



Colin G. Prince
John B. McEntire, IV
Dalia Ibrahim
The Glover Mansion
321 W. 8th Avenue
Spokane, Washington 99204
253.593.5100
Attorneys for Plaintiffs

WASHINGTON STATE SUPERIOR COURT
SPOKANE COUNTY

TB, CF, SG, JH, BH, TJ, TJJ, SK, TK, BL, SM,
NM, JN, MR, CS, individually,

Plaintiffs,

v.

Spokane County, Juvenile Detention Center, a
municipal entity,

Defendant.

No.

Complaint

Jury Demanded

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I. INTRODUCTION

For three decades, Defendant Spokane County employed multiple serial sex predators and granted them nearly unfettered power over children and adolescents helplessly locked in cells at the Juvenile Detention Center. Two guards in particular, William Lamb and Rafael Gray, exploited the power granted to them by Defendant Spokane County to groom and sexually abuse generations of kids—crimes ranging from the 1980s to at least 2010.

The grooming was brazen, guards openly flirting with kids and providing candy, cards, and extra out-time. The resulting sexual abuse was also brazen, performed throughout the Juvenile Detention Center, in cells, closets, the guard booth, and elsewhere.

That abuse was the product of extraordinary negligence by Defendant Spokane County and leaves a legacy of traumatized victims—boys and girls forced to endure acts of masturbation, oral sex, and vaginal and anal rape while incarcerated, alone, and separated from anyone who might care. Taken together, the acts of these serial sex predators spanned decades and demonstrate a continuing failure by Defendant Spokane County to protect vulnerable kids within their care.

The Plaintiffs here range from ages 12 to 17 when sexually abused. Kids. This suit seeks some semblance of justice for these victims.

II. PARTIES

A. Plaintiffs

2.1 All Plaintiffs are adults and residents of Washington State. As detailed below, each Plaintiff was a victim of childhood sexual abuse occurring in Spokane County by an employee of Defendant Spokane County. *See* [RCW § 4.16.340\(5\)](#) (defining “childhood sexual abuse”).

B. Defendant

2.2 Defendant Spokane County is a municipal entity within the State of Washington and liable to the same extent as a “private person.” *See* [RCW § 4.96.010](#).

III. JURISDICTION AND VENUE

3.1 Because the defendant is Spokane County itself, and because the events giving rise to Plaintiffs' claims occurred in Spokane County, jurisdiction and venue lie in Spokane County superior court. *See* RCW § 36.01.050(1) ("All actions against any county may be commenced in the superior court of such county"); RCW § 4.12.020(3) ("For the recovery of damages for injuries to the person," plaintiff may sue "in the county in which the cause of action or some part thereof arose"). Subject matter jurisdiction exists under the [Washington Constitution, Article 4, Section 6](#).

3.2 Each Plaintiff properly filed a tort claim and waited more than 60 days before filing suit. *See* RCW § 4.96.020(4) (requiring 60-days to elapse after filing tort notice).

IV. FACTS

A. Defendant operates the Juvenile Detention Center.

4.1 Since its inception, the Juvenile Detention Center has been owned and operated by Defendant Spokane County, which is solely responsible for hiring, supervising, training, and disciplining the staff.

4.2 The Juvenile Detention Center is functionally a prison for kids. It sits adjacent to the county jail¹—



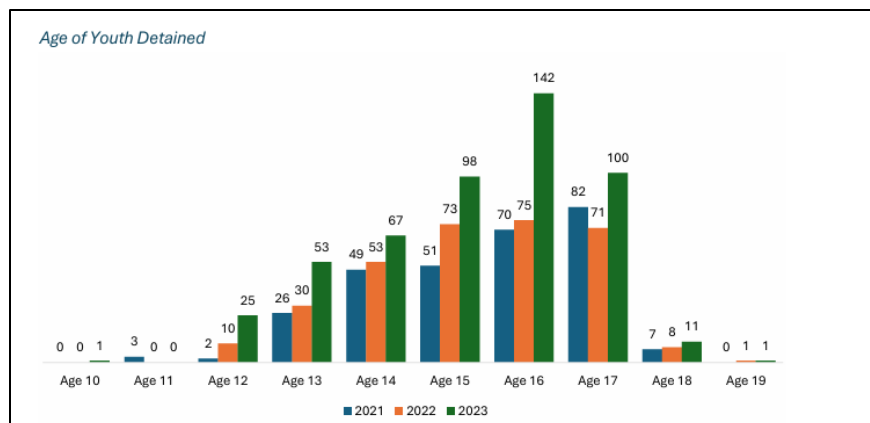
¹ *See Spokane County Juvenile Court Servs., Annual Report at 28 (2014).*

—and contains “39 cells” for housing youth either awaiting court proceedings or serving sentences, functionally no different from an adult jail cell:²



4.3 Defendant Spokane County employs approximately 38 confinement-related staff, many of whom interact directly with incarcerated minors daily, booking them into the facility, moving them to court hearings, and exercising complete control over them.

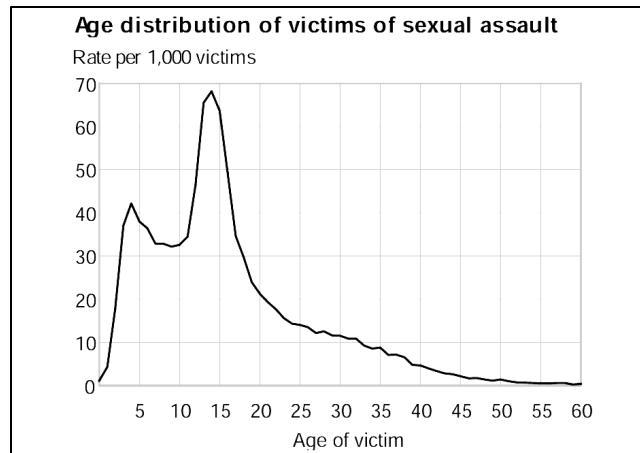
4.4 The kids held in this facility are among the most at-risk youth in Washington. They are typically poor, from unstable homes, often suffer from mental-health disorders, and vary in age, ranging from elementary-aged children to teenagers, mostly ages 12 to 17:³



² See [Spokesman-Review, Spokane County leaders say renewal of juvenile justice tax would be ‘money well spent’ \(Oct. 28, 2024\)](#).

³ *Id.* at 31; see also [Spokane County Juvenile Court, Annual Report at 27 \(2023\)](#).

4.5 That age group of children, according to the Department of Justice, also represents the most likely victims of sexual abuse:⁴



4.6 The guards hired to run the Juvenile Detention Center by Defendant Spokane County exercise virtually unlimited control. Indeed, in job postings for corrections-officer positions, Defendant Spokane County acknowledges the guards are “responsible for the health and welfare, safety and security of juveniles at the Juvenile Detention Center.”⁵

4.7 Despite holding the children most-likely to be targeted for sexual abuse in cells and knowing the power accompanying the position, Defendant Spokane County hired multiple serial sex predators and granted them nearly unfettered control over those children—for decades.

B. Defendant employs a prolific sex predator, William Lamb, to oversee kids.

4.8 Defendant Spokane County placed a serial sexual predator—indeed, more than one—in positions of almost absolute power over caged kids. For almost two decades, from 1999 to 2016, Defendant employed William Lamb as a guard and supervisor at the Juvenile Detention

⁴ See Dept. of Justice, Bur. of Justice Statistics, *Sexual Assault of Young Children as Reported to Law Enforcement* (2000).

⁵ See [Govt. Jobs, Spokane County, Juvenile Corrections Officer \(Oct. 2025\)](#) (“This position is an entry-level position responsible for the health and welfare, safety and security of juveniles detained at the Juvenile Detention Center. Duties include supervising, monitoring, and providing care for juvenile offenders and other court-involved youth in a confined, 24-hour maximum security facility.”).

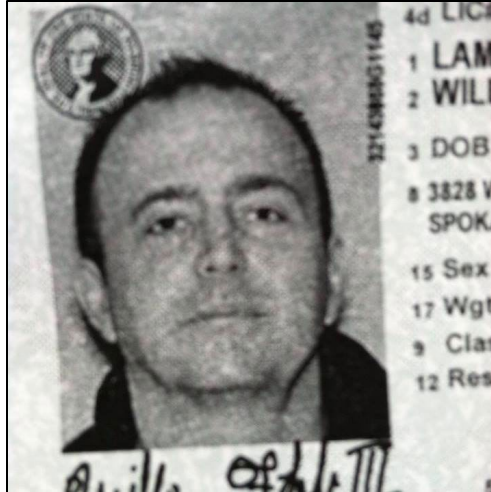
Center, where he systematically used his position to groom, threaten, and rape numerous children—the total number of victims not yet fully known.⁶

4.9 From the start of his employment, Lamb employed a remarkably consistent pattern of grooming: spending time with isolated children at the facility, promising extra time out of their cells, snacks, and other perks, all possible only by virtue of the power granted by Defendant Spokane County. After gaining a child’s trust, Lamb escalated from touching to coercion to outright forced sexual acts. The victims describe Lamb forcing them to perform oral sex and masturbation, acts of digital penetration, and vaginal and anal rape. Many were abused repeatedly—some over years as they cycled in and out of the facility.

4.10 After the abuse, Lamb sought to silence victims through retaliation and intimidation, including (1) threatening to make their confinement harsher; (2) insisting no one would believe a report; (3) threatening to add time to their sentences if they spoke up; and (4) threatening to tell other incarcerated juveniles the victims were “gay,” making them *de facto* targets of bigoted assaults by others.

4.11 Defendant Spokane County employed Lamb year after year without meaningful supervision as he targeted both boys and girls. The victims, almost without exception, don’t know each other. Yet, they provide remarkably similar accounts. Many identified Lamb by his full name. Others remember the guard simply as “Bill.” And nearly all described Lamb’s physical build, tattoos, or his “widow’s peak” hair:

⁶ Ongoing investigation and discovery are expected to reveal additional child victims.



4.12 Examples of Lamb’s abuse start nearly as soon as he was hired. Defendant Spokane County incarcerated Plaintiff TJ at the Juvenile Detention Facility multiple times in the late 1990s, when she was approximately 14 years old.⁷ At the time, TJ’s mother was dead; her father was absent; and she had few reliable adults to rely on. Lamb exploited that vulnerability and leveraged his authority by granting favors (e.g., extra out-of-cell time), cultivating TJ’s trust and compliance. He then escalated to touching her breasts and buttocks and rubbing his penis against her. When, on TJ’s release, Lamb told her no one was coming to pick her up and instructed her to go to his house, TJ followed the authority figure’s orders. He tried to coerce her with alcohol. When that failed, Lamb raped her.

4.13 It was not the only time. Lamb later introduced TJ to sex trafficking and sent her on a decades-long spiral of addiction and anguish. Today, TJ works as an addiction recovery coach, helping others avoid the despair she endured.

4.14 Other victims report similar patterns occurring from 1999 through at least 2010. Plaintiff JH was homeless when he was incarcerated at Defendant Spokane County’s facility. Lamb, once again preying on a child’s vulnerability, began grooming JH and ultimately lured the homeless adolescent to his home, supplied drugs, and raped JH orally and anally on numerous

⁷ Many victims, being children at the time and having attempted to forget painful memories, are able to place only general time periods on the abuse, particularly those whose personal lives were unstable or were repeatedly held at the Juvenile Detention Facility.

occasions. When JH returned to the Juvenile Detention Center, Lamb sexually abused the teenage boy in his cell after lockdown.

4.15 Plaintiff SM recalls being supplied first with extra food and drink, and then pornography as Lamb instructed him to masturbate while Lamb watched. One night after lockdown, Lamb lured SM to a closet, supplied drugs, and then orally raped him. Lamb then threatened SM that, if he reported the abuse, SM would receive additional time on his sentence.

4.16 Plaintiff TJJ remembers the closet too. Lamb took him there repeatedly to sexually abuse him, digitally penetrating his anus so violently that TJJ bled. TJJ remembers Lamb threatening him with isolation and added time to his sentence—threats that were distinctly real possibilities given the power Defendant Spokane County vested in Lamb.

4.17 Like TJJ, Plaintiff TK was violently digitally raped by Lamb and threatened with extended incarceration if he reported the abuse, which included oral rape.

4.18 Plaintiff JN was approximately 16-years-old when held by Defendant Spokane County at the Juvenile Detention Center. There, using the authority given to him by Defendant Spokane County, Lamb groomed JN by luring her to an employee booth with outside food (Subway and Starbucks, specifically), as well as playing cards (rummy). After establishing a relationship, Lamb exposed his penis and instructed JN to touch it. When she refused and protested that people were around, Lamb said, “it doesn’t matter, I run this place.” He then said, “oh, so you want to sit in your cell all day,” a not-so-implicit threat that JN would be restricted to her cell if she refused Lamb’s demands. JN was scared and feigned a reason to leave.

4.19 Lamb later came to JN’s cell and instructed her to remove her pants. JN said she “didn’t want to get in trouble.” Lamb said, “shut up, stand up, and hurry,” then forced JN against the wall and vaginally raped her.

4.20 Lamb would continue sexually abusing JN throughout her incarceration at the Juvenile Detention Center.

1 4.21 Despite Lamb being a serial sex predator, Defendant Spokane County promoted
2 him to become a supervisor.

3 4.22 In May 2015, Lamb was found with a methamphetamine pipe and briefly
4 hospitalized at Providence Sacred Heart as suicidal. His employment by Defendant Spokane
5 County ended in January 2016, and he committed suicide in 2022.

6 4.23 But Lamb was not even the longest running sex predator employed by Defendant
7 Spokane County to guard children. That appears to be Rafael Gray.

8 **C. Defendant employs another sex predator, Rafael Gray, for decades.**

9 4.24 Defendant Spokane County hired Rafael Gray as a correctional guard at the
10 Juvenile Detention Facility in 1983, granting him near-absolute power over the girls and boys
11 filtering through the facility:



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19 4.25 Plaintiff CS was middle-school aged when incarcerated at the Juvenile Detention
20 Facility. One evening after dinner, Gray entered CS's cell and offered him desserts in exchange
21 for helping in the kitchen. Once there, Gray pulled CS into a walk-in freezer and tried to sexually
22 abuse CS, who refused and escaped.

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24 4.26 Gray then cornered CS in his cell on multiple occasions and sexually abused him.
25 This abuse included anal and oral rape, among other horrific acts.

26 4.27 More than a decade later, in the mid-1990s, Plaintiff NM was incarcerated in
27 Spokane County's Juvenile Detention Center under Gray's authority. She recalls the guard, a

1 Black male in his 40s or 50s, known to her as “Rafael.” Like Lamb, Gray used promises of extra
2 time out of her cell and snacks to groom NM, eventually luring the young girl into a closet where
3 he forcibly raped her on at least 10 separate occasions.

4 4.28 Plaintiff BL was held by Defendant Spokane County at the Juvenile Detention
5 Center in the late 1990s, where Gray forced BL to perform oral sex and forced BL to engage in
6 unwanted sexual acts with two other minors while Gray watched.

7 4.29 Plaintiff TJ recalls Gray’s conduct as “flamboyant,” flirting with teenage girls and
8 engaging in brazen misconduct. She recalls Gray supplying razor blades to girls for shaving and
9 then watching them as they showered.

10 **D. Defendant fostered an environment of open sexual abuse on helpless minors.**

11 4.30 Defendant Spokane County, by exercising no supervision over its prolific sex
12 predators, appears to have attracted pedophiles into employment at the Juvenile Detention
13 Center. Multiple Plaintiffs in this suit independently named a third assailant, known as “Lupe,”
14 believed to be Guadalupe Alvarez:



23 4.31 Plaintiff BH remembers Lupe instructing him to “get naked” when he was
24 incarcerated at the Juvenile Detention Center. BH thought Lupe was performing a strip search,
25 but after Lupe patted him down for a few seconds, he proceeded to start masturbating BH. After,
26 Lupe told BH he would get out early if he kept this sex abuse quiet.

4.32 Certain Plaintiffs also identified other employees of Defendant Spokane County that committed sexual abuse—that is, some Plaintiffs were sexually abused by *multiple* employees at the Juvenile Detention Center.

4.33 Below is a general summary of abuse Plaintiffs experienced (although certainly not comprehensive):

Sexual Abuse by Spokane Juvenile Detention Center Employees		
Approximate Date	Plaintiff	Event
1980s	CS	Plaintiff CS, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of masturbation, oral sex, rape, and other conduct by guard Rafael Gray. Plaintiff CS suffered damages to be proven at trial.
1990s	NM	Plaintiff NM, while a minor, was sexually abused while in custody at the Juvenile Detention Center. She endured acts of oral sex and rape by guards Rafael Gray and “Little Dave.”
	SK	Plaintiff SK, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of oral sex and rape by a guard to be identified.
	TJ	Plaintiff TJ, while a minor, was sexually harassed and abused inside and outside custody of the Juvenile Detention Center. She endured acts of masturbation, oral sex, and rape by guard William Lamb.
	BL	Plaintiff BL, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of masturbation and oral sex by guard Rafael Gray, as well as another guard.
1990s-2000s	JH	Plaintiff JH, while a minor, was sexually harassed and abused inside and outside custody of the Juvenile Detention Center. He endured acts of masturbation, oral sex, and rape by guard William Lamb.
2000s	SM	Plaintiff SM, while a minor, was sexually abused while in custody at the Juvenile Detention Center, including acts of masturbation and oral sex by guard William Lamb.
	CF	Plaintiff CF, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of masturbation and rape by guard William Lamb.

Sexual Abuse by Spokane Juvenile Detention Center Employees		
Approximate Date	Plaintiff	Event
2000s	MR	Plaintiff MR, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of masturbation and rape by guard William Lamb.
	TB	Plaintiff TB, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of oral sex and rape by guard William Lamb.
	BH	Plaintiff BH, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of oral sex rape by a guard believed to be William Lamb. He also endured an act of masturbation by “Lupe,” believed to be guard Guadalupe Alvarez.
	TJJ	Plaintiff TJJ, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of oral sex and rape by guard William Lamb and another guard to be identified.
	TK	Plaintiff TK, while a minor, was sexually abused while in custody at the Juvenile Detention Center. He endured acts of masturbation, oral sex, and rape by “Lupe,” believed to be guard Guadalupe Alvarez.
	JN	Plaintiff JN, while a minor, was sexually harassed and abused inside the Juvenile Detention Center. She endured acts of masturbation, oral sex, and rape by guard William Lamb.
	SG	Plaintiff SG, while a minor, was sexually harassed and abused inside the Juvenile Detention Center. He endured acts of masturbation, oral sex, and rape by guard Rafael Gray.

4.34 This decades-long saga of sexual abuse, ranging from approximately 1983 to 2010, committed by Defendant Spokane County’s employees, fails to encompass all the abuse, and certainly does not encompass all the victims. (Indeed, Plaintiffs are aware of at least a half dozen other independent allegations of sexual abuse by other juveniles previously incarcerated at Defendant Spokane County’s facility.)

4.35 Defendant Spokane County failed to take even minimal precautions in supervising its employees and protecting youth in its custody. For example, Defendant Spokane County failed to install video surveillance until 2020, thereby allowing Lamb, Gray, and other staff to

1 corner children in their cells without the possibility of supervision or later evidence. This basic
2 failure foreseeably enabled and proximately caused the abuse.

3 4.36 Indeed, surveillance cameras are a standard safeguard against custodial abuse.
4 Federal authorities have characterized surveillance cameras as “absolutely critical” to deterring
5 sexual abuse against incarcerated persons.⁸ Federal regulations for juvenile facilities require
6 appropriate supervision and monitoring plans—including video monitoring—to protect residents
7 against sexual abuse. *See* 28 C.F.R. § 115.313 (“Supervision and Monitoring”). By operating
8 without such coverage, Defendant Spokane County created conditions under which predatory
9 staff could act with impunity.

10 4.37 Defendant Spokane County’s failure to screen, vet, and supervise its staff is
11 especially striking given that youth in custody are at heightened risk of sexual victimization and
12 require robust safeguards—a fact the County knew or should have known.

13 4.38 As a foreseeable result of Defendant Spokane County’s negligent hiring,
14 retention, and supervision, creating an environment in which multiple predatory staff operated
15 with impunity, Plaintiffs were reasonably afraid to report the abuse and many remained silent.

16 4.39 That is common for victims of sexual assault victims, particularly kids. Victims
17 typically do *not* report sexual assaults. According to the National Sexual Violence Resource
18 Center, in child sexual abuse cases, only 12% of assaults are “reported to the authorities.”⁹ For
19 male victims, it’s worse—some studies show “90 to 95% of all male violations are not
20 reported.”¹⁰

21 ⁸ *See* Insp. Gen., Michael Horowitz, Statement to U.S. Senate Comm. on Homeland Security,
22 Permanent Subcomm. on Investigations at 6 (Dec. 13, 2022) ([Horowitz Statement](#)). The federal
23 Inspector General outlined that resolved “camera deficiencies” is “absolutely critical” in
24 prisons to “ensure the safety and security” of inmates. In discussing sexual assaults in federal
25 facilities, he noted that “these tragic offenses and many other crimes” could “have been avoided
26 or deterred” if the prisons had “prioritized updating its camera coverage” at facilities.

25 ⁹ Nat’l Sexual Violence Resource Cntr., *Statistics About Sexual Violence* at 2 (2015).

26 ¹⁰ J. Thomas and J. Kopel, *Male Victims of Sexual Assault: A Review of the Literature*, *Behavioral*
27 *Sciences* (Apr. 2023) (“Approximately 90 to 95% of all male sexual violations are not reported.
Walker and associates reported that 12.5% never disclosed their assault to anyone; among those
28 who did, 54% delayed reporting for at least one year.”).

1 4.40 Three factors most strongly correlate to victims that do not report. Sexual assaults
2 are least reported when (1) the victim is an adolescent; (2) the perpetrator is someone close to
3 the victim; and (3) the rape involves penetration.¹¹ In other words, precisely the victims here.

4 4.41 Plaintiffs widely report fearing they would not be believed, would be retaliated
5 against, and would be targeted by others for assault. And they struggled with feelings of shame.
6 The inclination to remain silence was reinforced by the perpetrators' direct coercion, including
7 threats of punishment and harsher conditions, assertions that no one would believe them, threats
8 to extend detention, and threats to label them 'gay' to other detainees.

9 4.42 Nonetheless, some victims *did* report the abuse to staff at the Juvenile Detention
10 Center, who did nothing.

11 4.43 Rather than report sexual abuse, at least one guard, upon discovering the abuse,
12 joined in. Plaintiff NM was being sexually abused by Gray in a closet when another guard, known
13 as "Little Dave," opened the door, saw what was happening and simply closed the door. The
14 following day, that guard, identified as David Negron—



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24 — joined Gray in sexually abusing NM.

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26 ¹¹ See [Bianic et al., Predictors of delayed disclosure of rape in female adolescents and young adults, Euro.](#)
27 [J. of Psychotraumatology \(Aug. 2014\)](#) (“the results of the present study suggest that adolescent
28 victims of rape with penetration by someone close are at increased risk for delayed disclosure”).

1 4.44 Defendant Spokane County operated a Juvenile Detention Center housing youth
2 at heightened risk of sexual victimization; yet, despite duties and widely recognized standards
3 requiring active monitoring, reporting, staffing, and camera coverage, the County failed to
4 implement and enforce meaningful safeguards—including effective supervision, fixed-camera
5 coverage, staff screening and training, separation practices, and credible reporting channels—
6 thereby creating foreseeable conditions under which predatory staff could abuse children and
7 evade detection. These systemic failures were a proximate cause of Plaintiffs’ injuries.

8 **E. Defendant Spokane County left Plaintiffs to endure lifelong scars.**

9 4.45 Victims of sexual assault are left with “[e]nduring mental health issues such as
10 depression, anxiety, drug abuse and posttraumatic stress disorder (PTSD),”¹² although victims
11 typically are unaware of the tie between sexual abuse and the traumatic effects.

12 4.46 Victims are commonly cast into adulthood carrying severe risks of “long-term
13 psychosocial, psychiatric, and physical health outcomes,” particularly “schizophrenia and post-
14 traumatic stress disorder,” and cope with through substance misuse.¹³

15 **V. CAUSES OF ACTION**

16 5.1 Pursuant to RCW § 4.96, Spokane County is liable for damages arising from its
17 own negligence and the torts of its officers and employees. At all relevant times, County
18 employees—including William Lamb, Rafael Gray, Guadalupe Alvarez, David Negron, and
19 others identified through discovery—acted within the course and scope of their employment and
20 purporting to perform official duties, and exercised actual, implied, and apparent authority
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22 ¹² *Mulder et al., Reporting after sexual violence: The influence of victim, assault and perpetrator*
23 *characteristics*, J. Forensic & Legal Medicine (Apr. 2021) (“Enduring mental health issues such as
24 depression, anxiety, drug abuse and posttraumatic stress disorder (PTSD) are also associated
with sexual violence.”).

25 ¹³ See Hailes, et al., *Long-term outcomes of childhood sexual abuse: an umbrella review*, *The*
26 *Lancet, Psychiatry* (Oct. 2019) (“This umbrella review found that childhood sexual abuse is
27 associated with elevated risks of long-term psychosocial, psychiatric, and physical health
outcomes. In particular, there is high-quality evidence for associations between childhood sexual
abuse and two psychiatric disorders (schizophrenia and post-traumatic stress disorder) and one
psychosocial outcome (substance misuse).”).

1 conferred by Defendant Spokane County. Using that custodial authority, access, and control over
2 Plaintiffs, they committed the sexual abuse and related misconduct detailed here. Defendant
3 Spokane County is both directly and vicariously liable for Plaintiffs' injuries proximately caused
4 by their conduct.

5 **A. Negligence and Gross Negligence**

6 5.2 Defendant Spokane County and its employees owed a non-delegable duty to
7 Plaintiffs, both directly and through its employees and agents, to use reasonable and ordinary
8 care and to ensure the health and safety of incarcerated individuals. *See e.g., Gregoire v. City of*
9 *Oak Harbor*, 170 Wn.2d 628 (2010); *H.B.H. v. State*, 192 Wn.2d 154 (2018).

10 5.3 Defendant Spokane County also owed a duty to use reasonable care in hiring,
11 retaining, and supervising employees tasked with exercising power over Plaintiffs. *See, e.g., Niece*
12 *v. Elmview Grp. Home*, 131 Wn.2d 39, 48 (1997) (recognizing negligent hiring, retention, and
13 supervision duty).

14 5.4 It was reasonably foreseeable that minors in the facility, including Plaintiffs, would
15 be at risk of sexual abuse by County employees, as well as other minors, both inside and outside
16 the Juvenile Detention Center. On information and belief, Defendant Spokane County knew or
17 should have known that Lamb, Gray, and others were sexually abusing children in the Juvenile
18 Detention Center.

19 5.5 Defendant Spokane County knew or should have known that its employees
20 operating the Juvenile Detention Center possessed coercive authority over minors—including
21 control over movement and privileges—and could intimidate and threaten the youth.

22 5.6 Defendant Spokane County knew or should have known that it placed employees
23 in positions enabling them to identify, groom, and exploit minors, including facilitating abuse
24 outside the Juvenile Detention Center.

25 5.7 As detailed above, Defendant Spokane County and its employees breached their
26 duties continuously by, among other things: (a) hiring and retaining known or knowable sex
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predators; (b) failing to monitor or supervise staff with even minimal care; (c) failing to implement basic, common-sense safeguards (e.g., video monitoring, no one-on-one “closed area” rules, same-sex supervision for showers, proper reporting channels for sexual abuse, and separation practices); (d) failing to promptly act on or elevate allegations of abuse; (e) failing to monitor and supervise incarcerated minors; and (f) failing to investigate sexual abuse despite actual and constructive knowledge of such abuse.

5.8 Throughout this period, Defendant Spokane County failed to create, implement, or enforce reasonable policies, practices, and procedures to ensure the safety of minors in the facility, including but not limited to, monitoring staff and providing juveniles safe avenues to report sexual abuse.

5.9 Defendant and its employees and agents breached these duties through the events described above, and in other ways not specifically enumerated which may be revealed through the course of discovery, and in doing so failed to exercise ordinary care, or even slight care.

5.10 Defendant Spokane County’s decades-long failure to exercise ordinary care—indeed, even slight care—in screening, supervision, monitoring, investigation, reporting, and protection of detained children constitutes gross negligence.

5.11 As a direct and proximate result of the actions, omissions, failures, and negligent and grossly negligent conduct of Defendant and its employees and agents—as described above and in other respects as well—Plaintiffs were placed in harm’s way and subjected to repeated acts of sexual abuse and harassment.

5.12 As a direct and proximate result of the actions, omissions, failures, and negligent and grossly negligent conduct of Defendant and its employees and agents, and in other respects as well, Plaintiffs suffered severe physical harm, psychological harm, and emotional injury, including but not limited to severe anxiety and mental and emotional distress and anguish. These injuries and harms have continued to the present and will continue for an indefinite period of time into the future. They are permanent in nature.

1 5.13 As a direct and proximate result of the actions, omissions, failures, and negligent
2 and grossly negligent conduct of Defendant and its employees and agents, Plaintiffs have
3 incurred and continue to incur general and special damages in an amount to be proven at trial.

4 **B. Negligent Investigation**

5 5.14 Under [RCW § 26.44.050](#), law enforcement—including county correctional
6 officers and the Juvenile Detention Center—have a duty to investigate reports of sexual abuse
7 against children. See *Tyner v. DSHS*, 141 Wn.2d 68, 71 (2000).

8 5.15 Defendant Spokane County, through its law-enforcement components and agents,
9 received reports, complaints, and indicators that triggered a duty to investigate but failed to do so
10 with reasonable care— including failing to timely open and complete investigations; interview
11 victims and witnesses; separate and protect victims; remove perpetrator-employees from
12 positions of power over children; preserve and review evidence; make mandatory referrals to
13 prosecutors and child-protection authorities; and document and elevate findings. These breaches
14 left Plaintiffs exposed to Lamb, Gray, and other abusers, and resulted in additional abuse and
15 trauma.

16 5.16 As described above, Defendant Spokane County breached this investigative duty
17 both directly (through its policies, practices, and omissions) and vicariously through the acts and
18 omissions of its officers, employees, and agents acting within the course and scope of
19 employment.

20 5.17 As a direct and proximate result, Plaintiffs sustained significant general and
21 special damages to be proven at trial, including physical and mental harm, including severe
22 anguish, anxiety, depression, PTSD, and emotional distress.

23 **C. Failure to Report**

24 5.18 Washington law requires numerous professionals—including corrections officers
25 and detention personnel—to report suspected child abuse “to the proper law enforcement
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agency or to the department” at the first opportunity and no later than 48 hours. [RCW § 26.44.030\(1\)\(a\), \(3\)](#).

5.19 Defendant Spokane County’s employees at the Juvenile Detention Center had reasonable cause to believe Plaintiffs and others were being abused but failed to make the required reports, thereby breaching their statutory and common-law duties.

5.20 Defendant Spokane County failed to create, implement, or enforce reasonable policies, practices, and procedures to ensure compliance with mandatory reporting obligations, and failed to act on reports or indicators when they arose.

5.21 As a direct and proximate result of these failures, Defendant Spokane County’s predatory employees remained in positions of access and authority, enabling additional abuse and trauma on Plaintiffs, who suffered general and special damages to be proven at trial, including physical and mental harm, severe anguish, anxiety, depression, PTSD, and emotional distress.

VI. JURY DEMAND

6.1 Plaintiffs request a trial by jury on all triable issues.

VII. RELIEF REQUESTED

Plaintiffs request judgment against Defendant Spokane County as follows:

7.1 For general and special damages in amounts to be proven at trial;

7.2 For medical, psychological, and counseling expenses;

7.3 For loss of earnings and impairment of earning capacity;

7.4 For pre- and post-judgment interest as allowed by law;

7.5 For taxable costs where permitted;

7.6 For such other and further legal or equitable relief as the Court deems just and proper.

1 Dated: October 24, 2025.

2 Connelly Law Offices, PLLC
3 Attorneys for Plaintiffs

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5 Colin G. Prince, WSBA No. 43166
6 The Glover Mansion
7 321 W. 8th Avenue
8 Spokane, Washington 99204
9 253.593.5100

10 s/John B. McEntire, IV
11 John B. McEntire, IV, WSBA No. 39469
12 The Glover Mansion
13 321 W. 8th Avenue
14 Spokane, Washington 99204
15 253.593.5100

16 s/Dalia Ibrahim
17 Dalia Ibrahim, WSBA No. 61252
18 2301 North 30th Street
19 Tacoma, Washington 98403
20 253.593.5100