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

LARGO WALES, a married woman,)	
)	No.
Plaintiff,)	
v.)	COMPLAINT FOR DAMAGES
)	VIOLATION OF FREEDOM OF
CITY OF AUBURN, WA, a Washington)	SPEECH, RIGHT TO PRIVACY
State municipality; NANCY BACKUS, as)	
Mayor of the City of Auburn, and)	
Individually and her marital community; and)	
The Committee to Elect Nancy Backus and)	
its J. Doe committee members thereto; and)	
ROB ROSCOE and his marital community,)	
)	
Defendants)	
)	

Plaintiff LARGO WALES alleges:

I. JURISDICTION

1. This court has jurisdiction over the case pursuant to RCW 2.08.010.

II. PARTIES AND VENUE

1. Plaintiff LARGO WALES (Ms. Wales) resides in KING County, Washington and is a City of Auburn, WA Council member;
2. The City of Auburn is a Washington municipality co-located in King and Pierce Counties;

WALES COMPLAINT

AUBURN LAW OFFICES
220 1ST Street NE
Auburn, WA 98002
253-288-8015 (ph)
253-288-8016 (fax)

- 1
2 3. Rob Roscoe was the City of Auburn Director of Human Resources and Risk Management
3 during the period complained of; and
4
5 4. Nancy Backus is the Mayor of the City of Auburn, WA.
6

7 III. FACTUAL ALLEGATIONS
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- 9 1. On or about September 2016, Rob Roscoe held a meeting with Ms. Wales on City
10 property. Said meeting was called by Rob Rosco and attended only by he and Ms. Wales.
11
12 2. During said meeting Rob Roscoe complained about a statement. allegedly made by Ms.
13 Wales in an open, non-government, forum and advising Ms. Wales that her speech should
14 be attenuated.
15
16 3. Rob Roscoe reported directly to Mayor Nancy Backus during September 2016.
17
18 4. Whereas the Roscoe – Wales discussion was private any characterization of its ends and
19 means would be unknown and speculative. However, Nancy Backus’ Committee to Elect
20 Nancy Backus issued a campaign notice describing the Roscoe – Wales interaction as
21 “The City of Auburn chastised Largo Wales....”
22

23 COUNT I – Violation of Free Speech
24

- 25 1. The Rosco – Wales meeting was a violation Ms. Wales right to free speech by the City of
26 Auburn. Mr. Roscoe was acting under color of law for the City.
27
28 2. Mr. Roscoe’s meeting with Ms. Wales served no legitimate city business.
29
30 3. Any Roscoe complained of allegations against Ms. Wales was based on hearsay.
31
32 4. The later release of said meeting contents came from Rob Roscoe, ostensibly to Nancy
33 Backus, and finally the Committee to Elect Nancy Backus.
34
35 5. Ms. Wales ultimately suffered damage to reputation from the Roscoe meeting, which was
36 illegitimately released and ultimately intentionally misused.
37
38 6. Rob Rosco proximately caused Ms. Wales damages by infringing on her right to exercise
39 free speech.
40
41 7. Nancy Backus proximately caused Ms. Wales damages by releasing the Roscoe – Wales
42 meeting alleged content to her Committee to elect her as Mayor.
43

- 1 8. Nancy Backus, as Mayor of the City of Auburn, violated Ms. Wales right to free speech
2 by using her position to create unfavorable information on a political opponent and then
3 releasing said information that Backus would not have had in her possession but for her
4 position as Mayor.
5
- 6 9. The Committee to Elect Nancy Backus and its members proximately caused the damages
7 to Ms. Wales by using information it knew or should have known was ill gotten.
8
- 9 10. Defendants Roscoe, Backus, the City of Auburn, and the Committee to Elect Nancy
10 Backus and its members, are jointly and severally liable to plaintiff in an amount to be
11 proved at trial.
12

13 COUNT II – Violation of Right to Privacy
14

- 15 1. The release of said meeting contents by and between Rob Roscoe and Ms. Wales was a
16 violation on Ms. Wales expectation of privacy.
17
- 18 2. There were no other attendees so anything said therein could have been factually true or
19 false.
20
- 21 3. Ms. Wales ultimately suffered damage to reputation from the Roscoe meeting when its
22 alleged substance was illegitimately released and ultimately intentionally misused.
23
- 24 4. Rob Rosco proximately caused Ms. Wales damages by infringing on her right to privacy
25 by releasing any version of the meeting substance.
26
- 27 5. Nancy Backus violated Ms. Wales right to privacy and proximately caused Ms. Wales
28 damages by releasing the alleged Roscoe – Wales meeting content to her Committee to
29 elect her as Mayor.
30
- 31 6. Nancy Backus, as Mayor of the City of Auburn, violated Ms. Wales right to privacy by
32 using her position to create unfavorable information on a political opponent and then
33 releasing said information Backus would not have had in her possession but for her
34 position as Mayor.
35
- 36 7. The Committee to Elect Nancy Backus and its members violated Ms. Wales right to
37 privacy and proximately caused the damages to Ms. Wales by using information it knew
38 or should have known was ill gotten.
39
- 40 8. Defendants Roscoe, Backus, the City of Auburn and the Committee to Elect Nancy
41 Backus and its members, are jointly and severally liable to plaintiff in an amount to be
42 proved at trial.
43

V. DEMAND FOR RELIEF

Plaintiff requests that the court enter judgment against defendants Roscoe, Backus, the City of Auburn and the Committee to Elect Nancy Backus and its member as follows:

1. Awarding plaintiff special damages for lost potential future earnings.
2. Awarding plaintiff general damages for pain, suffering and mental anguish.
3. Awarding plaintiff her statutory costs and attorney fees incurred in this action.
4. Awarding plaintiff any additional or further relief which the court finds appropriate or just.

Dated: Aug 1, 2019

Largo Wales
LARGO WALES, Plaintiff

Presented by:

AUBURN LAW OFFICES PLLC

J. M. Torres, Jr.
John M. Torres, Jr.
Attorney for Plaintiff
WSBA# 26287

220 1st ST NE
Auburn, WA 98002
253-288-8015

main@auburnlawoffices.com