

**STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT**

Defendants.

1.2 This is an action under the Washington Law Against Discrimination (WLAD) to correct unlawful and discriminatory housing practices, and to provide appropriate relief to their tenant, Bernard Watkins, who was adversely affected by such practices. The Commission alleges Defendants unlawfully discriminated against Mr. Watkins by providing him, an African American man, with substantially different terms, conditions and privileges in his housing/real estate transaction and in the furnishing of facilities and services, including the use of the gym and other common areas, for himself and for conducting his personal and group training/fitness business, as compared to similarly situated white persons; engaged in retaliation following Mr. Watkins' discrimination complaints; and created a hostile environment because of race and in retaliation for his complaints.

II. JURISDICTION

2.1 The Commission has jurisdiction to prosecute this case. RCW 49.60.030(2), RCW 49.60.340. RCW 49.60.240(1)(c) requires the Commission to investigate complaints of housing discrimination and retaliation, and if it makes a finding of reasonable cause to believe discrimination or retaliation has occurred, to seek relief. If an agreement to eliminate the unfair practice is not reached, the Complainant or Respondent may elect to have the claims on which reasonable cause was found decided in a civil action under RCW 49.60.030(2), RCW 49.60.340(1)-(2). The Commission made a finding of reasonable cause of discrimination and retaliation, conciliation was attempted and failed, Mr. Watkins made an election to pursue a civil action and properly and timely served notice of his election to pursue a civil action on the Commission and Defendants.

2.2 This Court has jurisdiction over this matter pursuant to RCW 49.60.340(2), as the Commission has commenced this action within thirty days of Complainant's election to have the claims decided in a civil action under RCW 49.60.030(2).

1 **2.3** The violations alleged in this Complaint were committed in whole or in part in King
2 County, and Defendants transact business in King County. Venue is proper in King County pursuant
3 to RCW 4.12.020 and RCW 4.12.025.

4 **2.4** Defendants and Mr. Watkins engaged in a real estate transaction as defined by
5 RCW 49.60.040(22). Individuals have the right to be free from discrimination because of race,
6 including, but not limited to, the right to engage in real estate transactions without discrimination
7 under RCW 49.60.030(1)(c). Pursuant to RCW 49.60.222(1)(b), it is an unfair practice to
8 discriminate against a person in the terms, conditions, or privileges of a housing/real estate
9 transaction or in the furnishing of facilities or services in connection therewith because of race.
10 According to RCW 49.60.2235, it is an unlawful practice to coerce, intimidate, threaten, or
11 interfere with any person in the exercise or enjoyment of, or on account of his or her having
12 exercised or enjoyed, or on account of his or her having aided or encouraged any other person
13 in the exercise or enjoyment of, rights regarding real estate transactions secured by
14 RCW 49.60.030, RCW 49.60.040, RCW 49.60.222, and RCW 49.60.2235.

15 **III. FACTUAL ALLEGATIONS**

16 **3.1** On or about March 13, 2011, Mr. Watkins signed an annual, residential lease with
17 Defendants for an apartment in the Elements Apartments complex (Elements) located at 909
18 112th Ave NE, Bellevue, WA 98004. Since March 13, 2011, Mr. Watkins has maintained a
19 continuous tenancy at Elements, met all of the qualifications of tenancy, and followed the rules
20 of tenancy.

21 **3.2** Defendant UDR, Inc., is a publicly traded company incorporated in Maryland.
22 Defendant UDR, Inc., and its wholly owned subsidiaries, Defendant United Dominion Realty,
23 L.P., a Delaware Corporation, and Ashwood Commons North, LLC, a Washington Corporation,
24 own and operate Elements, by and through its managers and employees, including Elements'
25 General Manager, Erin Long, Community Manager, Steven Lewter, and District Business
26 Manager, Joni Mitchell.

1 **3.3** Elements comprises three separate glass and steel high-rise luxury mountain-
2 view apartment buildings: a stand-alone building with the address 989 111th Avenue NE,
3 Bellevue, WA 98004 (989 Building) and two buildings that are connected by a common area
4 and walkway with the addresses 958 111th Ave NE, Bellevue, WA 98004 and 909 112th Avenue
5 NE, Bellevue, WA 98004 (958/909 Building).

6 **3.4** In addition to housing, Elements provides its residential tenants with refuge and
7 resort through its common spaces, facilities, and services, including: lobby installations by
8 Dale Chihuly; a private theater; dedicated concierge services; and a 24-hour fitness center with
9 two gym rooms/work out facilities with exercise equipment (one in the 989 Building and one in
10 the 958/909 Building), as well as locker rooms, showers, an indoor lap pool, and an aerobic room
11 in the 958/909 Building, and an outdoor fitness area on the deck adjoining the 989 Building gym.

12 **3.5** At the time Mr. Watkins and Elements entered into their lease agreement,
13 Elements had a preexisting lease agreement with another tenant, Ryan Stefan, that he would be
14 permitted to operate his personal and group training and fitness business, Fire Fitness, in the
15 common areas of the Elements facility, without cost to Mr. Stefan. Mr. Stefan maintained his
16 tenancy at Elements until he moved out in November of 2016 and moved into another apartment
17 owned and operated by Defendants. Even after Mr. Stefan moved out of Elements, Elements
18 continued to permit Mr. Stefan access to Elements and its common spaces and use of those
19 spaces for his Fire Fitness training business.

20 **3.6** Professionally, Mr. Watkins is a personal and group trainer and fitness coach who
21 has worked over his career with a range of private clients, including professional athletes from
22 the Seattle Seahawks football team. Defendants, by and through Manager Erin Long, recognized
23 that Elements would gain benefits from Mr. Watkins' tenancy and his business operations at
24 Elements.

25 **3.7** When Mr. Watkins and Defendants, by and through Manager Erin Long, entered
26 into Mr. Watkins' lease, it was on the condition and based on a mutual agreement that

1 Mr. Watkins would be permitted to operate his personal and group training and fitness business,
2 Corfit Training, in the common areas of the Elements facility, without cost to Mr. Watkins.

3 **3.8** Mr. Watkins is African American. At all times material hereto, his clientele is
4 racially diverse, comprising a large proportion of Black and other people of color, in addition to
5 White people. Mr. Watkins also worked with over 30 professional athletes, many from the
6 Seattle Seahawks football organization, and the professional athlete clientele is predominantly
7 Black.

8 **3.9** Mr. Stefan is White. At all times material hereto, the trainers Mr. Stefan employs
9 are White and his clientele is predominantly White.

10 **Discriminatory Treatment**

11 **3.10** Defendants imposed substantially different and adverse terms, conditions and
12 privileges in Mr. Watkins' housing and his use of facilities and services, including the use of the
13 gym and other common areas for himself and for conducting his personal training/fitness
14 business, as compared to similarly situated White persons, because of his race. Defendants
15 imposed different adverse terms, conditions, and privileges within the period material hereto,
16 including, but not limited to, the following examples:

17 **3.10.1** Restricted the size of Mr. Watkins' classes/workout groups, while not
18 restricting the size of Mr. Stefan's classes or groups;

19 **3.10.2** Limited and then prohibited Mr. Watkins' from hiring trainers to work
20 with him, while allowing Mr. Stefan to employ trainers to work with him;

21 **3.10.3** Prohibited Mr. Watkins' from using certain common areas for group
22 fitness training, including the swimming pool, aerobics room, stairways, and hallways,
23 while allowing Mr. Stefan and other White persons to use these common areas for group
24 fitness training;

25 **3.10.4** Interfered with Mr. Watkins' promotion and operation of his business by
26 imposing limitations on Mr. Watkins' advertising and solicitations, engaging in hostile

1 and abusive behavior and actions, making negative comments about Mr. Watkins and his
2 business to staff, residents, and clients, and restricting Elements staff from interacting
3 with Mr. Watkins, helping him, or training with him. In contrast, Defendants provided
4 active support and promotion of Mr. Stefan's business by management and employees
5 training with him, permitting advertising and solicitations, referring clients, and
6 promoting his services to residents and others;

7 **3.10.5** Engaged in hyperscrutiny and surveillance, made and orchestrated
8 complaints against Mr. Watkins, enrolled Mr. Stefan in monitoring Mr. Watkins, notified
9 Mr. Watkins of resident complaints about his training (some of which were actually
10 directed at Mr. Stefan) and issued unfounded notices of rule and use violations, while
11 permitting Mr. Stefan to engage in harmful actions, behaviors, rule and use violations
12 and allowing complaints against Mr. Stefan to go without correction;

13 **3.10.6** Limited and then terminated Mr. Watkins' use of common facilities for
14 his private and group fitness training; and

15 **3.10.7** Interfered with Mr. Watkins' personal use of the common facilities.

16 **3.11** In approximately 2012, Defendants divided the locations for Mr. Stefan and
17 Mr. Watkins, assigned Mr. Stefan to the 989 Building gym facility for his personal and group
18 training and fitness business, assigned Mr. Watkins to the 958/909 Building gym facility for his
19 personal and group training and fitness business, and directed Mr. Stefan not to use the 958/909
20 Building gym facility. Defendants later provided upgrades to the exercise equipment and gym
21 facility in the 989 Building for the benefit of Mr. Stefan, while not providing comparable
22 upgrades to the 958/909 Building gym facilities. Defendants continued to allow Mr. Stefan, his
23 trainers, and clients full access to the other common areas in the 958/909 Building, including the
24 locker room and showers, where they continued to harass and intimidate Mr. Watkins;

25 **3.12** Mr. Watkins made an internal complaint to Defendants about Mr. Stefan's
26 violation of Elements rules, and racially hostile and abusive conduct he was experiencing from

1 Mr. Stefan and a trainer he employed, by and through General Manager Long on November 20,
2 2013. Mr. Watkins also complained that Defendants, by and through their Management, were
3 engaged in hostile behavior and actions, and were favoring Mr. Stefan and his personal and
4 group training, because of race. Ms. Long told Mr. Watkins that Mr. Watkins would no longer
5 be allowed to employ his personal trainer. Ms. Long also warned Mr. Watkins not to “play the
6 race card.” Defendants failed to investigate or take effective, corrective action, and the
7 discrimination continued.

8 **3.13** Mr. Watkins made additional complaints to Defendants, one in person about race
9 discrimination on January 3, 2014, followed up with a written race discrimination complaint by
10 email on January 10, 2014, in which he detailed Elements’ discriminatory treatment of him in
11 the terms and conditions of housing and requested correction.

12 **3.14** Defendants failed to initiate an investigation or take prompt and effective
13 corrective action to correct the discrimination, which continued. Ms. Long also labelled
14 Mr. Watkins a “trouble maker,” called him that with other staff, and instructed them not to talk
15 with Mr. Watkins or help him.

16 **3.15** Defendants failed to renew Mr. Watkins’ annual lease in the normal course of
17 business operations, despite Mr. Watkins’ repeated requests that they do so. Defendants
18 indicated on February 3, 2014, that they would not renew his annual lease, reverting his housing
19 to a month-to-month lease arrangement, creating insecurity and risk to Mr. Watkins’ housing
20 and work stability. Defendants did not renew Mr. Watkins’ annual lease until 2017. Defendants
21 again offered Mr. Watkins only a six-month lease in 2020, instead of a 12-month lease.
22 Defendants offered annual leases with more favorable terms and conditions to comparably
23 situated, White tenants, and those who had not made race discrimination complaints.

24 **3.16** Defendants reaffirmed and imposed further restrictions and additional adverse
25 terms and conditions on Mr. Watkins’ use of the common areas, as compared to Mr. Stefan,
26 permitted the hostile environment to continue and contributed to it, and engaged in hyperscrutiny

1 and complaints against Mr. Watkins while allowing Mr. Stefan, and the trainers he employed, to
2 violate rules without the same scrutiny or corrective action.

3 **3.17** On or about July 12, 2016, Mr. Watkins made another internal report of
4 discrimination to Defendants, by and through their Assistant Community Director, Mario
5 Manriquez. Mr. Watkins reported the hostile environment created by Mr. Stefan and his trainers,
6 together with Defendants' employees, including Ms. Mitchell, as well as the different treatment
7 because of race he was experiencing with regard to his training business, and asked for action to
8 be taken to address it. Defendants failed to investigate or take effective corrective action and the
9 discrimination, hostile environment, and retaliation continued.

10 **3.18** Defendants notified Mr. Watkins on December 1, 2016, that it was terminating
11 his ability to conduct his training business at Elements in three months.

12 **3.19** Mr. Watkins hired an attorney to mitigate the damage to his business and lodged
13 another race discrimination and retaliation complaint through his attorney in 2017 to request
14 Defendants to correct the discrimination and retaliation.

15 **3.20** Defendants then required Mr. Watkins to sign a Use Agreement, which imposed
16 even greater restrictions on the terms and conditions of Mr. Watkins' use of common areas.
17 Mr. Watkins agreed he would sign it on October 9, 2017, under protest and by registering his
18 complaint that its restrictions were racially discriminatory, because it was Defendants' condition
19 for restoring his ability to train in those areas. In contrast, Defendants did not restrict or terminate
20 Mr. Stefan's use of the facilities for his business purposes and Mr. Stefan was not required to
21 sign a Use Agreement with similar restrictions on his business use of common areas;

22 **3.21** On October 24, 2017, Mr. Watkins filed a complaint of discrimination with the
23 Washington State Human Rights Commission. Notifications of the complaint were sent to
24 Respondent on October 31, 2017.

25 **3.22** On October 25, 2017, Respondent served Mr. Watkins with a 10-day notice to
26 comply or vacate for conducting a commercial business at the subject property.

3.23 On or about October 27, 2017, Mr. Watkins signed the Access and Use Agreement under protest, and Defendants withdrew the 10-day notice to comply or vacate.

3.24 Defendants increasingly subjected Mr. Watkins to heightened scrutiny and surveillance, and unfounded violation notices and accusations of Use Agreement and rule violations, which were demeaning, embarrassing, humiliating, and harmful to Mr. Watkins, his clients, friends, other residents, and his business, while permitting Mr. Stefan and his trainers to continue to engage in surveillance of Mr. Watkins, take hostile and abusive actions against Mr. Watkins, violate Elements agreements and rules, and intrude on Mr. Watkins' private enjoyment of the facility, including the theatre, personal and assigned gym space, without correction or consequence;

3.25 On May 11, 2018, Defendants terminated completely Mr. Watkins’ Use Agreement and restricted his rights to use Elements common areas for training, based upon three “violation notices” that Mr. Watkins and his attorney notified Defendants were unfounded and disputed. Defendants continued an ongoing and exclusive relationship with Mr. Stefan who was allowed to continue to use Elements common areas for his personal and group training and fitness business while continuing to violate Elements policies and rules;

3.26 Even after he stopped using Elements common areas for his personal and group fitness training work, Defendants subjected, and continue to subject, Mr. Watkins to heightened scrutiny and surveillance, restrictions, and unfounded accusations of rule violations that are demeaning, embarrassing, humiliating, and harmful to Mr. Watkins, his friends, and other residents, and interfere with Mr. Watkins' personal use and enjoyment of the Elements common areas, including the gym rooms and the pool.

Hostile Living Environment

3.27 Defendants, by and through its management and employees, and its tenant and/or vendor Mr. Stefan, and the trainers who worked for him, subjected Mr. Watkins to unwelcome conduct based on race and/or retaliation that was so severe and/or pervasive that it altered the

1 terms and/or conditions of Mr. Watkins' housing and created a subjectively and objectively
2 hostile, intimidating and abusive living environment for Mr. Watkins. Defendants' unwelcome
3 conduct includes the acts and omissions set forth in paragraphs 3.1 through 3.26, which are
4 incorporated by reference herein, and additionally include, but are not limited to, the following:

5 **3.27.1** Defendants permitted its tenant and/or vendor, Mr. Stefan, and the trainers
6 who worked for him, to monitor and surveil Mr. Watkins' movements and activities as
7 he used common areas and worked, invade Mr. Watkins' personal space and crowd
8 common spaces that he, his clients, and other tenants were using, stare down Mr. Watkins
9 and his clients and other residents, confront them verbally, and make loud noise and bang
10 doors to disrupt their work; and confront Mr. Watkins when he parked in his normal
11 parking space in the garage.

12 **3.27.2** Even after Manager Long assigned Mr. Stefan to the 989 Building gym,
13 Defendants permitted Mr. Stefan, the trainers who worked for him, and their clients, to
14 enter and use common spaces assigned to Mr. Watkins, and which Mr. Stefan had been
15 directed to stay out of, where they engaged in surveillance, actions and behaviors, and
16 made comments and gestures, directed at Mr. Watkins and/or his clients, family, friends,
17 and other residents with whom Mr. Watkins associated, that interfered with
18 Mr. Watkins's quiet enjoyment of his housing and/or his training activities, made him
19 feel unsafe, were hostile and intimidating, abusive, provocative and threatening, and
20 caused Mr. Watkins emotional distress and fear;

21 **3.27.3** Defendants failed to investigate, or take prompt and effective corrective
22 action, after Mr. Watkins reported the hostile behavior and rule violations by Mr. Stefan,
23 and the hostile behavior and harassment continued;

24 **3.27.4** Defendants, by and through their employees and managers, also directly
25 participated in creating a hostile environment for Mr. Watkins by engaging in their
26 hyperscrutiny of Mr. Watkins, initiating unfounded complaints against him, encouraging

1 Mr. Stefan to document and initiate complaints against Mr. Watkins, withholding lease
2 renewals, imposing negative racial stereotypes and heightened standards to his use of the
3 facilities, accusing Mr. Watkins of rule violations based upon those standards and
4 stereotypes, engaging in hostile and abusive behavior and actions, and confronting and
5 embarrassing him for his quiet use and enjoyment of the premises in front of clients,
6 friends, and other residents.

7 **Retaliation**

8 **3.28** Defendants intimidated, threatened, and/or interfered with Mr. Watkins' exercise
9 or enjoyment of rights regarding real estate transactions in violation of RCW 49.60.2235.

10 **3.29** Mr. Watkins engaged in protected activity under the WLAD by making multiple
11 complaints of race discrimination to Defendants, including direct complaints to management
12 employees, a complaint of race discrimination through his attorney, and a complaint with the
13 Washington State Human Rights Commission.

14 **3.30** Defendants retaliated against Mr. Watkins for making these complaints by
15 increasing their different and adverse treatment of him, failing to renew his annual lease from
16 2014 – 2017 and limiting his lease to six months in 2020, restricting and terminating his use of
17 the common areas of the facility, subjecting him to hyperscrutiny and unfounded notices of
18 violation, and creating a hostile and abusive living environment, as set forth in paragraphs 3.1 to
19 3.27 above, which are incorporated by reference herein.

20 **Liability for Proximately Caused Harm and Damages**

21 **3.31** Defendants are directly liable for the acts and omissions of their managers,
22 employees, tenants and/or vendors and additionally are liable for the acts and omissions of their
23 managers, employees, tenants and/or vendors because they knew or should have known about
24 them and failed to take prompt and effective corrective action to stop the discrimination and
25 retaliation, which continued.
26

1 **3.32** As a proximate result of the Defendants' actions, Mr. Watkins has suffered and
2 will continue to suffer damages, including lost opportunity to use and enjoy the full benefits of
3 his housing, emotional distress and injury, pain and suffering, embarrassment, humiliation,
4 damage to reputation, economic and financial hardship, past and future loss of income, attorney's
5 fees and costs incurred to mitigate harm from Defendants' discrimination and retaliation,
6 inconvenience and lost opportunity caused by having to address discrimination and retaliation,
7 and other damages to be proved at trial.

8 **3.33** Defendants' discrimination and retaliation against Mr. Watkins is continuing.
9 Accordingly, the Commission requests an order that will eliminate and prevent recurrence of the
10 above-described discriminatory practices.

11 **IV. CAUSES OF ACTION**

12 **FIRST CAUSE OF ACTION** 13 **(Violation of the Washington Law Against Discrimination –** 14 **Disparate Treatment Because of Race)**

15 **4.1** The Commission re-alleges and incorporates by reference the allegations set forth
16 in each of the preceding paragraphs of this Complaint.

17 **4.2** Individuals have the right to be free from discrimination because of race,
18 including, but not limited to, the right to engage in real estate transactions without discrimination.
19 RCW 49.60.030(1)(c).

20 **4.3** It is an unfair practice to discriminate against a person in the terms, conditions,
21 or privileges of a housing/real estate transaction or in the furnishing of facilities or services in
22 connection therewith because of race. RCW 49.60.222(1)(b).

23 **4.4** Defendants unlawfully discriminated against Mr. Watkins, an African American,
24 in housing on the basis of race, by imposing different and adverse terms, conditions and
25 privileges in his housing/real estate transaction and in the furnishing of facilities and services,
26 including the use of the gym and other common areas, for himself and for conducting his
personal and group training/fitness business, as compared to similarly situated White person(s).

SECOND CAUSE OF ACTION
(Violation of the Washington Law Against Discrimination –
Hostile Environment Because of Race)

4.5 The Commission re-alleges and incorporates by reference the allegations set forth in each of the preceding paragraphs of this Complaint.

4.6 Individuals have the right to be free from discrimination because of race, including, but not limited to, the right to engage in real estate transactions without discrimination. RCW 49.60.030(1)(c).

4.7 Defendants, by and through their managers, employees, tenant and/or vendor, subjected Mr. Watkins to unwelcome conduct based on race that was so severe and/or pervasive that it altered the terms and/or conditions of Mr. Watkins' housing and created an objectively and subjectively intimidating, offensive and hostile environment, in violation of the WLAD. RCW 49.60.222(1)(b).

4.8 Respondent's management directly participated in the unwelcome conduct and harassment and/or knew or should have known of the unwelcome conduct and harassment, failed to take prompt and effective remedial corrective action, and the unwelcome conduct and harassment continued.

4.9 Defendants created a hostile living environment for Mr. Watkins because of race by allowing different and adverse terms and conditions of housing, permitting its tenant and/or vendor Mr. Stefan and the trainers he employs to engage in hostile, intimidating and abusive behavior and surveillance, monitoring and intrusion upon Mr. Watkins' space and work, and by directly engaging in hyper scrutiny of Mr. Watkins, initiating unfounded complaints against him, encouraging Mr. Stefan to document and initiate complaints against Mr. Watkins, withholding lease renewals, imposing negative racial stereotypes and heightened standards to his use of the facilities, accusing Mr. Watkins of rule violations based upon those standards and stereotypes, and confronting and embarrassing him for his quiet use and enjoyment of the premises in front of clients, friends, and other residents.

THIRD CAUSE OF ACTION
(Violation of the Washington Law Against Discrimination –
Retaliation)

4.10 The Commission re-alleges and incorporates by reference the allegations set forth in each of the preceding paragraphs of this Complaint.

4.11 It is an unfair practice to intimidate, threaten, and/or interfere with a person's exercise or enjoyment of rights regarding real estate transactions or retaliate against any person on account of his having exercised his right to be free from discrimination in housing, including by making complaints of discrimination. RCW 49.60.2235.

4.12 Defendants unlawfully retaliated against Mr. Watkins after he engaged in protected activity under the WLAD, and because of this protected activity, by increasing their different and adverse treatment of him, imposing restrictions and then terminating his use of the common areas of the facility, and subjecting him to hyperscrutiny, unfounded notices of violation, and a hostile and abusive living environment, all in violation of RCW 49.60.2235.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Washington State Human Rights Commission prays that the Court:

5.1 Adjudge and decree that Defendants have engaged in the conduct complained of herein.

5.2 Adjudge and decree that Defendants' conduct violates the Washington Law Against Discrimination, including RCW 49.60.030(1)(c), RCW 49.60.222(1)(b), and RCW 49.60.2235.

5.3 Enjoin Defendants from discriminating against, imposing different terms and conditions of housing, or creating a hostile environment because of race, and/or retaliating against tenants in the exercise of their rights to enjoyment of their housing, and require Defendants to change their policies and procedures to comply with this injunction.

5.4 Order other equitable relief which the Court finds necessary to eliminate the effects of past discrimination and retaliation, to prevent future discrimination and retaliation, and to position Mr. Watkins as close as possible to the situation he would have been in but for the

1 discrimination and retaliation. This includes retaining jurisdiction if necessary to fully effectuate
2 this Court's order.

3 **5.5** Award damages or other appropriate monetary relief to Mr. Watkins for lost
4 opportunity to use and enjoy the full benefits of his housing, emotional distress and injury, pain
5 and suffering, embarrassment, humiliation, damage to reputation, economic and financial
6 hardship, past and future loss of income, attorney's fees and costs incurred to mitigate harm from
7 Defendants' discrimination and retaliation, inconvenience and lost opportunity caused by having
8 to address discrimination and retaliation, and other damages in an amount to be proven at trial.

9 **5.6** Assess a civil penalty against Defendants in the amount of \$10,000 pursuant to
10 RCW 49.60.225(1)(a).

11 **5.7** Award attorney's fees and costs of suit.

12 **5.8** Award such other relief as the Court may deem just and proper.
13

14 DATED this 12th day of October 2020.
15

16 ROBERT W. FERGUSON
Attorney General

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18 ANDREA BRENNEKE, WSBA #22027

19 Assistant Attorney General
Office of the Attorney General
Wing Luke Civil Rights Division
800 5th Avenue, Suite 2000
Seattle, WA 98104
(206) 233-3384
Andrea.Brenneke@atg.wa.gov
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