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WHATCOM COUNTY RECEIVED

Tort Claim Packet

AUG 15 2025

CLAIM FORMS AND INSTRUCTIONS

WHATCOM COUNTY
COUNCIL

Please carefully read all of the information in this packet before completing and submitting your claim for damages.

The following forms in this packet are for filing a tort claim against Whatcom County, pursuant to RCW 4.96. All claim forms must be signed and delivered to the Whatcom County Council's Office.

Documents contained in this packet:

1. Claim for Damages
2. Vehicle Collision Form (required if vehicle is involved)
3. Medical Authorization (required if you are claiming personal injuries)

Type or print clearly in ink and sign the Claim for Damages form. If the requested information cannot be written in the space provided, please use additional blank sheets so your claim can be easily read and understood. Do not write on the back of the forms.

The more information you provide, the more accurate we can be in our response. Please remember the investigation process may take some time. You are required to mitigate (minimize) your own losses. You may wish to look to your own insurer first if time is of the essence.

For a tort claim notice to be effective, the packet must be substantially completed and delivered or mailed to:

WHATCOM COUNTY
Clerk of the County Council
311 Grand Ave., Ste. 105
Bellingham, WA 98225-4079

Business Hours: Monday- Friday 8:30 a.m. to 4:30 p.m.
Closed on weekends and holidays
Office Telephone Number: 360-778-5010

We will not accept service of your claim by E-mail or Fax. Please feel free to contact our Civil Division in the Prosecuting Attorney's office at (360) 778-5755 with any questions regarding this packet or the claims process.

After receiving your claim, additional information may be requested. This information may include documents or other evidence supporting your claim such as medical records or bills for personal injuries, photographs, proof of ownership for property damages, estimates for damages, receipts for property value, or other relevant documents or evidence. Please respond promptly if such additional documentation is requested.

AUG 15 2025

WHATCOM COUNTY
COUNCILWC CLAIM NO.

CLAIM FOR DAMAGES

Review Instructions Prior to Completing this Form PLEASE TYPE OR PRINT IN INK

Pursuant to RCW 4.96, this form is for filing a tort claim against Whatcom County. The requested information on this form may be subject to public disclosure pursuant to the Public Records Act (RCW 42.56) or other law.

All Claim forms must be signed and the original provided to the Whatcom County Council's Office. Forms must be presented in person or mailed to:

WHATCOM COUNTY**Clerk of the County Council**

311 Grand Ave., Ste. 105

Bellingham, WA 98225-4079

Business Hours: Monday- Friday 8:30 a.m. to 4:30 p.m.

Closed on weekends and holidays

Office Telephone Number: 360-778-5010

1. Name of Claimant:

Lautenbach	Erika		
Last Name	First	Middle	Date of Birth

2. Residential Address:

Street	City	State	Zip
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3. Mailing Address (if different)

701 Fifth Avenue Suite 3600, Seattle, Washington 98104

Street	City	State	Zip
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4. Phone Number: 206-622-8020

5. Email: mlamb@carneylaw.com

6. Date of Incident: March 19, 2025 Time of Incident: ☐ am ☐ pm

7. Location of incident:

N/A	
Address	City, Building or Office if applicable

8. Location if the incident occurred on a Street or Highway:

***Please attach any law enforcement reports generated in connection with the accident, if any**

9. Name of Street or Highway, Milepost Number OR At the intersection with/or nearest cross street
County agency or department involved:

County Executive Satpal Singh Sidhu

10. Names, Addresses and Telephone Numbers of all county employees having knowledge about this incident:

- Satpal Singh Sidhu;
- Dr. Jon Hutchings;
- All current and former County Councilmembers, including but not limited to Kaylee Galloway, Todd Donovan, Tyler Byrd, Mark Stremmer, Ben Elenbaas, Barry Buchanan, and Jon Scanlon;
- County Sheriff Donnell Tanksley;
- Kayla Schott-Bresler;
- Melissa Keeley and Aly Pennucci.

11. Names, Addresses and Telephone Numbers of all persons involved in or witnesses to this incident and a description of the nature of their knowledge or involvement:

See Attachment.

12. Names, Addresses and Telephone Numbers of all individuals not previously identified above that have knowledge regarding the liability issues involved in this incident, or knowledge of the Claimant's resulting damages. Please include a brief description as to the nature and extent of each person's knowledge. Attach additional sheets if necessary:

See Attachment.

13. Describe the cause of the damages or injuries. Explain the extent of property loss or medical, physical or mental injuries. Attach additional sheets if necessary:

See Attachment.

ATTACH ALL SUPPORTING DOCUMENTS TO THIS CLAIM PACKET, INCLUDING PHOTOGRAPHS, LAW ENFORCEMENT REPORTS, WITNESS STATEMENTS, INVOICES, ESTIMATES, AND ANY OTHER DOCUMENTATION TO SUPPORT YOUR CLAIM. IF YOU ARE CLAIMING PROPERTY DAMAGES, PLEASE INCLUDE TWO ESTIMATES FOR DAMAGES.

14. Was this incident reported to law enforcement, safety or security personnel? Please attach a copy of the report and contact information.

See Attachment.

15. Names, Addresses and Telephone Numbers of all treating medical providers.

*Attach copies of your medical records and bills:

See Attachment.

16. If a Vehicle is involved, fill out the following information and the attached Vehicle Collision Form:

- a. Year:
- b. Make:
- c. Model:
- d. Color:
- e. License #:

17. Name of Insurance Company and Contact Information (if applicable):

- a. Claim #:
- b. Claim Representative:
- c. I am claiming damages from Whatcom County in the sum of: **\$1,500,000.00**

18. This claim form must be signed by the Claimant, a person holding a written power of attorney from the Claimant, by the attorney in fact or an attorney admitted to practice in Washington State on Claimant's behalf, or by a court-approved guardian or guardian ad litem on behalf of the Claimant.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signature of Claimant

Date

City and County



, August 14th, 2025

Signature of Representative /relationship to Claimant Date

Seattle, King County

City and County

Attorney for Erika Lautenbach

Identity of Signature above and/or relationship to Claimant:

ERIKA LAUTENBACH NOTICE OF TORT CLAIM TO WHATCOM COUNTY

Carney Badley Spellman represents Erika Lautenbach in relation to her wrongful termination from her position as Director for Whatcom County Health and Community Services (“WCHCS”). Whatcom County (the “County”) is liable for the discrimination, hostile work environment, employment retaliation, and First Amendment retaliation Ms. Lautenbach experienced at the behest of County Executive Satpal Singh Sidhu. His decision to place Ms. Lautenbach on leave and then abruptly terminate her before she was able to exercise her statutorily protected 21-day consideration period for the Separation Agreement he provided was insulting and, moreover, discriminatory. Worse yet, Mr. Sidhu’s conduct and decision to terminate appear to be yet another chapter of his failed leadership and ethically questionable conduct. The circumstances and his actions create significant legal exposure for Whatcom County (“County”).

FACTUAL BACKGROUND

Mr. Sidhu’s Expressed Bias of Women. When Ms. Lautenbach interviewed with Mr. Sidhu and former Deputy Executive Tyler Schroeder in February of 2020, Mr. Sidhu inquired about how Ms. Lautenbach was doing. She replied that she was fine; she and her husband were remodeling their kitchen, so they were busy. He immediately responded “Ah, the kitchen, a woman’s palace”. Both Mr. Schroeder and Ms. Lautenbach were taken aback and very uncomfortable with the comment. Mr. Schroeder said something to the effect of being in the kitchen quite a bit and the conversation moved on. It was clear to Ms. Lautenbach, however, that if she worked for Mr. Sidhu, there would be a bias she would face as a woman.

The Coverup of Dr. Hutchings’s Sexual Harassment. On or about January 31, 2024, Ms. Lautenbach was required to participate in a panel hearing to ostensibly discuss the propriety of the conduct of a *former* Public Works Director, Dr. Jon Hutchings, nearly 1½ years after his departure. In reality, the panel became a “name clearing hearing” designed to limit the County’s legal liability by failing to acknowledge the facts of Dr. Hutchings’s conduct. The panel included Bennett Knox (Parks Director), Donnie LaPlante (former HR Assistant Director), George Roche (former Prosecuting attorney), and Dr. Hutchings, the accused sexual harasser. Ms. Lautenbach was the only woman in the room.

The male dominated panel afforded Dr. Hutchings—a *former* employee—nearly two hours of speaking time in which he described alleged mitigating circumstances related to the sexual harassment allegations. The panel asked questions and made comments throughout this process. In this male dominated atmosphere, the general sentiment was one of sympathy toward Dr. Hutchings, and callous disregard for his alleged victims. In contrast, as the lone female on the panel, Ms. Lautenbach dared to voice her valid concerns and questions about Dr. Hutchings’s alleged misconduct.

The directive was troubling to Ms. Lautenbach, who had understood the aim was to ascertain the validity of the allegations, not to issue a self-serving statement. The panel had only considered a two-page document containing the sexual harassment allegations, along with the nearly two-hours of testimony from the accused, Dr. Hutchings. No alleged victims or witnesses were present to aid in the purported fact-finding mission. Yet the clear consensus of the male panelists was that the panel should issue a statement that Dr. Hutchings had violated only the Code of Conduct. Isolated as the only female and concerned about negative ramifications if she refused to go along with the group’s decision (concerns that were later validated by her retaliatory termination), Ms. Lautenbach felt she had no choice but to join in voting that Dr. Hutchings had not committed sexual harassment while employed by the County.

The Council's Investigation of Dr. Hutchings. The Council subsequently formed a panel to "investigate" the allegations concerning Dr. Hutchings in response to overwhelming pressure by the community and a widespread perception of a cover-up and wrongdoing on the part of the County Administration. As part of the investigation, Ms. Lautenbach was interviewed for more than an hour by three Councilmembers and openly shared her concerns about the County's decision to forego doing the right thing (by issuing a thorough, fully vetted, and accurate statement about Dr. Hutchings) and instead choosing to issue a hasty statement to mitigate risk. Ms. Lautenbach also discussed Mr. Sidhu's lack of leadership and seemingly corrupt approach to handling the Dr. Hutchings allegations; his lack of transparency with Council, staff, and the community when he was running for re-election; the optics of a 'hero's send-off' for Dr. Hutchings because the allegations had been hidden; the glowing letter of introduction for Dr. Hutchings; and the nearly non-existent response or actions on the part of the Executive and HR to protect other victims and prevent such abuses from happening again. Ms. Lautenbach also shared the serious concerns of her staff about the male-dominated culture of the County, including a female staff member in another department reporting that her Director (who is still with the County) required her to iron a shirt for him after the shirt he was wearing became soiled, and lack of trust in its leadership, namely Mr. Sidhu.

Meeting with Mr. Sidhu. On January 7, 2025, Mr. Sidhu met with Ms. Lautenbach. He praised her performance under extraordinary pressure, particularly during the COVID pandemic. In this meeting, and a subsequent memo dated January 8, Mr. Sidhu also raised purported concerns about Ms. Lautenbach's related to budgeting, working collaboratively, and delivery on high priority directives. This was the first that Ms. Lautenbach had heard of such purported issues. Moreover, they were unfounded. Ms. Lautenbach described the many priority directives and the ways her department was delivering on all of them. She also attempted to share concerns she and her entire management team had about his Deputy Executive, Kayla Schott-Bresler, provided instances and specifics, and asked that he follow up with managers on her team to validate the concerns. Ms. Lautenbach also told Mr. Sidhu that she had proactively requested mediation between herself and Ms. Schott-Bresler to work through some of the challenges they were having and asked for Mr. Sidhu's support in convincing Ms. Schott-Bresler agree to work on the relationship. Mr. Sidhu rebuffed these concerns, told her he thought her managers were unhappy with her (which is false) and subsequently never followed up with the concerns or talked to managers. In this meeting, Mr. Sidhu was hostile toward Ms. Lautenbach, behaving in an aggressive manner and yelling at her.

Mr. Sidhu's Improper Request for VIP Treatment. On January 11, 2025, Mr. Sidhu texted Ms. Lautenbach on a Saturday, asking her to call him. They spoke via phone, and Mr. Sidhu stated his wife was going to the Emergency Department and requested that Ms. Lautenbach call the Medical Director to secure VIP treatment for his wife. Once again, Ms. Lautenbach was placed in an impossible position as this was the first conversation since Mr. Sidhu had been aggressive and yelled at her in his office four days prior. Ms. Lautenbach called the Health Officer, who then informed the Medical Director. The Health Officer was unsettled that Dr. Sidhu made such an inappropriate request.

Ms. Lautenbach Reports the Hostile Work Environment to Councilmember Scanlon. During a check-in call with Councilmember Jon Scanlon, he inquired about two recent high-profile departures from Ms. Lautenbach's department. Ms. Lautenbach explained that one departure was benign, but the Financial Services Manager, Sabrina Houck, left partly due to mistreatment from the Executive's office, which included aggressive behavior, lack of support, blaming, and constantly changing expectations. Ms. Lautenbach also mentioned being micromanaged and that Mr. Sidhu was abusive. Councilmember Scanlon was sympathetic and asked how he could help. Ms. Lautenbach requested the hiring of an ombudsman, which was a recommendation following Dr. Hutchings' sexual harassment allegations, as she lacked an effective way to lodge a complaint.

Report of Concerns to Sheriff Tanksley. Ms. Lautenbach called Sheriff Donnell Tanksley to discuss an unrelated matter and then asked if he had challenges with Kayla Schott-Bresler, Deputy Executive. Ms. Lautenbach shared her challenges with the Executive Office led by Mr. Sidhu, and Sheriff Tanksley was supportive and offered to think of ways to help.

Report to HR of Bullying and Hostility by Mr. Sidhu. On January 16, 2026, Ms. Lautenbach called Melissa Keeley (HR Director) after an aggressive and bullying conversation with Mr. Sidhu. Ms. Lautenbach detailed that Mr. Sidhu had little or incorrect information and would yell and personalize his attacks, blaming her for conflicts with Ms. Schott-Bresler without acknowledging Ms. Schott-Bresler's role. Ms. Keeley (HR Director) helped Ms. Lautenbach articulate specific concerns about Ms. Schott-Bresler, including her volume, aggressive tone, fear-based blaming, and even the pace of her walk. Ms. Keeley expressed regret and offered support. Ms. Lautenbach asked what could be done and Ms. Keeley did not have any immediate answers, but did say she was very sorry and everyone was struggling with the adjustment to working with Ms. Schott-Bresler.

Further Hostility from Mr. Sidhu. On January 17, 2025, Ms. Lautenbach had a meeting with Mr. Sidhu at a coffee shop. Once again, Mr. Sidhu was aggressive and hostile toward Ms. Lautenbach over his involvement in a single contract out of the more than approximately 300 contracts which WCHCS executes each year. This interaction was witnessed by a full coffee shop, including when midway through the conversation, Mr. Sidhu forced Ms. Lautenbach to sit next to him instead of across the table. He was so close to her face at points that she felt his spittle on her nose and cheeks. This interaction was deeply embarrassing and humiliating to Ms. Lautenbach, as she saw several people she knew there, who likely witnessed Mr. Sidhu's behavior. At the end of the conversation, Mr. Sidhu said "I'm a nice guy, I'm not a bad person" likely an acknowledgment of to his abusive behavior during the meeting.

Councilmember Buchanan Expressed Concern About Mr. Sidhu's Hostility. On January 18, 2025, Councilmember Barry Buchanan, who was at the coffee shop during Ms. Lautenbach's meeting with Mr. Sidhu, texted Ms. Lautenbach the next day to check if she was alright and offered support. Ms. Lautenbach later discussed the situation with Councilmember Buchanan during a ride to a community forum on February 6, 2025. Councilmember Buchanan shared his frustrations with Mr. Sidhu as a leader and expressed sympathy and support for Ms. Lautenbach. Councilmember Buchanan had previously removed Ms. Schott-Bresler from a jail planning leadership group due to her chaotic and disruptive behavior and subsequently asked Ms. Lautenbach to attend. Ms. Lautenbach shared this with Mr. Sidhu, who was livid with Councilmember Buchanan and denied any wrongdoing by Ms. Schott-Bresler.

HR Report on Further Hostility from Mr. Sidhu: On January 21, 2025, Ms. Lautenbach followed up with Ms. Keeley (HR Director) after Mr. Sidhu yelled at her in a coffee shop. Although they did not make contact, Ms. Lautenbach informed Ms. Keeley that she wanted to discuss their previous conversation. As far as Ms. Lautenbach knows, Ms. Keeley took no action to address her concerns. Ms. Keeley was present when Ms. Lautenbach was terminated and reviewed the form Separation Agreement provided to her.

Conversation with Ms. Schott-Bresler. On January 29, Ms. Lautenbach spoke with Ms. Schott-Bresler. Ms. Lautenbach viewed the conversation as productive, given that Ms. Schott-Bresler had been hostile to and challenged the decisions and leadership of Ms. Lautenbach. Aly Pennucci, Deputy Executive, Director of Administrative Services, also joined for the last part of the meeting and they developed a productive plan to resolve some of the inaccuracies in the one fund in question, given that WCHCS lacked both a Financial Services Manager and Accounting Supervisor at the time. Both Ms. Pennucci and Ms. Schott-Bresler understood the challenges, especially the recent disastrous roll-out of a new financial system that very few people could access or had been trained on.

Both Ms. Pennucci and Ms. Schott-Bresler committed to working collaboratively to help resolve the technical and personnel challenges. After the conversation, Ms. Schott-Bresler texted Ms. Lautenbach and said she felt a lot better and thanked Ms. Lautenbach for talking.

FMLA Leave. Ms. Lautenbach had begun to experience mental health issues from the hostile environment in the County. Ms. Lautenbach obtained the necessary approvals from her doctor, HR, Executive Sidhu, and Deputy Executives Schott-Bresler and Pennucci, and took her FMLA leave from February 10-21, 2025.

Inexplicable Termination. On Wednesday, March 5, 2025, Mr. Sidhu, Ms. Pennucci, and Melissa Keeley (HR Director) met with Ms. Lautenbach. Ms. Pennucci notified Ms. Lautenbach that Mr. Sidhu intended to separate her from employment with the County. The only reasons stated were that Ms. Lautenbach declined a meeting (in the declination response email she wrote, Ms. Lautenbach stated that she had a conflict and was presenting at an outside group meeting) and that Mr. Sidhu's vision for the department was different from Ms. Lautenbach's. (It should be noted that these reasons differed from the reasons provided in a public statement released by Mr. Sidhu's office when they announced Ms. Lautenbach's departure.) Ms. Lautenbach was provided with a blank Separation Agreement to consider and notified her she must accept and sign it by noon the next day, March 6. The consideration deadline was extended to Monday, March 10, at which point our office sent a letter demanding 21 days to consider the offer per 29 U.S.C. 626(F)(1)(f)(i). On March 14, 2025, at 5:27 p.m., we received an email from you confirming that Ms. Lautenbach was still on paid administrative leave but that "[i]f we aren't able to discuss by close of business Monday, March 17, the County informs me that they will proceed with termination of Ms. Lautenbach's employment." On March 19, Ms. Lautenbach received a notice of termination letter from Mr. Sidhu.

LIABILITY

Sex Discrimination and Hostile Work Environment.

The Washington Law Against Discrimination ("WLAD") effectuates a public policy of the highest order. *See, e.g., Martini v. The Boeing Co.*, 137 Wn.2d 357 (1999). As such, it is strictly enforced and given broad interpretation by Washington courts — broader than its federal counterparts.

Under the WLAD, discrimination occurs if an employee's sex is a "substantial factor" in the employment decision; it does not need to be the motivating factor or the only factor. *Mackay v. Acorn Custom Cabinetry*, 127 Wn.2d 302 (1995). In fact, there is often more than one "substantial factor" in an employment decision. *Washington Pattern Jury Instruction*, 330.01.01 ("Substantial factor" does not mean the *only* factor or the main factor in the challenged act or decision."). The U.S. Supreme Court recently recognized this important principle. In a recent decision, the Court explained that "a defendant cannot avoid liability just by citing some *other* factor that contributed to its challenged employment decision." *Bostock v. Clayton County, Georgia*, No. 17-1618 (U.S. June 15, 2020) (*slip op. at* *6 (emphasis in original)). The opinion explains that a plaintiff need not show that an illegal motive was "the sole or primary cause of the employer's adverse action." *Id.* at *14. Accordingly, it "doesn't matter if other factors besides the [illegal one] contributed to the decision." *Id.* at *9. The Court was emphatic that an employer cannot avoid liability by showing a legitimate factor was *one* cause of the employment decision: "that suggestion is at odds with everything we know about the statute." *Id.* at *22 (emphasis added). Thus, even if Mr. Sidhu had a nondiscriminatory reason to hire Ms. Lautenbach and terminate Ms. Lautenbach, it does not preclude a finding that her sex was also *another* substantial factor.

Likewise, an employer is liable for unwelcome harassment because of the protected class of the employee, such as race, sex, or other protected characteristics. *Alonso v. Qwest Communications Co.*,

LLC, 178 Wash.App. 734 (2013); *Crownover v. State ex rel. Dept. of Transp.*, 165 Wash.App. 131 (2011); *Robel v. Roundup Corp.*, 148 Wash.2d 35 (2002). Harassment is “**unwelcome**” if the employee did not solicit or incite it and the employee regarded as undesirable or offensive. Such harassment is actionable if it was sufficiently **pervasive or severe to alter the terms and conditions of employment** and create an abusive working environment. Liability attaches if the harassment is **imputable to the employer**, i.e., the harasser was in a management position, or the employer knew or should have known about the harassment and failed to take appropriate corrective action. *Id.*

As explained above, Ms. Lautenbach was unfairly targeted and treated with hostility because she was a woman. These facts establish discrimination and hostile work environment liability.

Retaliation for Taking FMLA Leave and Asserting 21-Day Consideration Period Right.

Under the WLAD, employment retaliation occurs upon proof of the following: (1) The employee engaged in a **protected activity**; (2) the employer took an **adverse employment action** against the employee; and (3) there is a **causal connection** between the employee’s protected activity and the adverse employment action. *Bittner v. Symetra National Life Insurance Company*, 32 Wash.App.2d 647 (2024); *see also Crownover v. State ex rel. Dept. of Transp.*, 165 Wash.App. 131 (2011); *Francom v. Costco Wholesale Corp.*, 98 Wash.App. 845 (2000); RCW 49.60.210(1); *Lodis v. Corbis Holdings, Inc.*, 172 Wash.App. 835 (2013).

In this case, Ms. Lautenbach was absent from work for reasons covered by the FMLA, and then shortly thereafter suffered an adverse employment decision (termination). There is little doubt that the covered FMLA leave was a negative factor in the employer’s adverse employment decision. Thus, the County is liable for FMLA retaliation. *See, e.g., Espindola v. Apple King*, 6 Wash.App.2d 244, 257 (2018).

Likewise, through our office, on March 10, 2025, we informed you that because Ms. Lautenbach is over 40 years of age, she is entitled to 21 days to consider the Separation Agreement she received on March 5, or until March 26. *See* 29 U.S.C. 626(F)(1)(f)(i); 29 C.F.R. 1625.22(e)(6). Nonetheless, on March 19, one week before the 21-day consideration period expired, Mr. Sidhu terminated Ms. Lautenbach in direct retaliation for asserting the 21-day consideration right. Contrary to your assertion, the County cannot avoid the 21-day consideration period requirement by crafting the release to exclude claims for age discrimination. Section 5 of the Separation Agreement purports to release all “rights and interests relating to [Ms. Lautenbach’s] employment with and separation from the County” and all “claims and “causes of action” including any such claims under “federal, state, or local law, rule, or regulation...” There is no doubt the scope of this broad release includes claims for age discrimination under the Older Workers Benefit Protection Act (OWBPA), and therefore, the 21-day consideration period applies. *See, e.g., Cole v. Gaming Entertainment, L.L.C.*, 199 F. Supp. 2d 208, 213-214 (D. Del. 2002) (by limiting Cole’s review to one day, employer effectively “rushed” the plaintiff into signing the document, finding that the time allotted for review was insufficient.).

First Amendment Retaliation.

Governmental employees such as Ms. Lautenbach have additional First Amendment protection against retaliation. A First Amendment Retaliation Claim is established upon proof of the following elements: (1) The government employee **spoke on a matter of public concern**; (2) the government employee **spoke as a private citizen** rather than as a public employee; and (3) the government employee’s protected speech was a **substantial or motivating factor** in the adverse employment action taken against them. *Adams v. County of Sacramento*, 116 F.4th 1004 (2024); *Moser v. Las Vegas Metropolitan Police Department*, 984 F.3d 900 (2021).

In this case, Ms. Lautenbach repeatedly spoke on matters of public concern as a private citizen, including as described above to Councilmembers Scanlon and Buchanon and to Sheriff Tanksley. She has also made similar comments as a private citizen to other business and community leaders. In litigation and discovery against Executive Satpal the full extent of Executive Satpal's retaliatory actions will be revealed, including additional comments and actions taken since Ms. Lautenbach's termination.

DAMAGES

Ms. Lautenbach lost a job she loved with serving the people of Whatcom County. She lost her job, not because of performance issues, but because she is a woman and she had temerity to stand up to an Executive who mistreats women and has mismanaged Whatcom County. At trial we will seek all lost wages, compensatory damages, reputational damages, and emotional distress damages in an amount totaling **\$1,500,000.00**.