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CASE #: 24-2-20053-3 SEA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

A.B.; A.C.; A.C.2; A.F.; A.G.; A.H.; A.K.; A.N.;
A.R.; A.R.2; A.S.; A.U.; B.B; B.B.2; B.B.3; B.G.;
B.R.; C.A.; C.B.; C.B.2; C.C.; C.C.2; C.J.; C.L.;
C.M.; C.N.; C.P.; C.P.2; C.S.; C.T.; C.T.2; D.A.;
D.A.2; D.B.; D.B.2; D.B.3; D.C.; D.D.; D.G.;
D.G.2; D.H.; D.H.2; D.I.; D.J.; D.J.2; D.J.3; D.M.;
D.P.; D.S.; D.W.; D.W.2; D.W.3; D.W.4; E.B.;
E.C.; E.C.2; E.D.; E.K.; E.M.; E.R.; F.D.; G.L.;
G.M.; G.P.; G.S.; H.C.; H.H.; H.T.; I.P.; J.A.;
J.B.; J.B.2; J.B.3; J.B.4; J.B.5; J.C.; J.C.2; J.C.3;
J.C.4; J.C.5; J.C.6; J.C.7; J.G.; J.G.2; J.G.3;
J.G.4; J.H.; J.H.2; J.H.3; J.J.; J.J.2; J.M.; J.M.2;
J.M.3; J.O.; J.P.; J.S.; J.S.2; J.S.3; J.S.4; J.S.5;
J.S.6; J.T.; J.V.; J.W.; J.W.2; J.W.3; K.B.; K..2.;
K.B.3; K.F.; K.G.; K.H.; K.L.; K.N.; K.V.; K.W.;
L.A.; L.K.; L.T.; L.W.; M.A.; M.B.; M.B.2;
M.C.; M.E.; M.H.; M.L.; M.M.; M.M.2; M.M.3;
M.O.; M.O.2; M.P.; M.R.; M.R.2; M.S.; M.V.;
N.S.; O.B.; P.B.; P.L.; P.M.; R.B.; R.B.2; R.B.3;
R.B.4; R.B.5; R.D.; R.G.; R.H.; R.L.; R.M.;
R.M.2; R.S.; R.S.2; R.S.3; S.B.; S.D.; S.E.; S.H.;
S.M.; S.N.; S.R.; S.S.; S.S.2; S.S.3; S.T.; T.B.;
T.B.2; T.B.3; T.C.; T.D.; T.D.2; T.E.; T.H.; T.L.;
T.S.; T.T.; V.C.; W.E.; W.H.; W.R.; Z.B.; and
Z.W., individuals.

Plaintiffs,

v.

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

NO.

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

1 **JUVENILE REHABILITATION**
2 **ADMINISTRATION**

3 Defendants.

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

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

8 **I. INTRODUCTION**

9 1.1 This is a negligence case against the State of Washington arising from the sexual
10 abuse and degradation of countless children and teenagers placed in its care in numerous juvenile
11 detention facilities over decades.

12 1.2 The State of Washington and its agencies are responsible for the rehabilitation of
13 children adjudged delinquent. When the State imprisons these children in detention facilities and
14 removes them from their families and their communities, the State is entrusted with caring for
15 and protecting these completely dependent youth.

16 1.3 However, as the facts of this Complaint lay bare, the State failed in its basic
17 responsibility to keep imprisoned or detained children free from bodily harm. The length,
18 breadth, and depravity of the abusive acts done to Plaintiffs demonstrates that the sexual abuse
19 was neither the result of a momentary lapse in supervision nor a matter of a few “bad apples”
20 among detention staff. Rather, the facts show an institutional failure that was caused by and
21 maintained through willful, and at times even nefarious, disregard for the well-being and safety
22 of the vulnerable children in the State’s care.

23 1.4 This culture of abuse has been well-documented and known to Defendants for
decades. As a result of chronic mismanagement, overcrowding, inadequate supervision, and

negligent hiring practices, children and teenagers incarcerated by the State of Washington have been subject to a culture of fear, violence, and sexual abuse for decades. The State's juvenile prison system has a longstanding track record of both staff sexually abusing residents, as well as residents sexually abusing other residents. When abuse was reported, staff punished the children with physical violence, threats of violence against the prisoner or their family members, threats to add time to their sentences, or to further deprive them of basic human needs, including the use of solitary confinement, among other retaliatory acts.

1.5 Several of the staff people identified faced criminal prosecution or were the subject of other civil actions. Nevertheless, upon information and belief, similar abuse of children in Washington's detention facilities continues to this day. Over the last decade, the number of child abuse claims filed against the State of Washington have more than doubled.

1.6 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 Defendants 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.

1 2.2 The Plaintiffs in this action are 188 men and women who the State removed from
2 their homes and placed in prisons or other detention facilities while children and sexually abused
3 in these facilities. Plaintiffs' ages when abused range from eight to 17. The dates of their abuse
4 while imprisoned span over six decades from the 1960s to the 2020s.

5 2.3 The perpetrators of the sexual abuse include more than 100 different state
6 employees at 18 facilities across the state. The State employed these abusers as counselors,
7 guards (including the head of security), clerical staff, recreational staff, teachers, dentists,
8 doctors, nurses, janitors, drivers, and in other positions. In some instances, these staff members
9 allowed other inmates to sexually assault Plaintiffs.

10 **III. JURISDICTION AND VENUE**

11 3.1 Under article IV, section 6 of the Washington State Constitution, the Superior
12 Court, King County, has universal original jurisdiction over this lawsuit. Jurisdiction is also
13 proper under RCW 2.08.010 and RCW 4.92.010.

14 3.2 Venue lies within King County, Washington under RCW 4.92.010, because it is
15 the county in which multiple Plaintiffs reside.

16 **IV. STATUTE OF LIMITATIONS**

17 4.1 Plaintiffs' claims have been filed within three years, or sooner, of when they learned
18 that the State of Washington and its agencies breached the applicable standards of care and/or
19 owed them duties which caused their injuries and/or discovered the causal connection between
20 the abuse and the injuries for which this suit was brought. *See* RCW 4.16.340.

21 **V. BACKGROUND INFORMATION**

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

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

2 **The History of the Incarceration of Children in Washington State**

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

6 5.2 The following year, the legislature passed the first law for juvenile offenders,
7 which permitted the State to remove children from their parents and guardians and commit them
8 to the State’s care.²

9 5.3 Nearly a decade later, the legislature set out its objective in maintaining the
10 “Juvenile Court” system. The goal was to provide for the children’s “aid, encouragement, help,
11 and assistance”³ and to meet the needs of children charged with violating criminal laws as well
12 as children facing “a range of social, economic, and familial problems.”⁴ The system’s “broad
13 scope was based on the belief that most juvenile offenders have more in common with a
14 dependent or neglected child than with an adult [convicted of a crime.]”⁵ As such, the system
15 was charged with the responsibility to protect children rather than to punish them.⁶

16 5.4 Under the 1913 law, all children found delinquent or dependent were “considered
17 wards of the state.”⁷ This development occasioned the State’s role as the common guardian of
18 the community, or the *parens patriae*, and its duty to provide for the “custody, care,
19 guardianship, and control” over these children.⁸

21 ¹ Wash. Sess. Laws 1889-90. RCW 72.16.010.

22 ² Wash. Sess. Laws 1891.

23 ³ Wash. Sess. Laws 1905.

⁴ *State v. S.J.C.*, 183 Wn. 2d 408, 415, 352 P.3d 749 (2015).

⁵ *Id.*

⁶ *Id.*

⁷ Wash. Sess. Laws 1913 (ch. 160)

⁸ *Id.*

1 5.5 Specifically, the “Juvenile Court Act” permitted the State to take custody of
2 children who had been convicted of certain crimes, those deemed to be “incorrigible,” and
3 children subject to “neglect, cruelty, or depravity” by their parents.⁹

4 5.6 After taking custody of these children, the State could commit them “to the care
5 of some reputable citizen of good moral character, or to the care of some training school or
6 industrial school.”¹⁰

7 5.7 Since the late 1880s, the legislature has imposed on the State an obligation to
8 investigate “any and all complaints made against” any of the school’s employees and to call for
9 their removal “for good and sufficient reason.”¹¹ This development further emphasized the
10 State’s role as the protector of the children in its care.

11 5.8 In 1951, the legislature passed the “Youth Protection Act,” which established the
12 creation of the Division of Children and Youth Services.¹² This state department was designated
13 “the power to acquire, establish, maintain, and operate” facilities for the “care, custody,
14 education, and treatment” of children in schools, homes, farms, and forest camps.¹³

15 5.9 The State later renamed two of these juvenile prisons: “Green Hill School,”
16 located in Chehalis, and “Maple Lane School,” located in Grand Mound, both of which are at the
17 center of multiple Plaintiffs’ claims.¹⁴

18 5.10 In 1977, the State passed the Juvenile Justice Act of 1977,¹⁵ which became
19 effective January 1, 1978. This law marked a sea change in the State’s approach to juveniles
20 accused of criminal activity. While it reinforced that the State must provide rehabilitation and

21 ⁹ *Id.*

22 ¹⁰ *Id.*

23 ¹¹ Wash. Sess. Laws 1889-90.

¹² Wash. Sess. Laws 1951.

¹³ *Id.*

¹⁴ Wash. Sess. Laws 1955; RCW 72.16.010 (Green Hill school); RCW 72.20.010 (Maple Lane school).

¹⁵ RCW 13.40.010.

1 treatment for young offenders, the law explicitly stated its intent that punishing juveniles and
2 holding them accountable were of equal importance.¹⁶ Washington’s Supreme Court has
3 contrasted the adult criminal system where “punishment is the paramount purpose” to the
4 juvenile system’s twin goals: “to establish a system of having primary responsibility for, being
5 accountable for, and responding to the needs of youthful offenders, and to hold juveniles
6 accountable for their offenses.”¹⁷

7 5.11 The 1977 law further introduced presumptive sentencing. With the enhanced
8 emphasis on punitive measurements and sentencing guidelines, the number of children
9 incarcerated in Washington exploded.

10 5.12 By the 1980s, the number of youth prisons included: Green Hill School, Maple
11 Lane School, Naselle Youth Camp, Cedar Creek Youth Camp, Mission Creek Youth Camp,
12 Echo Glen, Cascadia Diagnostic Center, Lakeland Village, Rainier School, Yakima Valley
13 School, Interlake School, Fircrest School, Francis Haddon Morgan Center, the Child Study and
14 Treatment Center, and the Secondary School of Western State Hospital.¹⁸

15 5.13 Each of these institutions were placed under the Department of Social and Health
16 Services (“DSHS”) for the rehabilitation and care of the wards placed there.¹⁹

17 5.14 In 2017, the legislature created the Department of Children, Youth, and Families
18 (“DCYF”), which took over responsibility for the youth prison and foster care systems.²⁰

19 5.15 In 2020, Juvenile Rehabilitation moved from the Rehabilitation Administration in
20 the Department of Social and Health Services to the newly created DCYF.

21
22 ¹⁶ 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.

23 ¹⁷ *State v. Chavez*, 163 Wn. 2d 262, 267–68, 180 P.3d 1250 (2008)

¹⁸ Wash. Sess. Laws 1979; RCW 72.05.010.

¹⁹ *Id.*

²⁰ Wash. Sess. Laws 2017.

1 5.16 The State of Washington acknowledges that its agencies are “legally responsible
2 for these youth” and that they must “retain them in safe custody.” It further agrees that this
3 responsibility extends to “the acts and omissions of [state] employees, and agents in exercising
4 and carrying out that authority.”

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

10 5.18 The childhood sexual abuse of Plaintiffs by State actors occurred at the following
11 juvenile prisons and detention facilities, in addition to several foster or group homes under State
12 contract or supervision:

13 a. Echo Glen Children’s Center is located in King County, Washington. At all times
14 relevant, Echo Glen Children’s Center has been a medium/maximum security prison that
15 imprisons boys and girls.

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

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

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

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

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

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

18 h. Child Study and Treatment Center is located in Pierce County, Washington. At
19 times relevant, Child Study and Treatment Center is and was a state-operated detention facility
20 used to house children detained to receive psychological or behavioral care.
21
22
23

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

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

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

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

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

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

21 o. Twin Rivers Community Facility is located in Benton County, Washington. At
22 times relevant, Twin Rivers Community facility is and was a state-operated minimum security
23 juvenile detention facility.

1 p. Spruce Street Inn was located in King County, Washington. At times relevant,
2 Spruce Street Inn was a state-contracted group home for wards of the State of Washington.

3 q. Haven House was located in Thurston County, Washington. At times relevant,
4 Haven House was a state-contracted group home for wards of the State of Washington.

5
6 r. J Street Boys Home was located in Pierce County, Washington. At times relevant,
7 J Street Boys Home was a state-contracted group home for wards of the State of Washington.

8 s. Excelsior Youth Center is located in Spokane County, Washington. At times
9 relevant, Excelsior Youth Center is and was a state-contracted group home for wards of the State
10 of Washington.

11 **The State's Broken Promises**

12 5.19 The State claims to have “zero tolerance” policy for any form of sexual abuse or
13 harassment of the children in its care. It has recognized the often permanent impacts this abuse
14 has on the children, as well as the repercussions for the families and communities to which they
15 return after completing their sentences.

16 5.20 As defined under federal regulations governing the Prison Rape Elimination Act
17 (“PREA”), 34 U.S.C. 30301 *et seq.*, as well as under State policy, sexual abuse of juvenile
18 inmates includes any of the following:

- 19 a. Contact between the penis and the vulva or the penis and the anus, including
20 penetration, however slight;
21 b. Contact between the mouth and the penis, vulva, or anus;
22 c. Contact between the mouth and any body part where the staff member, contractor,
23 or volunteer has the intent to abuse, arouse, or gratify sexual desire;

1 d. Penetration of the anal or genital opening, however slight, by a hand, finger,
2 object, or other instrument, that is unrelated to official duties or where the staff member,
3 contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire;

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

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

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

12 h. Voyeurism by a staff member, contractor, or volunteer.²¹

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

16 5.22 State policy requires that staff immediately report and escalate any “knowledge,
17 suspicion, or information” they receive about “an incident of sexual abuse or sexual harassment,”
18 including retaliatory actions against the children or staff neglect that may contribute to sexual
19 abuse, harassment, or retaliation. They must also document all allegations and report them to
20 Child Protective Services (“CPS”).

21 5.23 State policy further requires that inmates be provided multiple methods for
22 reporting sexual abuse and harassment.
23

²¹ 28 C.F.R. 115.6.

1 5.24 Plaintiffs filed multiple public records requests seeking any documentation from
2 the State of Washington evidencing compliance with these policies. By and large, the requests
3 revealed that CPS – with rare exception – did not receive any reports from facility staff, or at
4 least did not document any such reports, despite the widespread and largely open and obvious
5 nature of the abuse of the child inmates.

6 5.25 Plaintiffs’ claims further reveal the State’s unofficial and internal policy, which
7 calls for the punishment of children who are sexually abused by staff when staff believes the
8 child or teenager may report them. In multiple case, Plaintiffs subjected to abuse were warned
9 and threatened by the staff people abusing them or their colleagues that any report of the abuse
10 would result in penalty to the abused child. In many cases, staff threatened that they would
11 respond to any report by accusing the Plaintiff of rape.

12 5.26 These practices are in direct conflict with federal law under PREA, as well as the
13 laws of the State of Washington. Washington’s criminal statutes recognize that people under the
14 age of 18 cannot consent to sexual contact with individuals who abuse their supervisory positions
15 of the minor to engage in sexual contact.²²

16 5.27 Other laws, passed specifically to criminalize the custodial sexual misconduct at
17 issue in this lawsuit, recognize that “[c]onsent of the victim is not a defense.”²³

18 5.28 Nevertheless, multiple Plaintiffs were subject to punishment, including time in
19 solitary confinement for attempting to report sexual abuse. In other instances, staff called
20 Plaintiffs liars or even began to abuse them themselves once sexual abuse was reported.

21 5.29 Staff people also abused their supervisory positions to give the children small, but
22 highly valued items, such as extra phone calls, additional time out of their cells, or extra food to
23

²² RCW 9A.44.093; *State v. Fiser*, 99 Wn.App. 714, 995 P.2d 107 (2000).

²³ RCW 9A.44.160.

1 coerce and reward compliance with the staffs' sexual demands. In other instances, the staff
2 bribed their victims with illicit and addictive substances, including opioids, cigarettes, marijuana,
3 and methamphetamines to coerce compliance.

4 5.30 The wide-spread practice of staff trafficking in drugs to children and teenagers
5 has become commonplace at facilities like Green Hill School, where approximately ten 9-1-1
6 calls were made each month between November 2023 and February 2024 in response to fentanyl
7 drug overdoses experienced by child inmates.

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

15 5.32 While only Green Hill has been subject to a search warrant for this purpose,
16 Plaintiffs claims demonstrate that these practices were wide-spread across State facilities.

17 5.33 Available documentation, in addition to Plaintiffs' accounts, show that staff
18 traded this contraband with the children in exchange for exposing themselves or to coerce other
19 sex acts.
20
21
22
23



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 1966 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.

5.36 In 2009, a guard at Echo Glen, Robert Health Fox, pleaded guilty to first-degree custodial sexual misconduct after raping a female inmate. The investigation revealed that there were no security cameras in the area where the assault occurred, and no unannounced staff

1 rounds during the night shift. Additionally, others had made claims about Fox’s inappropriate
2 behavior without recourse. In response to Fox’s guilty plea, Defendants distanced themselves
3 from Fox, referring to him as a “depraved individual”.

4 5.37 That same year, 2009, Green Hill cook Deanna Witters, who went by “DeeDee,”
5 pleaded guilty to two counts of custodial misconduct. Witters testified, “[i]t’s the culture out
6 there [at Green Hill], it happens all the time.” Witters also sexually abused Plaintiffs R.M.2 and
7 J.B.2.

8 5.38 In May 2015, Kaila Jandoc –a counselor at Woodinville Community Facility and
9 responsible for chaperoning the inmates– was charged with custodial sexual misconduct after her
10 sexually explicit text messages to a teenage resident surfaced. The resulting investigation
11 revealed she had used the state-owned van and her own car to have sex with the teenager.

12 5.39 In 2016, the community facility administrator for Twin Rivers Community
13 Facility, Mindy Stoker, pleaded guilty to attempted assault and custodial sexual misconduct. The
14 evidence showed that Stoker abused the boy during outings and trips away from the facility and
15 at the facility. Stoker also sexually abused Plaintiff Z.B. during off-campus trips.

16 5.40 In response to Stoker’s crimes, Defendants stated they had “zero tolerance for this
17 type of behavior” and that “100 percent of our staff and youth have been trained on the
18 importance of ensuring appropriate boundaries and reporting questionable behavior related to
19 staff or other residents.”

20 5.41 Nevertheless, in 2016, at least two other Green Hill staffers pleaded guilty to
21 custodial sexual misconduct charges, including counselors Erin Stiebritz (née Snodgrass) and
22 Katherine Kimbel. Steibritz also abused several Plaintiffs.
23

1 5.42 In response to these charges, Defendants publicly emphasized their commitment
2 to “the standards set forth in the Prison Rape Elimination Act (PREA),” claiming that “staff
3 members are trained on compliance, and youth are provided with information on PREA.”

4 5.43 In another statement, John Clayton – the head of Washington’s Juvenile
5 Rehabilitation Administration in 2016 – echoed this commitment and called the violation of rules
6 by staff “surprising.”

7 5.44 A 2019 Federal PREA Audit at Green Hill tested this claimed “zero tolerance”
8 policy. The audit found that Defendants failed to adhere to multiple policies designed to protect
9 inmates from sexual abuse by staff. These deficiencies left inmates “highly vulnerable” to sexual
10 abuse. Among them, the Audit found Green Hill’s inmate-to-staff ratios were “out of compliance
11 on every shift, every day.”

12 5.45 The Audit emphasized compliance with PREA was achieved only “on paper, but
13 not in practice.”

14 **Supervision and monitoring**

15 **Auditor Overall Determination:** Does Not Meet Standard

16 **Auditor Discussion**

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

19 5.46 The Audit revealed that Green Hill failed to deploy video monitoring and periodic
20 unannounced rounds to deter, prevent, and detect sexual abuse and harassment of the inmates by
21 staff. In particular, it found an absence of adequate video monitoring in staff offices, laundry
22 rooms, and the health center – all areas where Plaintiffs reported sexual abuse at Green Hill and
23 other state-operated facilities.

1 5.47 Under federal standards, state officials are to monitor video recordings at juvenile
2 detention facilities to prevent and detect sexual abuse. However, Green Hill administrators
3 reported an agreement among staff that “cameras would not be viewed to ‘check up on staff,’
4 rather viewed when there was an incident or allegation.” The Audit noted that this practice is
5 non-compliant and, though Green Hill stated it would make a correction, no documentation was
6 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.

15 5.48 The 2019 Audit further found Green Hill administrators failed to implement
16 adequate programs to train the children in confinement about how to report sexual abuse. It also
17 reported that Green Hill’s failed to implement policies designed to ensure the referral of sexual
18 abuse allegations for appropriate investigation. Instead, as evidenced by many Plaintiffs’ claims,
19 the facility staff conducted their own inadequate investigations and dismissed claims without
20 escalating the abuse to CPS or appropriately documenting the allegations.

21 5.49 Staff from nearly every facility involved in this lawsuit have faced criminal
22 charges for sexual abuse of the inmates.
23

1 5.50 In the last two months, two different staff people, Angel Misner and Emily Baker,
2 were arrested for sexual misconduct with inmates at Green Hill School. The investigation noted
3 that some of the misconduct took place in supply closets at Green Hill where there are no
4 cameras. Police arrested a third employee for allegedly selling methamphetamines and other
5 contraband to inmates.

6 5.51 Earlier this year, two other Green Hill employees were arrested; one for
7 facilitating an attack on a teenage inmate and the other for possession of a controlled substance
8 in a correctional facility.

9 5.52 In 2022, a cook at Parke Creek Community Facility named Dawn McLaughlin –
10 who also abused Plaintiff A.S. – was arrested for seven counts of custodial misconduct after
11 sexually abusing a 16 year old inmate in approximately 2019 when McLaughlin was 44. The
12 resulting investigation revealed that the abuse occurred in a “blind spot” in the kitchen not
13 covered by surveillance cameras and during times the kitchen was not regularly patrolled by
14 other staff people. McLaughlin later admitted to the sexual relationship during a recorded phone
15 call according to the police report.

16 5.53 The concurrent DYCF investigation of McLaughlin, which was turned over to the
17 Kittitas County Sheriff’s Office, uncovered evidence that McLaughlin had sexually assaulted up
18 to three other inmates and “one other male juvenile had a sexual relationship with a former
19 counselor” at Parke Creek Community Facility. The investigator reported that this abuse
20 occurred in the freezer or a staff office, neither of which were covered by cameras. The
21 investigation further found McLaughlin had brought in contraband for the boys.
22
23

1 5.54 In 2021, a long-time DCYF counselor from Naselle Youth Camp named Michael
2 Nolan – who abused Plaintiffs in this suit – was charged with five different sex felonies
3 involving the sexual exploitation of additional children in the State’s care.

4 5.55 The criminal and civil cases alleged that Nolan used a Native American heritage
5 program, called Native Brotherhood, as a pretext to have one-on-one time with the boys in his
6 care. He used sweat lodge practices and other activities to coerce the boys to skinny-dip with him
7 at the nearby river. Reports show that Nolan went on these excursions without bringing a radio
8 with him and failed to document the one-on-one encounters. Despite these repeated violations of
9 protocol, staff did not escalate his behavior for review, which allowed it to continue.

10 5.56 These recent criminal charges are nothing new to Defendants. Each of the four
11 facilities – Green Hill School, Echo Glen Children’s Center, Maple Lane School, and Naselle
12 Youth Camp – have been the center of multiple criminal and civil lawsuits for child sex abuse
13 and harassment claims over the last several decades. These claims allege abuse at the State’s
14 juvenile prisons and detention facilities throughout the 1970s, 1980s, 1990s, and 2010s.

15 5.57 In addition to inadequate supervision, this culture is perpetuated by negligent
16 hiring policies. Among them, State policy allows for the hiring of individuals to work with
17 children in the State’s facilities even where they have been convicted of the following crimes:
18 assault of a child in the third degree, custodial assault, luring, and animal cruelty. A staff person
19 may also continue employment in a juvenile prison or detention facility even after being found to
20 have violated a sexual assault protective order, a vulnerable adult protective order, a no contact
21 order, or where they have engaged in stalking or the solicitation of prostitution.

22 5.58 As a result of these practices and policies, employees of all ranks perpetuated the
23 abuse against Plaintiffs, including the head of security, guards, and correctional officers;

1 physicians, dentists, and nurses; teachers, instructors, assistants, and bible study coordinators;
2 janitors, cooks, librarians; drivers, administrative workers, and case managers; in addition to
3 counselors assigned to each inmate, including those tasked with working with children facing
4 drug and alcohol problems as well as children coping with previous sexual abuse.

5 5.59 The abuse at the center of this lawsuit occurred between 1966 and 2022 and
6 affected children as young as eight years old and through the age of 18.

7 5.60 In many instances, the same staff person repeatedly abused the children over
8 many years.

9 5.61 For example, Dr. Isaac Pope, a physician at Green Hill School, who was
10 investigated both criminally and by the Washington Medical Commission, regularly assaulted his
11 patients by performing medically unnecessary rectal “examinations” for his own sexual
12 gratification and perpetuating other abuses against them, including six Plaintiffs here.

13 5.62 A librarian at Naselle Youth Camp, named Jackie, whose father was believed to
14 be the superintendent, abused Plaintiffs J.S. and C.M.

15 5.63 Darlene Donahue, a counselor at Green Hill, abused Plaintiffs J.B2. and A.B.

16 5.64 Jamie Miller, a counselor at Green Hill, abused Plaintiffs C.B. and J.B2.

17 5.65 A counselor at Echo Glen known as “Butch” sexually abused Plaintiffs D.A.2 and
18 D.C.

19 5.66 The Head of Security at Green Hill School, named Greg, subjected boys,
20 including Plaintiffs J.B. and E.M., to especially cruel sexual abuse, recruited other staffers to
21 participate, and photographed the acts.

22 5.67 However, the abuse sustained by Plaintiffs was not by a small handful of rogue
23 employees. Rather, the Plaintiffs were abused by over 100 different perpetrators, evidencing a

1 culture through Washington's juvenile system seemingly tolerant of sexualizing and
2 dehumanizing these child inmates.

3 5.68 In addition to the negligence that pervaded these juvenile detention facilities, the
4 same State actors and agencies negligently placed some Plaintiffs in unsafe foster homes where
5 they were subject to the same culture of abuse.

6 VI. PLAINTIFFS' ALLEGATIONS

7 6.1 Due to Defendants' negligence in allowing this culture of sexual abuse to flourish
8 and in failing to protect the children in their custody, including Plaintiffs, Plaintiffs suffered
9 physical, emotional, and psychological trauma, leading to significant anguish and distress that
10 they will be forced to live with for the rest of their lives.

11 6.2 At all times relevant, Plaintiffs were wards of the State and incarcerated or
12 detained at facilities that the Defendants operated or contracted with. At all times relevant,
13 Defendants had a special, custodial relationship with Plaintiffs, which required the Defendant to
14 take reasonable steps to protect them from foreseeable harm. At all times relevant, those
15 foreseeable harms included sexual abuse.

16 6.3 Each Plaintiff endured sexual abuse, harassment, and/or exploitation as a result of
17 the State's negligence. The negligence resulted in or allowed for the following abuses, as well as
18 others, to be inflicted on Plaintiffs. The descriptions below are merely summaries and do not
19 include every single act of abuse endured by Plaintiffs. All dates and ages are approximate.

20 6.4 Plaintiff A.B.

21 Current Residence	King County, Washington.
22 Dates of Abuse and Age	1998 to 2003; 15 years old.
23 Location(s) of Abuse	Green Hill School

Perpetrator, if known	Darlene Donahue, a counselor.
Details of abuse	AB was groomed and sexually abused by his assigned counselor, Darlene Donahue. She started grooming AB by bringing in cigarettes, snacks, and giving AB the highest level of freedom inmates were allowed. Their interactions escalated from weekly counseling meetings to Ms. Donahue coming to AB's cell to sexually abuse him. The abuse started with Ms. Donahue touching AB's genital area over his clothing then went on to touching AB under his clothing; Ms. Donahue forced AB to perform and receive oral sex and eventually progressed to vaginal sex. Ms. Donahue sexually abused AB at least 20 to 50 times during his sentence.

6.5 Plaintiff A.C.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	2000 to 2003; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor.
Details of abuse	AC was subjected to multiple "physicals" from Dr. Isaac Pope. The State required A.C. to see Dr. Pope for these medically unnecessary rectal exams on multiple occasions. When A.C. expressed any resistance, Dr. Pope threatened to penalize him by taking away meal time. During A.C.'s last visit with Dr. Pope, he was called into the

	exam room, told to strip, and forced to stand naked while Dr. Pope examined his body for upwards of 15 minutes.
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6.6 Plaintiff A.C.2

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2000 to 2003; 14 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Two male counselors, Mr. Hawkins and Hightower.
Details of abuse	Two male counselors abused A.C.2. First, Mr. Hawkins, his assigned counselor, brought AC to a padded room located behind the staff office in AC2's living unit as punishment. Mr. Hawkins proceeded to force AC2 to perform oral sex and informed AC2 that he would not be allowed to go home if he did not comply. AC2 reported the abuse to another counselor, who told AC2 he was lying. Over the next several months, Mr. Hawkins continued to force AC2 to perform oral sex on him approximately once or twice each week. Mr. Hawkins also masturbated AC2, forced AC2 to masturbate him, performed oral sex on AC2, and attempted to anally penetrate AC2. This abuse occurred about 60 times and continued throughout his entire incarceration. A few months before his release, another male staff member, known to A.C.2 as Hightower, walked in on Mr. Hawkins sexually abusing

	AC2. Instead of using his authority to report the abuse, Hightower also began sexually abusing AC2. The first two times Hightower abused AC2, Mr. Hawkins was also present and the two staff members forced AC2 to perform oral sex on Hightower to avoid “getting in more trouble.” AC2 was forced to go into the backroom with Hightower and perform oral sex approximately once or twice a week for the remainder of his incarceration. AC2 estimated the abuse perpetrated by Hightower occurred about 10 times.
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6.7 Plaintiff A.F.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	Echo Glen: 1980 to 1982; 11 -13 years old Maple Lane: 1984 to 1986; 15-17 years old
Location(s) of Abuse	Echo Glen Children’s Center Maple Lane School
Perpetrator, if known	Mr. Hunter, a male staff member, and Mr. Chase, a guard.
Details of abuse	<u>Echo Glen</u> A.F. was assigned to work with staff member, Mr. Hunter, an older white male in his late 50s. Mr. Hunter often entered A.F.’s cell before breakfast to “help” A.F. get dressed, which eventually turned into Mr. Hunter touching A.F.’s penis over his clothing and soon escalated to Mr. Hunter forcibly masturbating A.F. and performing oral sex. Mr. Hunter brought A.F. candy, cigarettes, and food. He

informed A.F. that A.F. would be penalized if anyone found out about what he was doing. A.F. escaped Echo Glen to get away from this abuse and was sent to Maple Lane.

Maple Lane

A.F. was targeted by a guard named Mr. Chase. Mr. Chase was an athletic white male in his early 30s that enjoyed engaging with inmates through sports. A.F.'s initial interactions with Mr. Chase were appropriate but turned into inappropriate flirtatious compliments about A.F.'s physicality. Mr. Chase brought A.F. to his office for one-on-one counseling sessions, which on information and belief were sessions outside of Mr. Chase's job description. In these sessions, Mr. Chase groomed A.F., gave him shoulder rubs, and forced A.F. to touch Mr. Chase's genital area over his clothing. If A.F. expressed any resistance, Mr. Chase threatened A.F. by letting him know his resistance would only cause him more trouble. This abuse occurred on at least four more occasions before A.F.'s release.

6.8 Plaintiff A.G.

Current Residence	King County, Washington.
Dates of Abuse and Age	Late 1970s; 16 or 17 years old.
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Ms. Jovan Walden, a teacher, and Ms. Brown, a state employee.
Details of abuse	A.G. attended classes taught by Ms. Jovan Walden, a tall, white woman who groomed and abused AG, which started with Walden rubbing her breasts and butt against A.G. It escalated to her groping A.G.'s penis over his clothing. A.G. estimates that this happened four times. Later A.G. then met Ms. Brown who singled AG out and groomed him. Her grooming started with her showing him special attention and “flirting” behaviors. Later, she called AG into her office at night, closing the door behind them. Over a series of visits, Ms. Brown’s sexual abuse escalated to include: her rubbing her breasts and butt against A.G.’s chest and groin, placing her fingers in her vagina then rubbing her fingers on A.G.'s face, her putting her fingers in A.G.’s mouth telling him to “taste her juices.” Ms. Brown also forced A.G. to perform oral sex and engage in vaginal sex with her.

6.9 Plaintiff A.H

Current Residence	King County, Washington.
Dates of Abuse and Age	Early 1990s; 15 or 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Female nurse, male guard.
Details of abuse	A female employee of the medical unit, who A.H. believed was a

	nurse, washed A.H. in the bath when he was wearing a cast for a broken leg. As she washed his genitals, A.H. became aroused. The nurse, having noticed, ordered A.H. to get out of the tub and have intercourse with her. She told him that he would be sent to isolation if he told anyone and she would be fired. A.H. was also assaulted by a male guard while in isolation, who demanded that A.H. expose himself to him and attempted to forcibly remove his pants.
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6.10 Plaintiff A.K.

Current Residence	Okanogan County, Washington.
Dates of Abuse and Age	1989; 14 years old.
Location(s) of Abuse	Foster Homes Maple Lane School
Perpetrator, if known	A female schoolteacher and male guard.
Details of abuse	<u>Foster Homes</u> In the early 1980s, when he was about 8 years old, the State removed A.K. from his mother's custody and placed him in a group home in Everett. There he was sexually abused by a staff member named Julie. The State permitted Julie to take A.K. to her home on Whidbey Island where she touched him sexually on all areas of his body. This happened multiple times. A.K. was later transferred to another group home that was run by a couple with the last name

Discade. There, a boy named Wade sexually abused A.K. multiple times, including anal penetration.

Maple Lane

One of A.K.'s teachers, who was a white female in her late 20s or early 30s, with a thin build, and black hair, sexually abused him.

The abuse occurred in the classroom and included groping of genitals, oral sex, and vaginal sex. The teacher warned A.K. that if he told anyone that no one would believe him. Additionally, one night when A.K.'s unit was in lockdown, a male guard/staff told A.K. that he would give A.K. a cigarette if A.K. exposed himself to the guard. A.K. really wanted a cigarette so he did what the guard/staff asked him to do.

6.11 Plaintiff A.N.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2007 to 2009; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Male guards.
Details of abuse	The guards terrorized AN through sexualized violence throughout his sentence. This involved leering at A.N. while he showered, belittling him for the size of his genitals, improper strip searches involving anal penetration with multiple fingers, and being left

	naked and alone for nearly 24 hours at a time,
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6.12 Plaintiff A.R.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1994 to 1996; 13 years old.
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	A female corrections officer.
Details of abuse	A female corrections officer, who was white with short brown hair in her late 30s, pulled AR out of his cell and said she needed his help in the laundry room. Once there, she asked him personal questions, groped and touched his genitals, and made him touch her. This abuse occurred dozens of times.

6.13 Plaintiff A.R.2

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1979 to 1980; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Maureen Gittman, a nurse, Teddy Burke, a case manager, and a male staff member.
Details of abuse	Three different staff members sexually abused A.R.2, including a nurse named Maureen Gittman, a case manager named Teddy Burke, and another male staff member. The abuse included fondling

	of A.R.2,'s genitals, oral sex, and vaginal sex. It occurred in the medical unit, A.R.2's cell, and off-site when the staff people took A.R2. to run errands. During these trips, staff people took A.R2. to their personal residence. Gittman even brought him to her family's Christmas dinner before sexually assaulting him in her apartment in Chehalis. Two staff people invited A.R.2. to live with him once he was released.
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6.14 Plaintiff A.S.

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	2019; 16 years old.
Location(s) of Abuse	Parke Creek Community Facility
Perpetrator, if known	Dawn, a female kitchen staff.
Details of abuse	A kitchen staff person named Dawn sexually abused A.S. Dawn's inappropriate conduct with the young boys at Parke Creek, who were all under the age of 16, was overt. She groomed the boys as soon as they arrived by providing them extra food, her cell phone so they could access the internet, and even brought in illicit marijuana edibles for them. When the boys were assigned chores in the kitchen, Dawn brushed up against them and made flirtatious and inappropriate comments. On at least one occasion, Dawn cornered A.S. and another inmate in the freezer and grabbed his penis

through his clothes.

6.15 Plaintiff A.U.

Current Residence	Multnomah County, Oregon.
Dates of Abuse and Age	2012 and 2014; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Greg, a male counselor, Jeff, a male staff member, and various male officers.
Details of abuse	Multiple staff members sexually abused A.U. including her counselor, Greg, a staffer named Jeff who Greg invited to A.U.'s one-on-one counseling sessions, and other staff people who subjected her to degrading and unnecessary strip searches. Greg and Jeff's abuse included oral and vaginal rape on more than a dozen occasions. They made clear that if she told anyone, she would be punished and sent to isolation, where they could find her.

6.16 Plaintiff B.B.

Current Residence	King County, Washington.
Dates of Abuse and Age	1992 to 1996; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Carolyn Paulson, a female director.
Details of abuse	B.B. was subjected to repeated sexual abuse at the hands of the Maple Lane employee who was the director of his cottage, Carolyn

	Paulson entered B.B.'s cell at night, laid with him and cuddled, then made him touch her breasts and she groped his genitals. Ms. Paulson further performed oral sex on B.B. Ms. Paulson threatened to send B.B. to the "crazy cottage" if he ever disclosed the abuse. B.B. eventually disclosed to this "relationship" to his counselor Norman Northbrook, who laughed and punished him - demoting him which resulted in a loss of privileges.
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6.17 Plaintiff B.B.2.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	2001 to 2004; 13 years old.
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Jeff Bieck, a male counselor, and Ruth Reseck, a female counselor.
Details of abuse	Echo Glen Jeff Bieck, B.B.2's counselor, sexually abused him. The abuse occurred on nature walks on the grounds and involved fondling B.B.2's genitals and forcing B.B.2 to touch his erect penis. <u>Naselle</u> B.B.2's next counselor, Ruth Reseck (spelling approximate), also abused him. This abuse occurred in the bathtub and his cell. Ruth arranged for B.B.2 to take baths and she sat beside him and directed him to masturbate for her. She also masturbated herself at the same

time. This occurred twice. When Resecki was reprimanded for being in the bathroom alone with an inmate, she made BB2 write a letter saying she had done nothing wrong and that he needed a bath due to an ingrown fingernail. She also entered his cell and rubbed his genitals over his clothing while he was in bed.

6.18 Plaintiff B.B.3

Current Residence	Grays Harbor County, Washington.
Dates of Abuse and Age	1991 and 1993; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female guard, Joyce, and a male guard, Rowland.
Details of abuse	A guard named Joyce, who often drove the boys to off-site medical appointments, sexually abused B.B.3. Joyce abused B.B.3 during these trips, which involved oral sex. Additionally, during lockdowns, Joyce let herself into BB3's room and sexually abused him, which included groping, kissing, over and under the clothes touching, and on at least two occasions vaginal intercourse. Joyce did not offer BB3 any condoms. This abuse continued for the length of BB3's incarceration. In addition to this abuse, the State subjected B.B.3 to degrading and sexually charged strip searches, as was typical at Green Hill. He also experienced verbal sexual harassment from a guard named Rowland, who made sexual jokes and

	comments to the boys.
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6.19 Plaintiff B.G

Current Residence	Okanogan County, Washington.
Dates of Abuse and Age	Echo Glen 2001 to 2002 Maple Lane 2004 to 2005; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center Maple Lane School
Perpetrator, if known	Two male staff members and a male inmate.
Details of abuse	<u>Echo Glen</u> BG was sexually abused by at least two unknown male staff members. They entered his cell at night, touched his genitals, masturbated him, and anally raped him. This occurred about once per week for a year. When BG informed a teacher about the abuse, the teacher did not believe him. <u>Maple Lane</u> The State placed B.G. in a cell with an inmate who was incarcerated for a sex offense. This cellmate forced BG to perform oral sex and anally raped him. BG was forced to endure this sexual abuse for about a month. BG tried to report the abuse to Mr. Burgeons, a staff member, but was not believed. After disclosing the abuse, BG found that the abuse from his cellmate worsened, and the other inmates began bullying him as well. This suggested staff disclosed B.G.'s reports to the people who were abusing him in retaliation.

6.20 Plaintiff B.R.

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	1984; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male State employee.
Details of abuse	A State employee who was a white, middle aged man of average height and build directed BR to leave his cell and follow him to an empty room near the administrative office. The employee pulled BR's pants down to his knees and forcibly performed oral sex on him. He then spit on BR's anus and tried to anally rape him. The man returned BR to his cell and threatened to retaliate if BR ever spoke about what had happened. The man returned a few days later and repeated the assault.

6.21 Plaintiff C.A.

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	Late 1990s; 16 years old.
Location(s) of Abuse	Indian Ridge Correctional Facility
Perpetrator, if known	A female kitchen staffer.
Details of abuse	On a weekly basis, a kitchen staffer – who was middle-aged, with short and curly hair, and glasses – forced CA and the other boys

	working in the kitchen to expose their genitals to her for her gratification in exchange for cigarettes.
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6.22 Plaintiff C.B.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2002 to 2003; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Multiple guards and three female counselors: Jamie Miller, Bobby Blankenship, and Jade Wrenzenski.
Details of abuse	Multiple staff people sexually abused C.B., in addition to subjecting him to abusive strip searches, during which the guards forced the boys to expose and handle their testicles, penis, and butts before placing their fingers in their mouth. During the searches, the guards used derogatory and insulting comments, including calling them “faggots” and other slurs. Three of the female counselors assigned to C.B.’s unit – Jamie Miller, Bobby Blankenship, and Jade Wrenzenski – did not abuse C.B. together, but often worked in concert and subjected him to the same type of abuse, demonstrating their apparent coordination and knowledge of one another’s treatment. These staffers followed CB to the showers forced him to expose himself to them and to masturbate himself until he was erect. They

often touched or stroked his erect penis.

On other occasions, the guards claimed that C.B. needed to come to the office because his family called, they needed to review his file, or address how much time he had left on his sentence. Once there, they asked him to expose himself, masturbate himself, and they touched or stroked his penis. While they watched, they exposed themselves and touched themselves at times.

The guards coerced C.B. silence by threatening to add time to his sentence or revoke certain privileges, like use of the phone or visitation with family.

6.23 Plaintiff C.B.2

Current Residence	Benton County, Washington.
Dates of Abuse and Age	1984 to 1986; fourteen years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male counselor, Bob.
Details of abuse	A counselor named Bob sexually abused C.B.2 repeatedly. The abuse occurred in various areas of the Skagit Cottage. Multiple times a week, Bob isolated C.B.2, grabbed her breasts, butt, and/or genital areas over her clothes, and whispered sexual comments to her and licked her ear. On one occasion, he forced her to perform oral sex on him. Bob told C.B.2 that he would make sure that she

	would never get out if she told anyone about the abuse.
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6.24 Plaintiff C.C.

Current Residence	Columbia County, Washington.
Dates of Abuse and Age	1992 to 1996; 14 years old.
Location(s) of Abuse	Naselle Youth Camp Green Hill School Mission Creek Youth Camp
Perpetrator, if known	Two female staff members, one named Shoemaker, a male guard, and a male inmate.
Details of abuse	<u>Naselle</u> Two staff members sexually abused CC. The first, a female counselor with the last name of Shoemaker, watched C.C. shower, fondled him, and forced him to engage in oral and vaginal sex. The abuse occurred on a near daily basis in the shower, C.C.'s cell, and Shoemaker's office. A second female staff member at Naselle, name unknown, who was blonde and taller than average, performed oral sex on CC and made CC perform oral sex on her about three occasions. The abuse occurred in holding cells that were located at the back of the cottage near the offices. This staff member also kept watch while Shoemaker abused C.C.. <u>Green Hill</u>

	At Green Hill School, a male guard anally raped CC on two separate occasions. The guard was white with glasses, brown or blonde hair, and about six feet tall with an average build. This abuse occurred in the laundry room and a back hallway. When C.C. confided in his counselor about this abuse, he was not believed. <u>Mission Creek</u> A larger inmate who had a job assisting the correctional officers entered CC's cell and anally raped him.
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6.25 Plaintiff C.C.2

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1998 to 1999; 16 years old.
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	A female counselor, Sue.
Details of abuse	The State assigned CC2 a counselor named Sue who sexually abused him during "one-on-one" sessions. Sue and other counselors sometimes held these meetings off-property in the woods. The counselors hid contraband there, including cigarettes and alcohol to consume with the children during one-on-ones. For some, like CC, the "monthly" meetings occurred twice or even four times per month. The abuse involved massaging C.C.2's shoulders, groping of his penis, masturbation, and vaginal sex. Staff often told the

children that any misbehavior or failure to comply at Mission Creek would result in them being shipped off to Green Hill or Maple Lane. This threat proved true – CC2 observed many boys be shipped off. Additionally, although Sue was CC2’s assigned counselor, another counselor named Jodie also told him that she needed to see him for “one-on-one” sessions. During these sessions, she forced him to engage in penetrative sex after shutting her door and closing her blinds. Jodie was younger than Sue and attempted to force CC2 to engage in more intimate acts, including kissing, cuddling, and later oral sex on her. In addition to this abuse, CC2 and the other boys at Mission Creek were subject to sexual harassment by the kitchen staff.

6.26 Plaintiff C.J.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2011 to 2012; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Multiple male guards, including Bill.
Details of abuse	Multiple staff people sexually abused C.J. First, a guard named Bill, who was a white man with a big red beard who always wore a hat and was in his 40s, abused him and threatened to report C.J. for

1 assault if he tried to tell anyone. The abuse involved groping of
2 C.J.'s butt and digital penetration. Afterwards, Bill removed all of
3 C.J.'s clothes and left C.J. naked in the IMU for an hour. The abuse
4 occurred on the grounds when Bill escorted C.J. between units.
5 Shortly after, C.J. was talking with Chris Ward, a program manager,
6 who asked him who the kids thought was the worst staff person on
7 payroll and why. C.J. admitted to him then that it was Bill because
8 he had been touching him. Chris told C.J. it would be taken care of,
9 but nothing happened. C.J. learned that Bill was still working there
10 a few years later.

11
12 In addition to this abusive treatment, C.J. was also subjected to
13 dehumanizing and sexualized strip searches, like many others at
14 Green Hill. During these strip searches, which happened randomly
15 and frequently, C.J. and other boys were asked to remove their
16 clothing, bend at the waists and expose their anuses, touch their
17 backsides, then stand up, turnaround, and lift their penises and balls.
18 Afterwards, they were made to place their hands in their mouths to
19 demonstrate the absence of anything in their mouths. During the
20 searches, the guards degraded the boys about the size of their
21 genitals and called them names. C.J. estimates he was stripped out
22 this way over 50 times.
23

6.27 Plaintiff C.L.

Current Residence	King County, Washington.
Dates of Abuse and Age	1998 to 2002; 17 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jerry and Jack, male counselors.
Details of abuse	Jerry, CL's assigned counselor, sexually abused her. The State required inmates to share their life stories with their assigned counselors. These meetings were held weekly and often in the inmates' cells with the counselors sitting beside the kids on their beds. This dynamic allowed the staff to build trust with the inmates, groom them, and sexually assault them. After Jerry recommended that C.L. have her own room, he used these one-on-one meetings to assault her on at least 20 occasions. The abuse included kissing, oral sex, hand jobs, and digital vaginal penetration. Jerry told CL that if she told anyone, he wouldn't be able to keep making her stay so easy. One day, CL observed Jerry targeting another inmate and threatened to report him. In response, Jerry had her sent to the maximum-security cottage. He continued to abuse her in other cottages, even when he was no longer her assigned counselor. When C.L. reported Jerry to her new counselor, Jack, he told her that no one would believe her. And, within a few months, Jack started sexually abusing CL, too. The abuse involved vaginal sex

	and oral sex. Jack threatened that if C.L. told anyone, he would punish her by cutting off visitation, sending her to maximum security, and recommending a longer sentence. The abuse continued until CL left Echo Glen.
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6.28 Plaintiff C.M.

Current Residence	King County, WA.
Dates of Abuse and Age	2015 to 2017; 16 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Jackie, on-site librarian
Details of abuse	C.M. was groomed and sexually abused by a librarian named Jackie who was known to be the superintendent's daughter. Jackie asked C.M. to bring her handwritten "love" notes to another inmate. When the other inmate was released, Jackie began grooming C.M. Over the course of approximately 10 months, Jackie manipulated C.M. into a pseudo-relationship that began with kissing and escalated to oral sex, digital penetration and vaginal sex. For seven months following his release, Jackie stalked and harassed C.M., expressing her desire to maintain a sexual relationship with him.

6.29 Plaintiff C.N.

Current Residence	Grays Harbor County, Washington.
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Dates of Abuse and Age	1995 to 2002; 14 and 17 years old.
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Cindy, woodshop assistant, and male guard.
Details of abuse	<u>Maple Lane</u> While incarcerated at Maple Lane, C.N. accidentally observed the woodshop assistant, Cindy, having sex with another inmate. Cindy noticed C.N. Later, Cindy pulled C.N. aside and told him that she would take care of him if he kept quiet. Cindy proceeded to flirt with C.N., then eventually solicited sex. The abuse included oral sex, vaginal sex, and digital penetration in a bathroom close to the woodshop. Additionally, during woodshop class, Cindy grabbed C.N.'s penis over the clothes and rubbed her butt up against him in front of the other students with impunity. <u>Green Hill</u> After learning that staff people brought contraband in for the inmates, C.N. approached a guard known to bring in tobacco chew. The guard explained that to obtain chew, he would need to give him something. He also threatened that the failure to comply would result in a penalty. The guard then forced C.N. to perform oral sex on him about once a week.

6.30 Plaintiff C.P.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1985; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staffer.
Details of abuse	A male staffer who was white, overweight, in his late 30s, with dark hair kept in a ponytail, sexually abused C.P. when escorting him to the hospital for medical treatment. The abuse involved forcing C.P. to expose himself and oral sex.

6.31 Plaintiff C.P.2.

Current Residence	Clark County, Washington.
Dates of Abuse and Age	2015; 17 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female staff member.
Details of abuse	A Black female staffer with long hair, of average height, and a bit heavier set, who was assigned to C.P.2's lodge sexually abused him. The abuse, which involved oral sex, typically occurred in the laundry room, though many grooming activities were in plain view of other staff. When C.P.2 resisted, the staff member threatened to get more time added to his sentence.

6.32 Plaintiff C.S.

Current Residence	King County, Washington.
Dates of Abuse and Age	Early 2000s; 14 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male guard.
Details of abuse	About halfway through C.S.'s sentence, a guard in approximately his 40s, who was tall with darker hair and potentially mixed race, began grooming her before sexually assaulting her repeatedly. The guard escorted the children around the facility and often called over the intercom for CS to be in certain places. Sometimes other staff people called for CS to meet the guard in secluded areas of the facility. For example, sometimes she would be ordered to get a broom from the cleaning closet and the guard would be hiding in the cleaning closet ready to abuse her. He also worked with another person, who was potentially a volunteer or part-time worker, who kept a lookout. The abuse involved kissing and under and over the clothes touching of her breasts and vulva. The guard also forced her to masturbate him and watch him while he masturbated himself and exposed himself to her. The guard reminded CS that no one would believe her if she told anyone what was going on. When CS finally felt like she could

	confide in a staff person about what was happening, the staff person – who was an older white woman with long hair – called her a liar. The abuse occurred approximately 40 times before CS was released. CS had been molested by her mother’s boyfriend before her incarceration. It is believed that she disclosed this molestation in her initial intake and that State employees were privy to this sensitive information and able to use it to target vulnerable children like CS.
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6.33 Plaintiff C.T.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1995 to 1998; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor.
Details of abuse	Dr. Issac Pope, a medical doctor, sexually abused C.T. during a “routine” medical exam. The abuse involved an unnecessary rectal exam. CT reported Dr. Pope’s abuse to a counselor at Green Hill School named Donna Eberly. CT does not know what, if anything, Ms. Eberly did with this report. However, the next time he had to see Dr. Pope, a guard escort came with CT. However, multiple boys continued to be seen by Dr Pope without an escort and he remained employed.

6.34 Plaintiff C.T.2.

Current Residence	King County, Washington.
Dates of Abuse and Age	Mid-1980s; 16 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male doctor.
Details of abuse	A medical doctor, who was a white male, with graying hair, sexually abused C.T.2 under the guise of performing a medical exam. The doctor stroked C.T.2's genitals for several minutes and digitally penetrated his anus. The doctor inquired whether C.T.2 had any family that would come to visit him and asked C.T.2 if he would like to come to the doctor's house on the weekends. Later, C.T.2 learned that other boys did go home with the doctor on the weekends and came back with contraband.

6.35 Plaintiff D.A.

Current Residence	Clark County, Washington.
Dates of Abuse and Age	2000 and 2001; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male doctor, male guard, and a cellmate.
Details of abuse	A male doctor subjected D.A. to a medically unnecessary rectal examination. Later, a Black male guard took DA to the "wet room" and forced DA to perform oral sex on him while taking pictures

	with a disposable camera. Additionally, another cellmate anally raped D.A. while guards walked by every 15 minutes.
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6.36 Plaintiff D.A.2.

Current Residence	Clallam County, Washington.
Dates of Abuse and Age	1999; 17 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Butch, a male counselor.
Details of abuse	A State employee accused of assaulting multiple child inmates, named Butch, sexually abused D.A.2 The abuse occurred in her cell and involved masturbation and oral sex. DA2 believed that Butch was abusing other inmates because every time she was forced to perform oral sex on him, Butch's genitals smelled slightly different. After DA2 told Butch that she would report him and face the consequences, Butch arranged for her transfer and release. Although Butch made these arrangements only to protect himself, his conduct was never flagged for review by the State, and he remained employed.

6.37 Plaintiff D.B.

Current Residence	King County, Washington.
Dates of Abuse and Age	2017 to 2022; 17 years old.

Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female supervisor, Lori Ambergee, and a female staff member.
Details of abuse	D.B.'s supervisor on his work detail, Lori Ambergee, sexually abused D.B., typically in her office. The abuse involved fondling his penis over his clothing and exposing her breasts to DB. When DB expressed any hesitation, she threatened to shackle his waist and wrists and leave him in solitary confinement. Ambergee regularly groomed, fondled, and exposed herself to DB over the next two years. After being transferred to another unit, another female staff member abused him in the facility's gym. This abuse involved groping DB's penis over his clothing and oral sex.

6.38 Plaintiff D.B.2.

Current Residence	Grays Harbor County, Washington
Dates of Abuse and Age	1974 to 1977; 14 years old
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	On-site male dentist.
Details of abuse	D.B.2 was sexually abused by the on-site male dentist while having a cavity filled.. The dentist was a short, chubby older white male and met with D.B.2 alone in his exam room. Before the procedure, the dentist made inappropriate comments to D.B.2 about his

“beautiful mouth.” The dentist gave D.B. two unknown pills and when D.B.2 woke up, his pants were unzipped and his penis which was wet, was exposed. Before D.B.2 left the exam room, the dentist gave him a long hug, and D.B.2 could feel his erection through his clothes, before making additional inappropriate comments about D.B.2’s genitals.

6.39 Plaintiff D.B.3.

Current Residence	King County, Washington.
Dates of Abuse and Age	1993 to 1995; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male doctor.
Details of abuse	When D.B.3 arrived at Green Hill School, he was taken to get a medical exam. The physician, a tall Black male, asked D.B.3 to bend over for what was described as a routine rectal examination. While digitally penetrating him, the doctor squeezed and fondled D.B.3’s penis and scrotum. A week later, the doctor called him back for another “exam.”

6.40 Plaintiff D.C.

Current Residence	King County, Washington.
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Dates of Abuse and Age	1996 to 1998; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Butch, a male employee.
Details of abuse	DC was sexually abused and groomed by, Butch, with whom she met for regular "one-on-ones" sessions. During these meetings, Butch sat very close to DC and rubbed her shoulders and legs while talking to her. Gradually, he touched her more and more, he began rubbing her inner thighs and then her genital area.

6.41 Plaintiff D.D.

Current Residence	Clark County, Washington.
Dates of Abuse and Age	1996 to 1998; 16 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A female guard and two male guards.
Details of abuse	A female guard sexually assaulted D.D. The guard pushed D.D. against a wall in the laundry area and placed her hands on D.D.'s breasts over her clothes and kissed her mouth and neck. When D.D. tried to push her away, the guard became more aggressive, placing her hands under D.D.'s shirt, groping her breasts, and kissing her mouth, face, and neck. Separately, D.D. was sexually assaulted on approximately three different occasions by two State employees –

	male guards. These men tied D.D. up and violently groped her breasts and genitals, leaving bruising on her body.
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6.42 Plaintiff D.G.

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	Mid-to-late 1990s; 13 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Multiple staff people.
Details of abuse	Multiple staff people sexually abused D.G. This abuse occurred in the laundry room, the "hole" or "quiet room," or D.G.'s cell. It was perpetrated by general staff members, including a counselor and a physician. The abuse included groping D.G.'s penis, forced masturbation, oral sex, and attempted anal rape.

6.43 Plaintiff D.G.2

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2004 to 2006; 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Two male staff members.
Details of abuse	D.G.2's assigned counselor and another employee who ran the commissary sexually abused D.G.2. These men – who were both white and between the ages of 30 and 50 – worked together. On at

1 least four separate occasions, D.G.2 was abused by one or both
2 men. The men forced D.G.2 to give them oral sex and the men
3 would masturbate D.G.2. At least one time, these state employees
4 brought other boys into the room and forced the boys to perform
5 oral sex and hand jobs on each other while they watched. The abuse
6 occurred in the kitchen when only the staff was present or in a side
7 room in the unit while the inmates were supposed to be sleeping.
8 D.G.2 tried to get transferred to escape the abuse, but when he tried
9 to report what was happening to him, he was ignored. Eventually,
10 one of the boys who was abused with D.G.2 retaliated, breaking the
11 jaw and nose of one of the staff people. Afterwards, D.G.2 and
12 another inmate pretended to get into a fight, so they would be
13 automatically transferred. D.G.2 was then transferred to solitary,
14 where he spent 23 hours alone each day for three months. When he
15 returned to general population, D.G.2 had a new counselor, but the
16 men who had abused him and other inmates were still employed by
17 the State, and he saw them in the kitchen at times.

18
19 6.44 Plaintiff D.H.

20 Current Residence	Clark County, Washington.
21 Dates of Abuse and Age	2013 to 2016; 16 years old.
22 Location(s) of Abuse	Green Hill School 23 Sunrise Group Home

1	Perpetrator, if known	A female guard, Ashley, and a female staff person, Andrea.
2		<u>Green Hill</u>
3		After his intake, a guard named Ashley began to groom D.H. This
4		started with compliments, special attention, and gifts, including
5		access to an iPhone, vape pens, tobacco, and marijuana. Ashley also
6		promised D.H. and the other boys in his unit access to other guards
7		who were bringing harder drugs, including heroin, meth, and
8		cocaine. Ashley proceeded to sexually abuse D.H., which involved
9		masturbation, oral sex, and vaginal sex. It typically occurred in her
10		office. On multiple occasions, Ashley brought D.H. and another boy
11		she was abusing into her office. She forced the boys to masturbate
12		each other while she watched. In addition to this abuse, D.H. was
13	Details of abuse	subject to the repulsive and perverted strip searches for which Green
14		Hill is notorious. Specifically, this involves asking the boys to
15		handle their genitals and anus before placing their fingers in their
16		mouths to demonstrate the absence of any contraband in their
17		mouths. The abusive nature of these searches is heightened by the fact
18		that most of the contraband was apparently entering Green Hill
19		through the guards themselves. One day, D.H. and his roommate
20		were stripped out six times in one day for the gratification of the
21		guards.
22		<u>Sunrise</u>
23		A staff person named Andrea forced D.H. to take naked photos of

	himself and threaten to take away his phone if he did not comply.
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6.45 Plaintiff D.H.2

Current Residence	Mason County, Washington.
Dates of Abuse and Age	1993 to 1994; 13 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Steven, a counselor/guard.
Details of abuse	After placing D.H.2 naked in solitary confinement for concerns of suicidal behavior, a counselor/guard named Steven forced D.H.2 to masturbate him; forced D.H.2. to perform oral sex on him; and anally raped D.H.2. Steven threatened to hurt D.H.2's family and told D.H. that he would take away his visitation and phone privileges if he told anyone. When D.H.2 bravely disclosed the abuse to another staffer named Joanie, she called him a liar and did nothing. The abuse occurred weekly for nearly a year.

6.46 Plaintiff D.I.

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	2002 to 2004; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Bill Feckner and Dave Eares, two male security guards and others
Details of abuse	Two security guards, Bill Feckner and Dave Eares (spelling

1 approximate), sexually abused D.I. Both worked the nightshift and
2 Eares confided in D.I. about his personal life and asked sensitive
3 questions about D.I.'s sexual preferences. The abuse involved
4 touching D.I.'s body – first his shoulder and back, then his genital
5 area; forcing D.I. to expose himself, and fondling of his genitals.
6 Feckner, who was close friends with Eares, harassed D.I. about this
7 sexual abuse but did nothing to stop it. He made comments to D.I.
8 in front of other inmates such as, "I hear you and Dave [Eares] are
9 official now." "Are you Dave's girlfriend?" and "I hear Dave's got
10 the fastest hand in the west!"
11 Feckner and Eares also teamed up to harass D.I. by stealing his
12 clothes while he showered so that he had to walk back to his cell
13 naked or barely clothed. On some occasions, they replaced his
14 clothes with underwear that didn't fit. Feckner was also violent and
15 subjected D.I. to frequent physical assaults.
16 After his release, while sleeping in his childhood home near Green
17 Hill School, D.I. awoke to Feckner and Eares, D.I.'s former
18 counselor, Dan Cosser, and two female staff named Heidi and Sara.
19 The five State employees entered his bedroom screaming, "You
20 didn't think you could get away from us that easily could you?"
21 and "Don't forget that we are just down the road!" The straddled
22 him and hand-cuffed his hands and feet on the bed, claiming it was
23 a playful hazing activity for newly released inmates.

6.47 Plaintiff D.J.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2017 to 2018; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Katie, a corrections officer.
Details of abuse	A corrections officer named Katie sexually abused D.J. Katie began grooming D.J. by being friendly and flirtatious, eventually bringing up her sex life and making sexual jokes to him. It escalated to her masturbating him, oral sex, and vaginal sex. Katie rewarded D.J. with more time out of his cell and outside food to keep him quiet. When D.J. attempted to report Katie, he was punished for making sexual comments to her and the abuse claim was not escalated.

6.48 Plaintiff D.J.2

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	Early 1990s; 11 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member.
Details of abuse	A white male staff member with short gray hair, who typically wore white shirts and tan khaki shorts, sexually abused D.J.2 under the guise of disciplining him for urinating "incorrectly" and getting urine on the toilet seats. This "discipline" involved the staffer holding

	D.J.2's penis to show him how to pee. It escalated to the staffer forcing D.J.2 to masturbate his penis, performing oral sex, and digital penetration. The staffer threatened D.J.2 that he would hurt D.J.2 and/or his family if D.J.2 ever told anyone. He also gave D.J. special privileges including swimming time, time on the baseball field, and a bike to ride to reward and induce compliance.
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6.49 Plaintiff D.J.3

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1997 to 1998; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Male guard.
Details of abuse	D.J.3 was groomed and sexually abused by a male guard who was white, in his late 50s/early 60s, and often wore a hat and smoked a pipe. The guard groomed D.J.3 by building trust with him through special snacks or chewing tobacco. The guard soon asked D.J.3 for favors in exchange. The sexual abuse occurred in D.J.3's cell and included rubbing and groping D.J.3's genitals and oral sex. The guard threatened to send police officers into D.J.3's cell if he resisted, likely for them to find the very contraband the guard brought D.J.3. To display his control, the guard did not allow D.J.3 to leave his living unit for weeks, which prevented D.J.3 from

	attending school.
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6.50 Plaintiff D.M.

Current Residence	King County, Washington.
Dates of Abuse and Age	2006 to 2007; 15 or 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mr. Berry, counselor.
Details of abuse	A counselor named Mr. Berry groomed and sexually abused D.M. repeatedly. The abuse involved groping, fondling, oral sex. The counselor also forced D.M. to masturbate him.

6.51 Plaintiff D.P.

Current Residence	Grays Harbor County, Washington.
Dates of Abuse and Age	Late 1990s and early 2000s; 14 years old.
Location(s) of Abuse	Echo Glen Children's Center Maple Lane School
Perpetrator, if known	Sparks, a male staff member; guards.
Details of abuse	<u>Echo Glen</u> A male staff member, who went by "Sparks," met weekly with D.P.. to "counsel" him for behavior problems, which escalated to sexual abuse. To further increase his dependence and trust, Sparks brought in tobacco that D.P. would sell to other kids. Sparks told D.P. that if

anyone found out about their plan, Sparks would lose his job and D.P. would get in trouble and get his sentence extended. Sparks informed D.P. of his terms – D.P. would have to masturbate Sparks and perform oral sex on him in exchange for tobacco. Sparks brought in tobacco approximately twice per month. Every time Sparks fulfilled his side of the bargain., D.P. had to perform oral sex on Sparks.

Maple Lane

D.P. was harassed and subject to aggressive and sexually charged behavior from the guards, which involved overly aggressive strip searches and punishments that left the boys alone and naked in their rooms for hours at a time.

6.52 Plaintiff D.S

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	1999 to 2003; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male bible study coordinator.
Details of abuse	The coordinator for bible study sexually abused D.S. This person, who was under the State's supervision, was white male, thin, about 6 ft tall, and had long dark hair. He was a fixture at Echo Glen and often brought his wife and kids to the facility to play music for the

	child inmates. The State permitted the bible coordinator to take D.S. off-campus along with two or three other boys. The bible coordinator showed D.S. a lot of special attention and took him out to dinner on their trips off campus. On one trip off campus, the coordinator took D.S. into his office at the church where he sexually abused him. The abuse included forcing D.S. to sit on his lap and fondling D.S.'s genitals while pressing his erect penis against D.S.
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6.53 Plaintiff D.W.

Current Residence	Lewis and Clark County, Montana.
Dates of Abuse and Age	Early 1990s; 13 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Male State employee, staff person in the educational center.
Details of abuse	During D.W.'s intake, his mother reported to the staff that D.W. was a survivor of childhood sexual abuse. On information and belief, other staff people had access to this information and used it to target D.W. On a regular basis, D.W. spent time in the gym and educational center, which had a playground. Two different staff people sexually abused him in these buildings. The abuse in the gym involved being forced to shower with other inmates and perform sex acts on one another while the State employee watched, as well as oral sex and staff anally raping of D.W. This abuse

	occurred on a regular basis throughout his incarceration and occurred dozens of times. In the educational center, another staff person – charged with educating the boys – sexually molested D.W. multiple times per week. The molestation involved the staff person reaching into D.W.’s pants and grabbing and rubbing his penis.
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6.54 Plaintiff D.W.2

Current Residence	Grant County, Washington.
Dates of Abuse and Age	2000 to 2001; 14 years old.
Location(s) of Abuse	Echo Glen Children’s Center
Perpetrator, if known	Theresa, counselor.
Details of abuse	D.W.2’s assigned counselor, a white female in her early 50s named Theresa groomed and sexually abused him. Theresa met with D.W.2 weekly. The abuse involved Theresa forcing D.W.2 to perform and receive oral sex from her on numerous occasions. Theresa also forced D.W.2 to have vaginal sex approximately 12 times.

6.55 Plaintiff D.W.3

Current Residence	King County, Washington.
Dates of Abuse and Age	Mid-to-late 1980s; 13 years old.
Location(s) of Abuse	Echo Glen’s Children’s Center
Perpetrator, if known	Two male staff members, one named Terry.

Details of abuse

D.W.3 was sexually abused by two different male staff members. First, a state employee named Terry assaulted her on a State-facilitated camping trip near the Wenatchee River. The abuse occurred after Terry isolated D.W.3 from the group and included over and under the clothing groping and touching of her breasts, oral sex, and digital penetration. Terry told D.W.3 not to say anything, that no one would believe her anyway, and that she would get in trouble for ratting on him.

Approximately five years later, D.W.3 returned to Echo Glen to serve a six-month sentence. D.W.3 was sexually abused again by a male staff member who came into D.W.3's cell and instructed her to remove her shirt and pants. The staff member then groped her breasts and forced D.W.3 to perform oral sex on him. He then threatened to get D.W.3 in more trouble if she disclosed the abuse to anyone.

6.56 Plaintiff D.W.4.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	2005 to 2007; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center Maple Lane School
Perpetrator, if known	A female transportation guard and a male guard.

Details of abuse

Echo Glen

A transportation guard, a white woman with red hair, assigned to drive D.W.4 and other inmates to off-site medical appointments sexually abused them. The boys rode in the staff SUV's backseats, with their hands handcuffed in front of them. The first time, the driver transported DW4 and another boy. While enroute, the driver pulled over and masturbated both boys, after unzipping their pants while their hands were bound, then told them not to tell anyone. Afterwards, while driving back to Echo Glen, she masturbated in the front seat, leaving both boys to listen to the sounds of her self-gratification while bound in the backseat. This occurred twice more, but DW4 was the only boy transported. Each time, when the staff person returned DW4 back to Echo Glen, she told the guards in his cottage how well he had done, and that he was owed video game time.

Maple Lane

While at Maple Lane, DW4 was placed in suicide watch. In what can be considered one of the most counterintuitive responses to a teenage boy in distress and threatening suicide, the guards at Maple Lane removed DW4's clothing and handcuffed him to a chair that faced the window. While bound, an older white male guard frequently walked by the window and stared at him. Eventually, and on three separate occasions, this guard entered DW4's cell – where

	he was bound to a chair and helpless – and masturbated him.
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6.57 Plaintiff E.B.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1997 to 2002; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center Green Hill School Maple Lane School Mission Creek Youth Camp
Perpetrator, if known	Multiple guards, counselors, medical staff, and staff people, including Sparks, a commissary worker, and Tina Shoemaker, a staff member.
Details of abuse	EB was incarcerated at Echo Glen, Green Hill, Maple Lane, and Indian Ridge. At each facility, he was subjected to sexual abuse by multiple adult staff people who were assigned to his care. The sexual abuse involved the guards, counselors, medical staff, and staff people assigned to work the commissary, like Sparks at Echo Glen. These employees forced EB to expose himself, exposed themselves to EB, forced EB to masturbate while they watched, performed sexualized strip searches involving digital penetration of his anus, in addition to forced hand jobs, oral sex, and vaginal penetrative sex. One of the abusers included Tina Shoemaker, who had abused numerous boys at Maple Lane, even after the State received notice of her misconduct. The abuse occurred largely in

areas where the staff people were able to ensure privacy by creating scenarios where they were the only adult people around, including abusing EB when he was in isolation. At Echo Glen, staff people sexually abused EB and other boys at the pool. The staff people coerced EB's silence by offering him food, extra privileges, or threats with threats of violence or added time in isolation. EB's abuse at the hands of the State occurred at least twice a week for the entirety of his incarceration.

6.58 Plaintiff E.C.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2010; 14 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Littlefield, a nightshift worker.
Details of abuse	Most nights, E.C. was monitored by a male nightshift worker known to him as Littlefield. Littlefield was a tall, heavy white man with gray hair who often wore glasses. Littlefield used his time alone with E.C. as an opportunity to sexually abuse E.C. whenever he was scheduled to work. The first incident involved Littlefield kissing E.C. and fondling E.C.'s genitals and the abuse continued to escalate in severity to include manual stimulation, oral sex, and digital penetration. When E.C. tried to report the abuse to Cindy

	Blue, another employee, she refused to believe him.
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6.59 Plaintiff E.C.2.

Current Residence	Clallam County, Washington.
Dates of Abuse and Age	1990 to 1992; 14 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Pletch, a male leader.
Details of abuse	E.C.2's department of Natural Resources leader, Mr. Pletch, sexually abused E.C.2 After arriving at the site, and once the other boys were out of sight, Mr. Pletch forced E.C.2 to participate in sexual acts with him, which included hand jobs and oral sex. Mr. Pletch forced E.C.2 to perform and receive these abusive sex acts at least 15 times.

6.60 Plaintiff E.D.

Current Residence	Sedgwick County, Kansas.
Dates of Abuse and Age	The 1980s; 14 years old.
Location(s) of Abuse	Maple Lane School Naselle Youth Camp
Perpetrator, if known	A night shift worker.
Details of abuse	<u>Maple Lane</u> E.D. was repeatedly sexually abused by a night shift worker. The perpetrator entered E.D.'s cell at night and covered E.D.'s head

before sexually abusing him, which included forcing E.D. to perform and receive oral sex as well as anal rape. E.D. lost count of the number of times he was sexually abused by the perpetrator, but recalled the perpetrator would threaten to harm E.D. as well as his family members if he told anyone about the abuse. To try to get away from the abuse, E.D. escaped from the facility and was gone for over six months. After his 18th birthday, E.D. turned himself in and served the rest of his sentence at Maple Lane. E.D. suffered from anal warts because of this sexual abuse but was too afraid to get them treated until over 10 years after he was released because of the severe humiliation.

Naselle

At Naselle, E.D. once awoke in a security room completely naked with no idea how he got there.

6.61 Plaintiff E.K.

7 Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1982 to 1983; 12 years old.
Location(s) of Abuse	A boys' home in Elma, Washington.
Perpetrator, if known	A male State employee, Sam.
Details of abuse	EK was arrested and charged with burglary after he broke into a

neighbor's home to eat from their refrigerator. His mother had been neglecting him and they had no food in the home. Instead of referring him to foster care or otherwise providing wrap around services, he was sent to Echo Glen as a convicted criminal. After serving half his sentence, the State sent E.K. to group homes. No one at the State of Washington made any inquiry into whether or not the home in Elma, Washington – where EK was sent to be closer to his mother – was safe. The home housed about 10 boys completing their sentences whose ages ranged from as young as EK, who was 12, up to age 17. EK met a State employee named Sam who worked in this boys' home. Sam assault E.K. and other boys during "movie nights," which included over and under the clothes fondling, oral sex, and attempted anal rape. After another boy reported Sam's abuse, staff went into damage control, assuring the boys that they were OK. Not long afterward, the State released EK back to his home, without conducting a proper investigation into whether his mother could provide a safe home. As he was before being arrested, EK was subjected to all types of abuse and neglect before finally running away from home at age 16.

6.62 Plaintiff E.M.

Current Residence	Franklin County, Washington.
Dates of Abuse and Age	1995 to 1996; 15 years old.

Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male Head of Security.
Details of abuse	The Head of Security sexually abused E.M. As the abuse progressed, the guard told EM that he could tell anyone he wanted about what was going on, but no one would believe him. The sexual abuse involved the guard exposing himself to E.M. and masturbating, forcing EM to expose himself to the guard and masturbate, in addition to over the clothes and under the clothes groping and fondling. After establishing this abuse and his control, the guard started calling out another boy with EM. This boy was housed in a private room due to severe mental health issues that involved self-mutilation and cutting. The guard made EM and this boy give each other oral sex, kiss each other, and masturbate one another for the guard's gratification. The guard masturbated while he watched them. Sometimes he would molest them while he forced them to touch each other. These acts of sex abuse occurred more than 15 times.

6.63 Plaintiff E.R.

Current Residence	Benton County, Washington.
Dates of Abuse and Age	2005 to 2008; 17 years old.
Location(s) of Abuse	Green Hill School

Perpetrator, if known	A male supervisor, a male guard, and a physician.
Details of abuse	Multiple staff people sexually abused E.R. First, D.B.'s supervisor in the embroidery shop, an older white male, made E.R. watch pornography depicting men having sex, solicited sex from him, and groped his penis. Second, a guard who was permitted one-on-one unsupervised contact with inmates pressed himself against E.R. and sucked on his ear before offering to give E.R. anything he wanted from outside the facility in exchange for sexual favors. Finally, a staff physician repeatedly groped E.R.'s testicles under the guise of a medical exam.

6.64 Plaintiff F.D.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	Early 1970s; 8 years old.
Location(s) of Abuse	Echo Glen Children's Center; Cascade Juvenile Reception and Diagnostic Center
Perpetrator, if known	A male staff member and two male officers.
Details of abuse	<u>Cascadia</u> A male staff member with dark hair and a mustache forced F.D. to perform oral sex on him multiple times. F.D. was just eight years old. <u>Echo Glen</u> Two guards responsible for escorting F.D. and other boys to the

pool and Chapel and supervising them forced F.D. to perform oral sex on the other boys while they watched. This abuse largely occurred in a room connected to the swimming pool. These officers also molested the boys in the Chapel. One of the officers sat next to F.D. and talked to him while the officer rubbed F.D.'s genitals.

6.65 Plaintiff G.L

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2004 to 2005; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff member.
Details of abuse	A staff person assigned to G.L.'s unit in the evenings sexually abused him. This staff person began grooming GL by giving him extra milk, sandwiches, and approving him to have additional time out of his cell or assigning him cleaning duties that gave him extended time out of his cell. This progressed to her making comments about his appearance, which were made in earshot of other staff people who did nothing to intervene. After some time, late at night, this staff person removed GL from his cell and took him to a storage area. While there, she would have GL to engage in sex acts with her. The abuse involved under the clothes touching, digital penetration, masturbation, and oral sex.

6.66 Plaintiff G.M.

Current Residence	Cowlitz County, Washington.
Dates of Abuse and Age	1977 to 1979; 14 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A staff member.
Details of abuse	A white staff member with a medium build, dark hair, and glasses sexually abused G.M. The abuse began when the staff member offered GM extra time during the hours of 6-8 pm to use the screen printer in the arts and crafts room. While there, the staff member touched GM's genitals, digitally penetrated GM's anus, and made him perform oral sex. This abuse occurred about two to three times a week for four months.

6.67 Plaintiff G.P.

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	1996 to 1997; 13 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male night guard.
Details of abuse	A night guard, with black hair and a mustache, sexually abused G.P., a small 13-year-old who received no visitors or phone calls during his sentence, leaving him completely alone. When alone on duty, the guard invited GP to the staff office to play video games.

	During these one-on-one interactions, the guard forced G.P. to engage in a variety of sex acts, including fondling, masturbation, oral sex, and digital penetration. When G.P. resisted, he was punished. This went on for the entirety of GP's stay at Echo Glen at least twice each week or more.
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6.68 Plaintiff G.S

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1999 to 2000; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Sherry, a female staff member.
Details of abuse	A kitchen staff worker, who supervised G.S. at work, sexually abused him in the dish pit and employee bathroom. The abuse included kissing, over the clothes touching, oral sex, and digital penetration. Sherry used chewing tobacco to reward G.S. The abuse occurred five days a week for approximately four months. When Sherry's misconduct was discovered and investigated, it was G.S. who the State punished with isolation, despite being a victim of custodial abuse.

6.69 Plaintiff H.C

Current Residence	Benton County, Washington.
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Dates of Abuse and Age	1996 to 1997; 16 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff person.
Details of abuse	A white male staff person, of average height and weight in his early 30s, sexually abused H.C. He forced H.C. to masturbate herself while he sexually harassed her for her sexual history. The staffer forced H.C. to touch his erect penis over his clothing and then masturbate him under his clothing. The staffer put his hand under H.C.'s shirt and inside H.C.'s pants groping and fondling her breasts and genitals. During the assaults, the man instructed HC to tell him, "I take joy in doing this." After assaulting H.C., the man told her that if anyone found out, he would make sure she never saw her baby daughter again. The abuse occurred weekly over a four-to-six month period.

6.70 Plaintiff H.H.

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	1985; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member.
Details of abuse	H.H.'s sexual abuse started a week or two into her incarceration.

Each assault occurred during the weekend in the shower area. The first assault happened when H.H. was getting ready to get in the shower. H.H. still had her clothes on when a male staff member entered the bathroom and cornered her. The staff member grabbed H.H. from behind and held his forearm over her mouth so she couldn't scream. The staff member fondled her over her clothing, starting with her breasts then moving down to touching her vaginal area and buttocks. The male staff member threatened to make H.H.'s stay worse and that he would make sure she would get more time if she spoke up. The abuse continued and H.H. became fearful of showering. Another assault took place while H.H. was in the shower, this time she was completely naked. The same male staff member grabbed H.H. and digitally penetrated her vagina. After H.H. failed to masturbate and perform oral sex on him, the male staff member raped her. The next assaults escalated to the man forcing H.H. to perform oral sex on him followed by rape. H.H. was assaulted between five and six times. H.H. was never able to identify which staff member was the perpetrator of these assaults because he used duct tape to cover his name tag.

The perpetrator promised to get H.H. out of Echo Glen on time and insisted he would put in a good referral for her. H.H. suspected another male staff member had been the lookout for the perpetrator.

	This was because during one assault, she heard a knock on the bathroom door and the perpetrator immediately stopped the assault and told her she was a "lucky little bitch" before exiting the bathroom.
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6.71 Plaintiff H.T

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	2015 to 2016; 14 years old.
Location(s) of Abuse	DCYF Offices Echo Glen Children's Center
Perpetrator, if known	A male guard and a male guard/counselor.
Details of abuse	<u>DCYF Office</u> While H.T. was about 13, the State warehoused her in a DCYF office to sleep because it could not find her a foster home. The office was not staffed with anyone qualified to watch over a minor child. Instead, the State left H.T. overnight alone with a male guard who attempted to groom her. He obtained her cell phone number and sent her nude photographs of himself. <u>Echo Glen</u> A male guard/counselor sexually assaulted H.T. in a cottage meeting room where no cameras were present. The abuse involved placing his hand on her leg and rubbing her vaginal area while kissing her.

6.72 Plaintiff I.P

Current Residence	Anchorage County, Alaska.
Dates of Abuse and Age	Haven House 1991 to 1992. Green Hill School 1992 to 1993; 15 years old.
Location(s) of Abuse	Haven House Green Hill School
Perpetrator, if known	John Sig and Frank, staff members.
Details of abuse	<u>Haven House</u> The State placed IP at Haven House where he met staff person, John Sig. While under the State's care, Sig sexually assaulted IP on multiple occasions. The abuse included oral sex and masturbation. <u>Green Hill</u> IP was groomed and abused by a staff person named Frank. Frank was a Black male in his late 40s or early 50s who wore glasses and worked the night shift. Initially Frank and IP agreed to exchange flowers IP obtained through his horticulture class for cigarettes that Frank brought into the facility. After some time, Frank started forcing IP perform oral sex in exchange for cigarettes. The abuse occurred at least 10 times before Frank took a different position.

6.73 Plaintiff J.A.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	1985 to 1987; 14 years old.

Location(s) of Abuse	Mission Creek Youth Camp Echo Glen Children's Center
Perpetrator, if known	Mr. Gold, a male counselor, and Mr. Green.
Details of abuse	<u>Mission Creek</u> J.A.'s counselor, Mr. Gold, sexually abused him during counseling sessions. The abuse involved spanking J.A. with a wooden paddle, attempted oral sex, and anal rape. When J.A. refused to attend these sessions, he was placed in isolation and the State allowed Mr. Gold to enter his cell and abuse him with the paddle. <u>Echo Glen</u> JA attended the Exodus Program at Echo Glen and was detained in maximum security isolation. After one week at Echo Glen, a man that JA believes was called Mr. Green entered his bunk, pushed JA onto his bed, pulled off his pants, and anally raped JA. The following morning, the State returned JA to Mission Creek.

6.74 Plaintiff J.B.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	Mid-1980s; 16 or 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Greg, head of security, and two security guards.
Details of abuse	During a strip search after family visitation, the head of security – named Greg– stripped J.B. out alone, left him nude, leered at him,

1 and made statements about the size and appearance of his genitals.
2
3 Greg went on to subject him to sexual abuse for the entirety of his
4 stay. Greg told J.B. that he could help him bring cigarettes in from
5 the outside. Greg took J.B. to a room between where the visits took
6 place and the cafeteria and masturbated him. Eventually Greg
7 started making J.B. masturbate him to orgasm. As this abuse
8 progressed, Greg called J.B. his “little princess” or “good girl.”
9 Greg often took J.B. out during out of his unit around dinner time.
10 JB often returned from these outings in tears. However, his
11 counselor Donna did not ask J.B. why these outing upset him and
12 failed to draw any connection between Greg’s improper one-on-one
13 sessions and JB’s emotional state. Crucially, Greg had a reputation
14 for being a creep, but no one from the State ever stepped in to help
15 the boys he was abusing. During these outings, Greg took J.B. to
16 the gymnasium to an area around the bench press, where there were
17 no cameras – a blind spot. There, Greg forced J.B. to pose in
18 sexualized and degrading positions while Greg took photographs.
19 He later used the photos as blackmail. Greg also used a delayed
20 response camera and photographed himself sexually abusing J.B.
21 His sexual abuse of J.B. included oral sex, digital penetration, and
22 anal rape. To force J.B.’s compliance, Greg pinched his testicles,
23 threatened to release the photographs to his family, suspend his
visitations, or get him more time.

After about 10 separate instances of rape, the next time Greg brought J.B. to the gym, there were two other staff people, who J.B. recognized as guards. The three men violently raped J.B. while taking photographs of him. Throughout the abusive event, which included oral sex, anal rape, and other violent sex acts and threats, the State of Washington employees heated the end of a lighter and held it to J.B.'s scrotum and threaten to burn him if he did not comply with their orders.

6.75 Plaintiff J.B.2

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2003 to 2006; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Multiple guards and four different female guards, one cook, and one summer intern; DeeDee Witters, Linda Minitre, Darlene Donahue, Liz Massett, Jamie Miller, and Katie Blankenship.
Details of abuse	JB2 was routinely subjected to strip searches that the staff perverted for their entertainment. For the first year and a half of his stay and at least 10 times per month, the guards initiated what they claimed was a routine strip search that was anything but standard. The guards belittled the boys, made sexually suggestive comments about their

1 genitals, and made them touch their genitals, including their anus,
2 before forcing them to place their fingers in their mouths to
3 demonstrate the absence of anything in their mouths.
4 In addition to these searches, JB2 was groomed, molested, and
5 sexually abused by four different female guards, one cook, and one
6 summer intern. Their names were DeeDee Witters, Linda Minitre,
7 Darlene Donahue, Liz Massett, Jamie Miller, and Katie
8 Blankenship. This abuse was widely known to other guards and
9 personnel, who failed to protect JB2 or otherwise report it. For
10 example, Minitre was among the staff people referred to as “hug a
11 thug staff” personnel, a term used to describe staff that had
12 inappropriate physical contact with the children and teenagers.
13 Many of these staff people also brought contraband to coerce
14 compliance with their sexual demands.
15 The abuse involved a variety of sex acts, ranging from over the
16 clothes groping to indecent exposure of the women’s breasts and
17 genitals and forced penetrative sex, and occurred multiple times
18 each week for the length of his stay. In exchange for his
19 cooperation, the State employees gave JB2 Mp3 players, marijuana,
20 tobacco products, provided him unsupervised and free time on the
21 office phone lines, and extra time outside of his cell.

6.76 Plaintiff J.B.3

Current Residence	Okanogan County, Washington.
Dates of Abuse and Age	1985 or 1986; 14 years old
Location(s) of Abuse	Chelan County for State classification
Perpetrator, if known	A female nurse/medical provider.
Details of abuse	To facilitate his placement in one of the State's facilities, the State sent J.B.3 to a Chelan County detention facility for "classification." While there, the medical providers – a male and female – charged with completing the State's exam subjected him to a medically unnecessary rectal examination. The exam involved the woman forcing multiple fingers into J.B.3's anus.

6.77 Plaintiff J.B.4

Current Residence	Multnomah County, Oregon.
Dates of Abuse and Age	2009; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Steven, a supervisor.
Details of abuse	A supervisor named Steven sexually abused J.B.4 approximately four times. Steven took J.B.4 to the "quiet room," which was located behind two locked doors. When someone was in the room, the key was left in the door handle, which signaled to the other staff not to enter. The abuse involved over and under the clothes genital

touching, Steven exposing himself and masturbating in front of J.B.4, and forcing J.B.4 to expose themselves to Steven. Steven gave J.B.4 special privileges, including allowing J.B.4 to spend more time on the Xbox and walk around outside alone. Steven also threatened J.B.4, saying that he would take away their pool time privileges and force J.B.4 to stay in their room.

6.78 Plaintiff J.B.5.

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	1976 to 1977; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Ogden, a male staff member.
Details of abuse	A staff member, Ogden, sexually abused J.B.5. The abuse involved fondling, masturbation, oral sex, and anal rape. It occurred during the weekends when Ogden was scheduled to work alone. Ogden threatened J.B.5 that he would never get out and would be sent to adult prison if he tried to tell anyone. He also threatened to tell J.B.5's parents that they had a sexual relationship. Ogden would go on to sexually abuse J.B.5, both days of nearly every weekend during J.B.5's year and a half sentence. J.B.5 attempted to end the sexual abuse the only way he could – by escaping. J.B.5 escaped from Echo Glen three times. After the first two escapes, he was

	returned to Echo Glen, and after the third was sent to Green Hill.
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6.79 Plaintiff J.C.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2010 to 2011; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female staff person.
Details of abuse	A Black female staff member, about 5'2, slim build, and in her late 20s or 30s, sexually abused J.C. She was not assigned to any particular unit but was a "floater" who filled in where needed. JC often saw her at the gym in the weight room or laundry room. The sexual abuse involved grabbing his genitals under his pants and oral sex. When JC confided in his counselor, Ernesto, who JC deeply trusted, Ernesto did not believe him.

6.80 Plaintiff J.C.2

Current Residence	King County, Washington.
Dates of Abuse and Age	2003; 2006; 15 years old.
Location(s) of Abuse	Samuel Group Home Naselle Youth Camp
Perpetrator, if known	Timothy Dampier, a male employee, and a male staff member.
Details of abuse	<u>Samuel Group Home</u> A State employee and/or employee of the State-funded group home

named Timothy Dampier sexually abused J.C.2 The abuse involved fondling J.C.2's genitals, oral sex and anal rape. When J.C.2 indicated he was going to report the abuse, Dampier reported J.C. for harassment and theft of his car causing J.C.'s arrest.

Naselle

A staff member made J.C.2 remove his clothing before he groped and fondled his genitals. When J.C.2 attempted to yell for help, the staff member assaulted him and rendered him unconscious during which time the abuse continued. Another inmate observed the assault and tried to intervene. Nothing was done; instead, J.C.2 was charged with an attempted escape, which increased his sentence.

6.81 Plaintiff J.C.3,

Current Residence	Clark County, Washington.
Dates of Abuse and Age	1990 to 1991; 15 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female staff member.
Details of abuse	A white female staff member, approximately in her early 30s, with short straight brown hair, sexually abused J.C.3 As part of her role, the staffer supervised inmates who helped delivery commissary items across the various living units. She invited J.C.3 and another inmate to join her, which took approximately an hour to complete.

	During the drive, she pulled the state vehicle to the side of the road and sexually assaulted both boys. The abuse involved her exposing herself to the boys, kissing them, over the clothes touching of their genitals, and their touching her breasts before she forced them to engage in vaginal penetrative sex. After raping the boys, who were unable to consent to this conduct, she told the boys that no one would believe them if they tried to tell anyone and that, instead, they would be punished.
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6.82 Plaintiff J.C.4.

Current Residence	Thurston County, Washington
Date(s) of Abuse	Early 2000s; 13 to 15 years old
Location(s) of Abuse	Echo Glen Children's Center; Naselle Youth Camp; Maple Lane School.
Perpetrator, if known	Various staff, counselors.
Details of abuse	<u>Echo Glen</u> On multiple occasions, Echo Glen staffers entered J.C.4's bunk, forced him to strip naked, placed him in handcuffs, put him into isolation, and groped him. The staff members, one woman and two men, told J.C.4 that he had brought the abuse upon himself. J.C.4 recalls the woman was white with dark hair, average height, athletic build, and in her late twenties; both men were white and in their mid-thirties, one was tall, the other short, and one had a beard.

Naselle

J.C.4's counselor, a short heavy-set woman in her mid-30s forced the 14-year-old to perform oral sex on her during their weekly counseling sessions in her office. This abuse occurred weekly for around nine months. On multiple occasions, Naselle management required JC to visit her in her office. This manager coerced J.C.4 to perform oral sex on her at least twice and to have vaginal sex with her at least five times. Both women brought J.C.4 home-cooked meals to reward his compliance.

Maple Lane

When J.C.4 was about 15 years old, a counselor working in the intake cottage anally raped JC in his cell. The staffer was a Black male who appeared to be in his early 40s.

6.83 Plaintiff J.C.5.

Current Residence	Mohave County, Arizona.
Dates of Abuse and Age	1995; 12 years old.
Location(s) of Abuse	Mission Creek Youth Camp
Perpetrator, if known	Female staff person.
Details of abuse	A female staff member began sexually abusing J.C.5 after recruiting him to help her with different chores around the facility. She also provided him cigarettes. She complimented JC5's physical

	appearance, smacked his butt, and rubbed and fondled his JC5's rear and genital area over his clothing. On two occasions, the staff member performed oral sex on JC5 in a supplies closet located near the visitation room. She threatened to take away JC's good time if he told anyone.
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6.84 Plaintiff J.C.6.

Current Residence	Toole County, Utah.
Dates of Abuse and Age	2011 to 2014; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Erin Snodgrass
Details of abuse	J.C.6 was groomed and sexually abused by Erin Snodgrass, a female staff member. Snodgrass groomed and manipulated JC into a pseudo-relationship that involved inappropriate sexual touching, oral sex, and vaginal sex at least once a week for approximately one year. The abuse occurred in secluded areas around the facility. Erin rewarded J.C.6 with luxuries like extra food, body wash, caffeine, cell phone use, porn DVDs, and cannabis.

6.85 Plaintiff J.C.7.

Current Residence	Snohomish County, Washington.
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Dates of Abuse and Age	2000; 17 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Griggs, a counselor.
Details of abuse	J.C.7 was sexually abused repeatedly by his counselor, Mr. Griggs, This abuse occurred in the bathroom at Griggs' request, where there were no cameras. Griggs forced J.C.7 to strip down for what Griggs termed a "routine strip search," however, the act was neither routine nor a search. Instead, he fondled J.C.7's genitals and digitally penetrated J.C.7's anus. Throughout, Griggs commented, "this is just for me" and told J.C.7 that he bet J.C.7 liked it. Griggs threatened J.C.7 that his life would only get worse if he reported. Nevertheless, after this assault occurred twice, J.C.7 bravely reported the abuse to Griggs' boss, whom J.C. believed was the administrator of Naselle. The administrator called Griggs into her office and directed J.C.7 to confront Griggs directly about the abuse, to repeat his recollections of the abuse to Griggs. Griggs denied everything and said that J.C.7 was a liar. The administrator agreed with Griggs and disciplined J.C.7. J.C.7's discipline was a week in isolation. After he returned from isolation, J.C.7 remained on Griggs' caseload and Griggs sexually abused him again in the same way.

6.86 Plaintiff J.G.

Current Residence	Whatcom County, Washington.
Dates of Abuse and Age	2003 to 2005; 14 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A female nurse.
Details of abuse	The attending nurse, a short and heavy-set white woman in her early 50s with glasses, light brown hair, and a soft voice, sexually assaulted J.G. during a medical exam. After making him undress, she masturbated him. She claimed they would both get in trouble if anyone found out about the exam.

6.87 Plaintiff J.G.2

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	2006 to 2007; 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Myrie, counselor, and Mr. Williams, staff member.
Details of abuse	J.G.2 was sexually abused by two staff members. Mrs. Myrie brought J.G.2 to her office to assist her with chores. There, she shared intimate details about her sex life and began abusing him. The sexual abuse included oral and vaginal sex. Myrie threatened

	J.G.2 that if he told anyone about the abuse, she would accuse him of rape. Mr. Williams worked the graveyard shift. Williams tormented the inmates by whipping his keys around and hitting the cell doors and sometimes the kids. Shortly before J.G.2's release, Williams let himself into J.G.2's cell, repeatedly whipped J.G.2 with his keys, pushed J.G.2 down onto his bed face-first, pulled down J.G.2's bottoms, and anally raped him.
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6.88 Plaintiff J.G.3

Current Residence	Yakima County, Washington.
Dates of Abuse and Age	Early 2000s; 14 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Mr. Fox, a staff member.
Details of abuse	<u>Naselle</u> A Naselle staff member who J.G.3 knew as "Mr. Fox" brutally sexually assaulted J.G.3 more than a dozen times. This abuse occurred in the bathroom. It included forcing J.G.3 to perform oral sex on Fox and anally raping J.G.3. During the times that Mr. Fox assaulted J.G.3. in the bathroom, there was typically an additional staff member at the "duty desk" who seemed to be paying little to no attention.

	Fox imposed two sadistic punishments on J.G.3 if he would not cooperate, including the removal of all of J.G.3's clothes, mattress, and bedding - leaving J.G.3 naked, cold, and alone in his cell for hours. He also forced J.G.3 to run laps in the gym carrying 60-to-80-pound weights until J.G.3 threw up from exertion. J.G.3 recalled Mr. Fox as being a white male, with gray and white slicked back hair and a thick gray and white moustache.
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6.89 Plaintiff J.G.4

Current Residence	Grays Harbor County, Washington.
Dates of Abuse and Age	Early 2000s; 16 or 17 years old.
Location(s) of Abuse	Naselle Youth Center
Perpetrator, if known	Male staff members.
Details of abuse	Two staff members anally raped J.G.4 several times. The abuse occurred in the woods surrounding the facility – one staff person acted as the lookout while the other abused J.G.4 before they switched. They forced J.G.4 to perform oral sex, digitally penetrated him, and anally raped him. The same two staff members also raped J.G.4 in his cell. This abuse occurred about eight times over the course of roughly a month and a half. To prevent J.G.4 from talking about the assaults, staff punched him in the stomach, told him that no one cared about him, and said that he would be forced to stay at

the facility longer if the assaults were revealed.

6.90 Plaintiff J.H.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2017 to 2018; 17 years old.
Location(s) of Abuse	Oakridge Community Facility Green Hill School Touchstone Community Facility
Perpetrator, if known	Jenifer Solano Jimenez, a counselor.
Details of abuse	J.H. was groomed and sexually abused by a female counselor that he met at Oakridge Community Facility who continued to target J.H. after he was transferred to two other facilities and even after his release. The counselor, Jenifer Solano Jimenez, remains employed by DCYF. At Oakridge, Jimenez took J.H. off-campus in her personal vehicle to spend one-on-one time together. Later, after J.H. was transferred to Green Hill, Jimenez sent him letters and photos. She also called him daily. When J.H. was transferred to Touchstone, Jimenez's grooming and abuse continued. The abuse involved all types of sexual contact, including oral and vaginal sex. Jimenez continued to pursue a sexual relationship with J.H. after his release. Jimenez became pregnant with J.H.'s child, who was born in March of 2020.

6.91 Plaintiff J.H.2

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1984; 15 years old.
Location(s) of Abuse	Echo Glen's Children's Center
Perpetrator, if known	An on-site physician and dentist.
Details of abuse	J.H.2 was sexually abused by two medical professionals. First, during J.H.2's intake, he met with a physician who completed a medically unnecessary rectal examination. Later on, after suffering some dental issues, the State sent J.H.2 to the dentist. On two occasions, J.H.2 presented for his appointment and met with the dentist alone. J.H.2 was sedated for both exams and started to regain consciousness when he felt the dentist rubbing his genital area and in between his legs over his clothing. J.H.2 recalled being unable to move from the sedation while he observed the dentist sexually abusing him.

6.92 Plaintiff J.H.3

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	2001; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male physician; Jimbo, a male guard; Debbie, a female guard.

Details of abuse

State employees, including a physician and guards, abused J.H.3 during medical exams, strip searches, and in his unit. First, a physician regularly abused J.H.3 during check-ins for his Ritalin prescription. During these check-ins, despite the stated purpose, the physician forced J.H.3 to undress, forced J.H.3 to masturbate himself, and the physician digitally penetrated him under the guise of a “rectal examination.” Second, J.H.3 was subject to weekly strip searches that did not adhere to normal protocol. Instead, the guards forced the boys to handle their genitals, including their anus, and then place their hands in their mouths to confirm the absence of anything in their mouths. Finally, in his unit, guards Jimbo and Debbie forced the boys to fight each other and they, alongside other employees, placed bets. If the boys refused to fight, the guards threatened them with solitary or a night in a single cell with another inmate, named Devin, who was known to have sexually abused his cell mates. When the fights resulted in significant injuries requiring attention from the nurses, the guards blamed the boys and said they fought when no one was looking. Debbie also sexually abused the boys. She required J.H.3. to come to her office for one-on-one sessions at least weekly, during which time she forced J.H.3 to manually stimulate her, expose himself, masturbate himself, and penetrate her. When J.H.3 finally worked up the courage to tell another adult, the guard Jimbo, about Debbie, Jimbo covered for her

and threatened J.H.3 if he tried to tell anyone else.

6.93 Plaintiff J.J

Current Residence	Multnomah County, Oregon
Dates of Abuse and Age	2006 to 2009; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	"D", correctional officer.
Details of abuse	J.J. was sexually abused by a male correctional officer who went by "D". D was a Black male, who was bald, and may have been between ages 35 to 45. After noticing that J.J. had girlfriends, D coerced her into allowing him to watch her and the other female inmates engage in sex acts, in exchange for extra food and special privileges. This occurred approximately once per week. On several occasions, D required J.J. to lift up her shirt and show her breasts in order for J.J. to be let out of her cell.

6.94 Plaintiff J.J.2

Current Residence	Whatcom County, Washington.
Dates of Abuse and Age	1994 to 1995; 14 years old
Location(s) of Abuse	Echo Glen Children's Center

Perpetrator, if known	Night shift worker
Details of abuse	A night shift worker sexually abused J.J.2 during periods where he was the only adult assigned to work in her cottage. The staff person entered J.J.2's room when he noticed she had trouble sleeping and engaged her in conversations about her personal life, commented on her appearance, and told her wanted to see and feel her body. He massaged her shoulders and thighs, before progressing to kissing, groping her breasts, forcing her to perform oral sex, masturbating and ejaculating onto her, and digitally penetrating her. The staffer gave J.J.2 candy, extra time on her phone card, and collected any personal items she needed. He told her that if she told anyone about the abuse it would ruin his life and he would lose his job.

6.95 Plaintiff J.L.

Current Residence	King County, Washington.
Dates of Abuse and Age	2012 to 2014; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Erin Snodgrass, a female State employee and counselor, and another female counselor.

Details of abuse	Two staff people sexually abused J.L. First, Erin Snodgrass groomed and abused J.L., which included coerced sexual touching, oral sex, and vaginal intercourse. This abuse occurred in Snodgrass's office. Second, another female counselor, who was potentially in her 50s, at Green Hill grabbed J.L. and forcibly felt his penis over his clothes on a separate occasion.
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6.96 Plaintiff J.M

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1990 to 1992; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mr. Lynn, a guard.
Details of abuse	A guard named Mr. Lynn sexually abused J.M. dozens of times and threatened to report him for violations if he did not comply. The abuse involved requiring J.M. to masturbate while Lynn watched and also masturbated. Lynn's abuse of the boys in J.M.'s cottage appeared to J.M. to be well-known to the inmates and other staff.

6.97 Plaintiff J.M.2.

Current Residence	Mason County, Washington.
Dates of Abuse and Age	2002 to 2004; 12 years old.

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Kathy, a female staff member and Jason, a male security officer.
Details of abuse	When JM2 arrived at Echo Glen, he only had the clothes on his back. A staff member named Kathy noticed this vulnerability and groomed JM2 by supplying him with the basics: socks, underwear, a t-shirt, and a pair of pants. Kathy then ordered JM2 to change into clean clothes while she and another state employee named Jason watched. As JM2 began to undress, Kathy instructed JM2 to masturbate himself to completion. Jason watched while Kathy put her hand into her pants and masturbated. After JM2 ejaculated, Kathy grabbed and held JM2's penis. Kathy and Jason brought JM2 back to a staff office. Again, Kathy instructed JM2 to masturbate, Jason watched, and Kathy put her hand in her pants and masturbated. This abuse occurred on two other occasions after Kathy observed J.M.2 walking the grounds. JM2 was also subjected to multiple invasive strip searches while incarcerated. He recalls at least 10 searches, which included a male security officer putting fingers into J.M.2's anus.

6.98 Plaintiff J.M.3.

Current Residence	Yakima County, Washington.
Dates of Abuse and Age	Mid-to-late 1990s; 16 years old.

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Two female medical staff and an inmate.
Details of abuse	J.M.3 was sexually abused on dozens of occasions by two female medical staff with whom he worked. The staff quickly became overly friendly and flirtatious with J.M.3. Their behavior escalated into sexual abuse that included the touching of J.M.3's genitals, them making him touch their genitals, oral sex, and vaginal sex. These nonconsensual sexual acts occurred a dozen times or more. These staff members warned J.M.3 that if he ever told anyone about these encounters that he would be the one to get in trouble. A fellow inmate also sexually assaulted J.M.3 This inmate was convicted of a sex offense and after isolating and intimidating J.M.3 forcibly performed oral sex on him.

6.99 Plaintiff J.O.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	Late 1960s; 13 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male nightshift guard.
Details of abuse	JO was incarcerated for incorrigibility. The State placed J.O. in

isolation, during which time a male night shift guard waited until he was the only adult in the cottage and then entered JO's cell to sexually abuse him. The guard groped and fondled him, removed JO's underwear, forced JO to give him oral sex, and anally raped him. This abuse continued for about four months. When JO tried to tell other adult staff people about what was being done to him, they told him not to say such things about people and accused him of lying. The abuser also threatened JO that if he reported it, JO would return to isolation, have his free time taken away, or be subjected to more time behind bars. It was later learned that this guard had helped some of the female inmates escape and they were all found at the guard's home. Nevertheless, JO's concerns were never revisited, and this guard was not fired.

6.100 Plaintiff J.P.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2001 to 2004; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Peterson, a male corrections officer, and Dr. Pope, a male doctor.
Details of abuse	Multiple staff people sexually abused J.P. First, a corrections officer known to J.P. as "Peterson", accused J.P. of having contraband, then fondled JP's penis and rubbed his own erection against J.P. This

happened multiple times a week during J.P.'s incarceration. A counselor sometimes watched Peterson grope J.P. but did nothing.

Additionally, J.P. was a patient of Dr. Pope. Dr. Pope insisted on performing a prostate exam on J.P. every month. J.P. recalls that that he, along with 10-15 other children, lined up in the waiting room of Dr. Pope's office for these exams. Dr. Pope inserted his fingers into J.P.'s anus and groped his testicles. After each exam, Dr. Pope gave J.P. the same instructions, "There's no need to be worried but keep this to yourself. Your family doesn't need to know."

6.101 Plaintiff J.S.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	2013 to 2016; 15 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Jacqueline Leal, a librarian.
Details of abuse	J.S. was groomed and abused by Jacqueline Leal, also known as "Jackie," who worked in the library. It started with her calling for JS to go to the library to pick up books she left for him, which contained hidden "love" notes. It progressed to her using her office to engage in sexual contact with J.S., including her grabbing his

	genitals, forcing him to do the same to her, and kissing. There were other staff members around, but they did nothing. Later, she coerced J.S. into digitally penetrating her and she regularly asked him to have vaginal sex.
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6.102 Plaintiff J.S.2.

Current Residence	Mason County, Washington.
Dates of Abuse and Age	Late 1990s; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor.
Details of abuse	Dr. Pope sexually assaulted J.S.2 under the guise of a medical exam. During his intake exam, Dr. Pope claimed he needed to check J.S.2 for prostate and genital cancers. He proceeded to digitally penetrate J.S.2's anus and fondle his genitals.

6.103 Plaintiff J.S.3

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1997; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor.

Details of abuse	J.S.3 was sexually assaulted by Dr. Pope at Green Hill School under the guise of a medical exam. Dr. Pope claimed he was checking J.S.3 for prostate and genital cancers when he digitally penetrated J.S.3's anus and fondled J.S.3's testicles and penis.
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6.104 Plaintiff J.S.4.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1993 to 1995; 13 years old.
Location(s) of Abuse	Spruce Street Inn
Perpetrator, if known	A female cook.
Details of abuse	JS4 was sexually abused at the hand of a cook employed at Spruce Street Inn, a state-funded group home. At least twice, she entered JS4's room while his other three roommates slept. She groped and fondled his genitals under his clothes.

6.105 Plaintiff J.S.5.

Current Residence	Whatcom County, Washington.
Dates of Abuse and Age	1995 to 1997; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Two male employees.

Details of abuse	J.S.5 was approached by a white male employee in his 20s or 30s. The staffer let himself into J.S.5's bunk at night and put his fingers into J.S.5's anus and then put his fingers into J.S.5's mouth. The staffer then instructed J.S.5 to do the same to him. He also performed oral sex on J.S.5 and forced J.S.5 to reciprocate. This happened at least six times. Another white male employee working in solitary confinement also let himself into J.S.5's bunk at night and forced J.S.5 to perform oral sex on him at least twice.
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6.106 Plaintiff J.S.6

Current Residence	Grant County, Washington.
Dates of Abuse and Age	Early-to-mid-2000s; 12 years old.
Location(s) of Abuse	Echo Glen's Children's Center Naselle Youth Camp
Perpetrator, if known	A male staff member and another inmate.
Details of abuse	<u>Echo Glen</u> After arriving at Echo Glen Children's Center, J.S.6 was targeted and sexually abused by a male staff member. The abuse slowly escalated and happened on countless occasions. The male staff member abused J.S.6 under the guise of taking him to the dentist. J.S.6 never actually saw a dentist during that time. Instead, the male staff member took J.S.6 to "the box" where he forced J.S.6 to strip

and perform oral sex. Eventually, the staff member anally raped J.S.6. The male staff member threatened to extend J.S.6's 36-month sentence if he told anyone.

Naselle

J.S.6 was smaller than other inmates. Upon arrival, J.S.6 was placed in a cell with another inmate that was significantly larger than him. J.S.6's cell mate forced J.S.6 to perform oral sex on him every night.

6.107 Plaintiff J.T.

Current Residence	Grant County, Washington.
Dates of Abuse and Age	2003 to 2005; 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A female kitchen employee.
Details of abuse	A kitchen employee – an older female with greying blonde hair and glasses –cornered J.T. in the walk-in cooler and forcibly removed his pants after leering at him around the facility for some time. She told him to be thankful and proceeded to perform oral sex on him. This abuse continued for approximately three weeks on about five occasions. When J.T. expressed any hesitations, the woman threatened him; she told him that if anyone found out what they were doing she would tell everyone that he had raped her.

6.108 Plaintiff J.V.

Current Residence	Mason County, Washington.
Dates of Abuse and Age	1993 to 1995; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female counselor/guard and two female kitchen staff.
Details of abuse	After J.V. caught a counselor having sex with another inmate, that counselor threatened J.V. and began sexually abusing him. The abuse involved masturbation, the counselor exposing herself to J.V., and oral sex. The abuse continued until it was discovered the counselor was pregnant by another inmate, at which time she was arrested. Prior to that discovery, the abuse occurred in plain sight of other staff people who did nothing. JV and the boys at Green Hill were subject to routine sexual harassment and abuse by the prison's kitchen staff. At the time, the kitchen was largely run by two older women with grey hair. These women often tried to get the boys into the freezers – a known “blind spot.” The abuse involved masturbation, usually where J.V. was forced to watch the women masturbate. They also engaged in sexual harassment, which included gesturing to the boys with corn dogs, as if being penetrated by the frozen food items.

6.109 Plaintiff J.W.

Current Residence	King County, Washington.
Dates of Abuse and Age	1988 and 1991; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor, and multiple guards.
Details of abuse	Like many children at Green Hill, JW was indoctrinated into its culture of abuse and degradation by Dr. Issac Pope, a staff physician who digitally penetrated him under the guise of a “rectal exam.” Additionally, approximately twice a week, a guard sexually abused J.W. in his cell or the guard’s office. The abuse included masturbation, oral sex, digital penetration, and anal rape. The guard sometimes brought JW cigarettes in exchange for his cooperation, but primarily threatened JW that if he reported him, JW would be sent to isolation. This threat was very real and serious to JW, who had once spent about 60 days naked and alone in isolation. The guard also threatened to add more time to his sentence. When the State transferred J.W. to another unit shortly before his release, another guard started abusing him the same exact way.

6.110 Plaintiff J.W.2

Current Residence	King County, Washington.
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Dates of Abuse and Age	Early 1990s; 15 years old.
Location(s) of Abuse	Spruce Street Inn Green Hill School Indian Ridge
Perpetrator, if known	A male staff person; Robin, a female counselor; multiple other State employees.
Details of abuse	<u>Spruce</u> Before being sent to youth prisons, the State of Washington placed JW2 at Spruce Street Inn, in Seattle's Central District. While there, a staff person repeatedly entered JW2's room at night and sexually assaulted him. The assault began with over the clothes groping before escalating to under the clothes manual stimulation. When JW2 tried to verbally resist, the staff person placed his hand over JW2's mouth and threatened him. The staffer abused JW2 twice more before JW2 escaped out a window to protect himself. JW2 was forced to live on the streets, surviving on his own, for approximately the next six months, during which time he was considered a fugitive. When he was apprehended, he was then sent into Washington's youth prison system. <u>Indian Ridge</u> At Indian Ridge, a work camp, a state employee named Robin was assigned to be JW2's counselor. She abused this position and one-on-one time by using office visits to groom JW2. Robin's abuse was

1 widely known, with other inmates and officers noticing her
2 scheduling unnecessary alone time with JW2. During these visits,
3 Robin forced JW2 to manually stimulate her. She also forced him to
4 perform vaginal sex at least twice. Robin warned JW2 not to report
5 the abuse to anyone, claiming that an allegation would result in
6 increased time or other problems for him. This abuse occurred on
7 approximately 20 separate occasions. When JW2 finally worked up
8 the courage to tell an adult he trusted about this abuse, a supervisor
9 at his job and another State employee, he was met with swift
10 retaliation. His supervisor sent him to the "heat room," which was a
11 room beside a boiler that was used for solitary confinement. The
12 guards ordered JW2 to remove all of his clothes while locked in this
13 room. When he refused, they cut the shoelaces off his shoes and
14 forcibly removed his clothing. He was left naked in the "heat room"
15 for at least two days.

16 Green Hill

17 J.W.2 was subjected to abusive strip searches during which times
18 the guards belittled him and ridiculed his naked body. His intake
19 also involved a physical that involved unnecessary and non-medical
20 sexual groping.

21
22 6.111 Plaintiff J.W.3
23

Current Residence	Pierce County, Washington.
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Dates of Abuse and Age	Early 2000s; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Isaac Pope and a male staff member.
Details of abuse	J.W.3 was sent to the medical office for a physical and STD check. Dr. Isaac Pope digitally penetrated J.W.'s anus and fondled his penis and testicles under the guise of performing a rectal exam. Dr. Pope scheduled J.W.3 for daily on-going "treatment." During this "treatment," Dr. Pope's abuse escalated from fondling and fingering to anal rape and forcible oral sex. Dr. Pope threatened that any attempt to tell anyone about what was going on would jeopardize J.W.3's safety. Additionally, during routine strip searches, a staff person regularly slapped J.W.3's butt and asked him if he wanted to watch pornography with him and do meth.

6.112 Plaintiff K.B.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1993; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female kitchen supervisor, Nancy.

Details of abuse	A kitchen supervisor, named Nancy, sexually abused K.B when he worked in the kitchen. The abuse occurred in a walk-in closet and involved her forcing hands down his pants to fondle his genitals; she also forced him to put his hand down her pants to touch her genitals; she forced oral sex that was so aggressive at times that it caused K.B.'s nose to bleed. K.B. told his roommate about the abuse and learned that his roommate was also being sexually abused by Nancy and had been coerced into vaginal intercourse with her.
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6.113 Plaintiff K.B.2.

Current Residence	Jackson County, OR.
Dates of Abuse and Age	2008 to 2012; 12 - 16 years old.
Location(s) of Abuse	Green Hill School Maple Lane School
Perpetrator, if known	Male counselor; male staff member
Details of abuse	<u>Maple Lane</u> K.B.2 was groomed and sexually abused by a male counselor in his unit. The counselor was a white male with a stocky build in his 50s who often played basketball with the inmates. It was widely known that the counselor smacked inmates on the butt during games. The counselor massaged K.B.2's shoulders and asked K.B.2 personal questions about his sexual development and experiences with girls

while rubbing his groin over his shorts. The counselor showed K.B.2 pictures of naked women and pornographic content on his cell phone while he rubbed K.B.2's genitals over his clothing. The counselor also made K.B.2 masturbate in front of him while the counselor also masturbated on multiple occasions.

Green Hill

A male staff member coerced K.B.2 to masturbate in front of him in exchange for extra snacks, explicit magazines, and chewing tobacco. This abuse occurred weekly.

6.114 Plaintiff K.B.3.

Current Residence	King County, Washington.
Dates of Abuse and Age	1999 to 2000; 14 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A male janitor.
Details of abuse	A staff janitor repeatedly assaulted K.B.3 after he was assigned to help clean up classrooms at the end of the school day. During these shifts, he worked alone with the janitor who began sexually assaulting KB3 by slapping his buttocks. The abuse escalated to include forcing KB3 to touch his genitals and touching KB3's genitals, masturbation, digital penetration, oral sex, and anal rape. This abuse occurred nearly every day for the month or two that KB3

	had this job assignment and typically occurred in the janitor's office area or in a school bathroom. The janitor threatened KB3 that no one would believe him if he reported the abuse and that KB3 would get into more trouble than the janitor would.
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6.115 Plaintiff K.F.

Current Residence	Whitman County, Washington.
Dates of Abuse and Age	1999 to 2000; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Kelly, a female staff member, and a male security guard.
Details of abuse	K.F. was escorted to the bathroom and showers by a female counselor named Kelly. During these interactions, Kelly asked K.F. if he masturbated and what aroused him. Kelly instructed K.F. to masturbate himself and ejaculate into his pants or into the laundry hamper. Later, in his cell, Kelly exposed her breasts to K.F. and instructed him to suck on her nipples and perform oral sex on her. Kelly manipulated K.F. into performing sexual acts by promising early release. This abuse occurred more than 40 times. K.F. was also sexually assaulted by a heavy-set, Black male security guard. On at least a dozen occasions, the man entered KF's bunk and forced him to perform oral sex. When K.F. resisted, the man

threatened to send KF to maximum security.

6.116 Plaintiff K.G.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1994; 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Rita, counselor.
Details of abuse	A counselor named Rita targeted K.G. after finding a pornographic magazine in his cell. Rita sat on K.G.'s bed, flipped through the magazine, and commented about how she had tried sex positions like those in the magazine. After, Rita sexually abused K.G. on multiple occasions. The abuse included kissing, genital fondling, digital penetration and oral sex.

6.117 Plaintiff K.H.

Current Residence	Grays Harbor County, Washington.
Dates of Abuse and Age	2007 to 2008; 14 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Liam, a male counselor.

Details of abuse	Liam, a male counselor, abused K.H. during weekly one-on-one sessions. The abuse involved over the clothes fondling of her genitals. The abuse occurred in his office and a nearby conference room. He promised to give her good assessments so she could get out early.
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6.118 Plaintiff K.L.

Current Residence	Clark County, Washington.
Dates of Abuse and Age	2017 to 2019; 17 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Michael Nolan.
Details of abuse	Michael Nolan sexually harassed K.L. repeatedly. Most Fridays, Nolan took K.L. to areas of Naselle where they could be alone. Once secluded, he touched his butt and genitals. On several occasions, Nolan took K.L. to the stream near the sweat lodge and directed K.L. to swim nude. Nolan then undressed and joined K.L. Nolan threatened K.L. that if he ever told anyone, no one would ever believe him.

6.119 Plaintiff K.N.

Current Residence	Walla Walla County, Washington.
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Dates of Abuse and Age	Early 1990s; twelve years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member.
Details of abuse	On at least three occasions while incarcerated, staff placed K.N. in solitary confinement in one of the boys' cabins. At night a white male staff member entered K.N.'s temporary cell while she was asleep. KN woke up to him massaging her developing breasts, butt, and genitals over her clothing.

6.120 Plaintiff K.V.

Current Residence	Chelan County, Washington.
Dates of Abuse and Age	2001 to 2003; 15-17 years old.
Location(s) of Abuse	Green Hill School Naselle Youth Camp
Perpetrator, if known	Dr. Pope, a male doctor; Mr. Song, a male counselor; a male guard; an additional male counselor.
Details of abuse	<u>Green Hill</u> Dr. Issac Pope subjected K.V. to a medical unnecessary rectal exam. Dr. Pope further abused K.V. during this "exam" by asking him sexual questions about whether and how often K.V. had ejaculated. K.V. reported this abuse to his counselor but was not believed.

1 Later, a counselor named Mr. Song sexually abused him. Mr. Song
2 coerced K.V. into exposing his genitals and anus to him in exchange
3 for commissary and cases of soda. This abuse typically occurred in
4 K.V.'s cell. Finally, after being sent to isolation, a guard assaulted
5 K.V. on his way to the shower. That guard orally raped K.V. forcing
6 his penis into K.V.'s mouth. K.V. was then put into solitary for 23
7 hours a day for 30 days. His clothes were taken away and he was
8 left nude in the isolation cell. Staff came by his cell, looked in, and
9 said derogatory things about his body.

10 Naselle

11 K.V.'s counselor at Naselle repeatedly sexually abused him. The
12 counselor was an older white male who was balding. He used their
13 counseling sessions to expose his genitals to K.V. and masturbate in
14 front of K.V. He also forced K.V. to expose his genitals and forced
15 K.V. to fondle his genitals. The counselor perpetrated this abuse at
16 least a few times a month. When K.V. resisted, the counselor sent
17 him to the "hole" – which was a metal box or cell in the back of the
18 cottage, just across from the counselor's office. When K.V. became
19 angry in the "hole" and acted out by kicking the walls or doors,
20 counselors took all his clothes away leaving him naked. The
21 counselor then stared at K.V.'s naked body through the window of
22 the box. K.V. tried to report the abuse through an intercom/speaker
23 system in the cottage, so that everyone could hear that the counselor

	was abusing him. In reaction and retaliation, all the staff on duty in the cottage swarmed K.V. and began beating him in his room. They chipped his tooth, which is still chipped to this day. K.V. was then shipped to Maple Lane.
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6.121 Plaintiff K.W.

Current Residence	King County, Washington.
Dates of Abuse and Age	Late 1990s and early 2000s; 13 years old.
Location(s) of Abuse	Echo Glen's Children's Center Green Hill School
Perpetrator, if known	A staff member and a male doctor.
Details of abuse	<u>Echo Glen</u> After a movie night, a white, blonde woman in her early 20s took K.W. into an office where she forcibly performed oral sex on the 13-year-old. The staffer also coerced KW to digitally penetrate her. <u>Green Hill</u> KW was sexually assaulted by a physician, who was a tall, black man. Under the guise of "treatment," the doctor fondled KW's penis and testicles and put his fingers in KW's anus. The doctor told KW to keep the "treatment" a secret to maintain "doctor-patient confidentiality."

6.122 Plaintiff L.A.

Current Residence	King County, Washington.
Dates of Abuse and Age	1995 to 1996; 17 years old.
Location(s) of Abuse	Mission Creek Juvenile Center
Perpetrator, if known	A female administrator.
Details of abuse	A Black female administrator sexually abused L.A. The abuse occurred in a closet in the medical unit, his cell, or in her office. It involved fondling, both over and under his clothing, and vaginal intercourse.

6.123 Plaintiff L.K.

Current Residence	Clark County, Washington.
Dates of Abuse and Age	1994 to 1995; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A male staff worker
Details of abuse	A white male staffer of average height with dark hair and a beard sexually abused L.K. when L.K. was working his maintenance job. The abuse involved fondling L.K. over and under the clothes, masturbation, oral sex, and attempted anal rape. It occurred in secluded areas of the campus on countless occasions.

6.124 Plaintiff L.T.

Current Residence	San Diego County, California.
Dates of Abuse and Age	Mid-1990s; 17 years old.
Location(s) of Abuse	Touchstone Community Facility
Perpetrator, if known	A female staff person/drug and alcohol counselor.
Details of abuse	A white female drug and alcohol counselor, who was heavy set with blonde hair, sexually abused L.T. under the guise of treatment. The counselor advised that the only way to test L.T. for drugs was if he was completely naked. She then rubbed L.T.'s buttocks and genitals.

6.125 Plaintiff L.W.

Current Residence	Franklin County, Ohio.
Dates of Abuse and Age	1985 to 1987; 14 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Mr. Brasher, a male staff member, Slack, a male staff member, and a female staff member.
Details of abuse	Three different staff people sexually abused L.W. on multiple occasions. First, Mr. Brasher – who played sports with the kids – fondled and masturbated L.W. in his cell. Second, a staff known as “Slack” fondled L.W. repeatedly in his cell. Slack was also known to force inmates to masturbate and ejaculate into cups, which he

kept. Third, a female staff member who was short and brunette fondled, masturbated, and forced J.W. to engage in oral sex and digital penetration in a secluded back room of his living unit.

6.126 Plaintiff M.A.

Current Residence	Clallam County, Washington.
Dates of Abuse and Age	1993 to 1995; 12 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Victoria Mattock, a counselor.
Details of abuse	The State assigned M.A. to a counselor named Victoria Mattock. M.A. met with her weekly for one-on-one counseling sessions, during which time she sexually abused him. She forced M.A. to penetrate her digitally and perform oral sex on her. Mattock used her position as a counselor to manipulate M.A. into thinking that this conduct was a privilege and rewarded him by putting him on the fire crew. She threatened M.A. by telling him that if he did not perform as she asked, he would be sent to Maple Lane. The abuse occurred approximately weekly for three months. When M.A. told his pod mate about the abuse he suffered in these one-on-one counseling sessions, the State punished M.A. for it. The Naselle staff locked him in his room for 24 hours and M.A. was unable to have physical education or recreational time for a week.

6.127 Plaintiff M.B.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	Early 2000s; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Bobbie Blakenship, a counselor.
Details of abuse	M.B. was sexually abused by his counselor, Bobbie Blakenship, while receiving substance abuse treatment. Blakenship was assigned to be M.B.'s counselor and began grooming him soon after meeting him. As part of his treatment, she directed M.B. to disclose to her his past traumas and relationships issues. On some occasions, she had them “role play” and have M.B. pretend that Blakenship was one of his girlfriends. Over time, Blankenship used the one-on-one counseling sessions to force M.B. to perform various sex acts. The abuse included over the clothes touching of her genitals. She also regularly flashed her breasts and genitals to M.B. and other inmates. During this time, multiple staff people were openly engaging in sexual abuse, which made the prospect of reporting this type of behavior obviously futile.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	2002 to 2003; 16 years old.
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Camp
Perpetrator, if known	Two male counselors and a male State employee.
Details of abuse	<u>Echo Glen</u> A male counselor who M.B.2 met during group therapy and who went on to schedule one-on-one sessions with M.B.2 sexually abused him. The abuse evolved over time but included the counselor putting his arms around M.B.2 under the guise of consoling him; forcing M.B.2 to expose himself; masturbating M.B.2; and oral sex. The counselor told M.B.2 that even if he were to try to tell someone, no one would believe him since M.B.2 was a criminal. <u>Naselle</u> One of M.B.2's two assigned counselors abused him. The abuse started with basic grooming - the counselor made sexual comments to test how M.B.2 responded, including commenting on M.B.2's appearance and calling out his female coworkers and drawing attention to their bodies and expressing how badly he wanted to see them naked. As at Echo Glen, the abuse largely occurred during the unsupervised one-on-one "counseling sessions." It included rubbing

	M.B2.'s thighs and belly area, masturbating M.B.2, exposing himself and making M.B.2 watch him masturbate, and oral sex. Although the counselor never made express threats against M.B.2's safety, he did make clear that no one would believe him if he came forward.
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6.129 Plaintiff M.C.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1980 to 1982; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Zoey, a nurse
Details of abuse	A nurse named Zoey sexually abused M.C. during medical appointments. During his first visit, Zoey examined MC's entire body, touching him everywhere, before masturbating and kissing him. She then forced MC to touch her. Afterwards, she gave him chewing tobacco. Zoey claimed MC needed twice weekly medical monitoring. During these appointments, her abuse escalated to include digital penetration, oral sex, and vaginal intercourse – without protection. This abuse occurred on approximately 50 separate occasions. Eventually, word got out about what Zoey was doing to MC. Rather than fire her and tend to MC, another guard placed M.C. in isolation. While in the hole, the State infringed MC

	for “compromising a staff member,” which resulted in a hearing where he disclosed everything. Again, instead of firing Zoey and helping MC, he was transferred, and more time was added to his sentence.
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6.130 Plaintiff M.E.

Current Residence	King County, Washington.
Dates of Abuse and Age	1999 to 2004; 13 years old.
Location(s) of Abuse	Echo Glen Children’s Center
Perpetrator, if known	Bob, a guard, and another inmate.
Details of abuse	M.E. was abused by a guard named Bob and another inmate. Bob worked the morning shift and often brought M.E. extra food and snacks and made comments about her appearance. Later, he grazed against her while she was on the phone, casually touched her breast or butt when he walked by and watched her shower. Sometimes Bob asked M.E. if she wanted to go shower, which she knew meant he was going to watch her. Bob was often the only adult around the cottage, during which time he isolated M.E. He grabbed and massaged her breasts and vulva over her clothes at least 10 times. Bob told M.E. that if she reported his conduct to anyone, she would get more time. In addition to this abuse, M.E. was also sexually assaulted by

	another inmate twice, who was incarcerated for rape of a child and molestation. This abuse involved digital penetration of M.E.'s vagina.
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6.131 Plaintiff M.H.

Current Residence	Cowlitz County, Washington.
Dates of Abuse and Age	2005 to 2006; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	CO Rankey, a male corrections officer.
Details of abuse	CO Rankey, a corrections officer, assigned to accompany boys from their cells to the restroom, sexually abused M.H. multiple times. When CO Rankey brought MH to the restroom, he exposed his genitals and masturbated himself in front of MH. If MH resisted in any way, CO Rankey accused him of not participating in the program and forcibly strip searched M.H. as punishment. On another occasion, when CO Rankey brought MH back to his cell, he slammed MH's arm in the cell door repeatedly, causing significant injury.

6.132 Plaintiff M.L

Current Residence	King County, Washington.
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Dates of Abuse and Age	1983 to 1988; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male driver and a male counselor, Jerry "Mr. B" Baumscavich.
Details of abuse	A driver sexually abused M.L. The driver was a tall, Black male between the ages of 35 and 40, he wore black pants with a walkie talkie clipped to the belt. Rather than taking M.L. to her destination, the driver pulled over behind the Echo Glen campus, directed her to the front seat, and began asking her questions about herself. He then grabbed her hand and put it on his erection over his pants. At other times, the driver stalked M.L. around the facility. When she was out of sight of others, he groped her over her clothing. He also removed M.L. from classes, groped her, and forced her to perform oral sex on him. This abuse went on for two years. Additionally, M.L.'s assigned counselor, Jerry "Mr. B" Baumscavich, abused her during their sessions, which involved groping her breasts and butt and whispering sexual comments in her ear. Shortly before her release, Mr. B and his wife Marge – who also worked at Echo Glen - petitioned to have M.L. released to their care.

6.133 Plaintiff M.M.

Current Residence	Pierce County, Washington.
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Dates of Abuse and Age	2017 to 2019; 17 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Michael Nolan, a male counselor.
Details of abuse	Michael Nolan targeted, groomed, and abused M.M. M.M. was one of many children at Naselle who Nolan brought to the stream and forced to skinny dip while he watched. This occurred on a daily basis for several months. On a few occasions, Nolan forced M.M. to go hiking with him to a secluded part of the lake then proceeded to encourage M.M. to remove all his clothing, “just like the Natives do it,” and jump in the lake alongside Nolan. M.M. reluctantly complied and removed all his clothing before jumping in the water. Nolan proceeded to come up close to M.M. and touched M.M.’s penis and testicles. On the walk home from these swimming excursions, Nolan forced M.M. to walk in front of him and repeatedly groped M.M.’s buttocks.

6.134 Plaintiff M.M.2.

Current Residence	Multnomah County, Oregon.
Dates of Abuse and Age	1986 to 1988; 15 years old.
Location(s) of Abuse	Echo Glen Children’s Center

Perpetrator, if known	Randy Green, a guard, and Mr. Miller, a guard.
Details of abuse	A security guard sexually abused M.M.2. The guard, named Randy Green, told M.M.2 he needed to give him “therapy” in his office. Green then made MM2 write down his fantasies, read them aloud to him, and then made MM2 masturbate and describe what he was thinking about as he masturbated. Randy told MM2 that he was sick and that was why he was in prison and that these sessions would help him. This abusive “treatment” escalated to include oral sex. Green told MM2 he would get more time if he resisted therapy or discussed it with anyone. To further coerce M.M.2’s compliance, Green allowed MM2 to care for and walk his cocker spaniel for the day and walk him around the grounds all day as long as he kept up with the “therapy”. This time with the dog felt really special to M.M.2, who loved animals and even kept photos of dogs in his cell, which Green knew and exploited. Eventually, MM2 disclosed that something had been weird about his therapy with Green to a chaplain. The chaplain told M.M.2 he would take care of it. Instead, M.M.2 was punished; Green reported that MM2 was using drugs and needed to be sent to the drug treatment cottage and additional time was added to his sentence. Green’s abuse then continued, and he even used other staff people to retrieve M.M.2 from his cell and bring him to Green’s office, which was in another cottage. Green told MM2 that things would only get worse for him if he kept

disclosing the abuse.

In addition to this abuse, on multiple occasions, MM2 was subject to abusive random strip searches by a guard named Mr. Miller. This guard took MM2 to the "quiet room," which was a space behind the staff room, in the middle of the night and left MM2 standing naked for what felt like hours, before making him bend over and spread his butt cheeks. Mr. Miller also said he needed to check to make sure MM2 wasn't keeping anything on him and inserted something into his anus. MM2 didn't know if it was his fingers or a tool of some sort. On two occasions, Mr. Miller brought other boys and "searched" them all at once, which added further humiliation to the experience.

6.135 Plaintiff M.M.3.

Current Residence	King County, Washington.
Dates of Abuse and Age	Late 2010s; 16 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male counselor named Nolan.
Details of abuse	MM3 was subjected to at least one "strip search" each week for the entirety of his stay – all completed by a male counselor who MM recalls was named "Nolan." Nolan was a tall Native American man

	with shoulder length hair. MM3 remembers several occasions when other guards volunteered to search MM3, but Nolan always insisted. During most strip searches, Nolan made sexual comments about MM3's genitals. Nolan also asked MM3 to masturbate in front of him. The staffer threatened M.M.3 that if he told anyone or resisted, he would get more time.
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6.136 Plaintiff M.O.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2000 to 2002; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Doug Cox, staff member; a male temporary staff member; and Ms. Reed, a teacher.
Details of abuse	M.O. was repeatedly groped and fondled by various staff people during strip searches, while using the urinal, and during school.

6.137 Plaintiff M.O.2.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2009 to 2010; 17 years old.
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Ronald, a male counselor/guard.
Details of abuse	A counselor/guard named Ronald sexually abused M.O.2, which included Ronald exposing himself to M.O.2, forcing M.O.2 to expose himself, and masturbation. The abuse occurred in Ronald's office under the pretense of discussing M.O.2's re-classification. Ronald told M.O.2 that many of the counselor/guards had relationships with the boys and he threatened that M.O.2 could catch new charges if he told anyone what was going on. He also said it would be M.O.2's fault if Ronald was fired. In addition to this abuse, M.O.2 was subject to abusive and sexually degrading strips searches, which were perverted for the guards' entertainment and gratification.

6.138 Plaintiff M.P.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1993 to 1996; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Maury, a male security guard.
Details of abuse	An older Black male security guard named Maury sexually abused M.P. when he escorted her to the medical unit for behavioral health

	appointments on approximately 20 occasions. When he drove M.P., he masturbated while staring at her in the rear-view mirror. Maury reminded M.P. that no one would believe her if she reported him because she was crazy, but if she kept her mouth shut, he could give her a good report.
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6.139 Plaintiff M.R.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1971 to 1972; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male corrections officer.
Details of abuse	A male corrections officer sexually abused M.R. after finding him hiding in a hollowed-out tree stump on Echo Glen's grounds. The guard aggressively pulled him out of the stump, removed MR's pants and underwear, spanked MR several times, digitally penetrated MR's anus, then forced MR to perform oral sex on him. Before bringing MR back to the facility, the guard threatened to kill MR and leave his body in the woods if MR told anyone about the abuse. MR was fearful of the ongoing abuse and attempted to escape numerous times after this initial incident. After each escape MR attempted, the guard forced MR to perform oral sex on him and

	anally raped MR. If MR was placed in isolation, the guard would go out of his way find MR and rape him there as well.
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6.140 Plaintiff M.R.2.

Current Residence	King County, Washington.
Dates of Abuse and Age	1988 to 1989; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female and a male counselor.
Details of abuse	Two counselors, a female and a male, separately sexually abused M.R.2. First, the female – who was white, short, heavy set, with thinning strawberry blonde hair, blue eyes, and in her late 30s to mid-40s – repeatedly groped and rubbed M.R.2 on his genitals over and under his clothing upwards of 50 times. This abuse occurred in his cell in the evenings and when M.R.2 was sent to isolation. Her abuse of the boys was well-known among staff who did nothing. Second, a male counselor – who was white, tall, with dark hair – groped M.R.2’s genitals over his clothing.

6.141 Plaintiff M.S.

Current Residence	King County, Washington.
Dates of Abuse and Age	2005 to 2006; 15 years old.

Location(s) of Abuse	Green Hill School
Perpetrator, if known	Two male guards and a male doctor.
Details of abuse	In addition to the depraved strip searches Green Hill inmates were frequently subject to, a white male doctor also abused M.S. during a “routine” exam. Towards the end of the exam, the doctor told M.S. he needed to check M.S.’s genitals area and made M.S. remove his pants and underwear. The doctor explained he needed to ensure M.S.’s blood flowed properly to his penis, so he asked M.S. to close his eyes and think of a girl he liked in a sexual way. The doctor proceeded to perform oral sex on M.S.

6.142 Plaintiff M.V.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2020 to 2021; 17 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Kimberly Burchfield, a counselor.
Details of abuse	MV was groomed and sexually abused by a female counselor named Kimberly Burchfield. Burchfield was an older white woman in her 50s, approximately 5’6” in height. Burchfield used her position as “counselor” to quickly develop a strong therapeutic relationship with M.V. This dynamic shifted when Burchfield took

	MV off-site for a medical procedure. During these off-site visits in the State vehicle, Burchfield sexually abused M.V., which included kissing, fondling, and oral sex. Burchfield also performed oral sex on MV in his cell one time. While Burchfield never directly threatened MV, she frequently verbalized concerns she had about losing her job due to their relationship. Burchfield continued to pursue her relationship with MV even after he was released. Burchfield created a fake Facebook account to stay in contact with MV and avoid suspicion. Burchfield came to MV's home on two separate occasions to have sex. Their relationship ended when Burchfield informed MV that she was under investigation at Naselle for inappropriate sexual behavior.
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6.143 Plaintiff N.S.

Current Residence	Grays Harbor County, Washington.
Dates of Abuse and Age	2012 to 2014; 16 years old.
Location(s) of Abuse	Canyon View Community Facility
Perpetrator, if known	Ann Warden, a female counselor.
Details of abuse	N.S.'s counsellor, Anne Warden, sexually abused him. The abuse involved her holding his hand and kissing him, giving and receiving oral sex, digital penetration, and vaginal intercourse. N.S. estimates that these sexual interactions occurred on at least eight different

	occasions. Much of the sexual activity occurred at times when Warden took N.S. off campus, including a trip to Seattle.
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6.144 Plaintiff O.B.

Current Residence	Skagit County, Washington.
Dates of Abuse and Age	2005 to 2009; 16 years old.
Location(s) of Abuse	Child Study and Treatment Center Echo Glen Children's Center Naselle Youth Camp Green Hill School
Perpetrator, if known	A male staff member; KC, a female staff member; Ruth Gerten, a female staff member; and Ms. Miley and Ms. Walker, two female staff members.
Details of abuse	<u>Child Study & Treatment Center</u> A male staff member entered OB's room, forced OB to remove his clothing, and stroked and rubbed his penis. He then exposed himself and masturbated in front of OB and forced OB to masturbate too. This occurred on numerous occasions. <u>Echo Glen</u> A female staff member known as "KC" sexually abused O.B. The abuse started by normalizing kissing and making out with OB, then progressed to involve genital fondling and vaginal sex. KC

threatened O.B. by deploying another staff member, named Byron, to intimidate him.

Green Hill

A female staff member named Ruth Gerten sexually abused O.B. The abuse involved kissing, oral sex, and vaginal sex. It typically occurred in O.B.'s cell at night. Ruth explained that she was going to be transferred to Naselle Youth Camp and intended to bring O.B. with her. Shortly after Ruth left, O.B. received an unexplained transfer to Naselle.

Naselle

Two female staff members, Ms. Miley and Ms. Walker, in addition to Ruth, coerced O.B. into sexual relationships. This involved genital touching and vaginal sex and typically occurred in his cell.

6.145 Plaintiff P.B.

Current Residence	Snohomish County, WA.
Dates of Abuse and Age	Early-to-mid 2000s; 9 to 11 years old.
Location(s) of Abuse	Child Study and Treatment Center, Echo Glen Children's Center, Excelsior Youth Center.
Perpetrator, if known	Staffers Mark and Scott and other boys.
Details of abuse	<u>Child Study and Treatment Center</u>

P.B. was sexually abused by several other inmates. These boys primarily abused P.B. in the shared showers in the bathroom. The abuse included the groping and fondling of PB's genitals and oral sex.

Echo Glen

P.B. was groomed and sexually abused by a male supervisor. The supervisor was a white male with a goatee who had a large muscular build. He abused PB in his secluded office; it involved over 20 instances of oral sex and on at least three occasions, the supervisor forced P.B. to anally penetrate him.

Excelsior

When P.B. was about 11 years old, he was sexually abused by a staffer. The abuse involved anal rape on approximately 10 occasions. Despite reports of abuse at Excelsior, it remains under State contract.

6.146 Plaintiff P.D.

Current Residence	Douglas County, Washington.
Dates of Abuse and Age	1966 to 1969; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Bill, staff member.

Details of abuse	A staff member named Bill sexually abused P.D. while she was incarcerated at Echo Glen. Bill was a clean-shaven white male in his 30's early or 40's with a medium sized body and thinning brown hair. The abuse occurred at least twice and began under the guise of Bill consoling P.D. when she was upset. Once on her bed, Bill hugged and fondled her. He grabbed her breasts and rubbed her genitals.
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6.147 Plaintiff P.L.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1982 to 1983; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male night shift guard.
Details of abuse	A male guard who worked the night shift sexually abused P.L. when he was in isolation, which was a small room without a mattress that the State left children for days without food or water. The State permitted this guard unrestricted access to the boys when no other adults were around. During this time, he entered P.L.'s cell and fondled his genitals over his clothing. Later, he made P.L. expose himself. The guard masturbated P.L. approximately six times over the course of his incarceration. Near the end of his incarceration, the guard exposed himself to P.L. and asked him to masturbate him.

6.148 Plaintiff P.M.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	1995 to 1996; seventeen years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Mike, a male volunteer.
Details of abuse	A volunteer named Mike who worked under the State's supervision to escort the inmates to off-site Alcoholics Anonymous or Narcotics Anonymous meetings sexually abused P.M. Despite his limited role, the State allowed Mike to check into Echo Glen and have one-on-one time with the inmates. After the State granted Mike access to P.M.'s cell, he groped P.M. over her clothing, grabbed her breasts and rubbed her crotch; Mike used his forearm to rub his erection over his pants. Mike pushed P.M. toward her bed, which she believed was an attempted rape, and managed to get his hands under her shirt. P.M. estimates Mike was in her cell for 40 minutes before she was able to get away from him and bang her fists on the door of her cell. Security heard the banging and opened the door. Mike suffered no consequences.

6.149 Plaintiff R.B.

Current Residence	King County, Washington.
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Dates of Abuse and Age	1991; 14 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	OT, male counselor.
Details of abuse	A bald white male counselor in his 50s or 60s known as "OT" groomed the boys by giving them sports cards. When R.B. accepted a few sports cards, OT demanded repayment in the form of sexual favors. OT forcibly performed oral sex on R.B. on at least three occasions and forcibly masturbated R.B. on at least four. OT also demanded that R.B. perform oral sex in his office.

6.150 Plaintiff R.B.2.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1979 to 1981; 13-15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Jesse Sumrall, a male staff member.
Details of abuse	Jesse Sumrall, a staff member, sexually abused R.B.2, kissing R.B.2 on the lips and then her neck; fondling R.B.2's breasts; digitally penetrating R.B.; and raping her. Sumrall never made direct threats when he was regularly abusing R.B.2. Instead, Sumrall offered to make R.B.2's life at the facility "easier" by allowing her special

	privileges like staying up later and having extra phone time in addition to bringing her gifts in the form of cigarettes and candy.
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6.151 Plaintiff R.B.3.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1980 to 1982; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male guard.
Details of abuse	R.B.3 was groomed and assaulted by a guard who worked in the medical unit, where she worked answering phones alongside Ms. Parrish, the swing shift nurse. After grooming her with extra snacks and personal conversations about her sexual experiences, the abuse included kissing, fondling, and oral sex. It occurred during periods when Ms. Parrish left for breaks. He told R.B.3 that if she ever told anyone about his behavior, he would deny it.

6.152 Plaintiff R.B.4.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	2004 to 2005; 17 years old.
Location(s) of Abuse	Naselle Youth Camp

Perpetrator, if known	A female corrections officer.
Details of abuse	A white female corrections officer with brown hair, average height, in approximately her early 30s, sexually abused R.B.4. The grooming behaviors involved flirtatious comments, small physical touches, displaying nude photos and pornographic videos to R.B.2. She asked R.B.2 to masturbate to this content. She showed R.B.2 her breasts and placed his hands on them, forced him to expose himself to her, and performed oral sex on him. This abuse occurred in either R.B.2's cell or in the mop closet in the lodge.

6.153 Plaintiff R.B.5

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1984 to 1985; 14 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Male staff member.
Details of abuse	An older white male staffer sexually abused R.B.5 in the bathroom closest to the staff's offices. It involved kissing, masturbation, oral sex, and digital penetration. To reward and induce RB5's compliance, the man often gave RB5 additional free time out of his cell and allowed RB5 to have access to the cottage's kitchen. The abuse ended after RB5 was transferred to the drug treatment

	cottage.
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6.154 Plaintiff R.D.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1997; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor.
Details of abuse	RD was forced to participate in multiple medically unnecessary “prostate exams” performed by Dr. Issac Pope. During these “exams,” Dr. Pope forcibly inserted his fingers into RD’s anus while fondling RD’s penis. Later, when R.D. needed care for minor cuts and scrapes, Dr. Pope also “examined” RD’s prostate and penis for possible injuries. On another occasion, RD exhibited cold or flu symptoms; again, Dr. Pope claimed he needed to complete a prostate and penis exam. In each instance, Dr. Pope inserted his fingers into RD’s anus and fondled RD’s penis for non-medical purposes.

6.155 Plaintiff R.G.

Current Residence	King County, Washington.
Dates of Abuse and Age	2017; 15 years old.

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Katherine, a counselor.
Details of abuse	<u>Echo Glen</u> R.G. was sent to Echo Glen for seven weeks in approximately April of 2017. At the time, R.G. was involved in a criminal case that had been filed against her uncle. He had been charged with raping R.G. and her sister. This information was known to the State's employees. R.G. was housed in the Yakima Cottage where she was assigned a female "counselor" named Katherine. The other girls warned R.G. that Katherine was "fucked up," but they would not say why. During their one-on-one weekly check-ins and during R.G.'s private time in the bathroom, Katherine sexually tormented R.G. This abuse began after R.G. told Katherine during a one-on-one meeting that she would refuse to testify against her uncle. Katherine then asked questions to test how serious R.G. was about keeping sexual abuse private. Soon after, Katherine overheard a conversation R.G. had with another inmate about R.G.'s understanding about why some girls resort to sex work to survive. Katherine used this information to bully R.G., constantly asking her about if she was going to be someone's puppet, if she would sell her body once she was released and suggesting that R.G. already was or had been a prostitute. Katherine also followed R.G. into the

bathroom when she showered. She waited until R.G. was undressed and had been in the bathroom for about 5-10 minutes before coming in. At first, she just watched her. On other occasions she would tell her she urgently needed to get out so they could review some paperwork. Katherine would remain in the bathroom while R.G. was naked. The first time this happened, as Katherine handed R.G. her towel, she grazed her breast and held it briefly. Afterwards, R.G. requested a counselor change, but the request was refused. Katherine then often entered the bathroom and touched R.G. when she got out of the shower. Each time, Katherine was the only adult in the area and no other staff people questioned why she was alone in the bathroom with a 14-year-old. Throughout R.G.'s incarceration, Katherine groped her breasts and butt after a shower approximately 8 times. On at least two occasions, she grabbed R.G.'s vulva and at least once tried to penetrate her digitally.

6.156 Plaintiff R.H.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1989 to 1990; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Ms. Applebee, a counselor, a female staff member, a male staff member.

Details of abuse	Ms. Applebee, R.H.'s assigned counselor, sexually abused R.H. with the help of two other staff people. The abuse involved stripping R.H. naked, hog tying him, and leaving him in his cell in plain view of anyone who walked by as punishment.
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6.157 Plaintiff R.L

Current Residence	King County, Washington.
Dates of Abuse and Age	2007 to 2008; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Debbie, a female guard.
Details of abuse	A female guard named Debbie forced R.L. to expose himself to her and made him masturbate himself on at multiple occasions. At times, she attempted to manually stimulate him. Another guard often stood in the office with Debbie and watched her order R.L. to perform these sex acts for their gratification. In exchange for his silence, Debbie offered R.L. extra tickets to use at commissary to purchase snacks and hygiene products. She also brought in outside food and chewing tobacco.

6.158 Plaintiff R.M.

Current Residence	Benton County, Washington.
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Dates of Abuse and Age	Late 1980s; 14 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A female counselor.
Details of abuse	A female counselor in her mid-30s, white and petite, with dark hair and who dressed casually, sexually harassed and assaulted R.M. The staff person regularly sat on her desk with her legs spread and the soles of her feet pushed together. RM recalls that the staff person encouraged the children to examine the wet fabric of her sweatpants around her crotch. Approximately one and a half years into his incarceration, the counselor removed RM from his cell early in the morning and took him to the bathroom; she instructed RM to undress and get into the bathtub with her. She washed his penis, forcibly performed oral sex on him, and coerced him to give her oral sex and have vaginal sex with her. This abuse happened at least a dozen times.

6.159 Plaintiff R.M.2

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	2005 to 2009; 16 years old.
Location(s) of Abuse	Green Hill School

Perpetrator, if known	Deedee, a female kitchen employee.
Details of abuse	RM2 worked in the kitchen with a staffer named Deedee who sexually abused him. The abuse involved fondling his genitals over his clothes, manually stimulating his genitals, and orally stimulating his genitals. Deedee also exposed her breasts to him. Deedee was also having non-consensual sex with another juvenile inmate who was a friend of RM2's.

6.160 Plaintiff R.S.

Current Residence	Spokane County, Washington.
Dates of Abuse and Age	1995 to 1996; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center Green Hill School
Perpetrator, if known	Joe, a male counselor and a female kitchen employee.
Details of abuse	<u>Echo Glen</u> A counselor named Joe sexually abused R.S. on a weekly basis. Joe was not assigned to be RS's counselor but was allowed to call RS into his office under the guise that RS had been difficult or done something wrong. In the office, Joe exposed his genitals and masturbated in front of RS while making explicit sexual comments and grabbing R.S.'s butt. <u>Green Hill</u>

	A female kitchen staffer sexually abused R.S. during his work in the kitchen. She was an older white woman, about 5'6 tall, with dark hair, and was overweight. The abuse occurred in the walk-in refrigerator or freezer and involved forcing R.S. to suck on her breasts, oral sex, and vaginal intercourse. She threatened to report R.S. for rape that if he did not comply. Additionally, she often alleged R.S. and the other boys had stolen pastries and made them strip to their underwear so she could pull back the elastic waistband and look at their genitals.
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6.161 Plaintiff R.S.2

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	Late 1980s to early 1990s; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Nancy Cox, a nurse.
Details of abuse	R.S.2 was abused by a facility nurse named Nancy Cox who often worked alone in the facility's clinic during periods when R.S.2 needed to use his inhaler. Cox used this time to sexually abuse RS2. Over the course of six months, the abuse escalated from under and over the clothes touching and kissing to oral sex and vaginal penetrative sex. All oral and penetrative sexual abuse occurred in the clinic, while other abuse occurred in the unit. When off-shift,

	Cox often called Maple Lane and pretended to be RS2's sibling or other friend to talk to him. She also threatened RS2 that if anyone found out about them, he would be penalized and would not be able to be released on time or would not qualify for placement in a group home. She once told him that she was pregnant with his child. On information and belief, Cox was later terminated for her abuse of other child inmates.
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6.162 Plaintiff R.S.3.

Current Residence	Lewis County, Washington.
Dates of Abuse and Age	1999 to 2001; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Several guards, including "Cowboy Chris", and a female counselor.
Details of abuse	R.S.3 was repeatedly subject to illegitimate strip searches that occurred as often as several times a day. These searches were conducted solely for the sadistic sexual gratification of the guards. During the strip searches, the guards yelled sexual insults and gay slurs at R.S.3 and his fellow inmates. The guards also forced R.S.3 to put his fingers in his anus and then put his fingers in his mouth afterward. If R.S.3 complained or tried to resist these abusive strip searches he was either thrown to the ground or was sent to isolation (i.e. "the hole"). He was also subject to on-going sexual harassment

by his female counselor.

6.163 Plaintiff S.B.

Current Residence	Kitsap County, Washington.
Dates of Abuse and Age	Mid-1990s; 12 years old
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	Two inmates
Details of abuse	S.B. was one of the smallest and youngest boys in his unit when he was anally raped by his roommate multiple times. S.B. reported these rapes to a staff member that he knew as “Mr. B”, but Mr. B did nothing to help S.B. Instead, S.B. was beaten by other boys who called him a snitch, which suggests Mr. B disclosed S.B.’s confidences to the other inmates. Later, S.B. was sent to another lodge where he again was roomed with a violent sexual predator. This roommate anally raped S.B. on multiple occasions. He also forced S.B. to perform oral sex on him. This happened on at least three occasions.

6.164 Plaintiff S.D.

Current Residence	Yakima County, Washington.
Dates of Abuse and Age	2004 to 2005; 17 years old.

Location(s) of Abuse	Green Hill School Oakridge Community Facility
Perpetrator, if known	A male doctor; Danita O'Connell, a female admin worker; Edwina Kawamura, a female evening staff member, and others.
Details of abuse	<u>Green Hill</u> S.D., who was known by his birth name M.R. while incarcerated, suffered abuse by three different staff people. First, a white physician at Green Hill kissed his neck during a medical exam while massaging his shoulders. Second, a Green Hill administrator, named Danita O'Connell, regularly brought her female colleagues – Ruth and Abbie – into the showers to watch S.D. while they made comments about his body. Once, Gertin got into the shower with S.D. and washed him. O'Connell also reached into the shower to masturbate S.D. Later, O'Connell's abuse escalated to include oral sex and vaginal sex in the administrative building on more than 20 occasions. When S.D. confided in a mental health counselor about the abuse, the counselor told S.D. that he should feel fortunate for the female attention. S.D. also reported O'Connell to his counselor, named Terry Lay, but nothing came of it. <u>Oakridge</u> After S.D. transferred to Oakridge, O'Connell followed him and began working there as an assistant director. The abuse continued and typically occurred in the director's office. When he resisted

O'Connell's demands, she reported him for attempting to escape and he was sent to county jail for 30 days and then back to Green Hill. Back at Green Hill, S.D. asked his old counselor Terry Lay to find a different transitional housing situation for him so that he did not have to go back to O'Connell. Nevertheless, S.D. was returned to Oakridge. O'Connell's abuse continued, as did abuse by an evening staff member and friend of O'Connell, named Edwina Kawamura. O'Connell brought Kawamura to S.D.'s bedroom and said, "This is the one that I told you about." The abuse by Kawamura involved vaginal penetrative sex.

6.165 Plaintiff S.E.

Current Residence	Yakima County, Washington.
Dates of Abuse and Age	Mid-1980s; 14-15 years old
Location(s) of Abuse	Echo Glen Children's Center Naselle Youth Center
Perpetrator, if known	"Gold", staff member; another unknown staff member.
Details of abuse	<u>Echo Glen</u> S.E. was repeatedly sexually assaulted in his cell by a staff member who went by the name "Gold." This staff member was a thin, white male, with reddish hair. The assaults included oral sex and genital touching on a weekly basis for about four to five months. He gave

S.E. cigarettes and special privileges - like letting S.E. visit the girls' cottage - to reward his compliance. The staff member threatened S.E. with lock up to coerce his compliance and told S.E. that no one would ever believe him if he told.

Naselle

A staff member anally raped S.E. multiple times in S.E.'s cell and near the basketball court on multiple occasions. He was an older white man with graying hair, who had a medium build and seemed large to 15-year-old S.E.

6.166 Plaintiff S.H.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2005 to 2007; 16 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Two female staff members, one named Mrs. Curtsman.
Details of abuse	Two female staff members abused and harassed SH as well as other inmates. One was named Ms. Curtsman. Both staffers required SH and other inmates to present their genitalia and masturbate for them to earn their way out of their cell. If S.H. refused to comply he would be placed in lockdown for 72 hours. Sometimes, even if SH complied, the staffers wrote him up for exposing himself to them.

6.167 Plaintiff S.M.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	Maple Lane School: 2008 to 2010 Green Hill School: 2011 to 2014; 15 years old.
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Kitchen employees and Erin Stiebritz (Snodgrass).
Details of abuse	<u>Maple Lane</u> A female kitchen employee groped and fondled S.M. and forced him to touch her and engage in oral sex, on multiple occasions. This staff person was a tall skinny white woman with blond hair, glasses, and appeared to be in her late 20's to early 30's. She provided S.M. contraband, including tobacco, cannabis, money, cell phones, and blank CDs. <u>Green Hill</u> S.M. met Erin Stiebritz when he started attending a cultural education group. Stiebritz used the bathrooms around the facility to fondle and touch S.M. and have him do the same to her – first over their clothes then underneath their clothes. The fondling quickly escalated to Stiebritz performing oral sex on S.M. numerous times and eventually escalated to vaginal sex on at least two occasions. Stiebritz brought in cell phones, cannabis, porn, and magazines to give to S.M.

S.M. obtained another kitchen job when he was at Green Hill and met a woman named Amie, a short, blond, white woman in her early 40s who wore glasses and oversaw S.M. in the kitchen. Amie touched S.M. over and under his clothing and forced him to do the same. On one occasion, Amie performed oral sex on S.M..

6.168 Plaintiff S.N.

Current Residence	King County, Washington.
Dates of Abuse and Age	1994 to 1996; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	A female schoolteacher.
Details of abuse	A female teacher sexually abused S.N. after asking him to stay back after class on nearly a daily basis. She used this one-on-one time to make S.N. give her foot rubs, fondle his genitals, force him to perform oral sex, masturbate, and engage in vaginal sex. She told him that if he ever told anyone, she would claim that he raped her.

6.169 Plaintiff S.R.

Current Residence	Clatsop County, Washington.
Dates of Abuse and Age	1992 to 1993; 15 years old.

Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male substance abuse counselor.
Details of abuse	A counselor sexually abused S.R. The abuse involved fondling, masturbation, and oral sex. Each time, the counselor reminded S.R. of how he could help him get out and implied that telling anyone or resisting would result in his disqualification for release.

6.170 Plaintiff S.S.

Current Residence	Douglas County, Washington.
Dates of Abuse and Age	2003 to 2005; 13 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Two male counselors, Damien and Jay.
Details of abuse	Two male counselors, Damien and Jay, sexually abused S.S. It was well-known that Damien was sexually abusing at least one other female inmate. When S.S. and some other girls in the unit attempted to report Damien for this abuse, Damien started sexually abusing S.S. by entering her room and fondling her under her clothes. Later, her counselor Jay abused her during their one-on-one counseling sessions. During one of their counseling session, SS asked to use the bathroom and Jay told her she had to use the toilet in "the quiet room." Jay followed her there and when she was pulling up her

	pants asked her about her sexual interest in older men. He then attempted to remove her pants, but she was able to get away. In retaliation, Jay refused to sign off on SS's paperwork to help her get released.
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6.171 Plaintiff S.S.2.

Current Residence	Kittitas County, Washington.
Dates of Abuse and Age	1999; 17 years old.
Location(s) of Abuse	Green Hill School Parke Creek Community Facility
Perpetrator, if known	Multiple staff members.
Details of abuse	<u>Green Hill</u> S.S.2 was immediately subject to an invasive strip search and sexual abuse at the hands of several staff members. After being stripped of all his clothing, S.S.2 was forced to receive and perform oral sex on several staff members. S.S.2 recalled being forced to masturbate himself and the staff and being forced to watch the staff masturbate themselves. S.S.2 was then anally raped. S.S.2's resistance was met with threats to hurt S.S.2 more and even escalated to threatening to kill S.S.2 The sexual abuse continued throughout S.S.2's time at the prison, and often occurred in his cell or the bathrooms. <u>Parke Creek</u>

	After a few months at Green Hill School, S.S.2's counselor confirmed he could be transferred to a minimum-security facility called Parke Creek. S.S.2 was thrilled to get out of his abusive circumstances. However, when S.S.2 arrived at Parke Creek, he was met with the same abusive treatment. S.S.2 was again forced to perform oral sex on several staff members and anally raped.
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6.172 Plaintiff S.S.3.

Current Residence	Snohomish County, Washington.
Dates of Abuse and Age	Early 2000s; 14 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Arthur, a counselor, and Bobbie, a counselor.
Details of abuse	S.S.3 was sexually abused by two different counselors on many different occasions. First, a staff person named Arthur exploited S.S.3 after S.S.3 was reprimanded for an altercation with another boy. Arthur claimed he could get the infraction taken off S.S.3's record if S.S.3 complied with his demands, which included exposing himself to Arthur and masturbating while he watched. Soon after, S.S.3 was transferred to a different cottage and assigned a new counselor. This counselor, known to him as Bobbie, began by being physically

affectionate with S.S.3 by rubbing his shoulders, massaging his neck, and petting his hair. This escalated to grabbing S.S.3's butt and genital areas while in the cottage. Notably, they were in the common areas of the cottage in view of other staff, who did nothing. After several weeks of this, Bobbie's abuse escalated to include kissing and genital touching whenever she could catch S.S.3 in his underwear changing for the pool, gym, or weight room. To reward and induce S.S.3's compliance, Bobbie brought him chewing tobacco.

6.173 Plaintiff S.T.

Current Residence	Yakima County, Washington.
Dates of Abuse and Age	1986 to 1989; 16 years old.
Location(s) of Abuse	Green Hill School Mission Creek Youth Camp Woodinville Community Facility
Perpetrator, if known	A male guard, Tom, multiple other guards, and a male counselor, John.
Details of abuse	<u>Green Hill</u> A guard named Tom sexually abused S.T. He exposed himself to S.T., masturbated in front of him, and forced S.T. to perform oral sex on him. Sometimes, he forced S.T. to undress during these acts.

When S.T. showed any signs of resistance, Tom threatened him with physical violence, isolation, and time added onto his sentence. Tom's abuse of S.T. was known to other guards, none of whom did anything to protect these boys. One guard referred to S.T. as Tom's girlfriend, which caused the other boys in his cottage to bully him.

Mission Creek

Guards at Mission Creek watched S.T. and other inmates shower and eventually made them all masturbate together for the guards' gratification. One of these same guards later visited S.T. in his cell where he masturbated S.T. and forced S.T. to give the guard a hand job. This abuse happened at least 10 times. When S.T. finally worked up the courage to disclose to another State employee that some bad things were happening to him, the employee did not ask any follow-up questions or try to protect him.

Woodinville

S.T. encountered a night shift counselor who started to abuse him. This counselor, named John, started off grooming S.T. by disclosing sensitive information about his marital problems, talking to him about sex and showing him pornography. The abuse went on to include masturbation and oral sex.

6.174 Plaintiff T.B.

Current Residence

Pierce County, Washington.

Dates of Abuse and Age	Early 1980s; 15 years old.
Location(s) of Abuse	Naselle Youth Camp
Perpetrator, if known	A male staff member.
Details of abuse	The staff made T.B. sleep in a storage closet that had been converted into a cell. During head calls, a male staff person entered his room, knelt before his bed, and masturbated T.B. This abuse occurred about a dozen times.

6.175 Plaintiff T.B.2

Current Residence	King County, WA.
Dates of Abuse and Age	1982 or 1983; 17 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Ben, male guard
Details of abuse	A male guard T.B.2 knew as Ben groomed and sexually abused T.B.2. Ben was a white male with short gray hair and a stocky build who appeared to be in his late 40s to early 50s. Ben often pulled T.B.2 out of his cell without cause and gave him cigarettes, magazines, food/snacks, and even a pair of Nike shoes. He also engaged T.B.2 in long conversations about his sexual development and home life. After some time, Ben brought T.B.2 to a secluded

	room connected to the staff office where he sexually abused him including oral sex over a period of approximately seven months. When T.B.2 had to go off-site to attend a court hearing and Ben transported him. During the drive, Ben pulled off to the side of the road and forced T.B.2 to perform oral sex.
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6.176 Plaintiff T.B.3

Current Residence	King County, Washington.
Dates of Abuse and Age	1993; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Male staff member.
Details of abuse	A male staff member, who appeared tall, thin, and balding, in his late 30s to early 40s, sexually abused T.B.3. The staffer was known among the inmates to be creepy and often watched them shower while making sexual comments. On at least 10 occasions, he groped TB3's penis and testicles both over and under his clothing. This abuse occurred in the bathrooms, the day room, and T.B.3's cell. When TB3 reported the abuse to staff, they accused TB3 of "not liking" the staffer and took no further action.

6.177 Plaintiff T.C.

Current Residence	King County, Washington.
Dates of Abuse and Age	Mid-1980s; 15 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Multiple male guards.
Details of abuse	TC, a teenage girl, was held at Green Hill, although typically used to incarcerate boys, for a brief two-week period. During this time, the State subjected her to invasive and improper strip searches while making sexually suggestive comments and another guard digitally penetrated her in the day room on multiple occasions.

6.178 Plaintiff T.D.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1985; 16 years old.
Location(s) of Abuse	Maple Lane School Seattle-area transitional group home
Perpetrator, if known	A male doctor; a male resident; and a counselor, Leslie Mammer.
Details of abuse	<u>Maple Lane</u> Two staff members and a fellow inmate sexually assaulted T.D. First, a doctor abused him by digitally penetrating T.D.'s anus for his own gratification during an "exam." Second, he was placed

with a roommate who physically held him down and attempted to anally rape him. Third, on T.D.'s 16th birthday, his counselor Leslie Mammer (spelling approximate), woke him up by kissing him and rubbing his genitals.

Group Home

After his release, the State sent T.D. to a group home in Seattle. Mammer came to the group home on two occasions and was permitted to take T.D. away from the home on a day pass. Mammer took him to motels both times where she forced him to have vaginal sex and perform and receive oral sex.

6.179 Plaintiff T.D.2

Current Residence	Clark County, Washington.
Dates of Abuse and Age	2005 to 2006; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Curtis Feigenbaum, a male counselor/guard.
Details of abuse	A counselor/guard named Curtis Feigenbaum (spelling approximate) repeatedly sexually abused T.D.2 while at Green Hill. The abuse occurred in T.D.2's cell or staff offices and included oral sex. He threatened that T.D.2 would never get released if he did not cooperate. When the counselor suggested he wanted to anally rape T.D.2, T.D.2 resisted. In retaliation, the counselor deployed another

inmate to violently assaulted T.D.2 The State then charged T.D.2 with assault, thereby extending his sentence.

6.180 Plaintiff T.E.

Current Residence	Thurston County, Washington.
Dates of Abuse and Age	2000s; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Three male guards.
Details of abuse	Three male guards sexually abused T.E. during strip searches. T.E. was first assaulted after being put into isolation. A guard instructed her to strip, and while she was naked, he inserted something into her vagina, which felt like fingers or a slim object. In a second assault, two guards tackled T.E., forcibly stripped her and made her open her vagina and anus with her fingers while they watched. This abuse happened approximately 10 times and was in contravention of State protocol.

6.181 Plaintiff T.H.

Current Residence	King County, Washington.
Dates of Abuse and Age	Mid-1990s; 16 years old.

Location(s) of Abuse	Green Hill School Mission Creek Youth Camp Carson Home
Perpetrator, if known	Multiple male staff members; a female staff member; and a female staffer, Alysha.
Details of abuse	<u>Green Hill</u> T.H. experienced abuse by male officers during strip searches on a weekly basis for several months. The abuse included fondling, touching, patting, spanking, and requests to spread his cheeks, squat, and cough while they made sexually derogatory comments. T.H. was also abused by a female staff person. She watched him get ready for his showers or return from the gym and commented on how nice his body looked. She also asked him to expose himself to her during "counts," which occurred multiple times per day. Sometimes she demanded he "make it hard" after making him expose himself. She also entered his cell and touched him, putting her hands down his pants, and promising him McDonalds the next day. Another staff person also forced T.H. to expose himself to her and/or masturbate at least 40-50 times over the course of two years. She also performed oral sex on him three to four times and vaginal intercourse about seven times over this same time period. <u>Mission Creek</u> T.H. was regularly sexually harassed during strip searches. Because

Mission Creek was a work camp, he left each day and guards strip searched him upon his return. During a portion of these searches, T.H. was subjected to sexual harassment and degradation by the guards. This involved the guards asserting that T.H. was bending over, squatting, and coughing incorrectly. They would manually correct him and spread his butt cheeks while making sexually charged remarks.

Carson Home

At Carson Home, a group home under State supervision, T.H. was regularly abused by a staffer named Alysha. She entered his room at night and made him expose himself. The abuse went on to include oral and penetrative sex a couple times per week. The abuse occurred in his room or her personal residence, where the State permitted her to take T.H.

6.182 Plaintiff T.L.

Current Residence	Asotin County, Washington.
Dates of Abuse and Age	2006 to 2007; 15 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Five male staff members and a female teacher.
Details of abuse	On three separate occasions while incarcerated in isolation at Echo Glen Children's Center, T.L. was restrained by five male guards.

The guards ordered T.L. to remove her clothing before they shoved her to the ground. Four of the guards held down her extremities while the fifth man grabbed and groped her genitals. The men then left T.L. in isolation, naked, for several hours. Later during her incarceration, a group of three male state employees attacked T.L. They forced her to strip and one of the men put his arm around T.L.'s neck while standing behind her. The men groped her breasts and genitals. The man who held T.L. around her neck was tall and thin with dark hair and a toothpick in his mouth. T.L. recalls another occasion waking up with her pants and underwear around her ankles. A female teacher was standing above her and T.L. had bruising on her arm.

6.183 Plaintiff T.S.

Current Residence	Skagit County, Washington.
Dates of Abuse and Age	2000 to 2002; 16 years old.
Location(s) of Abuse	Maple Lane School Green Hill School
Perpetrator, if known	Three male guards and a male counselor.
Details of abuse	<u>Maple Lane</u> A male guard, with a large build, about 5'10, with brown curly hair repeatedly sexually terrorized TS. This guard worked the evening

1 shift and came into TS's cell on multiple occasions, removed TS's
2 pants, and touched TS's penis and anus. He also tried to penetrate
3 TS's anus and tried to force TS to perform oral sex on him. The
4 guard did this with physical force, pushing TS down and holding
5 him down. On a few occasions, this man forced TS go to the
6 bathroom with him and made TS undress. He then told TS to
7 masturbate and ejaculate for him. Later, at a State group home, T.S.
8 confided in a counselor about the abuse, but was not believed.

9 Green Hill

10 Two guards sexually abused T.S. during a strip search. The abuse
11 was physically violent and involved grabbing his genitals and
12 attempting to anally rape him. TS was also sexually abused in the
13 shower by a counselor. In the shower, a guard, who was a white
14 man with long brown hair, took pictures of TS naked. He also
15 forced TS to masturbate and tried to digitally penetrate TS. The
16 counselor was a black male with waves in his hair. The counselor
17 showed TS porn and forced him to masturbate. TS tried to report the
18 abuse to a driver enroute to an eye appointment. The driver told the
19 abusers, who then threatened to plant drugs on TS if he told anyone
20 else.

21
22 6.184 Plaintiff T.T.
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Current Residence	Pierce County, Washington.
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Dates of Abuse and Age	1980 to 1981; 11 or 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	Male staff member.
Details of abuse	On multiple occasions, staff instructed T.T. to shower after he finished evening chores. When he entered the shower room, he was alone with an old, white, thin, male staff member. This staffer washed T.T. and grabbed and stroked his genitals during the shower while assuring him that everything was going to be "alright."

6.185 Plaintiff V.C.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	May 2004 to August 2005; sixteen years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	A female guard, Ayanna.
Details of abuse	A guard named Ayanna sexually abused V.C. The abuse involved manual stimulation, oral sex, and penetration. This abuse was an open secret, with other guards often asking V.C what kind of stuff he did with Ayanna.

6.186 Plaintiff W.C.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1983; 12 years old.
Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member.
Details of abuse	A male staff member who worked the night shift sexually abused W.C. weekly. The abuse began with the staffer, an older white male with salt and pepper blonde hair, engaging him in late night conversations about their personal lives while alone together in W.C.'s cell. He also brought W.C. candy, cigarettes, shoes, and other items. Later, the staff member started masturbating in front of W.C., touching W.C.'s genitals, and forcing W.C. to touch himself. He also forced W.C. to perform oral sex on him and digitally penetrated his anus. On at least one occasion, the male staff member took W.C. off-site and drove to Seattle for a day trip. The staff member warned W.C. that telling anyone about the abuse would be futile because the staff member would just call him a liar.

6.187 Plaintiff W.E.

Current Residence	Lincoln County, Washington.
Dates of Abuse and Age	1976 to 1977; 11 years old.

Location(s) of Abuse	Echo Glen Children's Center
Perpetrator, if known	A male staff member.
Details of abuse	A white college-aged male staff member who worked the night shift alone anally raped W.E. This abuse started after W.E. defied the male staff member's orders. Adding to the degradation and abuse, the guard ejaculated onto W.E.'s back and pajama shirt, then threatened him with isolation if he tried to tell anyone. This happened on multiple occasions. Each time, the male staff member would start out acting remorseful and kind, but then would proceed to anally rape W.E.

6.188 Plaintiff W.H.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	1991 to 1993; 16 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Dr. Pope, a male doctor.
Details of abuse	W.H. was forced to participate in a "routine" rectal exam at the hands of Dr. Isaac Pope. However, Dr. Pope claimed that for W.H. to qualify for release, he would have to submit to more abuse. In addition to medical unnecessary rectal exams, Dr. Pope subjected W.H. to oral sex and anal rape. Dr. Pope also inquired into W.H.'s

	masturbation habits and brought pornographic material for W.H. to review and encouraged W.H. to use these magazines for masturbation.
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6.189 Plaintiff W.R.

Current Residence	Pierce County, Washington.
Dates of Abuse and Age	2009 to 2010; 15 years old.
Location(s) of Abuse	Maple Lane School
Perpetrator, if known	Ms. Meyers, a staff member.
Details of abuse	W.R. worked in the kitchen of his living unit with a female staff member named Ms. Meyers who cornered and sexually abused him. The abuse involved Meyers grabbing, rubbing, and massaging W.R.'s genitals over and under his clothing.

6.190 Plaintiff Z.B.

Current Residence	Benton County, Washington.
Dates of Abuse and Age	2012 to 2015; 14 years old.
Location(s) of Abuse	Green Hill School Naselle Youth Camp Twin Rivers Community Facility
Perpetrator, if known	A female counselor; Ms. Poyer, a female counselor, and Ms. Stoker,

	a female program director.
Details of abuse	<u>Green Hill</u> A white female counselor with blonde hair, in her early 30s, about 5'8, and a bit overweight sexually abused Z.B. After making sexual comments to him, she rubbed Z.B.'s genitals over his clothing. This abuse occurred during one-on-one meetings in her office. <u>Naselle</u> Z.B.'s counselor, Ms. Poyer, sexually harassed him. She continually made sexual comments about his body and talked to him about sexual acts. <u>Twin Rivers</u> The program director, Ms. Stoker, assaulted Z.B. under the guise of driving ZB to a clinic in Pasco, Stoker raped ZB in the vehicle performing both oral and vaginal intercourse.

6.191 Plaintiff Z.W.

Current Residence	Yakima County, Washington.
Dates of Abuse and Age	2000; 14 years old.
Location(s) of Abuse	Green Hill School
Perpetrator, if known	Two male staff members.
Details of abuse	Two male staff members sexually assaulted Z.W. shortly before his

1 release. The staffers— two younger white males who appeared to be
2 in their 20s—entered Z.W.’s cell and restrained him by wrapping
3 him in his sheet. Then one of the staff people digitally penetrated
4 Z.W. through his underwear, causing injury and leaving blood on
5 his underwear. Z.W.’s cellmate observed this sexual abuse, which
6 was similar to “hazing” acts other incarcerated children have
7 endured shortly before or shortly after their release.

8 9 **VII. LIABILITY**

10 Based on the above paragraphs, Plaintiffs claim liability based on theories of common
11 law negligence and gross negligence, §302B negligence, outrage, infliction of emotional distress,
12 intentional infliction of emotional distress, and wanton misconduct. The liability-creating
13 conduct of Defendant State of Washington and its agencies consisted, *inter alia*, of breaching its
14 duty to refrain from negligently placing dependent children in situations that would foreseeably
15 cause grave harm; the negligent hiring, training, and supervision of its staff, including permitting
16 unsupervised one-on-one contact between staff and vulnerable inmates and failing to exercise
17 reasonable control over their staff; the failure to create and/or enforce policies and procedures to
18 protect children from sexual abuse, harassment, and retaliation, including inadequate or no
19 education being provided to young inmates about how to report misconduct; violating its special
20 trust relationship with Plaintiffs, who were held within their facilities, by failing to protect them
21 from the foreseeable criminal acts of their employees and other inmates; acting in reckless
22 disregard of the consequences under such surrounding circumstances and conditions that a
23 reasonable person would know, or should know, that such conduct would, to a high degree of

1 probability, result in substantial harm to others, including Plaintiffs; and the negligent, reckless,
2 and/or willful infliction of emotional distress on Plaintiffs. Plaintiffs further allege claims under
3 the doctrines of agency, vicarious liability and *respondeat superior* and allege Defendant is liable
4 for all damages sustained by Plaintiffs as a result of their staff people's actions committed within
5 the scope of their employment. Plaintiffs reserve the right to assert additional claims as may be
6 appropriate following further investigation and discovery.

7 **VIII. DAMAGES**

8 As a direct and proximate cause of Defendant's negligence, Plaintiffs were raped,
9 sodomized, molested, and manipulated into sexual contact and displays. They faced relentless
10 sexual harassment and exploitation, retaliatory threats and other acts of physical abuse and undue
11 punishment, severe emotional and psychological injury, distress, and anguish, post-traumatic
12 stress disorder, and other injury which has and will continue for an indefinite period into the
13 future and constitutes permanent, irreparable, and indivisible injuries.

14 **IX. JURY DEMAND**

15 Plaintiffs demand this case to be tried by a jury.

16 **X. PRAYER FOR RELIEF**

17 Plaintiffs respectfully request the following relief:

- 18 a. That the Court award Plaintiffs appropriate relief, to include all special and
19 general damages established at trial;
- 20 b. That the Court award pre-judgment interest on items of special damages;
- 21 c. That the Court award post-judgment interest;
- 22 d. That the Court award Plaintiffs such other, favorable relief as may be available
23 and appropriate under law or at equity; and

1 e. That the Court enter such other and further relief as the Court may deem just and
2 proper.

3 DATED this 5th day of September 2024.

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