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7 SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

8 LAUREN TRUSCOTT, KAME SPENCER,  
9 JUDINNA GULPAN, and VALERIE  
10 CARSON,

11 Plaintiffs,

12 v.

13 CITY OF SEATTLE, and SEATTLE POLICE  
14 DEPARTMENT,

15 Defendants.

NO. 24-2-14830-2 SEA

COMPLAINT FOR DAMAGES AND  
DEMAND FOR A JURY TRIAL

16 COMES NOW the Plaintiffs by and through their attorneys of record, and allege as  
17 follows:

18 **I. PARTIES**

19 1.1. Plaintiff Lauren Truscott ("Lt. Truscott") is an individual who is employed by the  
20 Defendant Seattle Police Department, in King County, Washington.

21 1.2. Plaintiff Kame Spencer is an individual who is employed by the Defendant Seattle  
22 Police Department, in King County, Washington.

23 1.3. Plaintiff Judinna Gulpan is an individual who is employed by the Defendant  
24 Seattle Police Department, in King County, Washington.

25  
COMPLAINT FOR DAMAGES AND DEMAND FOR A JURY  
TRIAL - 1

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1 1.4. Plaintiff Valerie Carson is an individual who is employed by the Defendant  
2 Seattle Police Department, in King County, Washington.

3 1.5. Defendant Seattle Police Department (“SPD”) is the police agency of the City of  
4 Seattle, a municipal corporation. Defendant SPD primarily conducts its business in King County,  
5 Washington.

6 **II. JURISDICTION AND VENUE**

7 2.1. Plaintiffs are residents of King County and the State of Washington. Both  
8 jurisdiction and venue are proper. *See* RCW 2.08.010; RCW 4.12.025(3).

9 **III. FACTUAL BACKGROUND**

10 **A. SPD Has Been Plagued By Sexism, Discrimination, and Sexual Harassment.**

11 3.1 SPD launched a “30x30” initiative designed to “bolster the participation of  
12 women in law enforcement to 30 percent of sworn capacity by the year 2030.”<sup>1</sup> On September  
13 26, 2023, SPD received a report of how its female officers viewed themselves within the  
14 department.<sup>2</sup> The comments universally condemned the treatment of women within the  
15 department. Female officers, under the protection of anonymity, made it clear that SPD suffers  
16 from a culture of masculinity, double standards, and disparate treatment and unreasonable  
17 expectations of women. The report indicated women find it hard to be promoted within the  
18 Department. The report also stated that there is “**active sexism**” within the Department.

19 3.2 The women who participated in the report made comments, such as:

- 20  
21 a) “Sexism is when you or I say something, and then he says the same thing, and  
22 everybody, when the dude says it is like, oh, of course. We all have to be  
23 aware that, you know, if we’re all sitting here at the command staff table, it’s  
24 possible that everybody here has something to offer, right?”  
25

<sup>1</sup> <https://www.seattle.gov/police/30x30>

<sup>2</sup> [https://www.seattle.gov/documents/Departments/Police/Reports/SPD\\_30\\_By\\_30\\_Report\\_09262023.pdf](https://www.seattle.gov/documents/Departments/Police/Reports/SPD_30_By_30_Report_09262023.pdf)

- 1           b) “And then it reminds me a lot of GI Jane, did you guys ever watch that? Demi  
2           Moore, her character joins the Seals. It was like, a whole thing. They’re  
3           hazing. They don’t want her in because she’s, she’s a liability to others.  
4           Remember when women were first introduced to being in combat positions,  
5           the military was in uproar. For a long time, policing was just women were  
6           there to do secretarial and evidence work. God forbid that there was an actual  
7           woman on the street taking reports, even though, we’re better.”
- 8           c) **“Well, if I were to tell my daughters or, you know, my friends, I tell them  
9           to run in the opposite direction, you know, because of the experiences  
10          that I’ve had.”**

11 **B.     Kame Spencer**

12           3.3     Kame Spencer joined SPD as a brand-new officer in 2017.

13           3.4     In April/May 2019, when she was assigned to the South Precinct, then Sergeant  
14           John O’Neil began to make physical advances towards Ms. Spencer. Sgt. O’Neil would put his  
15           arms around her and touch her in a way that made her feel physically uncomfortable. Sgt. O’Neil  
16           did not do this with other officers or employees. As a brand-new officer, Ms. Spencer did not  
17           feel comfortable telling Sgt. O’Neil “No” because he was her superior officer, and he is  
18           physically larger and more imposing than her.

19           3.5     Sgt. O’Neil took a particular interest in Ms. Spencer and forced a “mentor-  
20           mentee” relationship upon her. When she expressed to her fellow officers and partner that she  
21           “felt weirded out” by Sgt. O’Neil, Ms. Spencer would get teased by her fellow officers and  
22           effectively told, “that’s because he [Sgt. O’Neil] likes you” which she interpreted to mean that  
23           Sgt. O’Neil desired more than professional interactions.

24           3.6     Since then, Sgt. O’Neil engaged in grooming and predatory behavior to isolate  
25           Ms. Spencer. Sgt. O’Neil made her feel physically uncomfortable by his advances. Following  
26           are some, but not all, examples of Sgt. O’Neil’s grooming, predatory, and harassing behavior:

- 1 a) In June 2021, Sgt. O'Neil repeatedly ordered Ms. Spencer to his office. For context,  
2 this office is approximately 6 feet by 10 feet. Most of the time when they were in his  
3 office together, they were alone, and he would close the door to this small office. Sgt.  
4 O'Neil started the conversation by saying something to the effect that he wanted the  
5 conversation to remain between him and Ms. Spencer. He then confronted Ms.  
6 Spencer for turning down an offer to take on the role as a dog handler. He stated  
7 something to the effect that he could advance her career and that Ms. Spencer would  
8 not advance without his help. This entire interaction made Ms. Spencer feel  
9 uncomfortable, but she felt like she could not do anything because Sgt. O'Neil was  
10 her supervisor and is physically imposing to her. A few weeks later, Sgt. O'Neil once  
11 again ordered Ms. Spencer to his office. This time, Sgt. O'Neil stood up, got really  
12 close to her, put his hands on her shoulders, and said something to the effect, "I got  
13 you," "don't let me down." Ms. Spencer felt so uncomfortable that she told Sgt.  
14 O'Neil that she needed to go. Sgt. O'Neil simply went back to his chair, leaned back,  
15 and laced his fingers together behind his head.
- 16 b) In July 2021, Sgt. O'Neil tracked down Ms. Spencer on the street. He approached her  
17 and said something to the effect, "Hey, you go that interview next Friday, do you  
18 want to go over some questions beforehand?" and "you know how it is for us." He  
19 then leaned into Ms. Spencer's car, gave her hug, and left. This physical interaction  
20 was not consented to or welcomed by Ms. Spencer.
- 21 c) In August 2021, Sgt. O'Neil ordered Ms. Spencer to his office once again. He closed  
22 the door. He sat on a chair so close to Ms. Spencer that their legs were touching. She  
23 tried to move away. Sgt. O'Neil then started to question Ms. Spencer about her living  
24 situation under the guise of placing a dog with her. Ms. Spencer stated that she may  
25 turn down the job involving a dog because she felt her home may not be suitable for  
placing a dog. To this, Sgt. O'Neil stated something to the effect, "you can live with  
me; my ex-wife is still there but it's no big deal." Ms. Spencer stated that this  
suggestion was inappropriate. Sgt. O'Neil responded to the effect, "What's  
inappropriate about it?!"
- d) Between September 2021 and January 2022, Sgt. O'Neil's behavior persisted. He  
ordered Ms. Spencer into his office at least once a month. He would get physically  
close to her during these interactions. He would have what Ms. Spencer interpreted  
as inappropriate conversations with her under the guise of mentoring her. Every time  
Ms. Spencer resisted his advances and his demeanor would change. He was verbally  
abusive to her, telling her things to the effect: "I'm just trying to get to know you;"  
"What is it so inappropriate for me come to your house alone to inspect the  
premises?" "Nobody wants you here, you have a target on your back because you are  
Black, we need to stick together in the good old boy's system;" "You need to watch  
out, nobody likes you, you don't know what it's like to be Black."

1 e) In another instance, Sgt. O'Neil assigned a special project only to Ms. Spencer to  
2 research each retired dog handler and provide him a full report. Ms. Spencer felt that  
3 this task was punishment for Ms. Spencer asking why Sgt. O'Neil had taken down  
4 pictures of retired dog handlers. Luckily, another supervising officer intervened and  
5 told Sgt. O'Neil that it was inappropriate to order Ms. Spencer to complete the  
6 project. No policy or procedure required Ms. Spencer to do this project, and Sgt.  
7 O'Neil had not asked any other officer, male or female, to do such a report. Sgt.  
8 O'Neil became so upset that he yelled at the officer and Ms. Spencer something to  
9 the effect of, "Like I told Kame, it's my fucking office and I'll do what I want." No  
10 other officer was asked to do the history project that ordered Ms. Spencer to complete.

11 The incidents above are not exhaustive; the full extent of Sgt. O'Neil's misconduct will be  
12 uncovered in discovery.

13 3.7 **To be clear, Sgt. O'Neil did not treat any other employee – male or female –**  
14 **the way he did Ms. Spencer.**

15 3.8 In early January 2022, Ms. Spencer mustered the courage to file an EEO  
16 complaint against Sgt. O'Neil. She was hoping that SPD would stop Sgt. O'Neil's predatory and  
17 abusive behavior. Unfortunately, Ms. Spencer was met with extreme disappointment.

18 3.9 Rebecca McKechnie from SPD Human Resources received Ms. Spencer's EEO  
19 complaint. Ms. Spencer reiterated the situation with Sgt. O'Neil's retired dog handler history  
20 project. Ms. McKechnie cut her off and accused Ms. Spencer of having a "supervisor issue." Ms.  
21 McKechnie blamed Ms. Spencer, stating to the effect "you just got mad because you don't like  
22 being told what to do." Ms. McKechnie did not even inquire or allow Ms. Spencer to talk about  
23 the inappropriate harassing and predatory behavior she was experiencing. **To be clear, Ms.**  
24 **McKechnie was supposed to conduct an interview about Sgt. O'Neil's concerning behavior,**  
25 **but she instead blamed Ms. Spencer (victim shaming) and did not bother to investigate the**  
**substance of Ms. Spencer's EEO complaint.**

1           3.10   Even worse, Ms. McKechnie asked Ms. Spencer to the effect “Before we end,  
2 what do you identify as?” Ms. Spencer was taken aback by the question and was offended by  
3 Ms. McKechnie’s question. She responded that she was mixed race, to which Ms. McKechnie  
4 responded to the effect: “No more questions.”

5           3.11   In response to Ms. Spencer’s complaint, Sgt. O’Neil weaponized the complaint  
6 process and filed EEO complaints against Ms. Spencer. Ms. Spencer has also experienced racial  
7 slurs and comments as late as 2023 by other officers. Every time she raises this concern, she is  
8 told by her supervisors or EEO investigators something to the effect of “there is nothing there.”  
9 Ms. Spencer feels that SPD does not care about Sgt. O’Neil’s predatory and harassing behavior,  
10 and instead turned on her for daring to raise a complaint.  
11

12       **C.     Judinna (Jean) Gulpan**

13           3.12   Jean Gulpan joined SPD in 2018. She soon became one of the positive faces of  
14 the Department. In fact, SPD uses Ms. Gulpan to promote the Department and uses her pictures  
15 as a recruiting tool.  
16

17           3.13   Unfortunately for Ms. Gulpan, she was exposed to Sgt. O’Neil in late October  
18 2019. Similar to Ms. Spencer, Sgt. O’Neil forced a mentor-mentee relationship on Ms. Gulpan.

19           3.14   In April-May 2021, Sgt. O’Neil put in a request to have Ms. Gulpan transferred  
20 to the K-9 unit. This is the same unit where he engaged in grooming and predatory behavior  
21 involving Ms. Spencer.  
22

23           3.15   From early 2021 through 2022, Sgt. O’Neil engaged in inappropriate behavior  
24 with Ms. Gulpan. When she was studying for the Sergeant exam, Sgt. O’Neil offered to “assist”  
25

1 Ms. Gulpan. He offered to introduce Ms. Gulpan to people within the department to “assist with  
2 her career.” This is the same tactic Sgt. O’Neil used with Ms. Spencer.

3         3.16 In September 2022, Sgt. O’Neil invited Ms. Gulpan to join her in Las Vegas for  
4 a weekend of watching football. He explained that this trip was not a SPD sponsored event, but  
5 it was “invite only” event consisting mostly of former and current SPD officers. He said that the  
6 trip would be good for her career. Ms. Gulpan felt compelled to go on the trip.  
7

8         3.17 When she arrived in Las Vegas, she noticed that most of the officers were there  
9 with their respective spouses or partners, but Ms. Gulpan and Sgt. O’Neil were some of the few  
10 single people on the trip. Sgt. O’Neil knew the group already had plans to watch the football  
11 games at another location or their respective hotels, but he wanted to move the watch party to  
12 his hotel. Nevertheless, he indicated to Ms. Gulpan that the entire party would join them at their  
13 hotel to watch a football game, but then no one showed up. Ms. Gulpan ended up watching the  
14 game in the pool/bar area with only Sgt. O’Neil.  
15

16         3.18 At night, Sgt. O’Neil wanted to have dinner at a steak restaurant in his hotel. Ms.  
17 Gulpan went to dinner with him, and no one joined them. At dinner, Sgt. O’Neil bragged about  
18 his dating history and his success with women. He made it a point to tell Ms. Gulpan something  
19 to the effect of, “I’m really good at sex.” Ms. Gulpan was repelled and disgusted by this behavior  
20 but felt like she could not do anything because Sgt. O’Neil was her supervisor and had invited  
21 her on the trip.  
22

23         3.19 When she returned from this trip, there was a rumor in the Department that Ms.  
24 Gulpan and Sgt. O’Neil had slept together. When Ms. Gulpan confronted Sgt. O’Neil about this  
25 rumor, he responded that he was not bothered by the rumor because he “wouldn’t mind wearing

1 that feather in his cap.” No SPD officer or employee has been reprimanded or terminated for  
2 spreading this rumor.

3           3.20    Around October 2022, Sgt. O’Neil encouraged Ms. Gulpan to join him in the  
4 Public Affairs Office (“PAO”) Unit. Ms. Gulpan had already completed her Sergeant’s exam.  
5 Sgt. O’Neil promised to “train her” to be his replacement as the Sergeant of the PAO Unit since  
6 Mr. O’Neil was taking the Lieutenant’s exam. After interviewing with then Chief Adrian Diaz,  
7 Director of Strategic Communications Amy Clancy, and Sgt. O’Neil; Ms. Gulpan was given a  
8 permanent officer role in Public Affairs.  
9

10           3.21    From March 2023 to February 2024, Ms. Gulpan suffered disparate treatment,  
11 gender discrimination and sexual harassment by Sgt. O’Neil. Some examples of this treatment  
12 include:  
13

- 14           a) Having male officers assigned cars to take home, but Ms. Gulpan is not given  
15 access to a take-home car.
- 16           b) Male officers are given time off for personal matters whenever they request it,  
17 but Ms. Gulpan is not given training time to maintain her EMT training – a  
18 certification that is much coveted within the Department.
- 19           c) After male employees are brought into the Public Affairs Unit (leaving Ms.  
20 Gulpan as the only female in the unit) and she pushes back on Sgt. O’Neil’s  
21 favorable treatment of them, Ms. Gulpan is given the cold shoulder by Sgt.  
22 O’Neil. He became dismissive and angrier towards Ms. Gulpan and gave  
23 preferential treatment to the male officers.
- 24           d) Whenever she disagreed with Sgt. O’Neil’s suggestions, he became irate. At one  
25 point while he was out of town, he called Ms. Gulpan and told her that he was so  
mad that he wanted to get on a flight to come back to Seattle just so he could yell  
at her in person. This intimidated Ms. Gulpan.
- e) Ms. Gulpan asked for an accommodation because she was exhausted due to the  
workload imposed on her and was having tension headaches, but Sgt. O’Neil  
denied the request and said something to the effect of, “it wouldn’t be a good  
look.”



1 These incidents are not exhaustive; the full extent of Sgt. O'Neil's misconduct will be revealed  
2 through discovery.  
3

4 3.22 Ms. Gulpan submitted a transfer memo to leave the PAO Unit due to Sgt. O'Neil's  
5 abusive behavior. Former Chief Adrian Diaz immediately called her and wanted to discuss her  
6 transfer request. Former Chief Diaz essentially demanded that she explain the reason for her  
7 transfer request. Ms. Gulpan felt uncomfortable discussing her concerns about Sgt. O'Neil with  
8 former Chief Diaz because she knew the two were close friends and colleagues. Yet, Ms. Gulpan  
9 felt like she could not refuse the Chief of Police – her ultimate boss. Former Chief Diaz  
10 downplayed her concerns and said that the issue is a simple “miscommunication” between Ms.  
11 Gulpan and Sgt. O'Neil.  
12

13 3.23 Former Chief Diaz asked her about her career aspirations. When she answered  
14 that she wants to rise to the ranks of Assistant Chief, former Chief Diaz stated to the effect, “there  
15 are certain buttons to avoid touching.” Ms. Gulpan took this to mean that the Chief of Police just  
16 told her to shut up and take the abuse from Sgt. O'Neil – to avoid touching a button – so she can  
17 go further in her career.  
18

19 3.24 After certain assurances and promises made by former Chief Diaz and SPD Chief  
20 of Staff Jamie Tompkins, Ms. Gulpan withdrew her transfer request.

21 3.25 Shortly after the conversation with former Chief Diaz and Ms. Tompkins, Sgt.  
22 O'Neil took Ms. Gulpan to dinner outside of office hours so he could speak “freely.” He started  
23 the conversation at dinner by asking Ms. Gulpan if he had “hurt her.” Ms. Gulpan found this to  
24 be an odd comment. He told her that she would have been replaced by a male officer had she  
25 followed through with her transfer request. He told her that she was not acting right; she needed

1 to show more dedication to him; she needed to understand the sacrifices needed in order to be  
2 successful in the PAO Unit.

3           3.26   The following week, Sgt. O’Neil told Ms. Gulpan that she needed to learn how to  
4 handle her emotions as a female because “biologically males do not know how to handle when  
5 woman is being emotional,” and they cannot handle “female moods.” He also accused her of  
6 being in a “mood.”  
7

8           3.27   As expected, and essentially promised by him at this point, Sgt. O’Neil stopped  
9 Ms. Gulpan’s chances of becoming Sergeant because Ms. Gulpan did not show an interest in him  
10 except as her supervisor.

11           3.28   On October 26, 2023, Ms. Gulpan received an email informing her that she was  
12 eligible for a Sergeant promotional review with the paperwork due by November 1, 2023. She  
13 informed Sgt. O’Neil about this email because he was her supervisor, and he said something to  
14 the effect of, “I’m not trying to keep you from promotion, but I’m going to have to tell them  
15 everything.” Three days later, Sgt. O’Neil posted negative reviews of Ms. Gulpan in the PAS  
16 system. Sgt. O’Neil did not discuss the PAS entries with Ms. Gulpan after he made these entries,  
17 which is required by policy. Ms. Gulpan is passed over for the Sergeant position.  
18

19           3.29   Even though former Chief Diaz knew about Ms. Gulpan’s concerns and  
20 interactions with Sgt. O’Neil, he decided to promote Sgt. O’Neil to Lieutenant of the Public  
21 Affairs Unit. Former Chief Diaz essentially rewarded and condoned Sgt. O’Neil’s behavior even  
22 after he knew that he was a bully and had engaged in discriminatory and harassing behavior.  
23

24           3.30   In December 2023, Ms. Gulpan was summoned to a meeting with Sgt. O’Neil,  
25 Chief of Staff Thompkins, and Ms. McKechnie. Ms. Gulpan requested a meeting with her chain

1 of command, Sgt. O'Neil and COS Tompkins; but she did not expect or request Ms. McKechnie  
2 to be present at the meeting. Sgt. O'Neil outlined a written list of complaints about Ms. Gulpan  
3 at this meeting, but this list was not provided to Ms. Gulpan before the meeting. Ms. Gulpan was  
4 not given an opportunity to explain or defend herself. Instead, Ms. McKechnie effectively told  
5 Ms. Gulpan that she should "slow down" and learn Sgt. O'Neil's (now Lt.) priorities. Ms.  
6 McKechnie stated that Ms. Gulpan should look at Sgt. O'Neil as a "piece of meat," and Ms.  
7 Gulpan needed to be "like a puppy" to him, ready to anticipate his every need so she can get  
8 "fed" by him. Then, Ms. Gulpan was blamed for bullying, intimidation, and creating a negative  
9 work environment. Ms. McKechnie told Ms. Gulpan to "smile more" because it's hard to come  
10 off as intimidating when she is smiling. Ms. McKechnie also accused Ms. Gulpan of  
11 "oversharing" when she was asked "how are you?" Ms. McKechnie said, "they don't actually  
12 care, it's just a formality."

13  
14  
15 3.31 Ms. McKechnie tried to force Ms. Gulpan to sign a "performance/mentoring  
16 plan" the day after the meeting. Ms. Gulpan refused and told Ms. McKechnie that she wanted to  
17 confer with her union representative. The union representative counseled her not to sign the  
18 "performance/mentoring plan."

19 3.32 Shortly after the meeting with Ms. McKechnie and Sgt. O'Neil, and after she  
20 refused to sign the "performance/mentoring plan," Ms. Gulpan is subjected to an OPA complaint  
21 – which is believed to have been brought by Sgt. O'Neil. Ms. Gulpan was told that the  
22 "performance/mentoring plan" was compulsory, which is untrue.  
23

24 3.33 Eventually, Ms. Gulpan spoke with Capt. Nollette and shared her experiences  
25 about Sgt. O'Neil and being passed over for Sergeant. Ms. Gulpan said that she could not

1 complain to anyone because Sgt. O'Neil worked closely with Chief Diaz. Capt. Nollette  
2 encouraged her to file an EEO complaint, which she eventually did.

3         3.34 In January 2024, Ms. Gulpan submitted her EEO complaint against Sgt. O'Neil,  
4 and Ms. McKechnie responded to this complaint. Ms. Gulpan protested that Ms. McKechnie  
5 should be recused because she had a bias in this situation based upon the prior meeting. Her  
6 protests went unheard, and it is believed that Ms. McKechnie is still involved in this complaint.  
7

8         3.35 In February 2024, Ms. Gulpan requested and was granted a transfer out of the  
9 Public Affairs Unit. Even in her new assignment as a patrol officer in the West Precinct, she was  
10 not allowed to take the position as Acting Sergeant, even though she has passed the Sergeant's  
11 exam and board.  
12

13 **D. Lauren Truscott**

14         3.34 Ms. Truscott rejoined SPD in November 2021. She was asked/ordered to do  
15 public relations on behalf of SPD to promote female hiring and retention within the Department.

16         3.35 By Winter 2023 Ms. Truscott had reached the position of Lieutenant. She was  
17 asked/ordered to the special operations unit (SPOC). By this time, Captain Deanna Nollette had  
18 been demoted from Assistant Chief to Captain and assigned to run SPOC. Assistant Chief Dan  
19 Nelson oversaw these assignments.  
20

21         3.36 During her first week, Capt. Nollette was going to be on vacation. It is understood  
22 and has been long-standing policy that whenever a Captain is not available, the lieutenant  
23 assigned to the unit will fill in as Acting Captain. Assistant Chief Nelson specifically ordered  
24 that Ms. Truscott not stand in as Acting Captain, and the position should instead go to Sjon  
25 Stevens (of equivalent rank to Ms. Truscott), a male. Captain Nollette protested this decision.

1 When then Asst. Chief Nelson disregarded the protests, Capt. Nollette filed an EEO complaint  
2 on Ms. Truscott's behalf. Ms. Truscott requested that Capt. Nollette be present at the EEO  
3 investigation meeting with Asst. Chief Nelson, but he called Ms. Truscott prior to the meeting  
4 and attempted to persuade Ms. Truscott to not have Capt. Nollette attend the meeting. Capt.  
5 Nollette was Ms. Truscott's immediate supervisor and a supporter of Ms. Truscott's EEO  
6 complaint. Luckily, Ms. Truscott did not succumb to Asst. Chief Nelson's demands.

8 3.37 Asst. Chief Nelson, Ms. Truscott, Ms. McKechnie and Capt. Nollette were called  
9 into a meeting. At the meeting, Asst. Chief Nelson stated that Mr. Stevens was going to be  
10 training Ms. Truscott because she needed more experience.

11 3.38 In the same meeting, Asst. Chief Nelson pulled out a piece of paper and listed the  
12 criteria that Ms. Truscott would have to meet to be Acting Captain. No other male Lieutenant  
13 was given a list or asked to prove themselves before they were given the Acting Captain position.  
14 Capt. Nollette protested and stated that Asst. Chief Nelson's list was a disciplinary and remedial.  
15 Faced with this pushback, Asst. Chief Nelson simply stated to the effect, "Fine then! You can be  
16 Acting Captain!" He then stormed out. Ms. McKechnie asked that since Ms. Truscott seemed to  
17 get the result she wanted; did she still want to go forward with the EEO complaint. Ms. Truscott  
18 took that mean that Ms. McKechnie was suggesting that she should drop the complaint. Ms.  
19 Truscott disagreed and told her that she wanted to move forward with the complaint. After this  
20 meeting, Capt. Nollette was transferred out of SPOC and to a less desirable nightshift.

23 3.39 Since filing the complaint against Asst. Chief Nelson, Ms. Truscott has been  
24 excluded from multiple training sessions. Notably, Ms. Truscott has been awarded a medal of  
25 valor and commended for her work ethic, but, as soon as she filed the complaint, Asst. Chief

1 Nelson began to create unsurmountable obstacles for Mr. Truscott to progress in her career. The  
2 impediments began after she was assigned to SPOC and continued until she filed the complaint.

3         3.40 While working as Second Watch Commander in the West Precinct, Sgt. O'Neil  
4 pulled Ms. Truscott aside and began complaining about Ms. Gulpan. Ms. Truscott was Ms.  
5 Gulpan's supervisor at this time. Sgt. O'Neil tells Ms. Truscott something to the effect that Ms.  
6 Gulpan is a bad worker; she calls in sick all the time; she is having sex with another officer; and  
7 nobody likes her. He even indicated to her that he is "working" with EEO (Ms. McKechnie) to  
8 bring Ms. Gulpan down, and he had "pages and pages of documentation."

9  
10         3.41 It is notable that Sgt. O'Neil is spreading rumors about another officer's sexual  
11 conduct. Then Chief Diaz had an employee fired for spreading rumors about him having a sexual  
12 affair. Yet, Sgt. O'Neil has not been dismissed.

13  
14         3.42 Ms. Truscott reviewed the transcripts of the interviews from several complaints  
15 that were filed by and against Sgt. O'Neil. Ms. Truscott realized that Sgt. O'Neil displayed a  
16 pattern of grooming, predatory, abusive, and harassing behavior. Ms. Truscott filed a complaint  
17 against Sgt. O'Neil.

18         3.43 Since Ms. Truscott has filed a complaint against Sgt. O'Neil, he has filed several  
19 complaints against Ms. Truscott.

20         3.44 Sgt. O'Neil engages in a familiar pattern – if he suspects that someone will file a  
21 complaint against him, he will preemptively file a complaint against the person. If he has a  
22 complaint filed against him, he will turn around file a complaint. Sgt. O'Neil has weaponized  
23 the complaint process, and is assisted by Ms. McKechnie who catches the complaints in HR. She  
24 then minimizes Sgt. O'Neil's behavior and blames the victims of his abuse.  
25

1 **E. Valarie Carson**

2 3.45 Valerie Carson joined SPD in October 2018. Prior to joining SPD, Ms. Carson  
3 was recognized as a leader and chosen as Class President at the Police Academy. Ms. Carson  
4 was a Communications Specialist in the U.S. Navy and had received training in journalism,  
5 communications, public affairs, writing, and graphic design. She also received a bachelor's  
6 degree in communications from Oregon State University. When she was chosen for the Public  
7 Affairs Unit, she felt empowered and valued. Unfortunately, this feeling did not last long.  
8

9 3.46 Soon after she joined the Public Affairs Unit, then Chief Diaz began to pay special  
10 attention to Ms. Carson. He would call her out by name and talk to her one-on-one at the end of  
11 the day when there was no one else around in the office. This made Ms. Carson uncomfortable  
12 and kept her from her work duties, but she felt like she could not protest because she could not  
13 say no to the SPD Chief. Former Chief Diaz's practice became a running joke amongst his  
14 security detail because their workdays were consistently extended for apparently frivolous  
15 activities. After all, the Chief was "chatting" with Ms. Carson. When Ms. Carson expressed  
16 frustration with the situation to some members in his detail, it was indicated that former Chief  
17 Diaz called on her at the end of her shift to talk for as long as thirty minutes because he was  
18 trying to engage in a romantic relationship. This suspicion was warranted because former Chief  
19 Diaz would not talk about work during these conversations; he mostly bragged about himself  
20 and his "philosophy."  
21  
22

23 3.47 During this time, Ms. Carson had to change out of her uniform to civilian clothes  
24 in one of the cubicles during her shift depending upon the type of assignment she was tasked  
25 with on any given day. There was no changing room for women on this floor. The entire staff,

1 including former Chief Diaz, knew Ms. Carson changed out of her clothes on a regular basis. All  
2 other officers would alert Ms. Carson before walking by the cubicle to make sure they did not  
3 catch her changing. Former Chief Diaz, on the other hand, would simply walk into Ms. Carson's  
4 space without making an announcement even though he knew she could be changing. Ms. Carson  
5 believes that former Chief Diaz did this because he was hoping to catch her changing her clothes.  
6

7         3.48 On one occasion, Ms. Carson accompanied former Chief Diaz in his SPD car for  
8 work related duties. The subject of Ms. Carson's new home purchase came up, and she stated  
9 that she needed to replace the windows. Unsolicited, former Chief Diaz offered to replace the  
10 windows at Ms. Carson's house. This discussion is significant because, according to press  
11 reports, former Chief Diaz offered to help Jamie Tompkins, SPD Chief of Staff, do some  
12 housework at her house. It is also rumored that Chief Diaz hired Ms. Tompkins because they  
13 were having an affair. This conduct is arguably not coincidental.  
14

15         3.49 During New Year's Eve 2020, former Chief Diaz wanted Ms. Carson to drive him  
16 around the city. Ms. Carson insisted that they not drive together – just the two of them – without  
17 a detail. Ms. Carson thought it was odd that the SPD Chief would want to go out alone with a  
18 female officer on one of the busiest and most hectic nights in the City without a security detail.  
19 Ms. Carson was afraid that the former Chief would perhaps make an advance at midnight when  
20 people traditionally share a kiss to bring in the new year. After she insisted the detail join them,  
21 the former Chief changed his plans and did not ride with Ms. Carson at all.  
22

23         3.50 Previously, he would make uninvited comments on her leopard print outfits, her  
24 high heels, or her boots. For example, former Chief Diaz used to say, "boots are made for  
25 walking." Former Chief Diaz's comments made Ms. Carson feel uncomfortable about her



1 appearance and dress. In fact, she consciously changed her attire not to draw comments from  
2 him. When Sgt. O'Neil came into the PAU, former Chief Diaz instructed him to reprimand Ms.  
3 Carson for her attire.

4           3.51   **To be clear, Ms. Carson did not know and no one, including then Chief Diaz,**  
5 **informed her that he was gay or “realizing he was gay” during this time period. Then Chief**  
6 **Diaz’s sexual orientation is inconsequential in this case because an employee’s impression**  
7 **of the advances by a supervisor must be considered, not the intent or sexual orientation of**  
8 **the offending supervisor.**

10           3.52   Sgt. O'Neil, with the blessing of former Chief Diaz, went after Ms. Carson. In  
11 October 2022, Sgt. O'Neil took Ms. Carson to coffee and told her that things were going to  
12 change and she “was not going to like it.” He told her that he could have already filed a complaint  
13 against her for insubordination and she needed to just unfailingly follow his “orders” regardless  
14 of any concerns she might have about best practices, integrity, accuracy, or other concerns. Sgt.  
15 O'Neil then told her that she could not wear civilian clothes – the same clothes former Chief  
16 Diaz found flattering. As her supervisor, Sgt. O'Neil consistently changed the “rules”, creating  
17 a moving goalposts situation where Ms. Carson could never satisfy O'Neil’s expectations.

19           3.53   In February 2023, Ms. Carson was overworked and exhausted, having to endure  
20 Sgt. O'Neil’s bullying tactics. Ms. Carson declined a request for a television interview, which  
21 she had the discretion to do and had done so before. She asked Sgt. O'Neil to let Ms. Gulpan  
22 conduct the interview. Ms. Carson asked to go home, and Sgt. O'Neil said dismissively, “do you  
23 need to go home? If so, go home!” and simply sent her home without further discussion.  
24  
25

1           3.54   In March 2023, Ms. Carson discovered that Sgt. O’Neil had filed an OPA  
2 complaint against her. The complaint was closed almost immediately. Ms. Carson believed that  
3 Sgt. O’Neil filed this complaint as a form of retaliation because she sought medical leave for her  
4 exhaustion.

5           3.55   In May 2023, Ms. Carson felt like she had no choice but to file an EEO complaint  
6 against Sgt. O’Neil for his ongoing conduct. In July 2023, Sgt. O’Neil submitted entries for  
7 insubordination against Ms. Carson in the PAS system.

8           3.56   Ms. McKechnie investigated Ms. Carson’s complaint and determined that it was  
9 “unfounded.” Ms. McKechnie called a meeting with Ms. Carson and Sgt. O’Neil. During this  
10 meeting, Ms. Carson tried to raise her concerns about Sgt. O’Neil and working at PAU. Ms.  
11 McKechnie told Ms. Carson something to the effect, “sometimes you feel uncomfortable doing  
12 what your boss tells you to do, but you have to accept it.” Ms. Carson took that to mean that she  
13 should shut up and just accept what her supervisors asked her to do. When Ms. Carson brought  
14 up the sick leave issue, Sgt. O’Neil became irate. Ms. McKechnie said that Ms. Carson should  
15 have done things differently and been more welcoming towards Sgt. O’Neil. And Ms.  
16 McKechnie accused her of “not just liking her supervisor.” She also said, “I can tell you have a  
17 lot of convictions, but I think you need to let those go and follow orders.”  
18  
19  
20

21           3.57   Shortly thereafter, Ms. Carson was subject to another complaint alleging that she  
22 slandered then Chief Diaz. This was in addition to several other complaints. It is believed that  
23 Sgt. O’Neil filed these complaints anonymously.

1 **F. Plaintiffs Face Retaliation After Filing Their Claim for Damages**

2 3.58 On April 25, 2024, Plaintiffs filed their Claim for Damages, also known as a Tort  
3 Claim Form, and submitted the same to the City of Seattle.

4 3.59 Plaintiffs suffered retaliation almost immediately after filing this claim. The same  
5 evening, SPD issued an official statement in response to Plaintiffs' claims:  
6

7  
8 As a general rule, the Seattle Police Department  
9 does not litigate tort claims in the media – a  
10 practice which is discouraged under case  
11 schedules that dictate the flow of discovery in civil  
12 litigation, the rules of professional conduct to which  
13 all attorneys are bound, and as a matter of  
14 professional integrity. For that reason, the  
15 department will not respond to the personal attacks  
16 rooted in rough estimations of hearsay reflecting, at  
17 their core, individual perceptions of victimhood that  
18 are unsupported and – in some instances – belied  
19 by the comprehensive investigations that will no  
20 doubt ultimately be of record. While policing, not  
21 unlike many professions that require a high level of  
22 physicality, has been and remains a male-  
23 dominated profession, the Department, and Chief  
24 Diaz, are proud of the advancements made by  
25 women in the department over the past four years,  
the commitment of the department to work with its  
dedicated workforce to address both internal and  
external challenges that may push, or pull, women  
out of the workplace, and to create a healthy work  
environment where all employees can grow and  
thrive. While individual grievances may drive  
headlines, the Department is confident that the  
record, in its fullness, will prove them unsupported.

23 3.60 After filing the Claim for Damages, Plaintiffs were subjected to OPA complaints  
24 by several police officers and staff who are friendly with then Chief Diaz for “putting SPD in a  
25 bad light.”

1           3.61   Several SPD command staff and Assistant Chiefs attended roll call meetings in  
2 various precincts and told officers something to the effect, “don’t believe the lies being spread  
3 by individuals who hate the Department; only believe what comes from SPD command staff.”  
4 Plaintiffs take this to mean that SPD command staff were calling Plaintiffs liars and  
5 instructing/commanding their subordinates to not believe them.  
6

7           3.62   SPD’s statements when they filed their Claim for Damages, command staff  
8 statements, and other complaints against them adverse employment actions. Plaintiffs believed  
9 these statements were intended to discredit them and make them feel ashamed for filing their  
10 complaint.  
11

12           3.63   The Claim for Damages outlined allegations of sexual discrimination, disability  
13 discrimination, and retaliation. SPD’s subsequent actions are an attempt to dissuade Plaintiffs  
14 from continuing to make or support further charges of discrimination.  
15

16 **G.   Chief Diaz Steps Down, and Other City Actions.**

17           3.64   On May 29, 2024, approximately one month after the Claim for Damages was  
18 filed in this case, Mr. Diaz stepped down as SPD Chief of Police.  
19

20           3.65   City of Seattle Mayor Bruce Harrell stated on June 28, 2024, “In this case, with  
21 the abundance of lawsuits the chief was facing, named as a defendant and the department itself,  
22 I made the decision that we would be better served as a city to bring in new leadership.”  
23

24           3.66   On June 17, 2024, Former Chief Diaz publicly revealed that he is gay. In his  
25 public interview he stated:

*“Just because you are a gay man doesn’t mean you can’t be a misogynist.”*

1           3.67    It is undisputed that prior to Adrian Diaz stepping down as SPD Police Chief he  
2 had not made a public announcement to SPD staff or others that he was gay. Specifically, Adrian  
3 Diaz had not informed any of the Plaintiffs that he was gay when he interacted with them as the  
4 SPD Police Chief.

5           3.68    Former Chief Diaz conceded that the OPA process can be weaponized as a form  
6 of retaliation. John O’Neil, who then Chief Diaz personally promoted from Sargent to  
7 Lieutenant, weaponized the OPA process and targeted the Plaintiffs.  
8

9           3.69    When asked if Mayor Harrell believed a gay individual could not sexually harass  
10 someone, Mayor Harrell stated, *“No, I don't think data or history would suggest that*  
11 *proposition at all. I think every human being is capable of being prejudiced or being unfair or*  
12 *unkind or discriminatory toward another human being, regardless as to how they identify.”*  
13

#### 14                           **IV. CAUSES OF ACTION**

##### 15                           **SEX, RACE, DISABILITY DISCRIMINATION**

16           4.1.    Plaintiffs incorporate all allegations above.

17           4.2    Defendant(s) discriminated against Plaintiffs based upon their sex, race, and  
18 disability, as described above. Defendant(s), through their agents – the Plaintiffs’ supervisors  
19 (including the Chief of Police) – failed to accommodate Plaintiffs and treated Plaintiffs in a  
20 discriminatory manner, in violation of RCW 49.60 et. seq. Plaintiffs were subjected to an adverse  
21 employment action, and their sex, race, and disability were a substantial factor in the decision to  
22 take an adverse employment action.

23           4.3    As a result and proximate cause of Defendant(s)’s discriminatory conduct,  
24 Plaintiffs have been and continue to be injured. The full extent of these injuries will be further  
25 discovered at trial.

1           4.4     The full extent of damages as a result of those injuries will be further discovered  
2 and determined by a jury trial.

3                                   **SEXUAL HARASSMENT**

4           4.5.    Plaintiffs incorporate all allegations above.

5           4.6     Defendant(s) discriminated against Plaintiffs and harassed them based upon their  
6 sex and race, as described above. Defendant(s)'s, through their agents – the Plaintiffs'  
7 supervisors (including the Chief of Police) – treated Plaintiffs in a discriminatory and harassing  
8 manner, in violation of RCW 49.60 et. seq.

9           4.7     Plaintiffs were subjected to unwelcome sexual conduct or advances; Plaintiffs  
10 believed that their supervisors expressly or implicitly promised or threatened a change in their  
11 employment status or conditions unless they submitted to their supervisors' conduct or advances.

12          4.8     As a result and proximate cause of Defendant(s)'s discriminatory conduct,  
13 Plaintiffs have been and continue to be injured. The full extent of these injuries will be further  
14 discovered at trial.

15          4.9     The full extent of damages as a result of those injuries will be further discovered  
16 and determined by a jury trial.

17                                   **HOSTILE WORK ENVIRONMENT**

18          4.10    Plaintiffs incorporate all allegations above.

19          4.11    Defendant(s) discriminated against Plaintiffs based upon their sex, race and/or  
20 disability and created a hostile workplace, as described above. Defendant(s)'s, through their  
21 agents – the Plaintiffs' supervisors (including the Chief of Police) – treated Plaintiffs in a  
22 discriminatory and hostile manner, encouraged and condoned others to do so, in violation of  
23 RCW 49.60 et. seq.

24          4.12    There was language or conduct concerning Plaintiffs' sex/race/disability; this  
25 language or conduct was unwelcome in the sense that Plaintiffs regarded the conduct as

1 undesirable and offensive and did not solicit or incite it; this conduct or language was so  
2 offensive or pervasive that it altered the conditions of Plaintiffs' employment.

3 4.13 In the alternative, Defendant(s)' owners, managers, and/or corporate officers  
4 participated in conduct or language themselves. Defendant(s)' managed knew, through  
5 complaints or other circumstances, of this conduct or language and it failed to take reasonably  
6 prompt and adequate corrective action reasonably designed to end it. Defendant(s) should have  
7 known of this harassment because it was pervasive or through other circumstances, and it failed  
8 to take reasonably prompt and adequate corrective action reasonably designed to end it.

9 4.14 As a result and proximate cause of Defendant(s)'s discriminatory conduct,  
10 Plaintiffs have been and continue to be injured. The full extent of these injuries will be further  
11 discovered at trial.

12 4.15 The full extent of damages as a result of those injuries will be further discovered  
13 and determined by a jury trial.

#### 14 **RETALIATION**

15 4.16 Plaintiffs incorporate all allegations above.

16 4.17 Plaintiffs have made reports about sexual harassment and discrimination as  
17 related to the events described above to the Office of Police Accountability ("OPA"), the Office  
18 of the Inspector General, and an Equal Employment Opportunity ("EEO") complaint to the SPD  
19 Human Resources. Plaintiffs also filed a Claim for Damages outlining claims of sexual  
20 harassment, gender discrimination and retaliation claims.

21 4.18 Plaintiffs reported improper governmental action in good faith, with a reasonable  
22 basis.

23 4.19 Defendant(s) retaliated against Plaintiffs in violation of SMC § 4.20.860.  
24 Instances of retaliation occur daily, and are ongoing.

1           4.20   Defendant(s) caused an adverse change to their employment status, including but  
2 not limited to, Defendant(s) -- through their agents -- the Plaintiffs' supervisors (including the  
3 Chief of Police) -- filed OPA and EEO complaints against Plaintiffs; through direct action or  
4 inaction caused Plaintiffs to be ostracized or be subjected to rumors and lies; put out a public  
5 statement essentially stating that Plaintiffs should be discredited or are lying, which would  
6 otherwise dissuade them from pursuing the discrimination claim. Plaintiffs' complaints were a  
7 substantial factor in Defendant(s)' adverse employment action.

8           4.21   As a result and proximate cause of Defendant(s)'s discriminatory conduct,  
9 Plaintiffs have been and continue to be injured. The full extent of these injuries will be further  
10 discovered at trial.

11           4.22   The full extent of damages as a result of those injuries will be further discovered  
12 and determined by a jury trial.

13                               **V. RESERVATION OF RIGHTS**

14           5.1    Plaintiffs reserve the right to amend this complaint to assert or amend additional  
15 facts and claims in this case.

16                               **VI. DEMAND FOR A JURY TRIAL**

17           6.1    Plaintiffs demand a jury trial by twelve jurors.

18                               **VII. PRAYER FOR RELIEF**

19           Wherefore, Plaintiff requests judgment against Defendants as follows:

- 20           a.     A finding of liability against Defendants for all claims in this case;  
21           b.     An award of damages (economic and noneconomic) as allowed by law;  
22           c.     An award of attorneys' fees as allowed by law;  
23           d.     Any and all other remedies available by law.



1                                RESPECTFULLY SUBMITTED this 2nd day of July, 2024.

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