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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

SEATTLE DIVISION

TAMARA WEITZMAN, an individual,

Plaintiff,

v.

FRED HUTCHINSON CANCER CENTER f/k/a
SEATTLE CANCER CARE ALLIANCE, a
Washington not-for-profit corporation,
TIFFANY COURTNAGE, an individual,
NIDHI BERRY, an individual, and
JAMES JORGENSON, an individual,

Defendants.

No. _____

**PLAINTIFF, TAMARA WEITZMAN’S,
COMPLAINT FOR DECLARATORY
RELIEF, INJUNCTIVE RELIEF, AND
DAMAGES**

[JURY DEMAND]

COMPLAINT FOR DECLARATORY
RELIEF, INJUNCTIVE RELIEF &
DAMAGES

No. _____

ROBERT A. BOUVATTE, PLLC
P.O. BOX 14185
TUMWATER, WA 98511
(564) 999-4005

1 The Plaintiff, TAMARA WEITZMAN (“Weitzman” or the “Plaintiff”), by and through
2 her undersigned counsel, and for her Complaint against Defendants, FRED HUTCHINSON
3 CANCER CENTER f/k/a SEATTLE CANCER CARE ALLIANCE (“SCCA”), JAMES
4 JORGENSEN (“Jorgenson”), NIDHI BERRY (“Berry”), and TIFFANY COURTNAGE
5 (“Courtage”) (collectively, the “Defendants”), hereby alleges as follows:

6 **I. INTRODUCTION.**

7 1. This is a civil rights action for declaratory & injunctive relief, as well as
8 compensatory and punitive damages, seeking to vindicate the rights of the Plaintiff, Ms. Weitzman,
9 to be free of unlawful discrimination and retaliation in her workplace, to a workplace free of racial
10 and political harassment, and to not be terminated for expressing political views with which her
11 employer and some of her co-workers disagree.

12 2. Plaintiff has initiated this action because the Defendants, individually and
13 collectively, have knowingly and intentionally violated her state and federal civil rights. In short,
14 Defendants terminated Ms. Weitzman from a position in which she excelled, for failing to
15 sufficiently adhere to the race-conscious principles of Diversity, Equity, and Inclusion (“DEI”)
16 that her employer had determined would be a part of her role as a Social Worker seeing cancer
17 patients.

18 3. Ms. Weitzman was also branded as “white” by SCCA and its employees, and told
19 that her race made her an oppressor of disadvantaged segments of society, totally ignoring her
20 Jewish heritage and the history of race-based discrimination suffered by members of that race.
21 When she reported the egregious racial comments of others, it was Ms. Weitzman, not those others,
22 who were forced to take additional sensitivity training courses to address the situation. Ms.

23 Weitzman dutifully attended DEI courses along with other employees, after SCCA had determined
24 COMPLAINT FOR ROBERT A. BOUVATTE, PLLC
DECLARATORY RELIEF, P.O. BOX 14185
INJUNCTIVE RELIEF & TUMWATER, WA 98511
DAMAGES (564) 999-4005
No. _____

1 to re-educate its employees on “white privilege,” but finally objected when she felt that she
2 personally was being targeted by these courses. Within weeks of objecting to the content of the
3 DEI courses, Plaintiff was terminated for her “expressed racial insensitivities toward coworkers.”

4 **II. PARTIES.**

5 4. The Plaintiff, Ms. Weitzman, is a natural person, and a former resident of King
6 County, Washington, in the City of Seattle. Ms. Weitzman is presently a resident of Charlotte,
7 North Carolina.

8 5. Defendant, SCCA, is a local not-for profit corporation formed under Washington
9 state law, operating a cancer care hospital and research center that conducts business within King
10 County and the State of Washington.

11 6. Defendant, Tiffany Courtnage, was formerly a Manager of Social Work & Patient
12 Navigation at SCCA, now known as the Fred Hutchinson Cancer Center, and was Plaintiff’s direct
13 supervisor during her employment and at all times relevant to the allegations contained herein.
14 Upon information and belief, Ms. Courtnage remains a resident of King County and the State of
15 Washington.

16 7. Defendant, James Jorgenson, was formerly an Associate Director of Supportive
17 Care Services at SCCA, and was Ms. Courtnage’s supervisor during Plaintiff’s employment and
18 at all times relevant to the allegations contained herein, also having supervisory capacity over Ms.
19 Weitzman. Upon information and belief, Mr. Jorgenson remains a resident of King County and
20 the State of Washington.

21 8. Defendant, Nidhi Berry, was formerly a Social Worker in the same department as
22 Plaintiff (Clinical Oncology), to whom SCCA delegated significant supervisory authority over its
23 employees, with respect to “Race and Allyship” training sessions held by the employer, and with

1 respect to DEI matters in the workplace generally. Upon information and belief, Ms. Berry remains
2 a resident of King County and the State of Washington.

3 **III. JURISDICTION AND VENUE.**

4 9. The Court has subject matter jurisdiction based on 28 U.S.C. §§ 1331 and 1343(a),
5 because this case raises violations of Plaintiff’s federal civil rights, pursuant to 42 U.S.C. Section
6 1981, as well as intertwined violations of Washington state law as set forth in greater detail below,
7 and is brought pursuant to 28 U.S.C. §§ 2201 and 2202.

8 10. The Court also has subject matter jurisdiction based on 28 U.S.C. § 1332(a),
9 because the matter set forth herein involves citizens of different States, and the amount-in-
10 controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest, costs, and
11 attorney’s fees.

12 11. The Court has jurisdiction over the intertwined claims relating to Washington state
13 law, under 28 U.S.C. § 1367.

14 12. Venue in this Court is appropriate pursuant to 28 U.S.C. § 1391(b), and intra-district
15 assignment to the Seattle division of the United States District Court for the Western District of
16 Washington is proper under LCR 3(e)(1), because all relevant events occurred in King County,
17 Washington.

18 **IV. STATEMENT OF FACTS.**

19 ***Ms. Weitzman’s Employment as An Oncological Social Worker***

20 13. Plaintiff began her employment with SCCA on or around January 15, 2016, when
21 she was hired as a Social Worker II in the Clinical Services Division of SCCA.

22 14. At that time, Plaintiff’s gross rate of pay was Six Thousand Dollars (\$6,000.00) per
23 month, or Seventy-Two Thousand Dollars (\$72,000.00) annually.

24 COMPLAINT FOR
DECLARATORY RELIEF,
INJUNCTIVE RELIEF &
DAMAGES

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1 15. Ms. Weitzman’s position was a heavy clinical role and involved counseling cancer
2 patients and their families on a regular basis, virtually every day.

3 16. It had long been Ms. Weitzman’s dream to assist with the care of cancer patients,
4 following the death of her father at an early age. She viewed her employment at SCCA as an
5 opportunity to fulfill this dream, and committed fully to being the best employee she could be.

6 17. Ms. Weitzman received several favorable performance reviews throughout her
7 employment, starting with her 6-month review that stated: “Tammy has been such a wonderful
8 addition to the SCCA Social Work team. She has built strong relationships with her social work
9 colleagues from her first week at the clinic. She is quick to affirm those around her as well as the
10 team as a whole.”

11 18. Eventually, Ms. Weitzman’s pay was increased to Eighty-Nine Thousand Dollars
12 (\$89,000.00) annually, as a result of her stellar work performance, positive attitude, and
13 willingness to step in and help with workloads assigned to other social workers.

14 19. Throughout her employment, Ms. Weitzman maintained this helpful attitude,
15 professional demeanor, and strong work ethic, which is reflected in her yearly performance
16 reviews throughout the years 2016-2020.

17 20. Because of the circumstances set forth below, however, four (4) out of the five (5)
18 years that Ms. Weitzman was employed by SCCA were incredibly difficult for her, on an
19 emotional and social level, due to constant harassment and ostracization in the workplace.

20 ***The Environment of Racial Discrimination Tolerated at SCCA***

21 21. As do many other employers, including major medical institutions, SCCA
22 published on its website various policies of the company prohibiting unlawful harassment and
23 discrimination in the workplace, on the basis of protected classes recognized by state and federal

1 law, including race, political views, or political affiliations.

2 22. For instance, Defendant SCCA currently maintains on its website a “Standards of
3 Conduct” page, which states as follows: “Fred Hutch values diversity, mutual respect and the
4 principles of non-discrimination. Fred Hutch does not tolerate harassment on any basis, including
5 race, color, national origin, sex, pregnancy, age, disability, creed, religion, sexual orientation,
6 gender identity, gender expression, veteran status, political affiliation, or political philosophy.”
7 See [https://www.fredhutch.org/en/about/about-the-hutch/accountability-impact/standards-of-](https://www.fredhutch.org/en/about/about-the-hutch/accountability-impact/standards-of-conduct.html)
8 [conduct.html](https://www.fredhutch.org/en/about/about-the-hutch/accountability-impact/standards-of-conduct.html) (last visited 1/16/2024) (emphasis added).

9 23. Another section of the SCCA website, entitled “Patient Policies,” states that “Fred
10 Hutchinson Cancer Center complies with applicable Federal civil rights laws and does not
11 discriminate on the basis of race, color, national origin, age, disability, or sex. Fred Hutch does not
12 exclude people or treat them differently because of race, color, national origin, age, disability, or
13 sex.” See <https://www.fredhutch.org/en/util/patient-policies.html> (last visited 1/16/2024).

14 24. Moreover, each of the company-wide policies and standards listed on its webpage
15 contains language at the bottom of the page, stating that, “[w]e are committed to cultivating a
16 workplace in which diverse perspectives and experiences are welcomed and respected. We do not
17 discriminate on the basis of race, color, religion, creed, ancestry, national origin, sex, age,
18 disability (physical or mental), marital or veteran status, genetic information, sexual orientation,
19 gender identity, political ideology, or membership in any other legally protected class. We are an
20 Affirmative Action employer. We encourage individuals with diverse backgrounds to apply and
21 desire priority referrals of protected veterans.” See, e.g., *id.* (emphasis added).

1 25. Starting in 2017-2018, however, Ms. Weitzman began to realize that the work
2 environment at SCCA was not one that upheld the aspirations of non-discrimination, and
3 objectivity as to political affiliations, that it claims to espouse.

4 26. This was partly the result of interactions with two (2) other social workers, both of
5 whom are now former employees of SCCA, and their perceptions that Ms. Weitzman was not
6 sufficiently understanding of their cultures in the performance of Plaintiff's employment duties,
7 which included supervising other social workers in her division.

8 27. For instance, in 2017, one of the aforementioned former employees, Bertha
9 Santillan, complained to Plaintiff's supervisor, Ms. Courtnage, that Ms. Weitzman was being
10 insensitive to Ms. Santillan's culture, due to Ms. Weitzman's handling of a situation that touched
11 on culture, in accordance with protocols in place at SCCA. Essentially, Ms. Weitzman had
12 attempted to understand Ms. Santillan's discomfort in Ms. Santillan's interactions with another
13 co-worker, who had asked Ms. Santillan to attend a meeting with a Spanish-speaking patient (Ms.
14 Santillan spoke Spanish). Ms. Weitzman attempted to resolve the situation and to validate the
15 concerns of all involved, including Ms. Santillan, but it appears that Ms. Santillan faulted her for
16 not understanding the nuances of Hispanic culture. Ms. Weitzman did not intend to offend anyone.

17 28. This complaint resulted in a meeting between Ms. Courtnage, Ms. Weitzman, and
18 Ms. Santillan, during which Plaintiff articulated to Ms. Courtnage that she had overheard Ms.
19 Santillan refer to her as an "insensitive Canadian white bitch who cuts people off," in a
20 conversation with Janine Julien, Ms. Santillan's friend and the other aforementioned employee.

21 29. Upon information and belief, no disciplinary or other action was taken against Ms.
22 Santillan as the result of this meeting with Ms. Courtnage, nor as the result of her racially charged,
23 inappropriate, and demeaning remarks about Ms. Weitzman.

1 30. Instead, Ms. Weitzman was required by the Defendants to attend a workplace
2 education course on racial sensitivity, as an immediate and direct result of having reported the
3 racially discriminatory remarks of others.

4 31. Ms. Weitzman attended the course over two (2) days, at Plymouth Church in
5 downtown Seattle, but upon information and belief, evidence of her having attended it is not
6 contained within her personnel file at SCCA.

7 32. A few months after this incident regarding Ms. Santillan’s inappropriate race-based
8 comments overheard in the stairwell, Ms. Santillan resigned and relocated to the State of Maryland.

9 33. Ms. Courtnage asked Ms. Weitzman to supervise Ms. Julien in 2017, and Plaintiff
10 attempted to do so for a period, after voicing her concerns with the assignment, due to the above-
11 referenced incident with Ms. Santillan and Ms. Julien’s known friendship with Ms. Santillan.

12 34. After about a month of being supervised by Plaintiff, Ms. Julien complained to Ms.
13 Courtnage that she did not “feel safe” working under Ms. Weitzman, resulting in the three (3) of
14 them having a meeting, and Ms. Julien being re-assigned to Ms. Courtnage for supervision.

15 35. Ms. Julien also left the employment of SCCA in late 2019 or early 2020, after a
16 number of unpleasant and unprofessional interactions with other co-workers which did not result
17 in Ms. Julien’s employment being terminated from her employment.

18 36. On Ms. Julien’s second-to-last day at SCCA, she came to the new desk of Ms.
19 Weitzman (the latter had been relocated sometime prior), and directly referred to her as a White
20 “kike,” to her face – the latter term being a derogatory racial epithet for Jewish individuals.¹

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22
23 ¹ See <https://forward.com/culture/465557/we-need-to-talk-about-kike-etymology-ethnic-slur-antisemitic/> (discussing
the racial/ethnic origins of this epithet in the United States) (last visited 1/16/2024).

1 37. Ms. Weitzman immediately reported this instance of unacceptable racial
2 harassment to her supervisor, Ms. Courtnage, in the presence of another SCCA employee.

3 38. Ms. Courtnage effectively told Plaintiff that Ms. Julien’s racial comments were
4 tolerable in SCCA’s workplace, because “[i]t’s two more days, Tammy, and then she is gone.”

5 39. Upon information and belief, no disciplinary or other action was taken against Ms.
6 Julien, as the result of uttering a despicable racial slur to an individual known to be a member of
7 the race in question. Instead, Ms. Julien was permitted to end her employment voluntarily.

8 ***SCCA’s Harassment of Ms. Weitzman for Her Political Views & Affiliations***

9 40. Ms. Julien was replaced at SCCA by Nidhi Berry, a self-described “woman of
10 color” from an “immigrant family,” who would come to be a vocal proponent of racial identity
11 politics and other progressive talking points in the SCCA workplace, including unabashedly
12 partisan criticism of former President Trump and his administration.

13 41. Ms. Berry and Ms. Weitzman got along well initially, and Ms. Weitzman had few
14 issues in her employment generally after the departure of Ms. Julien, until such time as SCCA
15 began to require employees’ attendance at meetings focused on advancing DEI in the workplace.
16 This began in or around late 2019, after Ms. Berry’s hiring by SCCA.

17 42. SCCA often called upon Ms. Berry to assist with presentations in the workplace by
18 the Diversity, Equity, and Inclusion Council (“DEIC”) (an internal SCCA committee for
19 addressing DEI issues), including by curating articles that would be included in the presentations.
20 *See, e.g.*, DEIC meeting agenda, a true and correct copy of which is attached hereto as **Exhibit A**.

21 43. Because of SCCA’s delegation to Ms. Berry of significant supervisory authority
22 with respect to these matters, Ms. Berry exercised singular influence over the employer’s decision-
23 making with respect to the implementation of the DEIC program and employees’ adherence to it.

1 44. Ms. Weitzman attended a meeting of the DEIC in or around 2019, during which
2 she shared that due to her Jewish heritage, she could understand racial discrimination, and shared
3 an experience from her adolescence of antisemitic discrimination by a White Canadian family.

4 45. Following this disclosure, Ms. Weitzman was dismissed by the moderators of the
5 DEIC meeting and lectured that because she was white, she “could pass.” While this comment was
6 framed in terms of avoiding discrimination by others, at least for purposes of the relevant DEIC
7 discussion, the message from SCCA was clear: Ms. Weitzman could *not* understand the history of
8 racial discrimination, and her opinion was not valued in the context of that discussion.

9 46. As part of the 2019 DEIC meeting, employees were asked to come prepared with
10 questions and/or feedback about certain required reading included in the agenda. *See Ex. A*, p. 1.

11 47. Ms. Berry had curated the three (3) articles that Ms. Weitzman and other employees
12 were required to read in advance of the meeting. The articles bore the titles “White Privilege:
13 Unpacking the Invisible Knapsack,” “Why Saying ‘All Lives Matter’ Is a Problem,” and “For Our
14 White Friends Desiring to Be Allies,” and were all written from the misguided partisan perspective
15 that it is insufficient to simply treat all people alike, regardless of their immutable characteristics
16 – one must instead strive to be “anti-racist” and to recognize and combat one’s own “privilege.”
17 *See Ex. A*, p. 1. These articles aptly exhibit Ms. Berry’s animus for white employees like Plaintiff.

18 48. After SCCA began requiring all of its oncological Social Workers to attend DEIC
19 meetings, Ms. Weitzman was chided on a number of occasions by her supervisor, for not speaking
20 up enough in the meetings, or not otherwise appearing engaged enough in the content being
21 presented.

1 49. Later, on January 21, 2021, Ms. Weitzman attended a DEIC meeting via Zoom
2 teleconference, along with other co-workers, featuring a presentation by an African American
3 woman discussing the black community’s experience with racism in America.

4 50. Following this meeting, Ms. Berry circulated an offensive article to Ms. Weitzman
5 and SCCA’s other oncological social workers, from the website www.captainawkward.com.

6 51. Entitled “Guest Post: A post-election guide to changing hearts and minds,” the
7 article shared by Ms. Berry was thoroughly inappropriate for any workplace purporting to value
8 neutrality with respect to political views and/or associations. *See*
9 [https://captainawkward.com/2016/11/21/guest-post-a-post-election-guide-to-changing-hearts-](https://captainawkward.com/2016/11/21/guest-post-a-post-election-guide-to-changing-hearts-and-minds/)
10 [and-minds/](https://captainawkward.com/2016/11/21/guest-post-a-post-election-guide-to-changing-hearts-and-minds/) (last visited 1/16/2024).

11 52. For instance, the article stated that, “[m]any of us are grappling with how to use our
12 skills and influence to resist the upcoming Trump administration and the hatred and violence that
13 it inspires,” and that “[w]e are uniquely prepared for a crucial part of the next few months or years:
14 changing the minds of people who support the Trump administration, and standing up to the
15 abusers they are empowering.” *See id.*

16 53. Moreover, after defining the newly-coined vocabulary of “allies” and “targets” – in
17 language that smacks of race-baiting identity politics – the article goes on to state that “[f]or
18 example, a Jewish man can act as an ally when someone is being sexist, but will be a target when
19 someone is being anti-Semitic. It can get more complicated: a white Jewish person often can’t use
20 white privilege to be an ally against white supremacy since that system often also includes anti-
21 Semitism.” *See id.*

1 54. Ms. Weitzman found this discussion highly offensive and also not a proper part of
2 any workplace purporting to advance principles of non-discrimination – particularly its clumsy
3 discussion of when and how it is proper for people to object to discrimination, based on their own
4 race or racial categorization (or perceived race or racial categorization).

5 55. Such identity politics have nothing to do with social work, nor did they have any
6 bearing on the duties of Plaintiff’s position, and Ms. Weitzman was particularly incensed by her
7 employer’s mandate to push these “woke” politics on terminally ill patients dying of cancer, in the
8 course of serving them.

9 56. Ms. Weitzman complained to her supervisor, Ms. Courtnage, about the contents of
10 the article Ms. Berry circulated, at the behest of and with the apparent approval of SCCA and in
11 the course of performing her duties in assisting with the administration of SCCA’s DEIC program.

12 57. Ms. Courtnage told Ms. Weitzman that she should contact Ms. Berry directly to
13 discuss her concerns about what are effectively talking points for grassroots political operatives,
14 contained in the CaptainAwkward.com article, despite Plaintiff’s objections to this approach.

15 58. Plaintiff discussed with Ms. Courtnage her concerns about speaking directly to Ms.
16 Berry, and asserted that it was not her job to address a situation of this nature directly with a co-
17 worker.

18 59. These concerns were dismissed by Ms. Courtnage and by SCCA, who had
19 effectively delegated this and other matters concerning its DEIC program to Ms. Berry.

20 60. Accordingly, Ms. Weitzman reluctantly followed the instructions of her direct
21 supervisor, Ms. Courtnage, and had a telephone call with Ms. Berry, wherein the discussion was
22 relatively pleasant. This telephone conversation took place on or around Thursday, January 21,
23 2021.

1 61. During the telephone call, Ms. Weitzman informed Ms. Berry that she had family
2 who supported President Trump, as well as a good family friend in the Trump administration, and
3 that she wished that politics could stay out of the discussion, instead of having to hear these
4 negative things said about people close to her, in her workplace.

5 62. Also during the telephone call, Ms. Berry and Ms. Weitzman agreed to disagree
6 about their political views, and that the exchange would not impact their working relationship.

7 63. After the telephone call, however, Ms. Berry sent an email to Ms. Weitzman,
8 copying human resources personnel, wherein she claimed to be “profoundly perturbed” as a result
9 of the conversation, and insisted that Plaintiff must agree with her views in order to be an effective
10 social worker. *See* email correspondence sent on or around January 28, 2021, a true and correct
11 copy of which (redacted as necessary to protect attorney-client privilege, work product, or any
12 other applicable source of confidentiality) is attached hereto as **Exhibit B**.

13 64. By circulating the CaptainAwkward.com article, engaging in the telephone
14 conversation with Ms. Weitzman, and sending the aforementioned email (**Ex. B**), Ms. Berry was
15 exercising the authority for DEIC matters that SCCA had delegated to her, and was doing so in
16 pursuit of SCCA’s perceived interests. As such, these actions were within the scope and authority
17 of Ms. Berry’s employment by SCCA.

18 65. Also following the call with Ms. Berry, Ms. Danielle Brundage, an individual in
19 the Human Resources Department at SCCA, instructed Ms. Weitzman not to speak with Ms. Berry
20 in person or respond to her communications, and assured her that no retaliation would be taken
21 against Plaintiff as a result of the confrontation (which turned out to be false).

1 the stereotypes generally prevailing in the United States as to the political leanings of Jews and
2 members of other races.

3 71. Moreover, to be lumped in with members of the White race, despite her Jewish
4 heritage, and to be told that her views on the matter of racial discrimination did not matter because
5 being Jewish was equivalent to being White for purposes of racial discussions, was deeply
6 offensive and disconcerting to Ms. Weitzman, who had only attempted to participate in good faith
7 in the racially-centered conversations mandated by SCCA to take place in the workplace.

8 72. In Ms. Berry’s email, she linked to the NASW Code of Ethics discussed *infra*, and
9 essentially insisted that Ms. Weitzman’s views as expressed during the phone call were
10 incompatible with the duties of a social worker at SCCA. *See id.*, at p. 2.

11 73. Ms. Berry copied Ms. Courtnage on her email, as well as HR, and disrespected Ms.
12 Weitzman’s request for mutual understanding and tolerance, stating “I will not privilege your or
13 any other white person’s comfort over the safety of people of color and Black people, and I
14 certainly won’t privilege your comfort over equitable patient outcomes.” *See id.*, at p. 3.

15 74. Upon information and belief, Ms. Berry faced no disciplinary or other action
16 against her employment, as a result of these blatantly racist and inappropriate statements.

17 75. Upon information and belief, SCCA was aware of Plaintiff’s conservative political
18 leanings, even prior to her having disclosed them to Ms. Berry. Plaintiff frequently received
19 unsolicited political emails from co-workers criticizing the Trump administration, as well as
20 comments from co-workers and supervisors suggesting that they were aware of her conservative
21 views and believed that she was partially to blame for the Trump administration’s policies.

22 76. Ms. Weitzman timely reported these instances of harassment to Ms. Brundage, but
23 upon information and belief, no action was taken in connection with same.

1 77. Instead, upon one (1) instance of Plaintiff’s reporting her concerns about ongoing
2 political harassment in the workplace, Ms. Brundage told Ms. Weitzman that she could make a
3 written report of her complaint, but that it would likely only result in retaliation against Ms.
4 Weitzman, and suggested that Plaintiff’s only other alternative was simply to “deal with it.”

5 ***SCCA’s Termination of Ms. Weitzman for her Objections to SCCA’s Political Environment***

6 78. Finally, after having attended numerous DEI education sessions, at the request of
7 her employer and along with her other co-workers, maintaining her job performance at a steadily
8 high level for five (5) years, registering complaints with management for the racial comments of
9 her co-workers, and expressing her own views to Ms. Berry at the requirement of her employer,
10 Ms. Weitzman was terminated on February 5, 2021, in a meeting with her supervisors.

11 79. On this occasion, Ms. Weitzman was called into a conference room by Ms.
12 Courtnage, as well as the latter’s supervisor, Associate Director James Jorgenson.

13 80. During this meeting, Mr. Jorgenson told Ms. Weitzman that she was being
14 terminated because her “ethnicity sensitivity” and core values did not align with the core values of
15 SCCA, and because Ms. Courtnage, as Plaintiff’s direct supervisor, could not work with her to
16 address these issues.

17 81. In Plaintiff’s subsequent communications with SCCA’s general counsel, the
18 organization reiterated this basis for termination, stating that “SCCA is an anti-racist organization,
19 committed to Workplace Respect. SCCA considered the fact and substance of Ms. Weitzman’s
20 phone call to Nidhi Berry in January, 2021 to be antithetical to those values.”

21 82. Even immediately prior to the date of her termination, SCCA had no issues with
22 Ms. Weitzman’s objective performance. Indeed, less than a week prior to her termination, Ms.
23 Weitzman was asked to give a presentation for the entire hematology oncology division, along

1 with one other presenter, to be presented on February 8, 2021.

2 83. Further, on February 3, 2021, Ms. Weitzman attended a Zoom teleconference
3 wherein Ms. Courtnage, along with Ms. Katie Seitz (another supervisor at SCCA), requested that
4 she take on two (2) additional clinics on top of her existing workload. In accordance with her
5 strong work ethic and previous willingness to cooperate with her employer’s requests, Ms.
6 Weitzman agreed to do so, and Ms. Courtnage and Ms. Weitzman appeared to be appreciative.

7 84. SCCA appears to have raised no issues with Plaintiff’s objective performance,
8 instead relying solely on her unwillingness to push “woke” identity politics as the basis for its
9 termination decision.

10 85. Washington law prohibits discrimination against employees upon the basis of race,
11 as reflected in Washington’s Law Against Discrimination, RCW ch. 49.60, *et seq.* (the “WLAD”),
12 which contains perhaps the strongest policy statement concerning non-discrimination of any State
13 in the Union. *See* RCW 49.60.010.²

14 86. Moreover, Washington law prohibits employers from discriminating against
15 employees on the basis of political views and affiliations, in another clear articulation of the State’s
16 public policy in this area. *See* RCW 42.17A.495(2).

17 87. Because Ms. Weitzman suffered a hostile work environment and was wrongfully
18 terminated due to her race and her political views, and after objecting to how SCCA handled these
19 issues in the workplace, she is entitled to relief under the common law of Washington, the WLAD,
20 42 U.S.C. Section 1981, and the Seattle Municipal Code.

21 _____
22 ² “The legislature hereby finds and declares that practices of discrimination against any of its inhabitants because of
23 race, creed, color, national origin, citizenship or immigration status, families with children, sex, marital status, sexual
orientation, age, honorably discharged veteran or military status...are a matter of state concern, that such
discrimination threatens not only the rights and proper privileges of its inhabitants but menaces the institutions and
foundation of a free democratic state.” (emphasis added).

1 ***Plaintiff's Right to Declaratory & Injunctive Relief to Halt Future Political Persecution***

2 88. Whether Plaintiff may be lawfully terminated for expressing her political views in
3 the workplace, and whether SCCA may require its employees to adhere to a particular ideological
4 alignment, typically advanced by one side of the political aisle or the other, *inter alia*, are questions
5 comprising an actual, ongoing controversy that is ripe for a decision by this Court.

6 89. Without the preliminary and permanent injunctive relief requested herein, Ms.
7 Weitzman and other employees in this state will remain indefinitely deterred from the exercise of
8 rights protected under the statutory law of the State of Washington.

9 90. Enjoining Defendants from the employment practices complained of herein will
10 redress that injury, because it will mean Ms. Weitzman and other employees like her cannot be
11 terminated simply for expressing their views (or perhaps more accurately, expressing such views
12 while being a member of the wrong race).

13 91. It is squarely in the public interest to resolve the issues presented herein, for
14 application to workplaces across the State of Washington. These questions have broad application
15 to future cases, and it is in the public interest to resolve them now, rather than later.

16 92. Plaintiff has invoked the jurisdiction of this Court to vindicate her state and federal
17 rights, which have been and which will continue to be injured by the unlawful conduct of
18 Defendants, and which injuries would be adequately redressed by the relief set forth herein and/or
19 prevented in the future, as they are fairly traceable to the actions of the Defendants.

20 93. The Plaintiff has incurred attorney's fees and costs in connection with the filing
21 and prosecution of this lawsuit, and requests an award of same, pursuant to 42 U.S.C. § 1988,
22 RCW Section 49.60.030, or any other applicable source of law.

V. CLAIMS FOR RELIEF.

CLAIM 1

Violation of WLAD for Discrimination Upon the Basis of Race, Pursuant to RCW 49.60.180 and RCW 49.60.030, Against All Defendants

94. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs and allegations set forth above, as if fully set forth herein.

95. This Claim 1 alleges a violation of the WLAD, for Defendants’ intentional discrimination against Plaintiff on the basis of race.

96. As a White individual of Jewish heritage, Plaintiff is a member of a protected class.

97. The Defendants have individually and collectively treated Plaintiff less favorably in the terms and conditions of her employment than similarly situated employee(s) who are not members of that protected class, including, but not limited to by: (i) being asked to correct her perceived racial insensitivities towards former employees Ms. Santillan and/or Ms. Julien, while neither of those former employees was asked to correct anything, despite demeaning her in explicitly racial terms; (ii) instructing Ms. Weitzman not to speak with Ms. Berry following their telephone call and Ms. Berry’s subsequent email, and without similarly instructing Ms. Berry; (iii) crediting the experiences of certain races and classes of employees concerning discrimination and equity in the workplace, while discrediting those of White and/or Jewish employees, and explicitly demeaning individuals of those races throughout SCCA’s DEIC sessions and related communications; (iv) requiring her to discuss her concerns about Ms. Berry’s email directly with that employee, when upon information and belief, no similar request was made of members of other races who complained about racial discrimination; and (v) terminating Ms. Weitzman for objecting to the political environment at SCCA, while being White and/or Jewish.

1 98. The similarly situated employee(s) whom Defendants have treated more favorably
2 than Plaintiff, including Ms. Berry, do substantially the same work for King County.

3 99. Ms. Weitzman has been treated less favorably than similarly situated employees as
4 a direct result of racial discrimination against her, on the basis of her White and/or Jewish race.

5 100. As a result of Defendants’ racial discrimination and unlawful animus against
6 Plaintiff in violation of RCW 49.60.180 and RCW 49.60.030, Plaintiff is entitled to the remedies
7 provided by RCW 49.60.030, as well as by other applicable law.

8 **CLAIM 2**
9 **Violation of WLAD for Retaliation,**
10 **Pursuant to RCW 49.60.210 & RCW 49.60.030, Against All Defendants**

11 101. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs
12 and allegations set forth above, as if fully set forth herein.

13 102. This Claim 2 alleges a violation of the WLAD, for Defendants’ intentional
14 retaliation against Plaintiff on the basis of her protected activities as set forth herein.

15 103. The Plaintiff engaged in statutorily protected activity(ies) with respect to her
16 employment, including, but not limited to when she: (i) reported to management the instance of
17 being called an “insensitive Canadian White bitch” by Ms. Santillan; (ii) reported to management
18 the instance of being called a “White kike” by Ms. Julien; (iii) complained to management about
19 being harassed on the basis of her political views and/or affiliations; (iv) attempted to express
20 sentiments concerning her own experiences with racism and/or antisemitism, at a DEIC meeting
21 convened for that purpose; (v) complained to management about the content of Ms. Berry’s email
22 and the content of the DEIC meetings in general; (vi) expressed to management her concerns about
23 speaking directly with Ms. Berry, her co-worker, about the contents of Ms. Berry’s email; and (vii)
24 objected generally to the proposition that part of her job was to push politics on cancer patients.

COMPLAINT FOR
DECLARATORY RELIEF,
INJUNCTIVE RELIEF &
DAMAGES

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1 104. Defendants were each aware of Plaintiff’s aforementioned, statutorily protected
2 activities, from the time that Plaintiff engaged in them.

3 105. Defendants have individually and collectively taken several adverse actions against
4 Plaintiff’s employment, as a direct result of her engaging in the aforementioned statutorily
5 protected activities, including, but not limited to: (i) allowing Ms. Santillan, Ms. Julien, and others
6 to harass Plaintiff with impunity and otherwise contribute to a hostile work environment against
7 her; (ii) requiring Ms. Weitzman to attend racial sensitivity training after she reported the racially-
8 charged comments of these other co-workers to her management; (iii) crediting the experiences of
9 certain races and classes of employees concerning discrimination and equity in the workplace,
10 while discrediting those of White and/or Jewish employees, and explicitly demeaning individuals
11 of those races throughout SCCA’s DEIC sessions and related communications; (iv) requiring Ms.
12 Weitzman to convey a later complaint about a DEIC meeting directly to a co-worker known to
13 participate in the meetings, and to have radical, opposing views; (v) instructing Ms. Weitzman not
14 to speak with Ms. Berry following their telephone call and Ms. Berry’s subsequent email, and
15 without similarly instructing Ms. Berry; and (vi) terminating Plaintiff’s employment, after that co-
16 worker, Ms. Berry, complained about Ms. Weitzman’s reaching out to her.

17 106. Defendants’ unlawful animus against Plaintiff and desire to retaliate against her for
18 engaging in statutorily protected activities were, at the very least, “substantial factors” in taking
19 the aforementioned, adverse actions against Plaintiff’s employment.

20 107. As a result of Defendants’ retaliation against Plaintiff in violation of RCW
21 49.60.210, Plaintiff is entitled to the remedies provided by RCW 49.60.030, as well as by other
22 applicable law.

CLAIM 3

**Violation of WLAD for Hostile Work Environment,
Pursuant to RCW 49.60.180 and RCW 49.60.030, Against All Defendants**

108. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs and allegations set forth above, as if fully set forth herein.

109. This Claim 3 alleges a violation of the WLAD for the Defendants' maintenance of a hostile work environment wherein Plaintiff was not permitted to voice her political views or perform her job effectively, due to her race and the views SCCA required its employees to adopt.

110. As a White individual of Jewish heritage, Plaintiff is a member of a protected class.

111. Because of Ms. Weitzman's status as a member of a protected class, she has suffered frequent and egregious harassment at the hands of SCCA employees, including, but not limited to Ms. Berry, Ms. Julien, Ms. Santillan, and Ms. Courtnage.

112. This harassment, on the basis of her race, was not invited or welcomed by Ms. Weitzman.

113. The harassment directed to Plaintiff was sufficiently pervasive and significant to alter the terms and conditions of her employment.

114. The harassment directed to Plaintiff is imputable to Defendants, as Plaintiff's employer and supervisors, because Defendants took no meaningful action to stop, prevent or remedy such harassment, even after repeatedly being advised of same by Ms. Weitzman.

115. Moreover, Defendants have engaged in affirmative conduct that had the effect of stoking existing racial tensions at SCCA, such as by requiring its employees to participate in the DEIC meetings, by delegating to Ms. Berry responsibility over DEIC matters, and by including explicitly race-based content in the presentations associated with SCCA's DEI agenda.

1 116. Plaintiff has suffered severe humiliation, emotional distress, mental anguish, and
2 debilitating anxiety as a result of the abusive work environment where she was required to appear
3 every day, and which Defendants condoned by taking no action to remedy it.

4 117. Defendants knowingly permitted this abusive and hostile work environment to
5 subsist by taking no meaningful corrective action to stop, prevent, or remedy it.

6 118. As a result of Defendants' maintenance of a hostile work environment against
7 Plaintiff in violation of RCW 49.60.180 and RCW 49.60.030, Plaintiff is entitled to the remedies
8 provided by RCW 49.60.030, as well as by other applicable law.

9 **CLAIM 4**

10 **Intentional Racial Discrimination, Retaliation, and Hostile Work Environment,
11 Pursuant to 42 U.S.C. § 1981, Against All Defendants**

12 119. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs
13 and allegations set forth above, as if fully set forth herein.

14 120. This Claim 4 alleges a claim under 42 U.S.C. Section 1981, for the Defendants'
15 intentionally discriminating against Plaintiff upon the basis of race, retaliating against her for
16 raising complaints relating to this discrimination and to the DEIC agenda, and for maintaining a
17 hostile work environment wherein she was regularly subjected to harassment and abuse on account
18 of her race.

19 121. As a White individual of Jewish heritage, Plaintiff is a member of a protected class.

20 122. SCCA, as Plaintiff's employer, and Ms. Courtnage, as Plaintiff's supervisor, have
21 individually and collectively treated Plaintiff less favorably in the terms and conditions of her
22 employment than similarly situated employee(s) who are not members of that protected class, have
23 taken several adverse employment actions against her in retaliation for statutorily protected

1 expression, and have knowingly permitted a hostile work environment sufficient to impact the
2 terms of her employment, including, but not limited to by the facts set forth in Claims 1-3, *supra*.

3 123. The similarly situated employee(s) whom Defendants have treated more favorably
4 than Plaintiff, including Ms. Berry, do substantially the same work for King County.

5 124. Ms. Weitzman has been treated less favorably than similarly situated employees,
6 retaliated against, and subjected to a hostile work environment as a direct result of racial
7 discrimination against her, on the basis of her White and/or Jewish race.

8 125. As a result of Defendants' intentional racial discrimination and unlawful animus
9 against Plaintiff in violation of 42 U.S.C. Section 1981, as set forth in Claims 1-3, *supra*, Plaintiff
10 is entitled to compensatory damages, pursuant to 42 U.S.C. Section 1988, as well as all other
11 remedies provided by applicable law. *See Woods v. Graphic Communications, Inc.*, 925 F.2d 1195,
12 1204 (9th Cir. 1991).

13 126. The unlawful conduct of Defendants in violation of 42 U.S.C. Section 1981, as set
14 forth in Claims 1-3, *supra*, was intentional, or in the alternative, was malicious and/or recklessly
15 indifferent to Plaintiff's rights under applicable federal, State, and City law; therefore, Plaintiff is
16 also entitled to punitive damages. *See Zhang v. American Gem Seafoods, Inc.*, 339 F.3d 1020, 1041
17 (9th Cir. 2003).

18 **CLAIM 5**

19 **Violation of Seattle Municipal Code, for Discrimination & Retaliation on the Basis of Race
and of Political Views and/or Affiliations, Against All Defendants**

20 127. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs
21 and allegations set forth above, as if fully set forth herein.

1 128. This Claim 5 alleges a claim under the Seattle Municipal Code (the “SMC” or the
2 “Code”), for the Defendants’ unlawfully discriminating and retaliating against Plaintiff on the
3 basis of her race and of her political ideology and/or affiliations, as set forth in Claims 1-4, *supra*.

4 129. The Seattle Municipal Code, Section 14.04.040 states that “[i]t is unfair
5 employment practice within the City for any ... Employer to discriminate against any person with
6 respect to hiring, tenure, promotion, terms, conditions, wages or privileges of employment, or with
7 respect to any matter related to employment ... Employer ... to penalize or discriminate in any
8 manner against any person because they opposed any practice forbidden by this chapter...”. *See*
9 SMC § 14.04.040(A), (F).

10 130. For purposes of the Code, the terms “discrimination,” “discriminate,” and
11 “discriminatory act” are defined as “...any act, by itself or as part of a practice, that is intended to
12 or results in different treatment or differentiates between or among individuals or groups of
13 individuals by reason of race, color, age, sex, marital status, sexual orientation, gender identity,
14 genetic information, political ideology, creed, religion, ancestry, caste, national origin, citizenship
15 or immigration status, [or] honorably discharged veteran or military status,” and includes
16 “...harassment, such as racial and sexual harassment, as well as harassment based on other
17 protected classes.” *See* SMC § 14.04.030.

18 131. For purposes of the Code, “political ideology” is defined as “...any idea or belief,
19 or coordinated body of ideas or beliefs, relating to the purpose, conduct, organization, function, or
20 basis of government and related institutions and activities, whether or not characteristic of any
21 political party or group. This term includes membership in a political party or group and includes
22 conduct, reasonably related to political ideology, which does not interfere with job performance.”

23 *See id.*

1 132. For purposes of the Code, “race” is defined to be “inclusive of traits historically
2 associated or perceived to be associated with race...”. *See id.*

3 133. SMC § 14.04.185(A) provides that any person who has been injured by an unfair
4 employment practice as defined in the SMC has a private, civil cause of action that may be
5 commenced in any court of competent jurisdiction, regardless of whether the Plaintiff has filed a
6 charge with any administrative agency.

7 134. SMC § 14.04.185(D) provides that the relief available under the SMC for any unfair
8 employment practices is identical to the relief available under the WLAD, but additionally, Section
9 14.04.210 provides for a “civil fine or forfeiture not to exceed Five Hundred Dollars (\$500).”

10 **CLAIM 6**
11 **Wrongful Termination in Violation of Public Policy, for Discrimination & Retaliation on**
12 **the Basis of Race and of Political Views and/or Affiliations, Against All Defendants**

13 135. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs
14 and allegations set forth above, as if fully set forth herein.

15 136. This Claim 6 alleges a claim under the common law of the State of Washington, for
16 SCCA’s wrongful termination of Plaintiff in retaliation for her statutorily protected expression,
17 including that of making known her conservative political views, and in retaliation for her
18 complaining about the instances of racial harassment that she endured at SCCA.

19 137. RCW 42.17A.495 states, in relevant part that “No employer...may discriminate
20 against an officer or employee in the terms and conditions of employment for (a) the failure to
21 contribute to, (b) the failure to support or oppose, or (c) in any way supporting or opposing a
22 candidate, ballot proposition, political party, or political committee.”

1 138. The foregoing statute reflects a clear mandate of Washington state public policy,
2 that employees should not be terminated or otherwise discriminated against merely for expressing
3 their political views and/or affiliations in the workplace. *See, e.g., Nelson v. McClatchy*
4 *Newspapers, Inc.*, 131 Wn. 2d 523, 534 (Wash. 1997).

5 139. The ability of an employee in the State of Washington to freely speak one’s
6 conscience, particularly with respect to equity in the workplace and matters concerning politics
7 and civic responsibility, is a matter that strikes at the heart of a citizen’s social rights and duties.

8 140. Employees such as Plaintiff have a legal right and/or privilege not to be fired for
9 exercising legal rights and/or privileges protected by the law of Washington, for performing public
10 duties or obligations, or for reporting workplace misconduct, all of which Plaintiff has done.

11 141. Plaintiff engaged in a statutorily protected activity, including, but not limited to
12 when she engaged in the actions specifically identified in Claim 2, *supra*.

13 142. Defendants unlawfully took adverse actions against Plaintiff’s employment,
14 including, but not limited to when they took the discriminatory and retaliatory actions specifically
15 identified in Claims 1-3, *supra*.

16 143. Defendants’ having taken adverse employment actions against Plaintiff was the
17 direct result of her engaging in statutorily protected activities.

18 144. Defendants’ wrongful termination of Plaintiff was intentional and knowing, or in
19 the alternative, was recklessly indifferent to Plaintiff’s rights under applicable federal, State, and
20 City law.

CLAIM 7

Intentional Infliction of Emotional Distress, Against All Defendants

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3 145. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs
4 and allegations set forth above, as if fully set forth herein.

5 146. This Claim 7 alleges a claim under the common law of the State of Washington, for
6 Defendants' intentionally inflicting severe emotional distress upon Plaintiff, by way of all the facts
7 and allegations set forth in Claims 1-6, *supra*.

8 147. Defendants' conduct of discrimination, harassment, and retaliation directed to
9 Plaintiff, over a period of several years, was intentional and knowing, or in the alternative, was
10 recklessly indifferent to Plaintiff's rights under applicable federal, State, and City law.

11 148. Defendants' conduct was outrageous in character, and so extreme in decree, as to
12 go beyond all possible bounds of decency, and as to be regarded as atrocious and utterly intolerable
13 in a civilized society.

14 149. Plaintiff suffered severe emotional distress, as a result of Defendants' and their
15 employees' conduct.

CLAIM 8

**Declaratory & Injunctive Relief Pursuant to
28 U.S.C. §§ 2201 & 2202, Against All Defendants**

16
17
18 150. The Plaintiff hereby re-alleges and incorporates by reference all of the paragraphs
19 and allegations set forth above, as if fully set forth herein.

20 151. Based upon the foregoing allegations, there is presently existing between the parties
21 hereto an actual, substantial, ongoing controversy that requires the Court's intervention. This
22 request for a declaratory judgment is not seeking an advisory opinion from the Court.

1 152. 28 U.S.C. § 2201 provides, in relevant part, that

2 In a case of actual controversy within its jurisdiction...any court of the United
3 States, upon the filing of an appropriate pleading, may declare the rights and other
4 legal relations of any interested party seeking such declaration, whether or not
further relief is or could be sought. Any such declaration shall have the force and
effect of a final judgment or decree and shall be reviewable as such.

5 28 U.S.C. § 2201(a).

6 153. All of the parties necessary to resolve the present controversies are presently before
7 the Court, and subject to its jurisdiction.

8 154. A declaratory judgment as requested below would resolve all controversies
9 between the parties hereto.

10 155. Furthermore, 28 U.S.C. § 2202 provides that “[f]urther necessary or proper relief
11 based on a declaratory judgment or decree may be granted, after reasonable notice and hearing,
12 against any party whose rights have been determined by such judgment.”

13 156. Plaintiff has no adequate remedy at law to compensate for the loss of her important
14 City, federal, and state civil rights and will suffer irreparable injury absent an injunction against
15 the Defendants as requested herein.

16 157. The harms alleged herein are ongoing and continuing in nature.

17 158. The public interest favors the entry of injunctive relief, as do the equities in this
18 case, in order to protect the Plaintiff’s civil rights under City, state and federal law, and to prevent
19 a major non-profit corporation and employer such as SCCA from discriminating against
20 employees and/or other service providers on the basis of their race and/or political views.

VI. RELIEF REQUESTED.

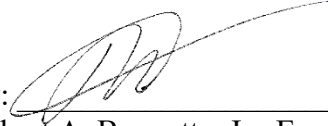
WHEREFORE, having set forth the claims for relief above, the Plaintiff, TAMARA WEITZMAN, respectfully prays for relief as follows:

1. Declaratory relief, declaring that the Defendants' actions, as set forth herein, constitute violations of 42 U.S.C. Section 1981, RCW 49.60.180, RCW 49.60.210, RCW 49.60.030, RCW 42.17A.495, and the Seattle Municipal Code;
2. Injunctive relief, prohibiting all Defendants from engaging in the conduct described herein, as well as all other forms of racial discrimination, political discrimination, and/or retaliation against the Plaintiff and against any other employees, independent contractors and other service providers, as permitted by RCW 49.60.030;
3. That judgment for compensatory damages be entered against the Defendants, jointly and severally, in an amount to be determined at trial, but not less than Seventy-Five Thousand Dollars (\$75,000.00);
4. That judgment for punitive damages be entered against the Defendants, jointly and severally, in an amount to be determined at trial;
5. That the Court order payment of reasonable attorneys' fees and costs to the Plaintiff, TAMARA WEITZMAN, in accordance with applicable law, including, but not limited to 42 U.S.C. § 1988 and RCW Section 49.60.030, recoverable jointly and severally against all Defendants;
6. Pre- and post-judgment interest, as allowed by law; and
7. That the Court order such other relief as is deemed equitable and just.

JURY TRIAL DEMAND

The Plaintiff, TAMARA WEITZMAN, by and through undersigned counsel and pursuant to Fed.R.Civ.P. 38(b), hereby demands a trial by jury, with respect to all claims so triable, as of right.

RESPECTFULLY SUBMITTED on January 16, 2024.

By: 

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Counsel for Plaintiff, Tammy Weitzman

COMPLAINT FOR
DECLARATORY RELIEF,
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DAMAGES
No. _____

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