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CASE NUMBER: 18-2-11403-9 SEA

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

JEFFREY SIMPSON,

Plaintiff,

v.

CITY OF SEATTLE, a municipal corporation,  
and EDWARD MURRAY, an individual,

Defendant.

No.

**COMPLAINT FOR DAMAGES**

COMES NOW the Plaintiff, by and through his attorneys of records, and by way of claim allege as follows:

**I. PARTIES**

1. Plaintiff Jeff Simpson, an adult male born in October of 1967, is the childhood sexual abuse victim of Ed Murray.

2. Defendant City of Seattle is a municipal corporation and the employer of Ed Murray at all relevant times hereto.

3. Defendant Edward Murray, now age 62, is a Seattle resident. He was the City of Seattle's Mayor from January 1, 2014 to September 13, 2017.

## II. FACTS

### Ed Murray's Sexual Abuse of Jeff Simpson

4. Ed Murray first met Jeff Simpson in 1979 at the Parry Center for Children, a residential treatment facility for children with emotional needs. Jeff was twelve years old and an orphan. Murray volunteered at the Parry Center for Children as a child care worker. Murray soon developed a fondness for Jeff. As Jeff moved to subsequent placements, Murray followed him and maintained their special relationship. Within a year of meeting him, Murray applied to be a "weekend visiting resource" for Jeff. It was during one of these weekend visits at Murray's home that Murray first sexually abused Jeff.

5. In November 1982, Murray applied to become Jeff's foster parent. In his application, Murray touted his experience with children and described himself as having been involved with children since his high school graduation as a neighborhood social worker for the Catholic Church dioceses in both the United States and Ireland. In his application to become Jeff's full time foster parent, in direct response to an inquiry about sexual preference, Murray described himself as heterosexual and dating occasionally.

6. By October 1983, Jeff started to run away from Murray's home. By the Spring of 1984, Jeff was removed from Murray's full-time care and placed in a drug and alcohol treatment center. During a treatment session, with the assurance that it would be kept confidential, Jeff disclosed that Murray had been sexually abusing him. The disclosure resulted in a mandatory report of childhood sexual abuse. Shortly thereafter, Jeff was interviewed by a Portland Police detective and Child Protective Services (C.P.S.) investigator. During the interview, Jeff detailed years of sexual abuse by Murray. Jeff described Murray oftentimes offering him marijuana, booze, or money in exchange for sexual intercourse. If Jeff protested the abuse, Murray would remind Jeff that he would likely be placed in an institution if Murray was no longer his foster parent. Jeff believed Murray's threat to be true and accurate.

7. The ensuing investigation revealed that Jeff had previously disclosed Murray's sexual abuse to his best friend and his (the best friend's) mother. When

1 interviewed by the Portland Police detective, both confirmed that Jeff had told them that  
2 Murray was having sex with him and that it “was really messing him up.” They specifically  
3 recalled a phone call where they overheard Jeff pleading with Murray to stop the sexual  
4 abuse. While conducting his investigation, the lead detective became aware that Murray  
5 had been repeatedly calling the group home that Jeff had been placed in, demanding to  
6 speak to Jeff. It was reported that when the group home denied Murray contact with Jeff,  
7 Murray threatened the group home with a lawsuit.

8 8. In a letter dated June 21, 1984, Oregon’s Protective Services found that Jeff’s  
9 complaint regarding Murray’s abuse was, “[V]alid for oral and anal sodomy, molestation,  
10 sexual harassment, and intimidation and exploitation.” They further noted that although  
11 the District Attorney’s office had decided to withdraw the case from the Grand Jury and  
12 not seek indictment because of Jeff’s emotional instability, “[T]he DA’s office did state  
13 that the decision to not proceed with the case in no means meant that they had decided that  
14 Jeff’s allegations were not true ... Although he [Murray] was not indicted, **the Protective**  
15 **Services department feels that the allegations are true, as does the district attorney’s**  
16 **office.”** In a follow up letter dated June 27, 1984, Protective Services stated, “The  
17 allegations are valid. The foster child is no longer in this home. I would emphasize that  
18 under no circumstances should Mr. Murray be certified in the future.”

19 9. At the time Murray was under investigation for sexually abusing his foster  
20 son, Murray was 29 years old. At the time the DA’s office addressed Jeff’s sexual abuse  
21 claims (and specifically stated that they had not found the allegations to be untrue), Murray  
22 was working at the Portland Metropolitan Public Defender’s Office. Following the Oregon  
23 Protective Services written decision that “under no circumstances should Mr. Murray be  
24 certified in the future,” Murray never again applied to be a foster parent.

25 **Mayor Murray’s Campaign of Lies, Slander, and Defamation**

26 10. On April 6, 2017, Delvonn Heckard filed a lawsuit that described years of  
27 sexual abuse by Ed Murray. In an article that was published by the Seattle Times (that  
28 same day), it was reported that two other men, Jeff Simpson and Lloyd Anderson, had also

1 previously reported being sexually abused by Murray. In a desperate attempt to defend  
2 himself, Mr. Murray, and his political team blatantly and inappropriately, used Murray's  
3 position of power as mayor to immediately begin slandering Jeff Simpson and the other  
4 known victims. On or about April 7, 2017, Mayor Murray's spokesperson, Jeff Reading,  
5 issued the following public statement regarding Simpson and Anderson's accusations that  
6 was published in the Seattle Times (and picked up by other media sources): "*The two older*  
7 *accusations were promoted by extreme right-wing anti-gay activists in the midst of the*  
8 *marriage equality campaign, and were thoroughly investigated and dismissed by both law*  
9 *enforcement authorities and the media.*" Murray's lawyer, Robert Sulkin, further claimed  
10 in his statements to the media that Simpson's claims had been **completely debunked** and  
11 **found to be false** by law enforcement.

12 11. On April 11, 2017, during a press conference on all the television networks  
13 at 5:30 p.m., Mayor Murray's attorney, Robert Sulkin, added to Jeff Reading and Mayor  
14 Murray's original public statements, stating: "*Previously as you know, false allegations*  
15 *were brought against the Mayor when he was pushing the Marriage Equality Act. They*  
16 *were **found to be false** by law enforcement, and not worthy of being published by the Seattle*  
17 *Times. **These accusers were aligned with a virulent, anti-gay organization.***" Mr. Sulkin  
18 offered this statement on behalf of Mr. Murray (in order to taint the venue and facilitate  
19 Murray's reelection effort) while knowing that it was false and would contribute to the  
20 extinguishment of Jeffrey Simpson and the other victims' claims.

21 12. Mr. Murray, and his husband Michael Shiosaki, participated in a barrage of  
22 television interviews on virtually every network in an attempt to spread a false narrative  
23 about Plaintiff's sexual abuse claim. In at least one interview, Mr. Shiosaki (with Mr.  
24 Murray sitting by) also actively asserted that the claims *were inspired by a felonious right-*  
25 *wing agenda.*

26 13. On April 14, 2017, *the Stranger* published an op-ed authored by Mayor  
27 Murray entitled "The Motivation Is Political." In the piece, Murray further lamented the  
28 purported conspiracy against him: *I will not let any unfounded accusation upend my*

1 administration... [T]hey (the accusers) have coordinated with each other. Coordination  
2 implies motivation, and I believe the motivation is political. This accusation, after all, is a  
3 hateful, homophobic stereotype brought to life ... the LGBTQ community should be  
4 extremely concerned, and I will continue to explore connections between my accusers, anti-  
5 LGBTQ groups and each other.”

6 14. In *the Stranger* op-ed piece, Mayor Murray further attacked Simpson, stating  
7 that Simpson’s criminal history “*proves he cannot be trusted*” and claiming that Simpson’s  
8 accusation of sexual abuse was brought to aid in a fight against marriage equality.

9 15. On April 17, 2017, during a televised press conference on city time and dime,  
10 Murray reiterated his message and claims that the accusations against him were politically  
11 motivated.

12 16. On May 9, 2017, a statement was issued on the Seattle.gov website for the  
13 Office of the Mayor. The article blatantly attempted to engender sympathy for Murray,  
14 describing, “the historic work of his administration to make Seattle a more affordable,  
15 equitable, and livable city” and casting Murray as the victim of false accusations. In the  
16 statement, which was issued by the City of Seattle, Murray claimed that all of his great  
17 work was being overshadowed by “the false allegations against me.” Murray complained  
18 that the false allegations “*have hurt the City, my family and Michael.*” A video clip  
19 attached to the City of Seattle website depicting Murray’s related press conference, shows  
20 Murray standing behind the City of Seattle podium with Sally Bagshaw and other City of  
21 Seattle employees clapping for, hugging, and supporting Murray as he defamed and  
22 minimized his victims’ sexual abuse reports, claiming that the accusations “painted him in  
23 the worst possible historic portraits of a gay man.” With full City of Seattle support and  
24 backing, Murray went on to claim that the accusations were untrue and that the victims’  
25 claims “*hurt those that have been victims of abuse.*”

26 17. In a June 2017 interview with *the Stranger*, Murray claimed that Jeff’s  
27 allegations were the result of Jeff being a troubled foster child, and Murray suggested that  
28 Jeff is homophobic or anti-gay. Murray appeared to claim that he had tried to help Jeff

1 with his homophobic thoughts: “When Simpson had problems with me being gay, I got his  
2 school counselor to counsel him.”

3 18. Mr. Murray’s use and abuse of his position of power proved to be temporarily  
4 effective. Believing it would be impossible to successfully prosecute their case while  
5 Murray was using the full power of his office as mayor, Delvonn Heckard and his legal  
6 team elected to voluntarily dismiss his claim. To many, it was concerning that Mayor  
7 Murray and his legal team had swayed public perception against his accusers. Murray and  
8 his legal team had repeatedly been permitted (by the City of Seattle) to make false and  
9 defamatory statements directly to the public and paint the victims as homophobic and anti-  
10 gay.

11 19. Shortly after Heckard voluntarily dismissed his lawsuit, media reports show  
12 Mr. Murray standing at the *publicly owned* mayoral podium, with his husband (a Seattle  
13 employee) by his side on the taxpayer time, declaring “vindication” in relation to Mr.  
14 Heckard’s *private* lawsuit claims while continuing to slander the lawyers and Jeff Simpson  
15 and other victims:



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26 20. In July 2017, the courageous and tenacious reporters at *The Seattle Times*  
27 recovered archived documents from the State of Oregon establishing Mr. Murray’s long  
28 history of abuse of Jeff Simpson. But still, most of Seattle’s political elite, in effect,

enablers, continued to back Mr. Murray, thereby causing continuing emotional injuries to Jeff Simpson. No one at the City of Seattle, including the City of Seattle Council members who publicly supported Mayor Murray, made any effort to investigate the victims' claims. Instead, they recklessly threw their support behind Murray and defended him in the media. And they complicity stood by as Mayor Murray used the power of his public office to repeatedly defame, shame, and intimidate his accusers.

21. Text messages from Sally Bagshaw evidence the hard work she continued to do on Ed Murray's behalf. In one of her messages, Bagshaw attempted to calm Murray's worries about a Seattle City Council vote to disqualify him by assuring him that she was working on gaining support for Murray among other council members: "I think we will get 5 votes ... I think you will like it." In perhaps one of the most richly hypocritical texts of all time, Bagshaw, who had done nothing but publicly devalue the victims' claims and publicly and privately politic for Murray, texted: "Shame on those who want a political witch hunt for their own political gain."

22. Finally, Mr. Murray's cousin stepped forward and confirmed Mr. Murray's history and propensities for pedophilia dating back to the 1970s. Mr. Murray started on a new campaign of slander of his own cousin ("family rift") until, reportedly, then Councilmember Tim Burgess demanded Mr. Murray's resignation.

### **III. DEFAMATION/LIBEL/NEGLIGENCE/NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS/ SEATTLE MUNICIPAL CODE 4.16.070 VIOLATIONS**

23. Acting within the scope of employment and utilizing his position of power as bestowed by the citizens of the City of Seattle, Mr. Murray knowingly and/or recklessly spread false and harmful information about Jeff Simpson in an effort to win reelection and extinguish these claims. Mr. Murray's false assertions included alleging that Plaintiff's motivations were political, "*anti-gay*" and/or that Plaintiff was purportedly lying about the allegations at issue. Mr. Murray and his legal team repeatedly falsely claimed that law enforcement had found Simpson's sexual abuse allegations to be false. Mr. Murray

1 attempted to incite the public against Jeff by labeling him as a homophobe and anti-gay.  
2 He also stated that Simpson could not be trusted. Mr. Murray repeatedly suggested to City  
3 of Seattle citizens that the private accusations against him were hurting them. Mr. Murray  
4 is responsible (respondeat superior) for the actions of his enablers and employees/agents,  
5 including his spokesperson, Jeff Reading (who may also be named as a defendant), and his  
6 attorneys, such as Robert Sulkin. Because Mr. Shiosaki participated in the charade, the  
7 marital community is not protected. All of these individuals, and Mr. Murray's campaign  
8 team, acted in concert to perpetuate this fraud.

9       24. Sex abuse is, in part, about a differential of power. The act of slandering and  
10 defaming a victim of sex abuse is a form of re-victimization that can be more harmful than  
11 the underlying violation. Emotional injuries of this nature are amplified when others  
12 endorse the misuse of power, such as many members of Seattle's political elite.  
13 Councilmember Sally Bagshaw took the extra step of publicly endorsing her confidence in  
14 Mr. Murray early during the initial disclosures: *"I want you to know I have faith in this*  
15 *mayor," she said. "I have faith in his vision. I have faith to make this city the best place it*  
16 *can be for all of us."* Councilmember Bruce Harrell publicly stated that stale acts of  
17 pedophilia were not compelling reasons to act: *"Mr. Murray should be allowed to continue*  
18 *in his role as Mayor because although the accusations are troubling, we should wait and*  
19 *allow the system to play out. Would you want to be judged by something alleged to have*  
20 *happened 30 years ago?"* The failure to act was a form of negligence that permitted Mr.  
21 Murray to continue to use his power to defame the assorted victims. Both Mr. Murray,  
22 who absolutely knew these claims were true, and the City of Seattle leaders, who did  
23 absolutely nothing to determine whether the accusations were true, demonstrated a reckless  
24 disregard for the truth that may support punitive damages. These actions, enabling, and  
25 watching future leaders of the community accept Mr. Murray's endorsement, caused added  
26 emotional distress and humiliation to Jeff Simpson and childhood sex abuse victims  
27 everywhere.



1           25. Mr. Murray's actions violated many legal principles as outlined herein,  
2 including violations of Seattle Municipal Code 4.16.070(B)(1), which prohibits the "*Use*  
3 *or attempt to use his or her official position for a purpose that is, or would to a reasonable*  
4 *person appear to be, primarily for the private benefit of the covered individual or any other*  
5 *person, rather than for the benefit of the City...*" Mr. Murray's use of the mayoral title and  
6 podium, at times, and his husband's on-duty time as a City employee, to make statements  
7 about this private lawsuit directly violate these ethics principles. Doing so was an  
8 impeachable offense that the City's leaders never pursued.

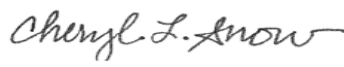
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10                               **IV. PRAYER FOR RELIEF**

11           WHEREFORE, Plaintiff requests a judgment against Defendants:

- 12           (a) Awarding Plaintiff general damages including loss of consortium and special  
13 damages in an amount to be proven at trial;  
14           (b) Awarding him reasonable attorney's fees and costs as available under law;  
15           (c) Awarding him any and all applicable interest on the judgment; and  
16           (d) Awarding him such other and further relief as the Court deems just and  
17 proper under the circumstances of this case.

18           DATED this 4<sup>th</sup> day of May, 2018.

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