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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ALEX RANDALL,

Plaintiff,

vs.

KING COUNTY, RICHARD C. ROWE;

Defendants.

CASE NO:

COMPLAINT

I. PARTIES

1. Plaintiff is Alex Randall, a married person who is a resident of King County, Washington.

2. Defendants are King County, Washington; King County Sheriff's Deputy Richard C. Rowe. All Defendants are believed to be residents of King County, Washington.

II. JURISDICTION AND VENUE

1. This action is brought pursuant to 42 U.S.C. § 1983.

2. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1332, 1343, and 1367.

3. Venue is properly set within this district pursuant to 28 U.S.C. § 1391.

4. The events upon which this suit is based occurred in this judicial district.

1 1. In committing the acts complained of, Defendant Rowe acted under color of state law
2 with deliberate indifference to deprive Plaintiff of his constitutionally protected rights to be free
3 from the excessive use of force.

4 2. The actions of Defendant Rowe were the direct and proximate cause of damages to
5 Plaintiff as alleged in this Complaint.
6

7 **B. MUNICIPAL LIABILITY CLAIM PURSUANT TO 42 U.S.C. § 1983**
8 **AGAINST DEFENDANT KING COUNTY: FAILURE TO TRAIN**

9 1. Defendant Rowe, acting under color of state law with deliberate indifference, deprived
10 the Plaintiff of his rights to be free from excessive force and wrongful arrest;

11 2. Defendant King County's training policies were not adequate to train its police officers
12 to handle the usual and recurring situations with which they must deal;

13 3. Defendant King County was deliberately indifferent to the obvious and foreseeable
14 consequences of its failure to train its police officers adequately; and
15

16 4. The failure of Defendant King County to provide adequate training caused the
17 deprivation of the Plaintiff's rights by the Defendant's police; that is, the Defendant's failure to
18 train is so closely related to the deprivation of the Plaintiff's rights as to be the moving force that
19 caused the ultimate injury.
20

21 **C. MUNICIPAL LIABILITY CLAIM PURSUANT TO 42 U.S.C. § 1983**
22 **AGAINST DEFENDANT KING COUNTY: FAILURE TO SUPERVISE**

23 1. Defendant Rowe, acting under color of state law with deliberate indifference, deprived
24 the Plaintiff of his rights to be free from excessive force and wrongful arrest;

2. Defendant King County's supervision of Defendant Rowe was not adequate to ensure

1 that he was able to properly handle the usual and recurring situations with which he must deal;

2 3. Defendant King County was deliberately indifferent to the obvious and foreseeable
3 consequences of its failure to supervise Defendant Rowe adequately; and

4 4. The failure of Defendant King County to provide adequate supervision caused the
5 deprivation of the Plaintiff's rights by Defendant Rowe; that is, the Defendant's failure to train is
6 so closely related to the deprivation of the Plaintiff's rights as to be the moving force that caused
7 the ultimate injury.

8
9 **V. JURY DEMAND**

10 Pursuant to Fed. R. Civ. P. 38, the Plaintiff hereby demands a trial by a jury.

11
12 **VI. PRAYER FOR RELIEF**

13 1. Judgment against the defendants for compensatory damages in an amount to be proven
14 at trial;

15
16 2. Judgment against the defendants for punitive damages;

17
18 3. An award of costs and attorney's fees, as provided by applicable provisions of federal
19 and state statutory and common law;

20 4. Injunctive relief to correct the policies and practices of the Defendants that violate
21 applicable Federal and Washington State statutes; and

22 5. For such other relief as the Court may deem just and equitable.

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24 Date: November 18, 2016

/s/ Christopher Carney
Christopher Carney, WSBA# 30325

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