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SEP 14 2021

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE**

21202600-32

<p>CHRISTIANNE M. LAURIA, Plaintiff, vs. FINANCIAL FORUM AND JEFFREY COMSTOCK, individually and the marital community composed thereof, Defendants.</p>	<p>Case No. 21202600-32 COMPLAINT FOR DAMAGES FOR TORT OF WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY GENDER DISCRIMINATION AND RETALIATION FOR OPPOSING GENDER DISCRIMINATION, WHISTLEBLOWER ACTIVITY, AND WASHINGTON EQUAL PAY AND OPPORTUNITIES ACT, RCW 49.58 DEMAND FOR JURY TRIAL</p>
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COMPLAINT - 1

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1 Plaintiff, Christianne M. Lauria (“Ms. Lauria”) through her attorneys Michael B. Love of
2 Michael Love Law, PLLC, and Matthew Z. Crotty of Crotty & Son Law Firm, PLLC, asserts the
3 following claims relating to her wrongful discharge in violation of public policy: gender
4 discrimination, retaliation for opposing gender discrimination in the workplace, whistleblower
5 activity and violation of Equal Pay and Opportunities Act, RCW 49.58.

6 Explicit and implicit gender bias is alive and well and continues to permeate American
7 Society even in the face of the “Me Too” movement and the criminal convictions of Jeffrey
8 Epstein and Harvey Weinstein for sex crimes against women.

9 Women who are not victims of criminal behavior unfortunately continue to face civil
10 mistreatment: unequal pay for equal work and an imbalance of power even when they have
11 superior experience, education and qualifications. When accomplished women complain they are
12 branded and face invidious discrimination and retaliation in the workplace resulting in being
13 thrown to the proverbially curb of life.

14 Every person has a story. This is Ms. Lauria’s sad story of gender discrimination and
15 retaliation in the workplace and wrongful discharge.

16 I. JURISDICTION AND VENUE

17 1. Ms. Lauria was a resident of Spokane County at the time the incidents alleged in her
18 complaint occurred.

19 2. Defendant Financial Forum is a Washington profit corporation whose principal office
20 address is 501 N Riverpoint BLVD STE 104, Spokane, Washington, 99202-1679. Defendant
21 Financial Forum’s UBI# is 602 679 600. The registered agent for service of process is Eric

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1 Sachtjen. Mr. Sachtjen's street and mailing address is 717 W Sprague Ave. Ste. 1200, Spokane,
2 Washington, 99201-0000. The nature of the business is wealth management.

3 3. Defendant Jeffrey Comstock is listed as one of the individual governors of Financial
4 Forum, a wealth advisor and managing partner.

5 4. The Spokane County Superior Court has personal jurisdiction over the parties and
6 subject matter jurisdiction over the claims in this Complaint.

7 5. Venue is proper in Spokane County because Financial Forum and Jeffrey Comstock
8 conduct business in Spokane County and the acts and omissions giving rise to Ms. Lauria's
9 Complaint took place in Spokane County, Washington.

10 II. FACTS

11 6. Ms. Lauria re-alleges the above paragraphs 1 through 5 as if fully set forth herein.

12 7. Ms. Lauria is 35 years old. Ms. Lauria is a graduate of Pepperdine University and its
13 business school and has a Master's in Business Administration from St. John's University in
14 Jamaica, New York. Ms. Lauria has substantial work experience (both domestic and
15 international) in the area of finance and wealth management.

16 *Ms. Lauria is hired and her relationship with Jeffrey Comstock is initially positive and
17 she always received positive performance evaluations and increases in salary and bonuses until
18 such time as she engaged in whistleblower activity.*

19 8. In August of 2018, Ms. Lauria was hired by Financial Forum as a "Wealth Management
20 Associate" at \$20.00 per hour or an annual salary based compensation of \$41,600. Ms. Lauria
21 attempted to negotiate a higher salary based compensation with Jeffrey Comstock based upon her
22 work experience (both domestic and international in the area of finance and wealth management)

23 COMPLAINT - 3

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1 and education which included undergraduate and graduate degrees from well-known and
2 prestigious universities in business, but Jeffrey Comstock refused to negotiate or discuss the
3 matter.

4 9. In December of 2018, Financial Forum awarded Ms. Lauria a \$2,000 bonus for good
5 performance.

6 10. In February of 2019, Ms. Lauria received an increase to \$23.00 per hour or an annual
7 salary based compensation of \$47,840 after a successful performance review, but was expected
8 to be available 24/7.

9 11. In July of 2019, Ms. Lauria's title was changed to Director of Operations with no
10 increase in pay. Ms. Lauria's job duties, however, increased. Ms. Lauria was assigned the
11 additional duties of running all office operations, including the internship program, and being in
12 charge of staff with no increase in pay at that time.

13 12. In August of 2019, after another glowing performance review Ms. Lauria's hourly rate
14 was increased to \$25.00 per hour or an annual salary based compensation of \$52,000 and received
15 a merit based bonus of \$3,000.

16 13. In December of 2019, Ms. Lauria received another positive performance review and
17 an above average bonus based on outstanding merit in the amount of \$3,000.

18 14. There is no evidence in Ms. Lauria's personnel file, or the file that was kept prior to
19 her termination, of any issues with her job performance, ability to follow the employer's policy
20 or law, or interpersonal communication skills with staff, employees, supervisors or owners.

1 *Ms. Lauria begins to have concerns about another employee she hired and supervised*
2 *and issues of alleged fraud on the part of this employee.*

3 15. Over the course of several months from July through November of 2019, Ms. Lauria
4 on several occasions brought to Jeffrey Comstock's attention she was not comfortable signing
5 alleged fraudulent time sheets of another employee, Wing "Tiffany" Wong.¹

6 16. In March of 2020 Ms. Wong's title with Financial Forum was "Marketing and Client
7 Service Associate." The application submitted was for a technical financial analyst. Ms. Wong
8 produced a rough draft of her job title and description as Marketing Associate, but Jeffrey
9 Comstock told Ms. Wong her job description would not qualify for an H1B Visa. As a result,
10 Jeffrey Comstock rewrote Ms. Wong's job description and placed it in plain view on Ms. Wong's
11 desk.

12 17. When Ms. Lauria saw the job description she raised the issue of fraud with Ms. Wong
13 and told her submitting a fraudulent application is a federal crime. Ms. Wong admitted she was
14 not aware of the definition of some terms or items in the job description or what they meant. Ms.
15 Lauria continued to raise concerns as well about Ms. Wong and the fraudulent Application issue
16 all the way up to the time she was wrongfully discharged.

17
18 ¹ Ms. Wong originally worked for Financial Forum as a college intern. Ms. Wong is originally
19 from Hong Kong. Ms. Lauria hired Ms. Wong as a full-time employee.

1 18. In April of 2020 Ms. Lauria brought to Jeffrey Comstock's attention her concerns
2 relating to an alleged fraudulent H1B Visa Application relating to Ms. Wong which was submitted
3 to USCIS for an H1B Visa Application ("Application"). The Application misrepresented Ms.
4 Wong's responsibilities at Financial Forum in order to prove her position was highly technical in
5 nature to ensure a Visa would be issued. Mr. Comstock responded by telling Ms. Lauria it was
6 "not my business" and "don't worry about it everyone does it" implying that everyone lies on
7 these types of applications. Ms. Lauria and other staff in the office were concerned over this issue
8 due to the potential individual and company exposure. Due to tension already existing between
9 Ms. Lauria and Jeffrey Comstock over Governor Inslee's stay at home order, the conversation
10 was heated between them.

*The worst pandemic since the end of the First World War strikes and Ms. Lauria's
relationship with Jeffrey Comstock dramatically changes.*

11 19. In March of 2020 at the start of the Covid-19 Pandemic, and Governor Inslee's stay
12 at home order, Ms. Lauria advised Jeffrey Comstock that "it was our social responsibility" to
13 allow employees to work from home. Ms. Lauria wanted to work from home. Jeffrey Comstock
14 told Ms. Lauria in response if she (and others) wanted their jobs they would have to come into
15 the office and not work remotely even though appropriate technology was available to work
16 remotely. A heated discussion over this issue ensued between Ms. Lauria and Jeffrey Comstock.²

17
18 ² Ms. Lauria was personally concerned about Covid-19 because she suffers from Crohn's disease
19 which can compromise a patient's ability to fight off the virus and put them at risk for death.
20 Financial Forum and Jeffrey Comstock were aware of her disease.

1 *Jack Bell “a good clean All-American white boy is hired” by Jeffrey Comstock.*

2 20. In May of 2020, Jack Bell, a twenty-two (22) year old white male, was offered a full-
3 time position as a “Wealth Management Associate” straight out of college with no graduate school
4 degree or work experience (other than a part-time summer internship with Financial Forum while
5 still in school) earning a purportedly negotiated starting salary plus benefits of \$58,000 per year.³
6 This was more than Ms. Lauria, a female, received when she was initially hired to work in the
7 same position for Financial Forum as a “**Wealth Management Associate**” despite having, at the
8 time, more than eight (8) years of experience in the business world (both domestic and
9 international) and a Master’s in Business Administration in comparison to Jack Bell. Ms. Lauria
had actually hired Jack Bell as a summer intern.

10 21. On several occasions after Jack Bell’s hiring Jeffrey Comstock stated to Ms. Lauria:
11 **“Jack (Bell) is exactly what I was looking for: a good clean all-American white boy”** who
12 Jeffrey Comstock further commented **“fit the bill of a financial advisor because he was a white
13 male.”** When Ms. Lauria complained about the obvious gender discrimination and disparity in

14 ³ While Jack Bell, a recent college graduate, and white male was allowed to negotiate a higher
15 salary, Ms. Lauria, a female with superior qualifications relating to work experience and education
16 was left with a proverbial take it or leave it job offer. Defendants will assert that Jack Bell was
17 hired at a negotiated salary of \$50,000 per year and that he never made more than Ms. Lauria.
18 However, Ms. Lauria observed Jack Bell’s offer letter from Jeffrey Comstock which listed a
starting salary plus benefits of \$58,000 per year for the same position at time of hire. Regardless,
what is undisputed is Ms. Lauria was hired for the same starting position (Wealth Management
Associate) at \$41,600 per year which is undisputed, in comparison to Jack Bell at \$50,000, even
though Ms. Lauria had more education (MBA) and work experience (8 years both domestic and
international) than Jack Bell a recent graduate who Ms. Lauria hired as a summer intern for
Financial Forum. When Ms. Lauria later raised concerns she was retaliated against and later
terminated.

1 pay between herself and Mr. Bell at time of hire for the same position and job title, Jeffrey
2 Comstock became quite angry and made the following comments to Ms. Lauria: **“Don’t make
3 this about gender.” “Don’t jump on the bandwagon of ‘Me Too’ and feminism.”**

4 22. When Ms. Lauria continued to complain to Jeffrey Comstock over the disparity in
5 compensation based on gender and obvious unfairness of the situation relating to Jack Bell, a
6 white male, Jeffrey Comstock responded: **“You need to get over fair treatment, that’s life and
7 life isn’t fair.”** Ms. Lauria continued to complain to Jeffery Comstock about the gender
8 discrimination and disparity in pay between herself and Jack Bell all the way up to the time she
9 was wrongfully discharged.

10 *The retaliation for Ms. Lauria’s protected activity of opposing gender discrimination in
11 the workplace and obvious whistleblower activity is accelerated which ultimately leads to her
12 wrongful termination.*

13 23. In the middle of August 2020, Ms. Lauria was informed, with no prior warning, by
14 Jeffrey Comstock that she would not be receiving a promised raise and bonus despite the
15 successful completion of a transition project for Financial Forum.

16 24. In September of 2020, Ms. Lauria confided in Landy Comstock, the father of Jeffrey
17 Comstock, and a partner in Financial Forum about these workplace issues, in particular, her
18 concerns about Ms. Wong and the fraudulent Application to no avail.

19 25. On September 28, 2020, Ms. Lauria again complained to Jeffrey Comstock over issues
20 with her compensation, as compared to Jack Bell, and Jeffrey Comstock’s decision to deny a
21 promised raise and bonus to Ms. Lauria. Jeffrey Comstock responded to Ms. Lauria’s complaint

1 by telling Ms. Lauria “you are not worth anything more than \$25.00 per hour.” Tragically
2 and effectively by making this bold statement of gender discrimination and gender bias relating
3 to compensation, Jeffrey Comstock imposed and placed a *glass ceiling* over Ms. Lauria’s head.

4 26. On September 29, 2020, Ms. Lauria was wrongfully terminated by Jeffrey Comstock.

5 27. After Ms. Lauria’s termination, Financial Forum and Jeffrey Comstock continued to
6 retaliate by failing to provide appropriate notice to her relating to her retirement accounts which
7 were held by Financial Forum.

8 III. CLAIMS

9 Tort of Wrongful Discharge Claims: Gender Discrimination, Whistleblower 10 Activity and Retaliatory Discharge

11 (BOTH DEFENDANTS)

12 28. Ms. Lauria re-alleges the above paragraphs 1 through 27 as if fully set forth herein.

13 29. Employees in Washington are protected from being discharged in violation of a clear
14 mandate of public policy. The stated public policy is either constitutionally, legislatively or
15 judicially recognized. *Thompson v. St. Regis Paper Company*, 102 Wash.2d 219, 232 (1984).

16 30. The common law tort of wrongful discharge applies to a small employer, employing
17 fewer than eight persons. *Roberts v. Dudley*, 140 Wash. 2d 58, 60, 66-77 (2000).

18 31. The Washington Supreme Court has allowed a plaintiff to sue, for wrongful discharge
19 in violation of public policy, his or her former supervisors in their individual capacities. *Roberts*
20 *v. Dudley*, 140 Wash. 2d at 61; *Lindsey Organik Techs., Inc.*, 1999 WL 239469 *4 (1999)

1 (rejecting individual defendant’s argument that “they cannot be held personally liable on
2 Lindsey’s claims for wrongful discharge.”)

3 32. There is a strong, countervailing public policy against wrongful discharge especially
4 relating to gender discrimination in the workplace and opposing gender discrimination. *Roberts*
5 *v. Dudley*, 140 Wash.2d at 60, 66-77; RCW 49.12.200; Equal Rights Amendment, WASH.
6 CONST. art. XXXI, § 1 (amend. 61); Law Against Discrimination⁴, RCW 49.60.180 and RCW
7 49.60.210; Equal Pay and Opportunities Act, RCW 49.58.

8 33. Following *Thompson*, the tort of wrongful discharge in violation of public policy has
9 been recognized where employees are fired in retaliation for reporting employer misconduct, i.e.,
10 whistleblowing. *Dicomes v. State*, 113 Wash.2d 612, 618, (1989).

11 34. Once a plaintiff shows the violation of a public policy, in this case gender
12 discrimination (unequal pay for equal work), opposing gender discrimination (same), and
13 whistleblowing activity (reporting purported fraud), the burden shifts to the employer to prove
14 the dismissal was for reasons other than those alleged by the employee. *Thompson*, 102 Wash.
15 2d at 233. See also *Wilmot v. Kaiser Aluminum & Chem. Corp.*, 118 Wash.2d 46, 70 (1991)
16 (“Employer must articulate a legitimate non-pretextual non-retaliatory reason for the discharge.”)

17 35. Under each scenario, Ms. Lauria is required to identify the recognized public policy
18 and demonstrate the Defendants contravened the policy by terminating her employment. *Gardner*

19 ⁴ Defendants have asserted they have less than 8 employees for purposes of a statutory remedy
20 under Chapter 49.60 RCW. Plaintiff reserves the right to amend her complaint if this assertion is
-- proven to be inaccurate.

1 v. *Loomis Armored Inc.*, 128 Wash.2d 931, 945 (1996) (finding employees must show “they
2 engaged in particular conduct,” which “directly relates to the public policy”); *Thompson*, 102
3 Wash.2d at 232 (finding the employee must demonstrate the dismissal violates a clear mandate
4 of public policy). Ms. Lauria clearly will be able to do so in support of her wrongful discharge
5 claims. See ¶¶ 7-27 of Ms. Lauria’s Complaint for Damages.

6 36. Washington courts apply a three-step, burden-shifting test taken from *McDonnell*
7 *Douglas Corp. v. Green*, 411 U.S. 792 (1973); *Scrivener v. Clark Coll.*, 334 P.3d 541 (Wash.
8 2014) (applying the *McDonnell Douglas* framework in the employment discrimination context).

9 37. The first step is for Ms. Lauria to make out a prima facie case for retaliatory discharge.
10 *Wilmot v. Kaiser Aluminum & Chem. Corp.*, 821 P.2d 18, 28-29 (Wash. 1991). To do so, Ms.
11 Lauria need not attempt to prove the Defendants’ sole motivation was discrimination or retaliation
12 or both. *Wilmot*, 821 P.2d at 30. Rather, Ms. Lauria need only produce evidence – even if
13 circumstantial – that her actions, which were in furtherance of public policy, were “a cause of
14 firing.” *Id.* at 30; *Rickman v. Premera Blue Cross*, 358 P.3d 1153, 1160 (Wash. 2015).

15 38. At the second step, the burden of production shifts to the Defendants who must
16 articulate a legitimate, non-retaliatory reason for the discharge. *Wilmot*, 821 P.2d at 29.

17 39. The third step requires Ms. Lauria to respond to the Defendants’ proffered reason by
18 showing either (1) the Defendants’ articulated reason is a pretext, or (2) even if the Defendants’
19 stated reason is legitimate, retaliation for protected conduct was nevertheless a substantial
20 motivating factor. *Wilmot*, 821 P.2d at 31.

1 40. Ms. Lauria will produce sufficient evidence to not only survive summary judgment,
2 but also prevail in front of a jury of her peers.

3 41. By standing up for herself as an accomplished professional women in opposing
4 obvious gender discrimination in the workplace over unequal pay for equal work at time of hire
5 to the same position, and despite the fact she had far more experience, education and job
6 responsibilities than a white male and former summer intern she hired (Jack Bell) who was a
7 recent college graduate, Ms. Lauria was engaged in protected activity.

8 42. Ms. Lauria was also engaged in protected activity *as a whistleblower* when she had a
9 reasonable good faith belief that fraud was being perpetrated on an Application to obtain an H1B
10 Visa relating to Ms. Wong with the assistance of Financial Forum and Jeffrey Comstock.

11 43. Ms. Lauria's engagement in protected activity was a *substantial factor* for her
12 discharge based upon the close proximity in time between her protected activity and her
13 termination. *Kahn v. Salerno*, 90 Wash. App. 110, 130-31 (1998) ("Proximity in time between
14 the adverse action and the protected activity, coupled with evidence of satisfactory work
15 performance and supervisor evaluations suggests an improper motive.")

16 44. The person who notified Ms. Lauria of her termination was Jeffrey Comstock who
17 had clear animus towards Ms. Lauria based on her complaints of gender discrimination, gender
18 bias, and whistleblower activity. Jeffrey Comstock's comments and evidentiary admissions of
19 gender discrimination and gender bias to Ms. Lauria is proof of direct animus and bias and will
20 preclude summary judgment. *See* ¶¶ 7-27 of Ms. Lauria's Complaint for Damages; Rule ER 801
-- (d) (2) Admission of a Party Opponent which is not hearsay. ER 801 (d) (2)

COMPLAINT - 12

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1 45. As a result of the conduct of the Defendants, Ms. Lauria has sustained substantial
2 damages both economic and non-economic.

3 **WASHINGTON EQUAL PAY AND OPPORTUNITIES ACT, RCW 49.58**

4 **(BOTH DEFENDANTS)**

5 46. Ms. Lauria re-alleges the above paragraphs 1 through 45 as if fully set forth herein.

6 47. The legislature has determined “that in order to promote fairness among workers,
7 employees must be compensated equitably. Further, policies that encourage retaliation or
8 discipline towards workers who discuss or inquire about compensation prevent workers from
9 moving forward.” RCW 49.58.005(1)

10 48. “Historically, women have been offered lower initial pay than men for the same jobs
11 even where their levels of education and experience are the same or comparable.” RCW
12 49.58.005(b)

13 49. Ms. Lauria is an “Employee” for purposes of the Act.⁵ RCW 49.58.010(4)

14 50. Financial Forum and Jeffrey Comstock meet the definition of an employer.⁶ RCW
15 49.58.010(5)

16
17 ⁵ “Employee” means an employee who is employed in the business of the employee’s employer
whether by way of manual labor or otherwise.

18 ⁶ “Employer” means any person, firm, corporation, partnership, business trust, legal representative,
or other business entity which engages in any business, industry, profession, or activity in this state
and employs one or more employees, . . .

1 51. "If any employee receives less compensation because of discrimination on account of
2 gender" than a "similarly employed" employee the employee is entitled to statutory remedies.

3 RCW 49.58.020(1)

4 52. Employees are "similarly employed if the individuals work for the same employer,
5 the performance of the job requires similar skill, effort and responsibility, and the jobs are
6 performed under similar working conditions. Job titles alone are not determinative of whether
7 employees are similarly employed." RCW 49.58.020(2)

8 53. "An employer may not discharge or in any manner retaliate against an employee for:
9 . . . (2) (a) Inquiring about, disclosing, comparing, or otherwise discussing the employee's wages
10 or the wages of any other employee." RCW 49.58.040(2) (a)

11 54. "An employer may not retaliate, discharge, or otherwise discriminate against an
12 employee . . . because of the exercise by such employee on behalf of . . . herself . . . of any right
13 afforded by this chapter." RCW 49.58.050

14 55. "A violation of this chapter occurs when a discriminatory compensation decision or
15 other practice is adopted, when an individual becomes subject to a discriminatory compensation
16 decision or other practice, or when an individual is affected by application of a discriminatory
17 compensation decision or other practice, including each time wages, benefits, or other
18 compensation is paid, resulting in whole or in part from such a decision or other practice." RCW
19 49.58.080

20 56. Defendants committed a violation of the provisions of RCW 49.58 which triggered
21 actual damages, attorney fees and costs at the time Defendants made the fateful decision to pay

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1 Ms. Lauria a lower wage at the time she was hired to the same position than a similarly employed
2 person, in this case, Jack Bell, beginning in May of 2020 and continuing to the present. Ms.
3 Lauria had more experience in the industry, more education, a Master's in Business
4 Administration, and had worked for Financial Forum longer than Jack Bell when he was hired by
5 Financial Forum. Jack Bell was a former part-time summer intern hired by Ms. Lauria and recent
6 college graduate when he was hired as a "Wealth Management Associate". Jack Bell did not have
7 a graduate degree (let alone a Master's in Business Administration). Jack Bell had no prior
8 experience in the financial industry outside of a 3-month internship. Yet Jack Bell was allowed
9 to negotiate, at time of hire, a substantially larger wage or salary in comparison to a "similarly
10 employed" person Ms. Lauria who was denied this basic human and legal right as an
11 accomplished professional business woman at time of hire to the same position. This disparity in
12 wage or salary compensation between similarly employed persons was never fixed. Jack Bell
13 received a higher wage or salary at the time he was hired than Ms. Lauria and this discriminatory
14 wage practice or decision continued all the way to the end of Ms. Lauria's employment with
15 Financial Forum and continues to the present. RCW 49.58.050, 49.58.070-080; see ¶¶ 7-27 of
16 Ms. Lauria's Complaint for Damages.

17
18
19 57. As a result of the statutory violations by the Defendants and subjecting her to a
20 retaliatory discharge after she exercised her rights, Ms. Lauria is entitled to bring a civil action
-- and recover substantial damages, including attorney fees and costs. RCW 49.58.070(1)

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III. PRAYER FOR RELIEF


58. Ms. Lauria respectfully seeks all damages allowed under the law including actual damages as defined under Chapter 49.58 RCW, and back pay, front pay, pre-judgment interest, adverse tax consequences, and general damages under the tort of wrongful discharge claims.

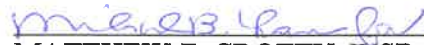
59. Attorney's fees and costs, and litigation expenses allowed under RCW 49.48.030, RCW 49.58.020, RCW 49.58.070 and the *private attorney general* concept of recovery under the law.

60. A declaration the Defendants violated the law.

61. All other relief that is just and equitable, including injunctive relief.

DATED this 14th day of September, 2021


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