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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF KING

DENISE “COOKIE” BOULDIN,

Plaintiff,

vs.

CITY OF SEATTLE,

Defendant.

NO.

COMPLAINT FOR DAMAGES

I. NATURE OF THE ACTION

1.1 This is an employment discrimination, harassment, and retaliation action brought by the Plaintiff, Denise Bouldin, also known as Detective Cookie, pursuant RCW 49.60 and the tort of outrage. Detective Bouldin alleges that the Seattle Police Department has subjected her to unlawful employment discrimination, including harassment, disparate treatment and retaliation based upon her race and gender.

1.2 Denise Cookie Bouldin has been a trailblazer within the Seattle Police Department. She became a Seattle Police Officer in the late 1970s. At the time she earned the honor of becoming a Seattle Police Officer there was only one other African American female in the Department. The process of becoming an officer was not only grueling because of the training and expertise

1 necessary to be a police officer, but she also faced race and gender discrimination on a daily
2 basis. This discrimination has been ongoing and continuous throughout her entire career. The
3 level of discrimination Detective Bouldin experienced at the hands of her fellow officers and
4 superiors has had a significant impact on her emotional and physical wellbeing. Detective
5 Bouldin continues to serve as a member of the Seattle Police Department because of her deep
6 dedication to service. She has stuck with this job for four decades because she believes that
7 she can make a positive difference in the lives of others. Being well-known for keeping kids out
8 of jail and teaching youth what to do when stopped by the police has created a close relationship
9 with the community. Unfortunately, some officers have overtly held that against her and have
10 treated her differently as a result. She files this claim for damages in the hopes that the depart-
11 ment will authentically address issues related to the racism, sexism and other forms of discrimi-
12 nation she has faced during her career. She notes that the hostile work environment she has been
13 subjected to has increased dramatically in recent years.

14 II. THE PARTIES

15 2.1 Plaintiff Denise Bouldin is currently a police officer for the Seattle Police Department
16 who resides in King County, Washington.

17 2.2 Defendant City of Seattle is a municipal corporation located in King County, Washing-
18 ton. At all times material to this Complaint, the Seattle Police Department was an agent of the
19 City of Seattle, acting under color of state law.

20 III. JURISDICTION AND VENUE

21 3.1 This Court has jurisdiction over the claims that have been brought by the Plaintiff.

22 3.2 This Court is the proper venue for this claim because the events giving rise to the claims
23 asserted herein occurred in King County.

1 IV. FACTS

2 4.1 The following recitation of facts is not exhaustive as the number of instances from recent
3 years is too voluminous to include and the degradation and hostility in Detective Bouldin's work
4 environment has been ongoing and continuous. The following merely provides support for De-
5 tective Bouldin's claims.

6 TREATING DETECTIVE BOULDIN LIKE A DOG

7 4.2 Detective Bouldin was forced to walk through a dog gate while at the police precinct.

8 4.3 Detective Bouldin was forced to ask for permission to move a dog gate while at work so
9 that she could make her way to necessary work materials within the police precinct.

10 4.4 There was no dog occupying or being contained by the dog gate and thus this experience
11 was degrading, humiliating, and shouted racial overtones.

12 4.5 Detective Bouldin has experienced retaliation for whistleblowing instead of resolution to
13 the problem she presented. Specifically, Detective Bouldin reported it when some officers al-
14 lowed their personal dogs to roam around the South Precinct. Detective Bouldin was told she
15 would be transferred to another precinct, her personal items, including some she uses in her com-
16 munity service chess club work, were mishandled, shoved in a corner, and superiors suggested
17 she use a suspect holding cell.

18 4.6 Dog feces were left in front of Detective Bouldin's locker as a direct result of her com-
19 plaining about the roaming dogs.

20 4.7 Dog food was also left in front of Detective Bouldin's locker while she was at the South
21 Precinct.

22 4.8 Detective Bouldin has historically received high marks for her performance. As a result
23 of reporting mistreatment, she received an unjustified lower performance evaluation. By failing
24 to review Detective Bouldin's performance accurately, she was constructively denied

1 advancement opportunities.

2 RACIST WORKPLACE PROPGANDA

3 4.9 Detective Bouldin was adversely impacted by witnessing another officer scratch out the
4 name of a wanted suspect on a police bulletin to replace it with the name of another African
5 American Seattle police officer. This humiliation and ridicule of her fellow Black officer caused
6 Detective Bouldin mental and emotional anguish; specifically, it impacted her feelings of safety
7 at her workplace.

8 4.10 A poster on the outside of a locker inside the South Precinct read “Some people require
9 inspirational quotes to start their day. Me: Caffeine and Hate.” The poster is of a heavily armed
10 man holding a cup of coffee and depicts a strong adversarial relationship with the community
11 these police officers work with.

12 SEATTLE POLICE DEPARTMENT VERSUS THE COMMUNITY

13 4.11 Detective Bouldin received regular and continuous internal complaints about her relation-
14 ship with the Black community.

15 4.12 The Seattle Police Department has used Detective Bouldin’s strong relationship with the
16 Black community to portray such relationship as one the Department itself has with the Black
17 community.

18 4.13 Behind closed doors, however, other officers and supervisors have belittled Detective
19 Bouldin, challenging her loyalty to the Department and marginalizing her for her active role in
20 the community.

21 4.14 Detective Bouldin placed African American Advisory Council pamphlets on all the Ser-
22 geants’ desks to promote an event. One white sergeant saw the flier and responded “Who put this
23 fucking shit on my desk?!” and threw it down on the floor. Later, the sergeant made it clear that
24 she did not want to work with any black people.

1 4.15 Some officers were watching a protest on TV referring to protestors as “those people.”
2 When Detective Bouldin asked for an explanation of the term, the officer responded flippantly.

3 4.16 A supervisor told Detective Bouldin she should be able to issue more tickets because De-
4 tective Bouldin patrols a predominantly Asian neighborhood.

5 4.17 A Sergeant told officers at the South Precinct, “Let’s put on our hoods and sheets and
6 clean up the valley of crime.” This is blatant reference to one of the most violent American ter-
7 rorist groups in the country; the Ku Klux Klan.

8 A CULTURE OF RETALIATION

9 4.18 Officers have refused to provide Detective Bouldin back-up when necessary, deliberately
10 putting her life and safety in jeopardy.

11 4.19 Detective Bouldin’s locker was taken without notice. Police Department staff did not
12 treat similarly situated people this way.

13 4.20 Department staff has refused to provide Detective Bouldin with the necessary access to
14 the parking garage. Despite her continued requests for a parking access card, Detective Bouldin
15 has yet to receive one.

16 4.21 Others have been given priority for overtime over Detective Bouldin.

17 4.22 Detective Bouldin has been repeatedly overlooked regarding opportunities for career ad-
18 vancement.

19 4.23 Hostile and derogatory marks were made by Seattle Police Officers about Detective
20 Bouldin to teenagers in the community. Something to the effect of, “I don’t give a fuck about
21 Cookie,” was said when the teens mentioned knowing her.

22 4.24 Detective Bouldin has experienced a different level of scrutiny than other similarly situ-
23 ated officers and City of Seattle employees.

1 TORTIOUS MISCONDUCT

2 4.25 On March 17, 2023, Detective Bouldin filed a tort claim against the City of Seattle con-
3 taining the allegations pleaded herein.

4 4.26 The City of Seattle opened an EEO investigation based on the assertions from Detective
5 Bouldin’s tort claim, but continued to degrade her for having reservations in participating in the
6 voluntary intake interview. Specifically, it was stated that “SPD does not compel non-supervi-
7 sory employees to make complaints of harassment and/or discrimination related to a protected
8 class.” This reference to Detective Bouldin’s non-supervisory status and statement that the police
9 department did not force Detective Bouldin to make her allegations in the first place is patroniz-
10 ing and harassing.

11 4.27 The City of Seattle failed to respond meaningfully and therefore, Detective Bouldin pur-
12 sues this lawsuit in hopes of achieving justice.

13 4.28 Defendant engaged in all of the above unlawful conduct and the unlawful conduct was
14 motivated by Plaintiff’s race, gender, and/or opposition to Defendant’s discriminatory conduct.

15 4.29 Defendant retaliated against Plaintiff for engaging in protected activity and for her oppo-
16 sition to activity to the above referenced unlawful employment practices.

17 4.30 The effect of the practices complained of herein have been to deprive Plaintiff of her
18 equal employment opportunities and otherwise adversely affect her status as an employee be-
19 cause of her opposition and reporting of Defendant’s misconduct.

20 4.31 Defendant failed to eliminate discrimination, harassment and the retaliation that created a
21 hostile work environment for Detective Bouldin.

22 4.32 Defendant intentionally committed unlawful employment practices based on the facts
23 complained of herein.

24 4.33 Defendant has made disparaging comments to Plaintiff regarding her age, including that

1 instead of filing grievances and complaints, she should just retire.

2 4.34 When committing the herein mentioned unlawful employment practices, Defendant acted
3 with malice or reckless indifference to Plaintiff's rights as protected by federal and state law.
4

5 **V. FIRST CAUSE OF ACTION:**
6 **Discrimination on the Basis of Race in Violation of the Washington Law Against Discrimi-**
7 **nation**
8 **RCW 49.60**

9 5.1 Plaintiff incorporates paragraphs 1.1 through 4.33 as though fully set forth herein.

10 5.2 Defendant's actions and/or omissions constitute disparate treatment, a hostile work envi-
11 ronment, and discrimination in Plaintiff's terms or conditions of employment (Section 4.4 of the
12 Seattle Police Department Employment Agreement) on the basis of his race, religion and na-
13 tional origin in violation of the Washington Law Against Discrimination (WLAD).

14 5.3 Defendant's actions and/or omissions constitute retaliation in violation of WLAD against
15 Plaintiff for her having engaged in protected activities under RCW 49.60.

16 5.4 As a result of Defendant's violations, Plaintiff has been damaged in an amount to be
17 proven at trial.

18 **VI. SECOND CAUSE OF ACTION:**
19 **Discrimination on the Basis of Gender in Violation of the Washington Law Against Dis-**
20 **crimination**
21 **RCW 49.60**

22 6.1 Plaintiff incorporates all of the above paragraphs as though fully set forth herein.

23 6.2 Defendant's actions and/or omissions constitute disparate treatment, a hostile work envi-
24 ronment, and discrimination in Plaintiff's terms or conditions of employment (Section 4.4 of the
25 Seattle Police Department Employment Agreement) on the basis of her gender in violation of the
26 Washington Law Against Discrimination (WLAD).

27 6.3 Defendant's actions and/or omissions constitute retaliation in violation of WLAD against

1 Plaintiff for her having engaged in protected activities under RCW 49.60.

2 6.4 As a result of Defendant's violations, Plaintiff has been damaged in an amount to be
3 proven at trial.

4
5 **VII. THIRD CAUSE OF ACTION:**
6 **Retaliation in Violation of the Washington Law Against Discrimination**
7 **RCW 49.60**

8 7.1 Plaintiff incorporates all of the above paragraphs as though fully set forth herein.

9 7.2 Defendant's actions and/or omissions constitute disparate treatment, a hostile work envi-
10 ronment, and discrimination in Plaintiff's terms or conditions of employment (Section 4.4 of the
11 Seattle Police Department Employment Agreement) on the basis of her reporting such disparate
12 treatment in the form of grievances and complaints, in violation of the Washington Law Against
13 Discrimination (WLAD).

14 7.3 Defendant's actions and/or omissions constitute retaliation in violation of WLAD against
15 Plaintiff for her having engaged in protected activities under RCW 49.60.

16 7.4 As a result of Defendant's violations, Plaintiff has been damaged in an amount to be
17 proven at trial.

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19 **VIII. FOURTH CAUSE OF ACTION:**
20 **Hostile Work Environment in Violation of the Washington Law Against Discrimination**
21 **RCW 49.60**

22 8.1 Plaintiff incorporates all of the above paragraphs as though fully set forth herein.

23 8.2 Defendant's actions and/or omissions constitute a hostile work environment for creating,
24 fostering, perpetuating, and refusing to eliminate discrimination against the Plaintiff in violation
of the terms or conditions of her employment (Section 4.4 of the Seattle Police Department

1 Employment Agreement) and in violation of the Washington Law Against Discrimination
2 (WLAD).

3 8.3 Defendant's actions and/or omissions constitute retaliation in violation of WLAD against
4 Plaintiff for her having engaged in protected activities under RCW 49.60.

5 8.4 As a result of Defendant's violations, Plaintiff has been damaged in an amount to be
6 proven at trial.

7
8 **IX. FIFTH CAUSE OF ACTION:**
9 **Tort of Outrage**
10 **Washington Common Law**

11 9.1 Plaintiff incorporates all of the above paragraphs as though fully set forth herein.

12 9.2 Defendant's actions and/or omissions constitute negligent or intentional infliction of
13 emotional distress, also known as tort of outrage.

14 9.3 As a result of the Defendant's violations, Plaintiff has been damaged in an amount to be
15 proven at trial.

16 **X. SIXTH CAUSE OF ACTION:**
17 **Discrimination on the Basis of Gender in Violation of the Washington Law Against Dis-**
18 **crimination**
19 **RCW 49.60**

20 10.1 Plaintiff incorporates all of the above paragraphs as though fully set forth herein.

21 10.2 Defendant's actions and/or omissions constitute disparate treatment, a hostile work envi-
22 ronment, and discrimination in Plaintiff's terms or conditions of employment on the basis of her
23 age in violation of the Washington Law Against Discrimination (WLAD).

24 6.3 Defendant's actions and/or omissions constitute retaliation in violation of WLAD against
Plaintiff for her having engaged in protected activities under RCW 49.60.

1 6.4 As a result of Defendant's violations, Plaintiff has been damaged in an amount to be
2 proven at trial.

3 **XI. JURY DEMAND**

4 The Plaintiff, by and through his attorney of record, hereby demands a jury trial in this
5 action upon all their claims in the complaint, and as may be hereafter amended, and all other re-
6 lated issues, pursuant to FRCP 38.

7 WHEREFORE, Plaintiff seeks the following relief:

- 8 1. Compensatory, general and special damages in amounts to be proven at trial:
- 9 2. Injunctive relief, including but not limited to, implementation of measures that
10 protect Detective Bouldin and other employees from further discrimination and
11 retaliation;
- 12 3. Punitive damages for Defendant's conduct, in amounts to be determined at trial to
13 the fullest extent allowed by law;
- 14 4. Order requiring Defendant to pay Plaintiff for any and all tax consequences asso-
15 ciated with the damages and cost award, including but not limited attorney's fees;
- 16 5. Reasonable attorney's fees and expenses;
- 17 6. Costs of suit; and
- 18 7. Any other relief deemed appropriate by the Court.

19 DATED this 3rd date of November, 2023.

20 /s Jesse Valdez
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23 Errin Loyal, WSBA #56672
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