions. Mr. Mac exposed his penis to M.P.2, manually stimulated M.P.2's penis, digitally penetrated M.P.2's anus, and anally raped M.P.2. After several months, Mr. Mac began involving Mr. Olsen, a maintenance worker, in the abuse. Mr. Olsen was a heavyset white man with white hair and a beard who wore

1 glasses. Mr. Olsen masturbated while watching Mr. Mac
2 assault M.P.2 and acted as a lookout.
3 Eventually, Mr. Olsen exposed his penis to M.P.2, forced
4 M.P.2 to manually stimulate his penis, and manually
5 stimulated M.P.2's penis while Mr. Mac watched and acted
6 as a lookout. Both men normalized their behavior, telling
7 M.P.2 that all the boys at Naselle had to endure sexual
8 abuse to make sure they were "strong men". M.P.2
9 attempted to contact his prior counselor, Ms. Bronze
10 (spelling approximate) to report the abuse, but she refused
11 to see him and instead directed him to address his
12 concerns with Mr. Mac. Mr. Mac threatened to add more
13 time to M.P.2's sentence if he reported the abuse.
14 Ms. Sackwriter, a tall blonde corrections officer who often
15 worked night shifts, came to M.P.2's cell at night to expose
16 and manually stimulate her breasts and genitals while
17 encouraging M.P.2 to watch.
18

19 6.204 Plaintiff M.P.3

20 Current Residence	Spokane County, Washington
21 Approximate Dates of Abuse and Age	1996; 16 years old

Location(s) of Abuse	Indian Ridge Youth Camp
Perpetrator, if known	Kevin, a male staff member
Details of Abuse	Kevin, a male staff member of Asian descent who appeared to be in his late twenties to early thirties, sexually abused M.P.3. After M.P.3 was physically assaulted by a group of inmates, he reported the incident to Kevin. Instead of protecting M.P.3 and taking action, Kevin rubbed his groin up against M.P.3 from behind and manually stimulated M.P.3's penis. Later, Kevin called M.P.3 into his office where he held M.P.3's head to the ground, impairing his breathing, and anally raped him. M.P.3 reported Kevin's assault to his D.N.R. foreman, but, to M.P.3's knowledge, there was no investigation or discipline.

6.205 Plaintiff M.S.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1999 to 2000; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown

Details of Abuse	A short white male staff member who had light hair and appeared to be in his thirties to forties sexually abused M.S. On multiple occasions, the staff member entered M.S.'s cell at night and forced M.S to perform oral sex. Once, the staff member attempted to anally rape M.S. but stopped after M.S. made too much noise. The staff member gave M.S. cigarettes, extra snacks, alcohol, and marijuana to induce and reward his compliance. The staff member threatened to have M.S. drug tested if he reported the abuse and stressed that no one would believe him.
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6.206 Plaintiff M.V.

Current Residence	Okanogan County, Washington
Approximate Dates of Abuse and Age	1971 to 1977; 12 years old
Location(s) of Abuse	Cascadia Juvenile Reception and Diagnostic Center Maple Lane School
Perpetrator, if known	Cascadia: A male medical professional and a female house matron, names unknown Maple Lane: Mr. Thompson, a male staff member and Maude, a female staff member
Details of Abuse	<u>Cascadia Juvenile Reception and Diagnostic Center</u>

Two staff members sexually abused M.V. One staff member was a short white woman who appeared to be in her sixties and was known to M.V. as her dorm's house matron. On multiple occasions, the matron entered M.V.'s cell, kissed her, and groped her breasts. If M.V. refused her advances, she sent M.V. to isolation.

The second staff member was a white male medical professional who sexually abused M.V. during a "medical exam." The staff member kissed M.V., exposed his penis, orally stimulated her breasts, manually stimulated her vagina, and attempted to force M.V. to orally and manually stimulate his penis and raped her. After, he told M.V. to keep the abuse secret.

Maple Lane School

Two staff members, Mr. Thompson and Maude, sexually abused M.V. Mr. Thompson was an obese white male staff member who wore reading glasses and appeared to be in his sixties to seventies. On multiple occasions, Thompson entered M.V.'s cell and he manually stimulated her breasts, orally stimulated her genitals, digitally penetrated her vagina, and attempted to force M.V. to touch his

	genitals, but she was able to successfully resist. After each assault, Thompson told M.V. to keep the abuse secret. Maude was a soft-spoken, petite white female staff member who appeared to be in her sixties. On multiple occasions, Maude entered M.V.'s cell and forced M.V. to expose her breasts and genitals and groped M.V.'s breasts.
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6.207 Plaintiff N.B.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2007; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	N.B.'s assigned counselor, a newly hired stocky white man with natural red hair and a beard who appeared to be in his thirties, sexually abused him during their weekly counseling sessions. On multiple occasions, the counselor manually stimulated N.B.'s penis and raped N.B. If N.B. resisted the counselor's advances, he reduced N.B.'s security level as a punishment. The counselor frequently

	threatened to physically assault N.B. and increase his sentence.
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6.208 Plaintiff N.B.2

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2004; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male corrections officer, name unknown
Details of Abuse	A tall white male corrections officer who appeared to be in his forties sexually abused N.B.2. The officer targeted N.B.2 after N.B.2 reported on another employee, a friend of the officer, for bringing in contraband. This employee was subsequently fired. In retaliation, the corrections officer subjected N.B.2 to sexual abuse under the guise of strip searching him. During these "searches," the officer forced N.B.2 to perform oral sex on the officer and to manually stimulate the officer's penis. The officer threatened N.B.2 reminding him that he was vulnerable and defenseless. The officer rewarded N.B.2's compliance with cigarettes.

6.209 Plaintiff N.E.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	2005 to 2006; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mrs. Easley (spelling approximate), a female staff member
Details of Abuse	Ms. Easley, a female staff member, sexually abused N.E. multiple times. She initiated sexual conversations with N.E. and manually stimulated his penis in the doorway of his cell and in the waiting room of the nurse's office. Easley gave N.E. pages from pornographic magazines and a cigarette. N.E.'s cellmate witnessed Easley abusing N.E. and reported it to other staff. It is believed that the State investigated Easley as a result; however, the State did not provide N.E. with any information about the investigation or any consequences to Easley.

6.210 Plaintiff N.L.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2000 to 2006; 14 years old
Location(s) of Abuse	Maple Lane School Green Hill School

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 256

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
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Perpetrator, if known	Maple Lane: Andy, a male staff member and Thomas, a male staff member Green Hill: Curtis, a male counselor and Tim, a male staff member
Details of Abuse	<u>Maple Lane School</u> Two staff members, Andy and Thomas, sexually abused N.L. Andy was an older white man with a protruding belly who talked with a lisp, often wore a hat, and chewed tobacco and sunflower seeds. Andy caught N.L. with chewing tobacco in the gymnasium and promised not to write N.L. up in exchange for sexual favors. On multiple occasions, Andy manually stimulated N.L.'s penis and coerced N.L. to orally and manually stimulate his penis in return. Andy rewarded N.L. with tobacco and kept him from reporting the abuse with threats of sending him to a higher-security facility. Thomas, a tall man with gray hair who appeared to be in his fifties, forced N.L. to manually stimulate Thomas's penis multiple times to avoid getting an infraction for entering another inmate's cell. <u>Green Hill School</u>

Two staff members, Curtis and Tim, sexually abused N.L. Curtis, N.L.'s assigned counselor, a short, bald Black man who appeared to be in his thirties, sexually abused N.L. during their weekly counseling sessions. On multiple occasions, Curtis forced N.L. to orally and manually stimulate his penis. Curtis discouraged N.L. from reporting the abuse and told him no one would believe him. He rewarded N.L. with tobacco, extra food, and energy drinks.

Tim, a heavysset white recreational staff member, helped N.L. obtain a job on the maintenance team. He often called N.L. to his office and gave N.L. tobacco, marijuana, alcohol, and money. Tim orally and manually stimulated N.L.'s penis and forced N.L. to do the same to him. On one occasion, Tim solicited N.L. for anal sex, but N.L. refused. Tim frequently got angry when N.L. did not ejaculate and, on one occasion, he punched N.L. in the face.

6.211 Plaintiff N.M.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1999 to 2000; 16 years old

Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Bailey, a male staff member and another male staff member, name unknown
Details of Abuse	Two white male staff members who worked the night shift, one named Bailey, sexually assaulted N.M. On multiple occasions, each staff member sexually assaulted N.M. individually while the other stood watch. Both staff members forced N.M. to perform oral sex on them. Bailey, a heavysset redhead, also anally raped N.M. while the other staff member a man with a muscular physique watched. Both staff members threatened that N.M. would get into more trouble if he reported the abuse.

6.212 Plaintiff N.M.2

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1996; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jay, a male security officer
Details of Abuse	Jay, a white male security officer who appeared to be in his late twenties to early thirties and worked the night shift,

	sexually abused N.M.2. On multiple occasions, Jay forced N.M.2 to perform and receive oral sex, digitally penetrated her vagina, and raped her vaginally and anally while violently choking her. Jay told N.M.2 that no one would believe her if she reported the abuse, and she would be punished for lying. Nevertheless, N.M.2 bravely reported the abuse to her counselor, whose name may have been Angela. Angela did not believe N.M.2 and punished N.M.2 for lying by placing her in solitary confinement for a week.
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6.213 Plaintiff N.M.3

Current Residence	Kittitas County, Washington
Approximate Dates of Abuse and Age	1973 to 1974; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mr. Bloom, a male counselor
Details of Abuse	Mr. Bloom, a male swing-shift counselor, sexually abused N.M.3 multiple times in her cell after lockdown. Bloom was a tall white man with dark wavy hair who wore glasses and appeared to be in his thirties. Bloom manually

	stimulated N.M.3's genitals and digitally penetrated her vagina.
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6.214 Plaintiff N.S.

Current Residence	El Paso County, Texas
Approximate Dates of Abuse and Age	1998; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Ron, a male staff member
Details of Abuse	Ron, a short Black male staff member with closely shaved hair, sexually abused N.S. in her cell after lockdown. About six months into her sentence, Ron began to stare at N.S. for extended periods, even shining a flashlight into her room to watch her sleep. One night, she woke up to find Ron standing over her bed. Startled, she asked what he was doing, and he said he was just checking on her before leaving her cell. A few days later, she woke up to the feeling of a hand reaching under her pants and fingers penetrating her vagina. Again, startled, she saw Ron pull his hand out from beneath her waistband. In the morning, another staff person approached her and said they learned

	from night shift workers that N.S. was not wearing pants to bed. Confused, N.S. disclosed what had happened with Ron the night before. The staff person shut her down, suggested she had been dreaming, and told her to wear her pants all the time. The staff apparently did not report the abuse and there was no investigation.
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6.215 Plaintiff N.S.2

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	2016 to 2017; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Art, a male counselor and three male staff members, names unknown
Details of Abuse	Multiple staff members sexually abused N.S.2. Art, N.S.'s assigned counselor, was a short Black man wore glasses and appeared to be in his fifties. Art sexually abused N.S. and another boy, R., multiple times while supervising recreation time in the pool locker room. Art orally and manually stimulated both boys' penises and forced the boys to orally and manually stimulate his penis

1 and each other's penises. When N.S.2 resisted, Art
2 threatened to send him to the "hole", delay his release, and
3 rape him. N.S.2 reported the abuse to Lisa, the head of
4 Cedar Cottage, but she did not believe him and called him
5 a compulsive liar. N.S.2 reported the abuse to another staff
6 member, a Black male physician, while he was in the
7 "hole". In response, the physician reported that N.S.2 was
8 hallucinating and remembering past trauma instead of
9 pursuing an investigation.
10 Three male corrections officers also sexually abused N.S.
11 during a physical assault. One officer, nicknamed
12 "Speedy", was a small, wiry white man likely in his fifties.
13 The second officer was a short, stocky Asian man who had
14 a mohawk and often wore a Superman shirt. The third
15 officer was a tall muscular white man who typically wore
16 flannel shirts. In response to a call that reported that
17 N.S.2 was misbehaving, these officers entered his cell and
18 tore off N.S.2's smock, leaving him completely naked. The
19 officers then tackled him. One kissed N.S.2's face to
20 degrade him; another grabbed and squeezed N.S.2's penis,
21

	causing him significant pain. During the assault, the officers restricted N.S.2's breathing and broke his forearm.
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6.216 Plaintiff P.A.

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	1996 to 2001; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Dowe, a staff member Ms. Johnson, a staff member
Details of Abuse	Ms. Dowe and Ms. Johnson, two staff members, sexually abused P.A. multiple times. Ms. Dowe was white with brown hair and eyes who appeared to be in her early thirties. Ms. Johnson was a tall, Black woman who also appeared to be in her early thirties. Dowe coerced P.A. into a nonconsensual sexual relationship. On multiple occasions, Dowe called P.A. into her office to perform and receive oral sex and have vaginal and anal sex with her.

	On one occasion, Ms. Johnson witnessed Dowe abusing P.A. and forced him to perform and receive oral sex and have vaginal and anal sex with her.
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6.217 Plaintiff P.D.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2007 to 2009; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Tina Shoemaker, a female counselor
Details of Abuse	Tina Shoemaker, P.D.'s assigned counselor, groomed and sexually abused him during their counseling sessions. Shoemaker was a white woman with an average build, short blonde hair, and brown eyes who appeared to be in her thirties. After gaining P.D.'s trust, Shoemaker orally and manually stimulated P.D.'s penis and coerced him to digitally penetrate her vagina and have vaginal sex. Shoemaker told P.D. to keep the abuse secret and gave him a contraband cell phone to communicate with her. A supervisor in Rainier Lodge saw Shoemaker kissing P.D. and P.D. believes that Shoemaker was fired as a result.

	P.D. was transferred to another lodge, perhaps as retaliation. When investigators came to speak to P.D., he was too fearful of additional retaliation to speak up.
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6.218 Plaintiff P.L.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1991 to 1994; 15 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	Lisa, a female counselor
Details of Abuse	Lisa, a slim white female counselor with curly blonde hair, which was shaved on the sides and who appeared to be in her twenties, sexually abused P.L. multiple times. Lisa engaged P.L. in sexually explicit conversations and brought him to her office. There, she exposed her genitals to P.L. and masturbated while he watched, kissed P.L. orally and manually stimulated P.L.'s penis, and coerced P.L. to orally and manually stimulate her breasts and vagina, digitally penetrate her vagina and anus, and have vaginal sex. Lisa threatened to delay P.L.'s release by

	adding more time to his sentence and to take away his privileges if he refuted her advances.
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6.219 Plaintiff P.M.

Current Residence	Lewis County, Washington
Approximate Dates of Abuse and Age	Early 1980s; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Dr. Jim Owens, M.D., a male physician
Details of Abuse	Dr. Jim Owens, a white male physician with gray hair who wore glasses and appeared to be in his sixties, sexually abused P.M. under the guise of providing medical treatment. P.M. was sent to the infirmary after injuring his ankle. Dr. Owens manually stimulated P.M.'s penis after examining his ankle and instructed P.M. to keep the abuse secret. P.M. returned to the infirmary a few months later after dislocating his shoulder. Dr. Owens, again, manually stimulated P.M.'s penis after examining him. Dr. Owens threatened to add more time to P.M.'s sentence and deny the allegations if P.M. reported the abuse.

6.220 Plaintiff P.O.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2008; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mr. H (Harris or Howard), a male counselor
Details of Abuse	Mr. H, a male counselor, whose last name may have been either Harris or Howard, sexually abused P.O. multiple times in his office. Mr. H was a conventionally attractive white man with brown hair and brown eyes who appeared to be in his forties and was assigned to work with P.O.'s cellmate in the Columbia living unit. Mr. H had frequent private meetings with P.O. where he gave P.O. candy and extra food. On several occasions during these meetings, Mr. H masturbated and ejaculated into a trash can after instructing P.O. to face away from him. Eventually, Mr. H instructed P.O. to perform oral sex on him then ejaculated into the trash can and, on one occasion, Mr. H. manually stimulated P.O.'s penis.

6.221 Plaintiff P.T.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	Early 1980s; 14 years old
Location(s) of Abuse	Echo Glen Children's Center Oakridge Community Facility
Perpetrator, if known	Echo Glen: A male counselor and a female counselor, names unknown Oakridge: Mr. Robinson, a male counselor
Details of Abuse	<u>Echo Glen Children's Center</u> A slim white female counselor who had long straight hair and appeared to be in her thirties sexually assaulted P.T. multiple times. She entered P.T.'s cell at night and manually stimulated P.T.'s penis. She threatened to send him to solitary and take away his radio if he did not comply. A white male counselor who appeared to be in his fifties to sixties also sexually assaulted P.T. He frequently entered P.T.'s cell to accuse him of bad behavior and manually stimulated P.T.'s genitals over his clothing and threatened to take away P.T.'s privileges if he did not comply. <u>Oakridge Community Facility</u>

	Mr. Robinson, the lead counselor, sexually assaulted P.T. several times. Mr. Robinson was a Black man of average height and weight who may have resided in Tacoma. Mr. Robinson removed P.T. from the facility and drove to P.T.'s mother's home. During the drive, Mr. Robinson pulled over and forcibly performed oral sex on P.T. Mr. Robinson warned P.T. that no one would believe him if he reported the abuse.
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6.222 Plaintiff P.W.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	2009 to 2012; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Crystal Mobbs, a female counselor and Song, a male staff member
Details of Abuse	Two staff members, Crystal Mobbs and Song, sexually abused him. Mobbs, a short, heavysset woman of possibly of Hispanic descent with long, curly that was often dyed, was P.W.'s assigned counselor in Hawthorne Cottage. During their

	weekly counseling sessions, Mobbs wore revealing clothing and often put her hands on P.W.'s thighs and the back of his neck. Once, Mobbs entered P.W.'s room while he was only wearing underwear, groped his penis, and commented that she'd been curious about his size. Song was a thin Asian male staff member with short, dark hair who appeared to be in his late twenties. Song subjected P.W. to abusive cavity searches, claiming that he believed that P.W. hid remote controls and chess pieces in his rectum.
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6.223 Plaintiff Q.B.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1998; 17 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Dan, a male counselor
Details of Abuse	Dan, a short white male counselor with thinning black hair, sexually assaulted Q.B. in the "quiet room" in Quinault Cottage. On multiple occasions, Dan placed Q.B. in isolation for small infractions. After escorting her to the

	"quiet room", Dan manually stimulated Q.B.'s breasts and genitals over her clothing while pressing his erect penis against her body. Q.B. reported the abuse to her counselor, Sheryn (spelling approximate). Apparently in retaliation, the State transferred Q.B. to another cottage where many of her privileges were taken away. Q.B. was not allowed to speak with Sheryn again or talk to other inmates outside of church-related activities.
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6.224 Plaintiff R.A.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1996 to 1997; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Joe, a male staff member and O.T., a male staff member
Details of Abuse	A white staff member named Joe sexually abused R.A. multiple times. Joe was a large-framed athletic man with brown hair and a thick mustache who appeared to be in his thirties. While R.A. was in the "quiet room", Joe put his arm around R.A. and rubbed R.A.'s leg and butt to "comfort" him. On multiple occasions, Joe entered R.A.'s

	cell and forced R.A. to orally and manually stimulate Joe's penis. Joe threatened to take away R.A.'s visitation privileges if he refused to comply. A second staff member who went by "O.T." also sexually harassed R.A. O.T. was a tall white man with gray hair who appeared to be in his sixties. He visited R.A. in his cell on weekends early in the morning. There, O.T. lay in R.A.'s bed, held R.A., and rubbed his back. At other times, O.T. rubbed R.A.'s shoulders in full view of other inmates and staff. O.T. gave R.A. money, apparently to reward his compliance.
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6.225 Plaintiff R.A.2

Current Residence	Skagit County, Washington
Approximate Dates of Abuse and Age	1978 to 1979; 13 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member who worked the night shift in the Moolock Lodge sexually abused R.A.2. The staff member was a heavysset white man with reddish-brown hair who

	appeared to be in his mid to late forties. One night, after lights-out, the staff member entered R.A.2's cell, manually stimulated his penis, and attempted to anally rape R.A.2, but stopped after R.A.2 shouted. The staff member threatened to throw R.A.2 in isolation for the rest of his sentence and to come after R.A.2 after he was released if R.A.2 reported the abuse. A few months after R.A.2's release, he developed genital warts around his anus, presumably from the assault.
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6.226 Plaintiff R.A.3

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1998 to 1999; 16 years old
Location(s) of Abuse	Green Hill School Indian Ridge Youth Camp
Perpetrator, if known	Green Hill: A male staff member and a female staff member, names unknown Indian Ridge: A male staff member, potentially named John.
Details of Abuse	<u>Green Hill School</u>

Two staff members sexually abused R.A.3. The first was an overweight white female staff member who had tattoos on her arm and back and worked in the kitchen. She gained R.A.3's trust by flirting with him, offering "relaxation time", allowing him to have extra time out of his cell, and offering him extra food. She frequently made inappropriate sexual comments about R.A.3 and sexually abused him in a cleaning room multiple times a week. The staff member kissed R.A.3, masturbated in front of him, orally and manually stimulated his penis, and coerced him to orally and manually stimulate her vagina, digitally penetrate her vagina and anus, and have vaginal sex. When R.A.3 resisted, she threatened to accuse him of rape. She discouraged him from reporting the abuse by reminding him that he was a criminal so no one would believe him, and he would stay at Green Hill indefinitely.

The second was a tall, fit white male staff member who had short hair, chewed wintergreen tobacco, and often wore a ball cap. The male staff member made inappropriate sexual comments to R.A.3 and violently sexually abused him several times in his cell. The staff

member masturbated in front of R.A.3, violently forced R.A.3 to orally and manually stimulate his penis, orally and manually stimulated R.A.3's penis, and raped R.A.3. Afterward, the staff member threatened to kill R.A.3 and his entire family if he told anyone.

Indian Ridge Youth Camp

A black male guard, who may have been named John, groomed R.A.3 by providing him extra snacks and playing cards with him and then sexually assaulted him. John pinned R.A.3 against a wall, kissed him and manually stimulated R.A.3's genitals. R.A.3 was able to hit the guard to stop the abuse. R.A.3 was then sent to "the hole" in punishment. Later, John caressed R.A.3's butt in the shower and tried to digitally penetrate his anus but stopped when someone else entered the shower area.

6.227 Plaintiff R.B.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1994 to 1995; 17 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A Black female staff member with shoulder-length hair who wore glasses and appeared to be in her mid-twenties sexually abused R.B. in the Honor Cottage multiple times. The staff member sexually abused R.B. in a supply closet, staff office, and occasionally in his cell. She kissed R.B., rubbed her body up against his, and orally and manually stimulated his penis.

6.228 Plaintiff R.B.2

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1976 to 1979; 14 years old
Location(s) of Abuse	Cascadia Juvenile Reception and Diagnostic Center Naselle Youth Camp Mission Creek Youth Camp
Perpetrator, if known	Cascadia: Mr. Jackson, a male staff member Naselle: Mr. Kirsch, a male counselor Mission Creek: Ms. Tolva, a female staff member and Emmet Bryant, a male staff member
Details of Abuse	<u>Cascadia Juvenile Reception and Diagnostic Center</u>

Mr. Jackson, a thin Black male staff member who appeared to be in his thirties, sexually abused R.B.2. At night and on several occasions, Jackson invited R.B.2 to come to a secluded corner of the dorm to call his family. There, Jackson manually stimulated R.B.2's penis, forced R.B.2 to manually stimulate Jackson's penis, and solicited oral sex from R.B.2. If R.B.2 resisted, Jackson threatened to take away his phone privileges and keep him at the facility indefinitely.

Naselle Youth Camp

Mr. Kirsch, a white male counselor with wavy, brown hair who chewed tobacco and appeared to be in his forties to fifties, sexually abused R.B.2 during their weekly counseling sessions. Kirsch manually stimulated R.B.2's penis over his clothing, forced R.B.2 to perform oral sex on him, and digitally penetrated R.B.2's anus. Kirsch allowed R.B.2 to purchase cigarettes if he complied and threatened to send R.B.2 to isolation if he refused. Additionally, Kirsch threatened to take away R.B.2's privileges and extend his sentence if R.B.2 reported the abuse.

Mission Creek Youth Camp

Two staff members sexually abused R.B.2. The first was Ms. Tolva, a white woman with dark hair who appeared to be in her thirties. Tolva often flirted with R.B.2 and his friend, gaining their trust. On multiple occasions, Tolva manually stimulated R.B.2's penis, forced him to manually stimulate her genital area, and coerced him to have vaginal sex. Tolva threatened to take away R.B.2's privileges if he refused to comply or reported the abuse. She encouraged both boys to run away from the facility with her, but R.B.2 refused. After Tolva ran away with R.B.2's friend, staff placed R.B.2 in isolation and questioned him. He is unaware of any other investigation that took place.

The second was Emmet Bryant, a tall Black male staff member who appeared to be in his forties. Bryant frequently took a group of inmates on trips to Seattle to watch sporting events. On these occasions, while the other inmates watched the event, Bryant sexually abused R.B.2 in the facility van. Bryant orally and manually stimulated R.B.2's penis, forced R.B.2 to do the same to him, and digitally penetrated R.B.2's anus. Bryant kept R.B.2

	compliant by threatening to stop taking R.B.2 on these trips.
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6.229 Plaintiff R.C.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1994; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Donald, a male staff member; Hank, a male staff member; a male staff member, name unknown
Details of Abuse	Three male staff members gang raped R.C. in his cell. The first, a staff member named Donald, was a bald Black male counselor who appeared to be in his late thirties to early forties. Another was Hank, a tall white man with graying hair and a beard. Third, was a muscular white man with red hair. The three men entered R.C.'s cell and directed R.C. to perform oral sex on them. When R.C. refused, two of the men restrained him while the other anally raped him. The three men took turns anally raping R.C. causing rectal bleeding. The staff members

	discouraged R.C. from reporting the abuse by telling him that no one would believe him and threatening to keep him on lockdown in his cell.
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6.230 Plaintiff R.D.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1995 to 1996; 14 years old
Location(s) of Abuse	Indian Ridge Youth Camp Parke Creek Community Facility
Perpetrator, if known	Indian Ridge: Robin, a female counselor Parke Creek: A male counselor, name unknown
Details of Abuse	<u>Indian Ridge Youth Camp</u> Robin, a woman of indeterminate ethnicity who appeared to be in her forties, sexually abused R.D. multiple times. Robin was R.D.'s assigned counselor and met with him weekly for counseling sessions. During these sessions, Robin orally and manually stimulated R.D.'s penis and coerced him to digitally penetrate her vagina. She rewarded him with cigarettes. <u>Parke Creek Community Facility</u>

	A tall white male counselor who worked in the chemical dependency program sexually abused R.D. multiple times. When R.D.'s success in the program began declining, the counselor offered to "help" R.D. meet his goals in exchange for sexual favors. The counselor then threatened to delay his release or send him back to juvenile prison if he did not comply. The counselor orally and manually stimulated R.D.'s penis and solicited the same from R.D., but he successfully resisted.
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6.231 Plaintiff R.D.2

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1976 to 1977; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	An overweight white male staff member with dark hair and a beard whose name may have been Craig or Carl sexually abused R.D.2 multiple times. When the staff member worked the night shift, he gained R.D.2's trust by allowing him to have time out of his cell to smoke, drink a

	soda, and look at a pornographic magazine in a private office. The staff member forced R.D.2 to perform and receive oral sex multiple times. On one occasion, he threatened to rape R.D.2.
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6.232 Plaintiff R.G.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1993; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male physician and a female counselor, names unknown
Details of Abuse	Two staff members sexually abused R.G. First, a Black male physician, known as "Dr. Gold Finger", conducted medical exam that included an unnecessary rectal exam and manually stimulating R.G.'s penis and testicles. Second, R.G.'s assigned counselor, a white woman who appeared to be in her thirties to forties and drove a blue sedan, sexually abused him after taking him off campus. A few weeks before his release, the State permitted R.G.'s counselor to take him off-site multiple times in her vehicle

	to purchase clothing and hygiene products. In the parking lot of the store, the counselor manually stimulated R.G.'s penis and coerced him to have vaginal sex with her. When he resisted her advances, she threatened to leave him there and report that he had escaped. As a reward for his compliance, the counselor bought him lunch and gave him cigarettes and money. She told him to keep the abuse secret.
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6.233 Plaintiff R.G.2

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	1968 to 1969; 16 years old
Location(s) of Abuse	Fort Worden Juvenile Diagnostic and Treatment Center Green Hill School
Perpetrator, if known	Fort Warden: Mr. McKee, a male staff member Green Hill: John T. Trisnawsky (spelling approximate), a male staff member
Details of Abuse	<u>Fort Worden Juvenile Diagnostic and Treatment Center</u> Mr. McKee, a short, stocky white male staff member with a muscular build who appeared to be in his thirties, sexually abused R.G.2. The State permitted McKee to take R.G.2

1 off-site for multiple reasons including a shopping trip
2 where he bought R.G.2 cigarettes and new clothes, as well
3 as a trip to McKee's home, where he sexually abused
4 R.G.2. McKee forcibly pulled down R.G.2's pants, manually
5 stimulated his penis, and raped him. McKee told R.G.2 to
6 keep his mouth shut. On information and belief, McKee
7 sexually abused other inmates as well.

8 Green Hill School

9 John T. Trisnawsky, a short, stocky white male staff
10 member with gray hair and a receding hairline who
11 appeared to be in his fifties and always had a pack of
12 cigarettes in his shirt pocket, sexually abused R.G.2. When
13 R.G.2 was in isolation, Trisnawsky visited him multiple
14 times. He facilitated R.G.2's transfer to another cottage
15 and helped him obtain a job that included tasks like
16 picking up trash on the facility grounds alongside
17 Trisnawsky. Some days, R.G.2 and Trisnawsky waited in
18 an isolated office for their work assignments. In the office,
19 Trisnawsky asked R.G.2 inappropriate sexual questions
20 and brought in pornographic magazines. Multiple times,
21 Trisnawsky orally and manually stimulated R.G.2's penis
22

	in the isolated office. Trisnawsky rewarded R.G.2's compliance by providing him with cigarettes and adding money to his account.
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6.234 Plaintiff R.G.3

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1996; 17 years old
Location(s) of Abuse	Indian Ridge Youth Camp
Perpetrator, if known	A male corrections officer, name unknown
Details of Abuse	A male corrections officer sexually abused R.G.3 multiple times. The officer was a tall, overweight white man with brown hair and a mustache. The officer forced R.G.2 to orally and manually stimulate his penis, orally and manually stimulated R.G.2's penis, and digitally penetrated R.G.2's anus. The officer threatened to make R.G.3's time at the facility miserable and take away his "good time" if he reported the abuse.

6.235 Plaintiff R.J.

Current Residence	Pierce County, Washington
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Approximate Dates of Abuse and Age	1979 to 1982; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Teddy Burke (spelling approximate), a female staff member and a female staff member, name unknown
Details of Abuse	Two female staff members sexually abused R.J. The first was Teddy Burke, a short, heavyset white woman who had long, dark hair and appeared to be in her twenties. Burke entered R.J.'s cell in Elm Cottage on weekends and, on several occasions, orally and manually stimulated R.J.'s penis and coerced him to grope her breasts. Burke rewarded R.J. with candy. The second was a short, slim Black female staff member who appeared to be in her late twenties to early thirties. After R.J. transferred to Spruce Cottage, the staff member shared sexually explicit information about her personal life and performed oral sex on R.J. in his cell. She rewarded him with homemade treats and cigarettes.

6.236 Plaintiff R.L.

Current Residence	Pierce County, Washington
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COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 287

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Approximate Dates of Abuse and Age	1985 to 1986; 9 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	R.L.'s assigned counselor, a tall, heavyset Black man with short, dark hair who appeared to be in his thirties, sexually abused R.L. during their counseling sessions. On multiple occasions, the counselor manually stimulated R.L.'s penis and forced R.L. to do the same to him. The counselor discouraged R.L. from reporting the abuse by telling R.L. that if he did, he would never see his mother again.

6.237 Plaintiff R.L.2

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	Early 2000s; 12 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male corrections officer and a male counselor, names unknown
Details of Abuse	Two staff members sexually abused R.L.2.

1 The first was tall, heavysset white male corrections officer
2 with dark hair and a beard who appeared to be in his
3 thirties and had arm tattoos. He visited R.L.2 while he was
4 in isolation and offered him cigarettes, marijuana, and
5 extra food in exchange for sexual favors. The officer orally
6 and manually stimulated R.L.2's penis, forced R.L.2 to the
7 same to him, and solicited R.L.2 for anal sex. When R.L.2
8 resisted, the officer physically assaulted him and
9 threatened to kill him. In retaliation, the officer allowed
10 other inmates to enter R.L.2's isolation cell and physically
11 assault him until he was unconscious.

12 R.L.2 reported this abuse to his counselor, a thin white
13 man with reddish hair and freckles on his arms who wore
14 glasses and appeared to be in his twenties to thirties.
15 Instead of protecting R.L.2, the counselor forced R.L.2 to
16 re-enact the abuse and started sexually abusing R.L.2
17 during their counseling sessions. The counselor forced
18 R.L.2 to orally and manually stimulate his penis and did
19 the same to R.L.2 while calling R.L.2 a "dirty little bitch"
20 or a "slut". The counselor wanted to digitally penetrate
21 R.L.2 and asked R.L.2 to penetrate him with a large object,
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	but R.L.2 was able to resist. The counselor threatened to delay R.L.2's release, make his life at the facility miserable, and revoke his privileges if R.L.2 reported the abuse.
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6.238 Plaintiff R.M.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	Late 1970s; 17 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Two male corrections officers, names unknown
Details of Abuse	Two white male corrections officers who appeared to be in their thirties to forties sexually assaulted R.M. They placed R.M. in isolation after he arrived at the facility for a few days. During that time, the officers physically and sexually assaulted R.M. Both officers raped R.M. individually while the other stood watch and masturbated. They threatened to kill R.M. if he reported the abuse.

6.239 Plaintiff R.M.2

Current Residence	Multnomah County, Oregon
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Approximate Dates of Abuse and Age	1983 to 1985; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A female counselor, name unknown
Details of Abuse	A female counselor sexually abused R.M.2 and his cellmate, L., individually and simultaneously multiple times. The counselor was a tall, slim, white woman with long curly hair who appeared to be in her thirties. With her encouragement, R.M.2 went on hikes that this counselor did with a small group of other inmates without other staff. She used the hikes to isolate the inmates and sexually abused R.M.2 and L. After giving the other boys an activity to distract them, she took R.M.2 – and occasionally L. as well – to a more secluded location. When she abused R.M.2 alone, she coerced him to kiss her, fondle her breasts, manually stimulate and digitally penetrate her vagina, and orally and manually stimulated his penis. When L. was present, she coerced both boys to participate in the same sexual acts, sometimes she forced one of them to watch while the other performed sexual acts on her. The counselor allowed R.M.2 to have extra time out of his cell

	and stay up later than other inmates. She discouraged him from reporting the abuse by threatening to revoke his special privileges and send him to isolation. After he was released to a group home, R.M.2 reported the sexual abuse, but the staff member did not believe him and accused him of lying.
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6.240 Plaintiff R.N.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	Late 1980s; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Fran Scott, a female staff member
Details of Abuse	Fran Scott, a heavysset white female maintenance worker with white, curly hair who wore glasses and appeared to be in her fifties, sexually abused R.N. Scott was R.N.'s supervisor for his job detail and he assisted her with maintenance projects around the facility. On days when they had free time, Scott groomed and sexually abused R.N. in various locations around the facility. She asked him inappropriate questions about his sexuality, she

	kissed R.N., orally and manually stimulated R.N.'s penis, and coerced R.N. to manually stimulate her breasts and vagina. Scott discouraged R.N. from reporting the abuse by threatening to have him fired and sent to isolation and reminding him that no one would believe him.
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6.241 Plaintiff R.N.2

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	Early to mid-1990s; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Ken, a male security officer a male video tech teacher, name unknown
Details of Abuse	Two male staff members sexually abused R.N.2. The first was Ken, a tall male security officer who appeared to be of Native American descent and in his thirties. Under the guise of escorting R.N.2 to a maintenance job, Ken took him to an isolated building near the woodshop and raped him. Ken threatened to make the rest of R.N.2's sentence unpleasant if he reported the assault.

	The second was a short white man with gray hair who appeared to be in his sixties and taught math, video technology, and drama. The teacher was permitted to have private lessons with R.N.2 for video tech class. During these lessons, the teacher manually stimulated R.N.2's penis and forced R.N.2 to do the same to him. The teacher rewarded R.N.2 with special privileges, candy, and gum.
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6.242 Plaintiff R.P.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	2001 to 2007; 12 years old
Location(s) of Abuse	Echo Glen Children's Center Green Hill School Maple Lane School
Perpetrator, if known	Echo Glen: Gerald, a male counselor and "O.T.", a male staff member Green Hill: A male corrections officer, name unknown Maple Lane: A male physician, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> Two male staff members sexually abused R.P. One staff member, R.P.'s assigned counselor, Gerald, was a Black

1 man with short, graying hair who wore glasses and
2 appeared to be in his forties. During their weekly
3 counseling sessions, Gerald gained R.P.'s trust by bringing
4 him food from McDonald's and allowing him to play
5 videogames. He asked R.P. inappropriate personal
6 questions while massaging R.P.'s thighs then, on several
7 occasions, manually stimulated R.P.'s penis over his pants.
8 Gerald threatened to revoke his video game and visitation
9 privileges if R.P. reported the abuse.

10 The second staff member, who went by "O.T.", was a tall
11 white man who appeared to be in his fifties. On multiple
12 occasions, O.T. rubbed R.P.'s shoulders and back, made
13 sexual comments to R.P., groped R.P.'s buttocks, and
14 digitally penetrated his anus. O.T. also threatened to
15 revoke R.P.'s video game and visitation privileges and
16 withhold food if R.P. reported the abuse.

17 Green Hill School

18 A white male corrections officer with a beard who often
19 wore a hat, appeared to be in his thirties, and worked the
20 night shift sexually abused R.P. The officer gave R.P.
21 candy and allowed him to use the bathroom more often
22

than the other inmates in his living unit. On multiple occasions, the officer visited R.P. in his cell after lockdown. There, the officer rubbed R.P.'s back and legs, exposed his genitals to R.P., manually stimulated R.P.'s penis, and forced R.P. to grope the officer's bare buttocks and thighs. The officer threatened to send members of the Hilltop Crips gang at the facility to physically assault R.P. if he reported the abuse.

Maple Lane School

A tall, heavysset Black male physician sexually abused R.P. multiple times under the guise of performing medical exams. During the "exams", the physician digitally penetrating R.P.'s anus and manually stimulated R.P.'s penis. The physician told R.P. that this was a prostate exam and a normal procedure but told R.P. to keep the details about the "exams" secret.

6.243 Plaintiff R.R.

Current Residence	Mason County, Washington
Approximate Dates of Abuse and Age	1980s; 15 years old
Location(s) of Abuse	Naselle Youth Camp

Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member sexually abused R.R. The staff member was a tall, slender white man with white hair who appeared to be in his fifties. He came to R.R.'s cell and offered to give R.R. a pack of cigarettes and matches if R.R. showed the staff member his penis. R.R. complied, pulled down his pants and underwear, and, the staff member reached out manually stimulated R.R.'s penis. The staff member gave R.R. the cigarettes and matches and told R.R. to keep the incident a secret.

6.244 Plaintiff R.R.2

Current Residence	Cowlitz County, Washington
Approximate Dates of Abuse and Age	1978 to 1981; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jerry, a male counselor; Gretchen, a female staff member; two male staff members, names unknown
Details of Abuse	Multiple staff members sexually abused R.R.2.

A male counselor named Jerry, was a tall man of indeterminate ethnicity who had a scar on his right cheek and appeared to be in his thirties. On multiple occasions, Jerry forced R.R.2 to manually stimulate his penis; he also manually stimulated her breasts and vagina and rubbed his penis on R.R.2's clothed body in her cell and in an isolated area behind the school. Jerry discouraged R.R.2 from reporting the abuse by reminding her that he was the authority and that no one would believe her.

Gretchen, a white female staff member with a pixie-cut hairstyle who appeared to be in her early twenties, also sexually abused R.R.2. Multiple times, Gretchen came into R.R.2's cell, laid on top of R.R.2, manually stimulated R.R.2's breasts and genitals, and digitally penetrated her vagina. Gretchen threatened to put R.R.2 on lockdown if she reported the abuse and told R.R.2 no one would believe her.

Two white male staff members who appeared to be in their thirties also sexually abused R.R.2, one with strawberry blonde hair and the other with dirty blonde hair. Once in the laundry room and multiple times in R.R.2's cell, the

	staff members came in, manually stimulated each other's penises while forcing R.R.2 to watch, and manually stimulated R.R.'s breasts and genitals over her clothing.
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6.245 Plaintiff R.R.3

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1976; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mr. Bees, a male staff member
Details of Abuse	Mr. Bees, a heavysset white male staff member with a beard who wore thick glasses, sexually assaulted R.R.3 more than a dozen times. Mr. Bees entered R.R.3's room and forced R.R.3 to perform oral sex with him while gripping R.R.3's hair to hold R.R.3 in place and manually stimulated R.R.3's penis. Mr. Bees told R.R.3 to keep the abuse secret.

6.246 Plaintiff R.S.

Current Residence	Whatcom County, Washington
Approximate Dates of Abuse and Age	1980s; 15 years old

Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	“Bear”, a male D.N.R. crew foreman
Details of Abuse	A white male D.N.R. crew foreman known as “Bear” sexually assaulted R.S. multiple times. Bear was a short, stocky, muscular man who appeared to be in his late fifties to early sixties and often wore a red plaid shirt. While in the wooded area where D.N.R. crew met, Bear followed R.S. when he left to urinate. Bear stood behind R.S., reached around, and grabbed R.S.'s penis, saying, “I can hold [your penis] while you go.” On the occasion that R.S. needed to defecate, Bear watched and verbally compared the size of R.S.’s penis, his own penis, and the excrement. Bear sexually assaulted and harassed R.S. in these ways at least once a week for the duration of his involvement with the D.N.R. crew.

6.247 Plaintiff R.S.2

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1987; 14 years old
Location(s) of Abuse	Echo Glen Children’s Center

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 300

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Perpetrator, if known	"Dr. Jelly Wrists", a male physician
Details of Abuse	A male physician inmates referred to as "Dr. Jelly Wrists" sexually abused R.S.2 during a "medical exam." The physician was an older white man with a strict and authoritative demeanor. The physician made sexualized comments about R.S.2's physique and instructed him to remove his bottoms and bend over the exam table for a prostate exam. When R.S.2 refused, the physician implied that his refusal to participate in the "exam" would result in R.S.2 getting into trouble. R.S.2 then complied with the physician's request. The physician digitally penetrated R.S.2's anus and reached around to stroke R.S.2's penis simultaneously. R.S.2 reported to a woman at the front desk that the physician assaulted him, and she responded by giving him a dirty look.

6.248 Plaintiff R.S.3

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1990s; 16 years old
Location(s) of Abuse	Parke Creek Community Facility

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 301

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A white male staff member with short, dark hair who appeared to be in his forties sexually assaulted R.S.3 on multiple occasions. The staff member took R.S.3 with him to run errands in a van. While they were alone, the staff member orally and manually stimulated R.S.3's penis and forced R.S.3 to perform oral sex on him. The staff member rewarded R.S.3's compliance with marijuana.

6.249 Plaintiff R.W.

Current Residence	Des Moines County, Iowa
Approximate Dates of Abuse and Age	1996 to 1997; 14 years old
Location(s) of Abuse	Naselle Youth Camp Camp Outlook
Perpetrator, if known	Naselle: A male counselor and a male medical provider, names unknown Camp Outlook: Emaline Edwards, a female staff member
Details of Abuse	<u>Naselle Youth Camp</u> An older white male counselor in Harbor Lodge who was balding and wore glasses sexually abused R.W. multiple times. Weekly, the counselor took R.W. to the back of a

common room away from the other inmates, rubbed R.W.'s shoulders and inner thighs, and manually stimulated R.W.'s genitals both over and underneath his clothing. Prior to his release, R.W. visited an on-campus healthcare provider for tooth pain. The healthcare provider was a white man who required R.W. remove all his clothing for an oral exam.

Camp Outlook

Staff member Emaline Edwards, a short Black woman who appeared to be in her forties, often wore camouflage, and had her hair pulled back, sexually abused R.W. Edwards flirted with R.W., fondled him, and gave him alcohol. Eventually, Edwards took R.W. offsite, gave him a can of beer and coerced him into a sexual relationship. Edwards pressured R.W. to have vaginal sex with her multiple times. Edwards told R.W. to keep the encounters secret. R.W. reported the abuse to a counselor named Pat Stretch, but Stretch did not believe him.

6.250 Plaintiff R.W.2

**Current
Residence**

Snohomish County, Washington

Approximate Dates of Abuse and Age	2000 to 2002; 14 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	Carrie, a female corrections officer and Tammy, a female nurse
Details of Abuse	Two different staff members sexually abused R.W.2. Carrie, a tall white female corrections officer, sexually abused R.W.2 along with several other inmates in the laundry room. There, Carrie orally and manually stimulated R.W.2's penis and forced him to perform oral and vaginal sex. On some occasions, she abused R.W.2 by himself, but at other times there were two or three other boys who she was also sexually abusing simultaneously. She did not provide any of the boys with condoms. Tammy, a white female nurse with short curly hair, sexually abused R.W.2 after he injured a tooth in a fight. After examining his tooth and mouth, she made sexual comments about him being a bad boy, orally and manually stimulated his penis, digitally penetrated R.W.2's anus, and forced him to have vaginal sex.

6.251 Plaintiff S.B.

Current Residence	Grays Harbor County, Washington
Approximate Dates of Abuse and Age	2002 to 2005; 13 years old
Location(s) of Abuse	Echo Glen Children's Center Green Hill School
Perpetrator, if known	Echo Glen: Scott, a male counselor Green Hill: A male staff member, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> S.B.'s assigned counselor, Scott, groomed and sexually abused him. Scott was a white man with long hair who wore glasses and appeared to be in his thirties. While S.B. was cleaning the Cottage mud room, Scott put on a pornography video, pulled out his penis, began masturbating, and then anally raped S.B. When S.B. asked Scott to stop, Scott began crying and apologized for assaulting S.B. Scott then told S.B. that no one would believe him if he reported the abuse. On a few more occasions, Scott forced S.B. to perform oral sex on him and threatened to delay S.B.'s release if he refused to comply. <u>Green Hill School</u> A Black male corrections officer who appeared to be in his thirties sexually abused S.B. in the isolation unit. The

	officer was a Black male who appeared to be in his thirties. He entered S.B.'s cell at night and showed S.B. photos of women with whom the officer was in a sexual relationship and then forced S.B. to perform oral sex on him.
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6.252 Plaintiff S.C.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1998 to 1999; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Dorthy (spelling approximate), a male counselor
Details of Abuse	S.C.'s assigned counselor, Mr. Dorthy, repeatedly sexually abused him during their weekly counseling sessions. Dorthy was a white man with blue eyes and dark, shoulder-length hair who had a mustache and appeared to be in his forties. Dorthy kissed S.C., manually stimulated S.C.'s penis, and digitally penetrated S.C.'s anus. Dorthy attempted to coerce S.C. to reciprocate the acts, but S.C. refused. Dorthy threatened to prevent S.C. from being transferred to a group home if S.C. tried to stop or report the abuse. Dorthy

	rewarded S.C. with candy, extra phone calls, and additional clothing.
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6.253 Plaintiff S.C.2

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1980; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Kathleen, a female counselor
Details of Abuse	Kathleen, a tall white female counselor with long brown hair who appeared to be in her thirties, groomed and sexually abused S.C.2. Kathleen gained S.C.2's trust by buying him clothing, bringing him treats, allowing him to smoke marijuana and cigarettes, and taking him on trips off-site, often to her home. There, and in her office, Kathleen orally and manually stimulated S.C.2's penis and coerced him to manually stimulate her breasts and vagina and have vaginal sex with her. She warned S.C.2 that they both would get in trouble if he reported the abuse.

6.254 Plaintiff S.C.3

Current Residence	Grays Harbor County, Washington
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Approximate Dates of Abuse and Age	1996 to 1998; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A female corrections officer, name unknown
Details of Abuse	A female corrections officer sexually abused S.C.3. The corrections officer was a heavysset white woman with dark hair who appeared to be in her forties and worked in S.C.3's Lodge. On several occasions, the corrections officer entered S.C.3's cell to sexually abuse him and threatened to send him to "the hole" if he did not comply with her demands. The corrections officer manually stimulated S.C.3's penis and forced S.C.3 to kiss her, manually stimulate her breasts, and digitally penetrate her vagina.

6.255 Plaintiff S.D.

Current Residence	Thurston County, Washington
Approximate Dates of Abuse and Age	1982; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male doctor, name unknown

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 308

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
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Details of Abuse	A white male doctor in his late forties to early sixties, with a medium build and grey hair, sexually assaulted S.D. During an office visit, the doctor forced S.D. to perform oral sex on him then raped S.D. and told him to keep the assault a secret.
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6.256 Plaintiff S.E.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2000 to 2003; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Ms. Matlock, a female counselor
Details of Abuse	Ms. Matlock, a female counselor in Eagle Lodge, sexually abused S.E. Matlock was a short, heavysset white woman with brown eyes and dark hair who appeared to be in her forties. On a few occasions, Matlock grabbed S.E.'s genital area over his clothing and, eventually, slid her hand down his pants to manually stimulate his penis. When S.E. pulled away from her, Matlock grabbed S.E.'s hand and forced him to touch her genital area over her clothing.

	Matlock told S.E. that no one would believe him to discourage him from reporting the abuse.
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6.257 Plaintiff S.G.

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1998; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Webb, a female counselor
Details of Abuse	Ms. Webb, a white female counselor with brown hair and brown eyes who appeared to be in her late twenties to early thirties, groomed and sexually abused S.G. multiple times. During their weekly counseling sessions, Webb asked S.G. personal and sexually explicit questions. She directed S.G. to lie down and close his eyes while she manually stimulated his genitals above and beneath his clothes. She also forced him to watch her masturbate, digitally penetrate her vagina, and have vaginal sex with her. Ms. Webb also digitally penetrated S.G.'s anus and penetrated him with a sex toy. Ms. Webb threatened to

	physically harm him and get him into trouble to discourage him from reporting the abuse.
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6.258 Plaintiff S.K.

Current Residence	Lewis County, Washington
Approximate Dates of Abuse and Age	1990s; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Janie, a female staff member
Details of Abuse	Janie, a white female staff member, sexually abused S.K. multiple times. Janie had a slim physique, blue eyes, blonde hair, appeared to be in her late thirties to early forties, and worked in the laundry room. S.K. was assigned to help Janie in the laundry room. She gained his trust by providing him with gum and tobacco and promised to get him anything else he wanted. When they were alone together, Janie orally and manually stimulated S.K.'s penis and coerced him to orally and manually stimulate her vagina, grope her breasts, and have vaginal sex with her.

6.259 Plaintiff S.K.2

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	Early 1990s; 15 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Marvin Sperber, a male counselor and Joanne Weis, a female counselor (both spellings approximate)
Details of Abuse	Two staff members sexually abused S.K.2. First, S.K.2 was subject to abusive searches by Marvin Sperber, a male counselor. Sperber was muscular white man with long blonde hair who appeared to be in his late twenties or early thirties. During multiple pat-down searches, Marvin fondled S.K.2's penis over his clothes while making sexually explicit comments about the size of his penis. Second, Joanne Weis, a female gym instructor, groomed and sexually abused S.K.2. Weis was a petite white woman with green eyes and blonde hair who appeared to be in her late twenties. During gym activities, Joanne forcefully rubbed her body against S.K.2 and, in the pool, Weis

	manually stimulated S.K.2's penis. Weis also coerced S.K. into having vaginal sex on more than one occasion.
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6.260 Plaintiff S.L.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1999 to 2003; 14 years old
Location(s) of Abuse	Echo Glen Children's Center Maple Lane School
Perpetrator, if known	Echo Glen: Mack, a male corrections officer Maple Lane: A male staff member, name unknown
Details of Abuse	<u>Echo Glen Children's Center</u> Mack, a tall male corrections officer of an indeterminate ethnicity, sexually abused S.L. After transferring S.L. to an isolation unit, Mack was tasked with bringing S.L. his breakfast on weekend days. He withheld S.L.'s breakfast and refused to feed S.L. unless S.L. stripped for him. S.L. complied and Mack masturbated while watching. <u>Maple Lane School</u> A white male staff member sexually abused S.L. While incarcerated, S.L. developed Gynecomastia, a hormonal condition that causes an increase in breast gland tissue in

	males, and S.L. needed to see an off-site medical provider. While the staff member transported S.L. off-site for treatment, he verbally criticized and harassed S.L. because of his condition, then grabbed and squeezed S.L.'s chest, causing him pain.
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6.261 Plaintiff S.M.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1988 to 1990; 15 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male woodshop teacher and a female staff member, names unknown
Details of Abuse	Two staff members sexually abused and harassed S.M. The first was a white male woodshop teacher who told S.M. to stay behind after class and sexually abused him multiple times. He rubbed his erect penis on S.M.'s shoulders, forced S.M. to perform oral sex, and punished S.M. when he resisted by sending him to isolation. When SM tried to report the abuse to his counselor, she refused to believe him and sent him to isolation.

	An older female staff member who worked in the isolation harassed S.M. and the other inmates by trying to kiss them.
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6.262 Plaintiff S.M.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2002; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Hickland, a male D.N.R. crew foreman
Details of Abuse	Mr. Hickland, a male D.N.R. crew foreman, repeatedly sexually abused S.M.2. Hickland was a short, thin man with a slight hunchback and short gray hair he covered with a hat who appeared to be in his sixties and of Asian descent. Hickland oversaw transporting the S.M.2 and other female inmates to and from the work site and supervised them while they worked. Hickland was well-liked among the inmates on his crew, so when he began sexually abusing S.M.2, she was hesitant to tell anyone about his behavior. Hickland accompanied S.M.2 on most of her bathroom breaks. Before allowing S.M.2 to relieve

	herself in an isolated location near the worksite, he forced her to pull down her pants and underwear, bend over, and use her hands to spread apart her bottom to expose her entire genital area. Hickland discouraged S.M.2 from reporting the abuse by claiming he would get into trouble and delay her release if she did. He rewarded S.M.2 with puffs from his cigarettes, snacks, and candy.
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6.263 Plaintiff S.P.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	2020 to 2021; 16 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mike, a male staff member
Details of Abuse	Mike, a well-dressed Black male staff member who appeared to be in his forties to fifties, sexually abused S.P. Mike promised to allow S.P. to have more time out of his cell if S.P. helped him with the laundry. When they got to the laundry room, Mike manually stimulated S.P.'s penis and encouraged S.P. to do the same by exposing his penis. When S.P. refused, Mike told him to return to his cell.

6.264 Plaintiff S.V.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1999 to 2003; 14 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Joe, a male security officer
Details of Abuse	Joe, a white male security officer with gray hair and a full beard who had faded arm tattoos and appeared to be in his sixties, sexually abused S.V. Multiple times, when Joe escorted S.V. to the "hole", he forced S.V. to manually stimulate his penis over his clothes. On one occasion, Joe forced S.V. to manually stimulate his penis over his clothes while they waited in the dentist's office.

6.265 Plaintiff T.B.

Current Residence	Grays Harbor County, Washington
Approximate Dates of Abuse and Age	2008 to 2009; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male corrections officer, name unknown

Details of Abuse	A middle aged Black male staff member with graying hair who worked the night shift sexually abused T.B. The staff member stopped by T.B.'s cell to engage T.B. in late-night conversations, offered T.B. treats and extra tokens for good behavior, and allowed T.B. to have more time out of his cell. Multiple times, the staff member manually stimulated T.B.'s penis and forced T.B. to manually stimulate his penis. He threatened to place T.B. in isolation if he reported the abuse.
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6.266 Plaintiff T.C.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1995 to 1995; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Bob, a male counselor
Details of Abuse	T.C.'s assigned counselor, Bob, groomed and sexually abused her. After learning they shared the same birthday, Bob treated T.C. favorably and targeted her. During their counseling sessions, Bob groped her breasts and butt and massaged her genital area with his knee or foot multiple

times. While T.C. fought back, Bob threatened to revoke her family visitation privileges and send her to isolation if she reported the abuse. He further discouraged her from coming forward by telling her that no one would believe her. T.C. concluded Bob was correct because T.C. reported him the first time he groped her butt, and the staff member dismissed her.

6.267 Plaintiff T.D.

Current Residence	Benton County, Washington
Approximate Dates of Abuse and Age	2002 to 2003; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Denison, a male counselor and Mark, a male supervisor
Details of Abuse	Two male staff members, Mark, a supervisor, and Denison, a counselor, sexually abused T.D. Mark was a heavysset white man of average height who appeared to be in his early thirties. Denison was a tall, athletic white man with red hair and freckles who appeared to be in his mid-thirties. While taking T.D. to the "quiet room", Mark and Denison put their full weight on T.D., hit him, and

	slammed his head on the stairs, causing T.D. to lose consciousness. T.D. woke up the next morning to intense pain in his rectum and felt damaged and violated. On information and belief, T.D. was anally raped after he lost consciousness. After T.D. came to, Denison entered the quiet room and threatened to keep T.D. incarcerated indefinitely if he reported the abuse.
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6.268 Plaintiff T.E.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	Late 1990s; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Thomas Hall, a male counselor
Details of Abuse	Thomas Hall, a white male counselor with red hair and freckles, sexually assaulted T.E. dozens of times. During their counseling sessions, Hall encouraged T.E. to verbalize his sexual fantasies. Hall manually stimulated T.E.'s genitals over his clothing and insisted that T.E. do the same to him. Occasionally, Hall targeted T.E. for

	additional strip searches and pat downs to touch T.E.'s body.
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6.269 Plaintiff T.F.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	1983 to 1988; 12 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	"I.", a male inmate
Details of Abuse	I., a male inmate in Palouse Cottage, repeatedly sexually assaulted and harassed T.F. I. was much larger than the other inmates and frequently assaulted them. Thus, Staff were aware of his dangerous propensities. Despite this knowledge, staff allowed I. to have free range of Palouse Cottage during the day. Multiple times a week, I. forced T.F. into a lockdown room, forcibly manually stimulated T.F.'s penis and threatened him.

6.270 Plaintiff T.H.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1990 to 1992; 14 years old

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mike Wilcox, a male staff member
Details of Abuse	Mike Wilcox, a male staff member in Toutle Cottage, sexually assaulted T.H. nearly a dozen times. Wilcox was a white man with a ruddy complexion who appeared to be in his forties. Wilcox often followed T.H. to the bathroom to watch T.H. while he showered and groped his genitals. On several occasions, while transporting T.H. from his cell, Wilcox grabbed, squeezed, and held T.H.'s penis. Wilcox also administered most of T.H.'s strip searches and "punishments" by forcing T.H. onto a table while he groped T.H.'s penis or pulled on his underwear until it chaffed and injured his skin.

6.271 Plaintiff T.J.

Current Residence	Clark County, Washington
Approximate Dates of Abuse and Age	1999; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A female corrections officer, name unknown

Details of Abuse	A young female corrections officer who appeared to be of Native American descent and had a short stocky build groomed and sexually abused T.J. The officer favored T.J. and spent extra time with him lifting weights, playing pool and basketball, and gave him extra snacks and soda. The officer entered T.J.'s cell at night and manually stimulated T.J.'s penis over his clothes. T.J. reported the incident to his assigned counselor and the unit supervisor, but both staff members dismissed him and told him to stop making up lies.
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6.272 Plaintiff T.K.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2007 to 2008; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member, name unknown
Details of Abuse	A male staff member in Klickitat Cottage sexually abused T.K. multiple times. The staff member was a tall, clean-shaven white man with short hair who appeared to be in his thirties and often wore athletic wear. The staff member

	escorted T.K. and the other inmates from the cottage to the on-site pool and supervised them. The staff member sexually abused T.K. multiple times in the swimming pool while "testing" T.K.'s swimming abilities, in the Klickitat Cottage showers, and the facility laundry room. The staff member manually stimulated T.K.'s penis, forced T.K. to orally and manually stimulate his penis, and, on one occasion, attempted to anally rape T.K.
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6.273 Plaintiff T.K.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	1997 to 1999; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Van, a male counselor
Details of Abuse	Mr. Van, T.K.2's assigned counselor, sexually abused him multiple times. Van was a white man with long hair who appeared to be in his fifties. Van frequently played chess with T.K.2 and rubbed T.K.2's legs and genitals under the table. During their counseling sessions, Van forced T.K.2 to manually stimulate his penis, orally and manually

	stimulated T.K.2's penis, digitally penetrated T.K.2's anus, and raped T.K.2. Van rewarded T.K.2's compliance with candy, soda, and extra time out of his cell.
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6.274 Plaintiff T.L.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1978 to 1979; 12 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male counselor, name unknown
Details of Abuse	A white male counselor in his thirties with dark hair and a mustache forced T.L. to perform oral sex on him. The counselor attempted to engage T.L. in oral sex several more times. When T.L. refused, the counselor sent him into isolation and threatened to permanently remove T.L. from his parents' care.

6.275 Plaintiff T.M.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1989; 15 years old
Location(s) of Abuse	Echo Glen Children's Center

Perpetrator, if known	George, a male staff member
Details of Abuse	George, a Latino staff member with a soft voice, sexually assaulted T.M. multiple times. George often entered T.M.'s cell at night and manually stimulated T.M.'s genitals under her clothing.

6.276 Plaintiff T.M.2

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1993 to 1994; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A thin, white female staff member in her late twenties or early thirties with brown hair sexually assaulted T.M.2 in the laundry room in Poplar Cottage. On multiple occasions, the woman engaged T.M.2 in sexual acts including kissing, manual stimulation, and digital penetration. The woman encouraged T.M.2 to not speak about the abuse and offered him loose tobacco and rolling papers to reward his silence.

6.277 Plaintiff T.M.3

Current Residence	Klickitat County, Washington
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Approximate Dates of Abuse and Age	2006; 16 years old
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Reed, a female corrections officer
Details of Abuse	Ms. Reed, a Black corrections officer with short hair, groomed and sexually assaulted T.M.3. Ms. Reed attempted to kiss and grope T.M.3, but he pushed her away and notified the staff in Birch Cottage. The staff declined to investigate the allegations and instead told T.M.3 to stop lying. Emboldened, Ms. Reed forced T.M.3 to manually stimulate her genitals and breasts.

6.278 Plaintiff T.N.

Current Residence	Clallam County, Washington
Approximate Dates of Abuse and Age	1999 to 2001; 15 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	Don Jones A/K/A "DJ", a male staff member
Details of Abuse	Don "D.J." Jones, a heavyset white man in his late forties or early fifties with a long, gray beard and ponytail groomed and sexually assaulted T.N. Jones gave T.N.

	pornographic magazines and extra commissary in exchange for watching T.N. masturbate. Jones also masturbated in front of T.N. and attempted to anally rape T.N.
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6.279 Plaintiff T.P.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1992 to 1995; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Uribe, a male counselor
Details of Abuse	Mr. Uribe, a tall, thin white man in his late thirties or early forties who wore glasses, groomed and sexually assaulted T.P. Uribe invited T.P. to play cards almost daily, and the two often worked out together. After gaining T.P.'s trust, Uribe "taught" T.P. how to masturbate, forcibly performed oral sex on him, and anally raped him multiple times. T.P. reported the abuse to a nurse who promised to investigate, but the abuse continued until T.P.'s release.

6.280 Plaintiff T.R.

Current Residence	Grant County, Washington
Approximate Dates of Abuse and Age	2002; 17 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Prestiguard, a male staff member
Details of Abuse	Mr. Prestiguard, a thin, white male staff member with a prosthetic leg, sexually assaulted T.R. while she was held in solitary confinement. A group of four of five staff transferred T.R. to solitary with her wrists and ankles bound together. The staff untied T.R. and instructed her to remove her bra; when she refused, they forcibly removed it. T.R. eventually fell asleep and woke to Prestiguard groping her breasts.

6.281 Plaintiff T.R.2

Current Residence	Yakima County, Washington
Approximate Dates of Abuse and Age	1989 to 1990; 13 years old
Location(s) of Abuse	Parke Creek Community Facility
Perpetrator, if known	A female staff member, name unknown

Details of Abuse	A middle aged, racially ambiguous female staff member sexually assaulted T.R.2 in a cleaning closet. The woman manipulated T.R.2 into engaging in sexual acts with her including manually or orally stimulating T.R.2's penis and forcing T.R.2 to digitally penetrate her.
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6.282 Plaintiff T.V.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	2009 to 2011; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jessica, a female counselor
Details of Abuse	Jessica, T.V.'s counselor in Toutle Cottage, was a white woman in her late twenties or early thirties with blonde hair who groomed and sexually assaulted him during two incarcerations spanning approximately three years. During weekly one-on-one counseling sessions, Jessica shared intimate details about her sex life and encouraged T.V. to tell her about his sexual development. Eventually, Jessica manipulated T.V. into engaging in sexual acts, including manual stimulation of Jessica's breasts, manual

	and oral stimulation of each other's genitals, and vaginal sex. Jessica rewarded T.V.'s silence and compliance with food, clothing, cigarettes, Xanax, and alcohol.
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6.283 Plaintiff T.W.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	Late 1990s; 16 years old
Location(s) of Abuse	Naselle Youth Camp Green Hill School
Perpetrator, if known	Naselle: Mr. Ennis, a male counselor; Mr. Sorry, a male counselor; multiple medical staff members, names unknown Green Hill: A male counselor, name unknown
Details of Abuse	<u>Naselle Youth Camp</u> Two male counselors and medical staff members repeatedly sexually assaulted T.W. One counselor, Mr. Ennis, was a tall, white man with red hair and a beard who appeared to be in his fifties. The other counselor, Mr. Sorry, was a short, bald, heavysset white male who wore glasses and appeared to be in his fifties. Both counselors worked in Moolock Lodge, where

1 T.W. resided, and occasionally took on the role of being
2 T.W.'s counselor when his assigned counselor was out of
3 town.

4 Both counselors sexually abused T.W. in the staff office in
5 a similar manner, separately. On multiple occasions, Mr.
6 Ennis and Mr. Sorry manually stimulated T.W.'s penis,
7 coerced T.W. to do the same to him, and unsuccessfully
8 solicited oral sex from him. In addition to the abuse, both
9 men offered to decrease T.W.'s security level to encourage
10 his compliance.

11 On at least two occasions, the medical staff at the facility
12 sexually abused T.W. during medical exams. During these
13 "exams," medical staff manually stimulated T.W.'s penis
14 and digitally penetrated T.W.'s anal cavity repeatedly.

15
16 Green Hill School

17 A male counselor sexually assaulted T.W. The counselor
18 was a short, heavysset, middle-aged white man. While T.W.
19 was in his cottage's mudroom preparing to go out on a
20 D.N.R. crew assignment, the counselor approached him.
21 The counselor pulled down T.W.'s bottoms and manually

	stimulated T.W.'s penis. He asked T.W. to keep this incident secret and rewarded him with cigarettes.
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6.284 Plaintiff T.W.2

Current Residence	Snohomish County, Washington
Approximate Dates of Abuse and Age	1998 to 1999; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Two male staff members, names unknown
Details of Abuse	Two male staff members groomed and sexually assaulted T.W.2. The first staff member was a white man in his thirties with a mustache, and second staff member was a heavysset white man in his forties with brown hair. Both men gave T.W.2 candy and allowed him to stay up late and sexually abused him dozens of times. The first staff member promised T.W.2 more candy if he helped him with a cleaning project, but instead he isolated T.W.2 and manually stimulated his penis. The other staff member also isolated and manually stimulated T.W.2's penis.

6.285 Plaintiff T.W.3

Current Residence	Lewis County, Washington
Approximate Dates of Abuse and Age	2008 to 2009; 14 years old
Location(s) of Abuse	Parke Creek Community Facility
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A white female staff member with short hair who appeared to be in her late fifties to early sixties, sexually assaulted T.W.3 while he helped her in the kitchen. The woman manually stimulated T.W.3's penis over and under his clothing on multiple occasions and threatened to accuse T.W.3 of sexual misconduct if he spoke about the abuse.

6.286 Plaintiff U.H.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1978; 15 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Joanne, a female teacher
Details of Abuse	Joanne, an art teacher, was a white woman in her early forties with blonde hair and blue eyes. Multiple times a

	week, Joanne forced U.H. to have oral and vaginal sex with her. U.H. reported the abuse to his counselor. Before an investigation was launched, the State transferred U.H. to a group home.
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6.287 Plaintiff V.M.

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2000; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	"L.C.", a male staff member
Details of Abuse	A tall Black male staff member who went by L.C. and had short hair, an average build, and appeared to be in his thirties, sexually assaulted V.M. numerous times. L.C. gave V.M. special attention and often gave her candy, soda, and food from McDonald's. L.C. entered V.M.'s cell, kissed her, manually stimulated her genitals, and forced her to manually stimulate his penis. V.M. told a fellow inmate about the abuse who reported it to staff. V.M., afraid of retaliation, denied she made any allegations against L.C., and no investigation was done.

6.288 Plaintiff V.P.

Current Residence	British Columbia, Canada
Approximate Dates of Abuse and Age	1980; 16 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Laura Durham, a female counselor and Doug Cox, a male staff member
Details of Abuse	Laura Dunham, a tall, heavyset woman in her late twenties with red hair sexually assaulted V.P. multiple times. Dunham gave V.P. cigarettes and concert tickets to manipulate him into engaging in sexual acts with her including manual and oral stimulation of each other's genitals, mutual digital penetration, and vaginal and anal sex. The abuse occurred in V.P.'s cell and Dunham's house and vehicle. Dunham's romantic partner, Brian, also a state employee, found out about the abuse and threatened V.P. Doug Cox, a tall, heavyset man with balding, curly brown hair, glasses and a mustache sexually assaulted V.P. in the isolation cell. Cox groped V.P.'s genitals and threatened to leave him in isolation indefinitely.

6.289 Plaintiff V.P.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2007; 17 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Columbo, a male counselor
Details of Abuse	Columbo, a short, heavyset, middle aged male counselor with a bald head and goatee, sexually abused V.P.2 by forcing him to participate in multiple "strip searches" and "physical exams." Once, while V.P.2 was naked, Columbo exposed himself and masturbated. Columbo threatened to extend V.P.2's sentence if he spoke about the abuse.

6.290 Plaintiff V.S.

Current Residence	Benton County, Washington
Approximate Dates of Abuse and Age	1997 to 2004; 14 years old
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Maple Lane: Ms. Kelly, a counselor Mr. Taylor, a counselor

	Green Hill: Laurel, a female counselor and Jill, a female staff member
Details of Abuse	<u>Maple Lane School</u> Two counselors, Ms. Kelly and Mr. Taylor, groomed and sexually abused V.S. Ms. Kelly was a short white woman who appeared to be in her forties to fifties. Mr. Taylor was a large-framed white man with blonde hair and a full beard. Ms. Kelly kept V.S. back in his cell while the other inmates left. She forced V.S. to masturbate while she masturbated and eventually coerced V.S. to perform and receive oral sex and have unprotected vaginal sex with her. She discouraged V.S. from reporting the abuse by threatening to falsely accuse him of rape. Mr. Taylor took a special interest in V.S. and gained his trust by playing basketball with him and complimenting his athletic talents. He visited V.S. in his cell on multiple occasions where he forced V.S. to orally and manually stimulate his penis. V.S. also witnessed other Maple Lane staff abusing the inmates. This included Ellie, a kitchen staffer, who he observed performing oral sex on a child inmate in the

1 freezer; Mr. Johnson, a counselor in Sequoia who took
2 multiple boys to various blind spots (such as the swimming
3 pool changing area) to abuse them; and a maintenance
4 employee who abused the inmates in a supply closet. The
5 rampant sexual abuse at the facility was open and known
6 to all staff and inmates alike.

7 Green Hill School

8 Two female staff members, Laurel and Jill, sexually
9 abused V.S. Laurel was a thin, older white female
10 counselor with dirty blonde hair who worked in the
11 segregation unit. Laurel's abuse of the inmates was so
12 well-known that when she walked through the facility,
13 other staff people shouted at her over the intercom to
14 "move along" to prevent her from spending too much time
15 with the boys. Nevertheless, she was still assigned to work
16 alone in the hole on numerous occasions. During these
17 shifts, Laurel got onto the intercom system and announced
18 to each boy locked in segregation what she wanted to do to
19 them sexually, how she thought of them while she touched
20 herself, and then invited them to walk towards the open
21 slots on their doors for her to manually stimulate their
22

penises as she walked through the unit. This happened to V.S. at least a dozen times.

Jill was a slightly overweight white staff member with blonde hair and light-colored eyes who was the daughter of a laundry person at the facility. Jill appeared to be in her twenties. She gained V.S.'s trust by sharing personal stories and complaining about her husband and their sex life. Jill encouraged V.S. to obtain a groundskeeping job and, once he did, she used the free time he had in the mornings to isolate him and sexually abuse him in various locations at the facility over a dozen times. Jill kissed V.S., coerced him to perform and receive oral sex and have unprotected vaginal sex with her.

V.S. was also subject to multiple strip searches which exceeded the policies in place and amounted to sexual harassment.

6.291 Plaintiff V.S.2

Current Residence	Pierce County, Washington
Approximate Dates of Abuse and Age	2009 to 2010; 17 years old
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Crystal Mobbs, a female staff member
Details of Abuse	Crystal Mobbs, a female corrections officer, groomed and sexually abused V.S.2 Mobbs was a short woman likely of Hispanic descent with black hair who appeared to be in her mid-thirties. When V.S.2 transferred to the cottage where Mobbs was stationed, it is believed that she was under investigation for inappropriate behavior with inmates. However, Mobbs did not lose her job and, when she returned to working her regular shift, she began grooming V.S.2. While patrolling the cottage, she frequently visited V.S.2 to talk to him and disclosed inappropriate details about her personal life. Mobbs' behavior escalated, and she orally and manually stimulated his genitals on multiple occasions, including in the laundry room and in his cell. Mobbs threatened to increase V.S.2's security level, report him to the Department of Corrections, delay his release, and send him to the hole if he disclosed the abuse. She rewarded V.S.2's compliance with books, DVDs, video games, marijuana, and extra time out of his cell.

6.292 Plaintiff V.T.

Current Residence	Tooele County, Utah
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COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 341

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Approximate Dates of Abuse and Age	1998 to 1999; 15 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	A female staff member, name unknown
Details of Abuse	A female staff member sexually abused V.T. The staff member was a tall Black woman who likely in her thirties. She harassed V.T. daily. She often lingered in the doorway of his cell while he was getting dressed and smacked her lips at him and instructed V.T. to remove or put on his clothing slowly while she watched. On multiple occasions, the female staff member called V.T. over to his cell door and manually and orally stimulated his penis. She forced V.T. to fondle her breasts under her shirt and directed his hand down the front of her pants. She told V.T. not to tell anyone about the abuse and rewarded his silence with extra food.

6.293 Plaintiff W.H.

Current Residence	King County, Washington
Approximate Dates of Abuse and Age	1984 to 1987; 17 years old

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 342

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Nancy, a female staff member and a male dentist, name unknown
Details of Abuse	Nancy, a female staff member, sexually abused W.H. She was a tall, white woman with long, curly blonde hair who appeared to be in her mid-twenties and worked the evening shift. After letting W.H. out of his cell and escorting him to use the bathroom, Nancy grabbed W.H.'s genitals over his clothes, commented about how "big" his penis was, and forced W.H. to expose himself to her. On information and belief, Nancy also sexually abused other minor inmates in the same manner. A male dentist also sexually abused W.H. The dentist was a balding, tall, slim white man who wore glasses and appeared to be in his thirties. The dentist performed a root canal on W.H. with no other staff present. After being sedated, W.H. woke up to find his pants unzipped and his clothes disheveled.

6.294 Plaintiff W.M.

Current Residence	Whatcom County, Washington
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COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 343

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Approximate Dates of Abuse and Age	1974; 15 years old
Location(s) of Abuse	Cascadia Juvenile Reception and Diagnostic Center
Perpetrator, if known	Mr. Zenior (spelling approximate), a male staff member
Details of Abuse	A male staff member, believed to be named Mr. Zenior, raped W.M. while he was held at the Cascadia Juvenile Reception and Diagnostic Center. The assault occurred while W.M. was in the "hole". Mr. Zenior entered W.M.'s cell, instructed W.M. to remove his bottoms and bend over his cot, and raped him. Before leaving the cell, Zenior informed W.M. that he would deny any allegations and advised W.M. not to report the assault.

6.295 Plaintiff W.M.2

Current Residence	Multnomah County, Oregon
Approximate Dates of Abuse and Age	1986 to 1987; 15 years old
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	Ms. T, a female counselor
Details of Abuse	Ms. T, a female counselor, sexually abused W.M.2 multiple times. Ms. T was a middle-aged heavyset white woman

with curly black hair who may have been of Italian-
descent. She often wore heavy makeup and perfume. While
Ms. T was not W.M.2's counselor, she often called him into
her office. There, Ms. T exposed her breasts to W.M.2 and
forced him to grope and massage them, exposed her genital
area to W.M.2, and performed oral sex on W.M.2. Ms. T
gave W.M.2 cigarettes and, to discourage him from
reporting the abuse, she threatened to revoke his earned
privileges and delay or prevent his release to a group
home.

6.296 Plaintiff W.W.

Current Residence	Spokane County, Washington
Approximate Dates of Abuse and Age	1983 to 1984; 16 years old
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male doctor, name unknown
Details of Abuse	A male physician sexually abused W.W. multiple times under the guise of medical exams. The physician was a tall, thin white man with light brown hair who wore glasses and appeared to be in his forties. He called W.W. in

	to have genital warts on his penis removed even though, W.W. did not actually have genital warts. During those "exams", the physician touched and handled WW's penis for an unnecessarily long time. Additionally, the physician subjected W.W. to a medically unnecessary "prostate exam" and digitally penetrated W.W.'s anus.
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6.297 Plaintiff Z.H.

Current Residence	Kitsap County, Washington
Approximate Dates of Abuse and Age	2006 to 2007; 13 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Lindsey, a female counselor and Kyle, a male counselor
Details of Abuse	Two Kalama Cottage counselors groomed and repeatedly sexually abused Z.H. The primary perpetrator was Z.H.'s assigned counselor, Lindsey, a thin, white, blonde woman who appeared to be in her late twenties to early thirties and sometimes wore glasses. The other perpetrator was a counselor named Kyle, a bald white man who appeared to be in his twenties to thirties. Lindsey abused Z.H. during their weekly counseling sessions in the staff office or the

facility's gymnasium. After grooming Z.H. and normalizing increasingly inappropriate behavior, Lindsey coerced Z.H. to grope her breasts, digitally penetrate her vagina, and perform oral sex on her. Lindsey also orally and manually stimulated Z.H.'s penis.

On a few occasions, Lindsey and her fellow counselor, Kyle, brought Z.H. and a girl inmate (name unknown) to the gymnasium and sexually abused them together. Lindsey and Kyle sexually abused their primary victims near each other in the gym. They also forced the two child inmates to engage in sexual acts with each other – including oral and vaginal sex while these counselors watched and performed sexual acts on each other. On one occasion, the counselors forced Z.H. and his fellow inmate to remove their clothing and get in the pool together. To prevent Z.H. from reporting the abuse to other staff, Lindsey and Kyle threatened to isolate him in room confinement and threatened to falsely accuse Z.H. of perpetrating sexual abuse if he did not participate.

6.298 Plaintiff Z.K.

**Current
Residence**

Thurston County, Washington

COMPLAINT FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER DAMAGES - 347

BERGMAN OSLUND UDO LITTLE
520 PIKE STREET, SUITE 1125
SEATTLE, WA 98101
TELEPHONE: 206.957.9510

Approximate Dates of Abuse and Age	2009; 15 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Schrebeck (spelling approximate), a male counselor
Details of Abuse	Z.K.'s counselor, Mr. Schrebeck, sexually abused him multiple times. Mr. Schrebeck appeared to be white and in his forties to fifties, was of average height, and had grayish brown hair. During their counseling sessions in Schrebeck's office, Schrebeck forced Z.K. to perform oral sex on him and anally raped Z.K. Schrebeck threatened to physically harm Z.K. if he told anyone about the abuse.

VII. LIABILITY

Based on the above paragraphs, Plaintiffs claim liability based on theories of common law negligence and gross negligence, §302B negligence, outrage, infliction of emotional distress, intentional infliction of emotional distress, and wanton misconduct. The liability-creating conduct of Defendant State of Washington and its agencies consisted, *inter alia*, of breaching its duty to refrain from negligently placing dependent children in situations that would foreseeably cause grave harm; the negligent hiring, training, and supervision of its staff, including permitting unsupervised one-on-one contact between staff and vulnerable inmates and failing to exercise reasonable control over their staff; the failure to create and/or enforce

1 policies and procedures to protect children from sexual abuse, harassment, and
2 retaliation, including inadequate or no education being provided to young inmates
3 about how to report misconduct; violating its special trust relationship with
4 Plaintiffs, who were held within their facilities, by failing to protect them from the
5 foreseeable criminal acts of their employees and other inmates; acting in reckless
6 disregard of the consequences under such surrounding circumstances and conditions
7 that a reasonable person would know, or should know, that such conduct would, to a
8 high degree of probability, result in substantial harm to others, including Plaintiffs;
9 and the negligent, reckless, and/or willful infliction of emotional distress on Plaintiffs.

10 Plaintiffs further allege claims under the doctrines of agency, vicarious liability
11 and *respondeat superior* and allege Defendant is liable for all damages sustained by
12 Plaintiffs as a result of their staff people's actions committed within the scope of their
13 employment. Plaintiffs reserve the right to assert additional claims as may be
14 appropriate following further investigation and discovery.

15 Plaintiffs allege vicarious liability claims based on the State's operation of a
16 culture of fear and control where sexual abuse was used by employees and agents in
17 response to and/or in furtherance of that culture. This culture was not simply
18 tolerated but was actively facilitated as part of the State's operation of its juvenile
19 punishment system. Sexual abuse, humiliation, and harassment were regular and
20 foreseeable consequences of employment-related activities completed in furtherance
21 of the maintenance of order in the facilities where the State:

- 1 • Authorized its employees and agents to use force to gain compliance of and to
- 2 subdue inmates and to maintain prison safety and security;
- 3 • Allowed employees and agents to bring in contraband and other high-value
- 4 items to motivate and control inmates;
- 5 • Employed individuals without any mental health training or background as
- 6 “counselors” and required regular “one-on-one” meetings between assigned
- 7 counselors and inmates to groom inmates and build their trust, which included
- 8 directing the “counselors” to inquire into an inmate’s sexual history, desires,
- 9 and/or abuse history;
- 10 • Allowed employees and agents to hold “group therapy” where they made the
- 11 inmates disclose sensitive sexual information to one another;
- 12 • Empowered employees and staff to make decisions and recommendations
- 13 about an inmate’s placement in certain facilities and the length of an inmate’s
- 14 stay, including by extending the length of an inmate’s sentence by
- 15 recommending against early release and placement in solitary, isolation,
- 16 and/or in certain areas of the facility, such as rooms or cabins where sexually
- 17 violent inmates were housed;
- 18 • Condoned its employees and agents’ failures to report abuse claims and other
- 19 acts and efforts intended to discourage the escalation of abuse claims beyond
- 20 DCYF/DSHS/JRA to protect the State’s reputation and other interests, which
- 21 included allowing employees and agents to make decisions about which areas
- 22
- 23

1 of the facility would be subject to continuous recording and the types of
2 documentation that would be made following an allegation of abuse;

- 3 • Permitted employees and staff to use acts of sexual abuse, humiliation, and
4 harassment to punish inmates;
- 5 • Allowed employees and agents unfettered access to sensitive inmate
6 information to use for their own entertainment;
- 7 • Directed employees and agents to conduct invasive strip searches, including
8 anal and vaginal cavity searches, and allowed them to do so without cause;
- 9 • Allowed its employees and agents to disregard policies designed to prevent the
10 abuse of inmates, including related to decisions about the ratio between
11 inmates and guards/counselors during waking and sleeping hours, to keep
12 costs low;
- 13 • Required physicians and health care providers to conduct medically
14 unnecessary rectal examinations and sexual health examinations.

15
16 Across the time period at issue, custody and control of inmates, enforcing
17 discipline, and maintaining prison security were among the primary duties of the
18 State employees and agents assigned to each facility. In each applicable instance of
19 abuse, the State authorized its employees and agents to exercise their discretion in
20 carrying out that authority such that the alleged conduct was of the same general
21 nature as that authorized, or was incidental to authorized conduct, and rightfully
22 considered within the scope of employment.

1 Even where the conduct was excessive or the employee or agent derived sexual
2 gratification or pleasure, the alleged sexual abuse remained a reasonably foreseeable
3 consequence of the employment-related activity, was at least partly in service of the
4 employer's interest, and did not involve a degree of conduct that was beyond that
5 expected by the employer, and/or was consistent with written rules, unwritten
6 policies, or common practice.

7 These claims for vicarious liability and the scope of employment do not limit
8 claims alleged for the State's breaches of its own duty of care. Liability under those
9 theories is analytically distinct and separate from vicarious liability, even when
10 premised on the same policies and procedures.

11 **VIII. DAMAGES**

12 As a direct and proximate cause of Defendant's negligence, Plaintiffs were
13 raped, sodomized, molested, and manipulated into sexual contact and displays. They
14 faced relentless sexual harassment and exploitation, retaliatory threats and other
15 acts of physical abuse and undue punishment, severe emotional and psychological
16 injury, distress, and anguish, post-traumatic stress disorder, and other injury which
17 has and will continue for an indefinite period into the future and constitutes
18 permanent, irreparable, and indivisible injuries.

19 **IX. JURY DEMAND**

20 Plaintiffs demand this case to be tried by a jury.

21 **X. PRAYER FOR RELIEF**

1 Plaintiffs respectfully request the following relief:

- 2 1. That the Court award Plaintiffs appropriate relief, to include all special and
3 general damages established at trial;
4 2. That the Court award pre-judgment interest on items of special damages;
5 3. That the Court award post-judgment interest;
6 4. That the Court award Plaintiffs such other, favorable relief as may be available
7 and appropriate under law or at equity; and
8 5. That the Court enter such other and further relief as the Court may deem just
9 and proper.

10 DATED this 13th day of May 2025.

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