



City of Seattle CLAIM FOR DAMAGES

CITY USE ONLY
CLAIM NUMBER
DATE FILED

Note:
Type or Print Legibly.
See instructions on back.

CLAIMANT	NAME (FIRST - MIDDLE - LAST, OR BUSINESS NAME) Jeffrey David Simpson	DATE OF BIRTH 10/19/1967	HOME PHONE
CURRENT HOME ADDRESS (NUMBER - STREET - CITY - STATE - ZIP) All contact should be through Cheryl L. Snow, Mr. Simpson's lawyer @			BUS. PHONE (206) 501-4446
HOME ADDRESS AT THE TIME THE CLAIM AROSE (NUMBER - STREET - CITY - STATE - ZIP) Friedman Rubin, 51 University St. Suite 201		CELL PHONE	E-MAIL ADDRESS csnow@friedmanrubin.com
ACCIDENT/LOSS	DATE SEE ATTACHED DESCRIPTION OF CLAIM	TIME SEE ATTACHED DESCRIPTION OF CLAIM	DIAGRAM Use if this will help you locate or describe what happened
LOCATION/SITE	BE VERY SPECIFIC: STREETS, ADDRESSES, etc. SEE ATTACHED DESCRIPTION OF CLAIM AND DAMAGES		
WHAT HAPPENED?	DESCRIBE IN YOUR OWN WORDS HOW THIS LOSS OCCURRED AND WHY YOU BELIEVE THE CITY IS RESPONSIBLE. (additional space on reverse side or attach additional pages and supportive documents as needed) SEE ATTACHED IDESCRIPTION OF CLAIM AND DAMAGES		
NAMES, ADDRESSES, AND PHONE NUMBERS OF ALL PERSONS INVOLVED IN OR WITNESS TO THIS INCIDENT			CITY DEPT?
1) SEE ATTACHED WITNESS LIST 2) _____ 3) _____			CITY EMPLOYEE
Ph: _____ Ph: _____ Ph: _____			CITY VEHICLE NUMBER, LICENSE, etc.
WAS YOUR PROPERTY DAMAGED? (i.e. Home, Auto, Personal Property)			
<input type="checkbox"/> YES IF SO, THEN FULLY DESCRIBE - SUCH AS AGE, MAKE, MODEL, CONDITION, VALUE, OR EXTENT OF DAMAGE			
<input type="checkbox"/> NO (additional space on reverse side or attach additional pages and supportive documents as needed)			
SEE ATTACHED DESCRIPTION OF CLAIM AND DAMAGES			
WERE YOU INJURED?	<input type="checkbox"/> YES IF YES, THEN COMPLETE THE FOLLOWING: <input type="checkbox"/> NO (additional space on reverse side or attach additional pages and supportive documents as needed)		
DESCRIBE YOUR INJURY (IDENTIFY YOUR DOCTOR(S))	SEE ATTACHED DESCRIPTION OF CLAIM AND DAMAGES		
WAGE LOSS <input type="checkbox"/> YES <input type="checkbox"/> NO IF YES, THEN RATE OF PAY: _____			
KIND OF WORK _____		EMPLOYER _____	
AMOUNT CLAIMED (if known)	\$ See Attached		
SIGNATURE OF CLAIMANT (AND TITLE, IF A BUSINESS)	I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct		
This claim form must be signed by the Claimant, verifying the claim; or pursuant to a written power of attorney, by the attorney in fact for the claimant; or by an attorney admitted to practice in Washington State on the claimant's behalf; or by a court-approved guardian or guardian ad litem on behalf of the claimant.	EXECUTED this <u>20th</u> day of <u>February</u> <u>2018</u>		
	At <u>SEATTLE</u> <u>KING</u> County, Washington		
	X <u>Cheryl L Snow, WSBA# 26757</u>		

PRESENTATION OF A CLAIM

This official City of Seattle document must be signed, and the form *with original signature* (not a photocopy or scanned copy) must be mailed *or* delivered.

Mail to:
CITY CLERK'S OFFICE
PO BOX 94728
Seattle, WA 98124-4728

Deliver to:
CITY HALL
600 Fourth Ave., 3rd floor
Between James St & Cherry St
Business Hours: Monday-Friday, 8:00 a.m.-5:00 p.m.
Closed on weekends and official City of Seattle holidays

An adjuster will be assigned to your claim after it is filed with the City Clerk's Office. **It is to your advantage** to present with your claim relevant supporting documents (receipts, cancelled checks, estimates, billings, etc.) or additional evidence (photos, diagrams, etc.). Please note that the claim form and other supporting documents filed with the City Clerk are considered public records under Revised Code of Washington Chapter 42.56, the Public Records Act. Public records are presumed subject to disclosure upon request. Additional claim forms can be downloaded from the Risk Management website: (<http://www.seattle.gov/riskmanagement/>)

EXPLANATION OF THE CLAIMS PROCESS

Shortly after your claim is filed in the City Clerk's Office, it is delivered to the Claims Section. The claim is then assigned to an adjuster who will contact you with your assigned claim number and their contact information and then they will conduct an investigation which includes a written response from the involved department(s). The Claims Section will then evaluate and recommend a reasonable resolution of your claim which will be one of three alternatives:

1. Pay a sum of money.
2. Tender – transfer to another party or entity responsible for your alleged damages.
3. Deny – where there is no evidence of any negligence by the City of Seattle.

If you have any questions about filing then do not hesitate to call 684-8213 during normal business hours Monday-Friday, 8:00 a.m.-5:00 p.m. If you have any questions after filing, call the Claims Adjuster assigned to your claim.

CS 19.10 REV. 12/14

THIS SPACE PROVIDED FOR ADDITIONAL INFORMATION

DESCRIPTION OF CLAIM AND DAMAGES FOR JEFF SIMPSON

Pursuant to RCW 4.96.020 and SMC 5.24.005, Plaintiffs file this Claim for Damages on behalf of Jeff Simpson to provide notice of Mr. Simpson's intent to file a lawsuit against the City of Seattle and Ed Murray. Mr. Simpson's complaint against the City of Seattle is for damages arising from claims of negligence and defamation.

Contrary to the repeated prior public accusations of Mr. Murray, his lawyer, and his spokesperson, and members of the Seattle City Council, Mr. Simpson's description of childhood sexual abuse does not arise from any anti-gay agenda or political motivation. Mr. Simpson is simply the survivor of horrific sexual abuse who sought justice and accountability from his abuser, Ed Murray. All he ever desired, was for the truth to be known – that Ed Murray sexually abused him.

For some unexplainable reason, the City of Seattle was never vested in the truth about Ed Murray coming out to the public. Instead of valuing the truth, it made the decision to quickly align itself with Ed Murray, joined in the accusations about Mr. Simpson's anti-gay and political motive, and allowed Mr. Murray to quickly mount a campaign of lies, misrepresentations, and disparagement of his accusers.

At no point did the City of Seattle make the slightest effort to attempt to objectively examine the background of its mayor or to conduct any type of investigation into the accusations. Despite the fact that one of its top employees could be a serial sex abuser, the City of Seattle appeared to view itself as unable and incapable of investigating the allegations.

Instead of seeking the truth and acting with transparency, starting in 2015, the City of Seattle chose to bury a report of childhood sexual abuse and rely solely on Mr. Murray and his various defenders' self-serving proclamation that the accusation was untrue. No report to any law enforcement agency was made. No internal investigation to gain independent knowledge was conducted. No one even attempted to interview or speak to the man who made the accusation.

When the accusations became public, the City of Seattle chose to publicly side with Mr. Murray and sat back and watched as Mr. Murray and his lawyer and spokesperson defamed, disparaged, and slandered his accusers.

Acting within the scope of employment and utilizing his position of power bestowed by the citizens of the City of Seattle, Mr. Murray spread false, prejudicial, and damaging information about Mr. Simpson. While on City of Seattle's time and dime, and with the assistance of City of Seattle employees,

Mr. Murray and his team were allowed to use and abuse the full might and power of Murray's position to wage a full-fledged campaign of disparagement and slander against Mr. Simpson and other survivors who came forward. And the leaders of the City of Seattle, who oftentimes publicly (and privately) sided with Mr. Murray, did nothing to stop this abuse of power. When a City of Seattle employee expressed concern about City resources and time being used by Mr. Murray, they quickly dismissed this concern. This failure to act and to, instead, continually endorse Mr. Murray's abuse of office was a failure to exercise ordinary care that caused added emotional distress, shame, and humiliation to Mr. Simpson, and childhood sex abuse victims everywhere.

Mr. Murray, backed by the City of Seattle, instantly went on a smear campaign to discredit Mr. Simpson and the other accusers. The City of Seattle leaders encouraged and accepted Mr. Murray's efforts to deflect attention away from his actions by falsely claiming that the accusations were politically motivated and intended as an attack on LGBTQ rights. In an April 14, 2017, Guest Editorial that Mr. Murray authored and submitted to the Stranger (as the Mayor of Seattle), Murray drove home his public announcement message that Mr. Simpson's accusations were politically motivated and that the accusations were a "hateful, homophobic stereotype brought to life." As if the victim shaming and blaming wasn't sufficient, Mr. Murray sought to frighten and guilt trip the Seattle public about his (personal) situation, ending his Editorial with the dramatic question of, "What has been the cost [of the accusations] to our city?"

Willfully misusing his position of power as Seattle Mayor to incite the public, (future jurors), mislead, lie, and extinguish the allegations against him, Mr. Murray repeatedly proclaimed to the public that Mr. Simpson and the other accusers were liars, mentally unstable, drug users, untrustworthy, criminals, homophobes, politically motivated, and hateful. Mr. Murray and his employees repeatedly told the public that no one should believe Mr. Simpson.

In releasing information about Mr. Simpson's criminal history Mr. Murray and those he employed intentionally misled the public. They intentionally ignored and omitted the stale age of Mr. Simpson's convictions, the fact that (due to their age) the convictions would likely never be admissible in a court of law, and the fact that Mr. Simpson had, in many ways, turned his life around – now crime free, drug free, married, a father, and employed. They erroneously disparaged Jeff Simpson to the public, which had a detrimental effect on Mr. Simpson and his loved ones. Mr. Murray and his employees hoped to shame and silence Mr. Simpson and reduce him down (in the public eye) to a nothing. And in so doing, they inflicted pain and suffering.

It's clear that the City of Seattle had no issue with devoting city resources and time to defending Mr. Murray and, thereby, funding his defamation campaign. Starting in (at least) 2015, the City of Seattle coordinated, conspired, and rallied behind Mr. Murray after it was contacted directly by one of Mr. Murray's victims. Instead of acting with transparency to the public, the City of Seattle buried the accusation, called in Mr. Murray's personal legal team, and held private meetings to craft responses to defend Mr. Murray if the allegations somehow emerged to the public.

The City of Seattle's coordinated defense and public support of Mayor Murray continued until the day he left office. The evidence will show that while Murray bemoaned the "political" attack against him, behind the scenes he desperately politicked and used city resources to his fullest advantage to rally support from Seattle City Council Members and former mayors.

Emails and text messages that were recently released to the Seattle Times reveal a disturbing amount of city time, city money, city equipment, and city politics devoted to protecting Ed Murray.

In July 2017, the Seattle Times published documents from the State of Oregon wherein an Oregon child-welfare investigator found that Ed Murray sexually abused his foster son (Jeff Simpson), leading state officials to assert that "under no circumstances should Mr. Murray be certified" as a foster parent in the future. In response to the documents, Mr. Murray (who like Jeff Simpson previously believed the documents had been destroyed) publicly denied being aware of this finding and the fact that he was prohibited from ever being certified as a foster parent.

Mr. Murray's false statement that "the system" had previously "vindicated" him (regarding Mr. Simpson's allegations) is entirely inconsistent with the documents. The documents also directly disprove the public statement of Murray's attorney, Robert Sulkin, who trumpeted that Mr. Simpson's claims had been "completely debunked" and "found to be false by law enforcement." And they directly disprove the statement of Mr. Murray's attorney, Janet Hoffman, that the Portland prosecutors must have been "thoroughly convinced" the allegations were "totally false." Instead, a letter from the Multnomah County prosecutor who withdrew the criminal case against Murray expressly stated that it was not because she thought Mr. Simpson was lying: "this is no way means that the District Attorney's Office has decided Jeff's allegations are not true."

By July 2017, Jeff Reading, Murray's long-time confidant and spokesperson, turned on Murray and pressed the Seattle City Council to demand Murray's resignation. In a text to council member Lorena Gonzalez, Reading urged

disqualification of Murray as the Seattle Mayor. He texted Gonzalez: "[S]eriously, who wants a mayor that CPS says sexually abused a minor and should never be put in that position again? It's astounding that Ed has had a 20 year career in elected office. These records should have disqualified him ..."

In response to this text, council member Lorena Gonzalez agreed, but expressed concern about Murray's supporters. "I don't know," she responded. "Ed worked Bruce [Harrell], Sally [Bagshaw] and Debora [Juarez] pretty hard."

In an effort to calm Murray's worries about a vote to disqualify him, council member Sally Bagshaw assured Murray's chief of staff that she was working on gaining support (for Murray) among other council members. "I think we will get 5 votes," she added. "I think you will like it." In perhaps one of the most richly hypocritical texts of all time Bagshaw (who had done nothing but publicly devalue the victim's' claims and privately campaign for her Mayor), then texted: "Shame on those who want a political witch hunt for their own political gain."

Like Mr. Simpson's allegations, Mr. Simpson's lawsuit has no political agenda and bears no anti-gay message. We fully recognize and advocate for the well-established principle that sexual deviancy has no relation to sexual orientation. This lawsuit is prompted by the damage inflicted by Mr. Murray's lies, denials, and abuse of power while working for the City of Seattle. It is brought to establish and advocate for the truth.

In short, Ed Murray lied. He did so when he: repeatedly denied any sexual contact with Mr. Simpson, labeled Mr. Simpson as being politically motivated and anti-gay, called Mr. Simpson untrustworthy, misrepresented Mr. Simpson's criminal history, denied knowledge of being permanently disbarred from being certified as a foster parent, and claimed that Mr. Simpson's criminal case had been withdrawn by the prosecutor because it was "totally false". And these lies, together with the efforts of the City to sustain them, harmed Mr. Simpson and his family.

WITNESS LIST:

The Plaintiff's witnesses include all persons who have been identified above in the notice of claim and includes, but is not limited to:

Jeff Simpson

Ed Murray

Michael Shiosaki

Jeff Reading

Robert Sulkin

Sally Bagshaw

Lorena Gonzalez

Mary Tomlinson

Mike Fong

Joe Mirabella

Susan Coskey

AMOUNT CLAIMED

Based on the continuing nature of the damages suffered by the claimant, the exact amount of his claim cannot be listed at this time. Claimant recognizes that a jury will determine the amount of damages that they are entitled to. For notice purposes, claimant's counsel asserts that damages and fees could collectively exceed \$1,000,000.