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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

GINA BLOOM, an individual;

Plaintiff,

v.

SNOHOMISH COUNTY, a local
governmental entity operating in the State
of Washington,

Defendant.

NO. 24-02155

PLAINTIFF’S COMPLAINT FOR
DAMAGES FOR:

Monell-related Claims.

JURY DEMAND

I. INTRODUCTION

1.1 Plaintiff respectfully brings this action for damages, declaratory, and injunctive relief, against Snohomish County (the “County”), pursuant to *Monell v. Department of Social Services* (436 U.S. 658, 1978) and 42 U.S.C. §1983, challenging the County’s “customs, policies and practices” related to the establishment, maintenance, training and oversight employed in the County’s Guardian ad Litem (GAL) program, and alleges those customs, policies and practices amounts to deliberate indifference to the Plaintiff’s constitutional rights, and that those customs, policies and practices, did violate Plaintiff’s constitutional rights causing her significant and lasting damages for which she now seeks redress.

1 1.2 Plaintiff asserts that the Defendant(s) Snohomish County by and through those certain
2 administrators for the County’s Superior Court (“County Court”) and the County’s Chair of
3 its GAL Committee, while aware of the clearly established constitutional rights at risk,
4 *including* the care, custody, and control of Plaintiff’s children, and with deliberate
5 indifference to those rights, perpetuated County customs, policies and practices, by, through
6 and evidenced, in its failure to properly establish, administer, train, supervise, and oversee
7 the GAL Program and manage its GALs, and that those customs, policies and practices
8 violated Plaintiff’s constitutional rights, causing lasting and irreparable damages to her and
9 her children.

10 **II. PARTIES**

11 2.1 Plaintiff Gina Bloom, by and through her attorney(s), Carnation Legal Services LLC, and
12 Shannon M. Draughon, as and for her Complaint against the Defendant(s): Snohomish
13 County and states as follows:

14 2.2 Plaintiff GINA BLOOM is an individual residing in King County, Washington, and who was
15 always relevant to the events, acts or omissions complained of herein, residing in either
16 Snohomish or King County Washington.

17 2.3 Defendant SNOHOMISH COUNTY (“County”) is a municipal government entity
18 established by the State of Washington which manages all matters legislated to it by the
19 State, including that of its Superior Courts, and remains beholden to the State, it’s
20 Constitution and the Constitution of the United States of America.

1 **III. JURISDICTION AND VENUE**

2 3.1 Plaintiff Gina Bloom brings this civil rights lawsuit under the First, Fourth, Fifth and
3 Fourteenth Amendments to the Constitution of the United States and under federal and state
4 regulatory and case law as applicable, including *Monell v. Department of Social Services*.¹

5 3.2 Jurisdiction is conferred on this Court by 28 U.S.C. § 1343 and 28 U.S.C. §1331, as this
6 Court has jurisdiction over all suites brought pursuant to 42 U.S.C. §1983 and because all
7 claims for relief derive from the United States Constitution and the laws of the United States.

8 3.3 Venue is proper in the Western District of Washington as all parties are and were present or
9 domiciled in Western Washington at the time of the acts, events and omissions complained
10 of herein.

11 3.4 This Court is authorized to grant Ms. Bloom’s request for relief regarding damages pursuant
12 to Rule 54 of the Federal Rules of Civil Procedure and the supplementary law of the State of
13 Washington, as applicable under Fed. R. Civ. P. 69.

14 **IV. UNDERLYING PROCEDURAL POSTURE**

15 4.1 Before the County appointed Brian J. Parker (“Parker” or the “GAL”), a family law attorney
16 with Port Gardner Law Group, as Guardian ad Litem (GAL) in Gina Bloom’s Snohomish
17 County family court dissolution with children,² she was a legally protected domestic violence
18 survivor and the sole custodian and caregiver to her two young sons.

19 4.2 Plaintiff was protected by Snohomish County Court-issued Domestic Violence Protection
20 Orders (DVPOs)³ which formally affirmed the credible threats posed by her then estranged
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23 ¹ *Id.*, 436 U.S. 658, 1978

24 ² Snohomish County Superior Court No. 20-3-00465-31

³ 20-2-01235-31 & 21-2-02025-31

1 husband, Brian Yorks (Yorks), and granted Plaintiff sole temporary custody of the parties'
2 children.

3 4.3 On January 4, 2021, nearly a year after Plaintiff's rape allegation that perpetuated party
4 opponent Yorks to file for divorce, Damon Canfield of Canfield Madow Law Group
5 ("Canfield"), Yorks' divorce lawyer, requested a Guardian ad Litem (GAL) be appointed to
6 the case, urgently, citing his (Canfield's) significant concerns for Ms. Bloom's mental health,
7 as evidenced, he argued, by her historically consistent allegations of domestic violence
8 against her by Yorks.

9 4.4 However, the attorney did not just petition the County Court for a GAL, he specifically
10 requested that the County appoint family law attorney GAL Parker. Plaintiff objected.
11 Nevertheless, and despite County mandated legal and administrative protocols for the neutral
12 selection and appointment of GALs to family law cases, the County accommodated quickly
13 through standard backchannels commonly employed by family law attorneys and County
14 court administrators when placing their GALs of choice (Ex. A).

15 4.5 Plaintiff asserts that, facilitated by the County and its judicial administrators, Canfield
16 deliberately arranged the assignment of the GAL to the Yorks divorce case with the intent to
17 manipulate litigation and custody evaluation in favor of Yorks. In the five (5) months he
18 served his appointment as GAL for Canfield, the County was issued five (5) discrete GAL
19 reports, each in response to a Canfield prompt, and methodically building upon the last, to
20 shift the case narrative and recast Yorks as the victim and Plaintiff as his abuser.

21 4.6 It is evident from administrative records that not only do those **(a)** backchannels exist,
22 maintained for County policy administration; **(b)** attorneys and administrators routinely use
23 the backchannels to circumvent the legal and administrative protocols and protections
24 otherwise in place; **(c)** the defendants know that these backchannels exist and are specifically

1 used by administrators to help attorneys and practitioners circumvent those existing protocols
2 and protections; **(d)** and clearly as a matter of longstanding custom policy and practice, the
3 Defendant(s) ignore, even embrace as standard practice, these explicit violations of protocols
4 and protections, ratifying the actions of their agents by failing to appropriately respond, **(e)**
5 and do so with deliberate indifference to the consequences of these violations (Ex. N).

6 4.7 Although sworn an oath and duty as a licensed attorney, Court GAL, and County
7 Commissioner, also legally bound to the best interests of the children, GAL Parker's reports,
8 embraced by the County Court without any substantive or procedural safeguards, constitute
9 fraud upon prima facie review, fabricating evidence and plainly misstating expert witness
10 declarations and reports, omitting, even covering up, Yorks' criminal history and prior
11 merited allegations against him of sexual assault. The GAL reports include demonstrable
12 fallacies clearly evolved to benefit party opponent Yorks (Ex. K & T Oaths).

13 4.8 In addition to the series of fraudulent reports accepted and thereby endorsed by the County
14 Court, the GAL was invited to testify against Plaintiff, at *ex parte* and in non-family law
15 hearings, as well as her divorce trial, falsely representing medical conclusions and
16 maliciously proclaiming that Plaintiff suffered from untreated mental health disorders when
17 she categorically did not, all evidence being to the contrary. The County relied on the GALs
18 conclusions related to medical and psychological concerns, unreasonably choosing to
19 subordinate the doctors and expert opinions to that of their GAL.

20 4.9 When Plaintiff became aware that the County would so unreasonably rely upon and amplify
21 the GAL's unsubstantiated, fraudulent, reports, reports contrary to all expert and medical
22 evidence and declaratory testimony provided the Court, as directed by the Court, she filed a
23 grievance with the Snohomish County GAL Administration Office on August 20, 2021 (see
24 Ex. U, docket #54, Plaintiff's Motion for Reconsideration).

1 4.10 Plaintiff then urgently complained to the Washington State Attorney General Office (Ex.
2 R). However, despite the lack of real or credible evidence relied upon by the GAL to
3 challenge Plaintiff's fitness as a parent, Ms. Bloom's attempts to challenge his
4 "recommendations" and false reports, were summarily dismissed as "without merit,"
5 permanently blocking any meaningful review or accountability of the GAL's determinations
6 in her family law case (Ex. B).

7 4.11 The County Court chose to act against Plaintiff's fundamental liberty interests including
8 the care, custody and control of her children, her expectations of privacy in her home, in her
9 medical and financial affairs, and ultimately to deny her right to access the courts and legal
10 system, without due process of law, but based entirely on the presentation(s) of the County
11 assigned GAL.

12 4.12 There is no indication that the County or the County Court ever reviewed, considered, or
13 resolved Plaintiff's GAL complaints. Instead, the matter was dissolved behind closed doors
14 by the GAL Committee Chairman and County final policy administrator, Paul Thompson.
15 Despite mounting allegations, including substantiated evidence of illegal conduct from third-
16 party law enforcement and attorney(s), and the serious consequences of the GAL's
17 misconduct, the County has taken no known action to review or discipline improper GAL
18 conduct, including the misconduct of Parker herein alleged (Ex. C, E, K).

19 4.13 Throughout the family court proceedings, trial, and beyond, the County allowed the GAL
20 to exploit the power they vested in him to unreasonably undermine Plaintiff's standing in
21 favor of party opponent Yorks. Then, the County allowed the GAL direct access to County
22 and Court personnel and records, whereby Parker then fraudulently interfered with child
23 protective services investigations, preventing intervention to safeguard Plaintiff's sons. The
24 County worked with GAL Parker to obstruct and ultimately halt the County's prosecution of

1 operate to abridge well established constitutional rights, here those of Plaintiff, causing
2 ongoing and irreparable harm to her and her children.

3 5.2 These customs, practices and policies include the select placement of the (County
4 empowered neutral) GALs at the request of attorneys, the non-training and lack of oversight
5 to ensure GAL compliance with the law, the carte blanche acceptance of GAL reports,
6 testimony and evidence, the inability to meaningfully appeal, challenge or review GAL
7 conduct or evidence, the custom of shielding GALs from outside scrutiny and oversight, and
8 the custom of withholding or obstructing GAL and GAL related records from the public.

9 5.3 The County's failure to implement corrective measures or oversight protocols despite
10 numerous red flags and formal complaints over the years, even if given only those in this
11 case and timeline, is evidence of a much larger systemic indifference to individual citizens',
12 including Plaintiff's, well established civil and constitutional rights.

13 5.4 Further, the lack of meaningful review and disciplinary action against the GAL despite third
14 party verified allegations (other than Plaintiff) of perjury and ethical misconduct,
15 demonstrates the County's deliberate policy of protectionism, creating and fostering a
16 climate where County GALs may operate with impunity, shielded from review outside the
17 County itself.

18 5.5 The County maintains a custom policy and/or practice of allowing attorneys to hand pick
19 their GALs. Here, such County policy allowed Yorks's divorce attorney Canfield to work
20 directly with judicial coordinator Nancy Norris of the County Courts office, to select and
21 assign Brian J. Parker as the GAL in Plaintiff's family law case (Ex. A).

22 5.6 According to that custom, policy and practice, and over Plaintiff's continued objections, the
23 selected GAL was appointed by the County at Canfield's request, in direct contradiction of
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1 the neutral registry-based selection process mandated by County law, Administrative Order
2 36-10 (Ex. I).

3 5.7 In Plaintiff's case, the GAL's placement was premeditated to benefit opposing party Yorks,
4 Canfield's client. In the summer 2019, Jennifer Bitner ("Bitner"), an associate at Canfield's
5 office, met Parker at a continuing legal education event hosted in Vancouver, Washington,
6 initiating a strategic relationship that later facilitated most of his GAL appointments. Bitner
7 supported Parker's relocation from Clark County to Snohomish County to secure his spot in
8 the County GAL registry. On June 3, 2019, Parker applied for the registry, and buttressed
9 with recommendations from Bitner and Canfield, the process was expedited by Judicial
10 Coordinator Nancy Norris, who administratively oversees the GAL assignments.

11 5.8 Bitner and Canfield routinely represented as though they were not personally or
12 professionally associated with GAL Parker, although evidence establishes that their law firm,
13 Canfield Madow, was the thrust behind his arrival on the Snohomish County family law
14 scene and the direct source of a majority of his privately paid GAL employment (Ex. J).

15 5.9 Despite the registry protocols that require the randomized selection of GALs based on a
16 rotation system as mandated by Administrative Order 36-10 by January 30, 2020, at the
17 direct request of Canfield, Norris, for the County, placed Parker with first GAL case in
18 Snohomish County (Ex. I)⁶.

19 5.10 The County's custom, policy and practice of facilitated favoritism is evident and ongoing
20 in Parker's twenty-four (24) GAL appointments running the pendency of his GAL career
21 with the County, twelve (12) of which were direct appointments by the County at the request
22 of the Canfield team of lawyers. Thus, *at least* 50% of all the GAL's appointments by the
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⁶ Sno Co No. 10-3-01103-1

1 County, and only considering those for Canfield, bypassed clear legal procedural
2 requirements (Ex J).

3 5.11 The County maintains a custom policy or practice of ignoring, or summarily dismissing,
4 or covering up, GAL complaints without procedural adherences. In addition to those
5 submitted to the County, Ms. Bloom filed formal complaints regarding their GAL with the
6 State Attorney General in August of 2021 and again in January 2023 (Ex. U at pg. 10).

7 5.12 However, Ms. Bloom’s efforts to challenge the County’s acceptance of the GAL’s
8 conduct through the grievance process of the County Court were summarily denied without
9 due process by Paul Thompson, as Chair of the GAL Committee (Ex. B). Neither grievance
10 received a formal adjudication or review, and Ms. Bloom was not provided proper notice of
11 the County’s determination in either instance.

12 5.13 The County’s knowledge of the GAL’s misconduct was not isolated to his work for
13 Canfield. It was in just his third GAL appointment, in 2020, and his first case without
14 Canfield, that attorney J. Michael Gallagher complained by sworn declaration to the County
15 Court with concerns over the GAL’s truthfulness and the integrity of his reports (Ex. E)⁷.

16 5.14 In addition to attorney Gallagher and Plaintiff Bloom’s formal complaints, public records
17 and complaint documentation demonstrate that by 2022, GAL Parker also reported, and the
18 County was aware of GAL Parker’s additional formal complaints by “clients”
19 (Ex. K at Pg. 4).

20 5.15 By October 2023, the County was further alerted to the GAL by an Everett Police
21 Department (EPD) investigation, under which probable cause was found to refer charges for
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⁷ Sno Co No 20-3-00087-31

1 first-degree perjury based on GAL (specifically) his 5th statement representing false
2 testimony at Ms. Bloom’s family law trial in May 2022 (Ex. C at pg. 43 of 106).⁸

3 5.16 Following referral of the EPD investigation the County shielded itself and Parker from
4 additional scrutiny by quietly suspending him from the Pro Tem bench. The County did not
5 however chose to conduct any investigation into the growing misconduct, and despite
6 Parker’s failure to re-execute the GAL oath, the County continued to allow him to serve as
7 GAL in high conflict divorce cases into at least November 2024 (Ex. K).

8 5.17 The County maintains a custom policy or practice of withholding, delaying or obstructing
9 GAL and GAL related records from public requests. Here, Plaintiff’s requests for public
10 records under GR 31.1 have been and are being obstructed by the County by purposely and
11 unreasonably delaying, and denying, destroying or concealing records that would expose the
12 unconstitutional customs, policies and practices of the County GAL administration⁹.

13 5.18 Plaintiff has made multiple requests for public records under GR 31.1 to access
14 grievances, communications, and misconduct reports related to GAL Parker. However,
15 despite proper and timely requests, Snohomish County, through Lisa Galvin and Andrew
16 Somers, delayed, obstructed, and refused to release crucial records (*e.g.* Ex. L).

17 5.19 Plaintiff has submitted numerous records requests, in her judgement the two most central
18 and crucial being records requests being: K177188-SSCGR311 (Plaintiff requested GAL
19 Communication) and K181119-SSCGR311 (Plaintiff requested communication regarding
20 how the GAL Chair, Thompson was informed of the criminal investigation against the GAL).
21 Specifically, in each of those two (2) cases, Plaintiff was initially warned that such a records
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23 ⁸ Everett Police Department #2022-00096343

24 ⁹ Confirms the right of the public to examine administrative records of the judicial branch and establishes procedures for requesting records and guidelines for those responding to requests.

1 request would be released in installments and then both were unreasonably delayed or
2 obstructed.

3 5.20 For Request K177188, County administration promised the second installment by April
4 4, 2025, but failed to meet this deadline and failed to provide a revised estimate until Plaintiff
5 initiated follow-up contact on May 7, 2025, when Snohomish Administration acknowledged
6 the oversight and promised delivery by the end of that week. No such delivery occurred.

7 5.21 For Request K181119, despite acknowledgment of receipt, the County stalled responses
8 for over forty (40) business days without justification or production of the requested records,
9 forcing Plaintiff to again file an internal review request.

10 5.22 The delays and incomplete production of records are designed to and do directly
11 prejudice Plaintiff's ability to plead her claims, file motions based on the GAL's misconduct,
12 and present supporting evidence in both state and federal court filings. Further, complete and
13 detailed records related to the GAL's conduct and discipline history are prohibited to the
14 public, including Plaintiff, as confidential administrative materials, and thus protected from
15 discovery and disclosure under GR 31.1 (Ex. M & P).

16 5.23 The County maintains a custom policy or practice of non-training and non-oversight to
17 ensure GAL compliance with the law. The County empowers its GALs akin to law
18 enforcement and beyond, granting the GAL direct and unfettered access to individual
19 litigants' most personal and precious aspects of life, including their homes, place of work,
20 medical and financial information, and their children.¹⁰ Nevertheless, the County chooses to
21 *not* ensure that GALs adhere to legal and constitutional mandates while executing their duties
22 on behalf of the County.

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¹⁰ RCW 26.12.175

1 5.24 The County has intentionally and knowingly failed to establish oversight and
2 accountability mechanisms for its GAL Program, allowing appointed GALs to operate
3 without supervision, transparency, or meaningful review as explicitly acknowledged in a
4 public records response by Lisa Galvin, County Public Records Officer, dated March 15,
5 2025, regarding request number K177236-SSCGR311, affirming that *no* responsive records
6 existed for the following critical oversight elements (Ex. N):

7 A) No, Internal or external review mechanisms for GAL performance evaluations.

8 B) No, Administrative policies addressing the handling of complaints or grievances
9 against GALs.

10 C) No, Guidelines specifying the evidentiary weight of GAL recommendations in
11 judicial decisions.

12 D) No, Differentiation protocols for the appointment of private-pay GALs versus
13 state-funded GALs.

14 E) No, Procedures ensuring equitable access to GAL services regardless of the
15 financial status of the parties involved (Id.).

16 VI. ARGUMENT

17 6.1 By maintaining and endorsing the custom policy or practice of allowing attorneys to hand
18 pick their GALs, specifically here party opponent divorce lawyers such as Canfield, the
19 County knowingly and deliberately maintains a custom policy or practice, that violates the
20 mandates of the GAL selection process designed to ensure procedural and substantive
21 neutrality and due process in family court proceedings and the appointment of County GALs
22 (e.g. Ex. A).

23 6.2 Canfield Madow Law Group, with the assistance of Nancy Norris, would frequently bypass
24 Administrative Order 36-10, which mandates: “In the event that multiple Guardians ad Litem

1 are named in the order, the GAL Programs staff will contact the Guardians ad Litem and,
2 determine who will be appointed within one (1) business day. In the event the GALs named
3 in the Order are not available, GAL Program staff will assign and notify the parties.”

4 6.3 Instead, the County allowed the GAL to be routinely handpicked for high-conflict custody
5 disputes where Canfield Madow's clients were parties to the litigation. This ensured
6 outcomes through biased reports that favored Canfield Madow's clients, here directly
7 impacting Plaintiff's custodial rights and violating Plaintiff's Fourteenth Amendment rights
8 to due process and equal protection (Ex. A & J).

9 6.4 County administration, including Nancy Norris, Judicial Coordinator for the Snohomish
10 County Court GAL Program, played critical roles in facilitating these appointments outside
11 of registry-based selections. Through the influence of Bitner and Canfield Madow Law
12 Group, Norris would manipulate the registry system to place Parker into cases where his
13 preconceived bias and unfettered discretion would benefit Canfield Madow's clients (Ex. J).
14 It is not uncommon for Norris and staff to work directly with counsel through these backdoor
15 channels to facilitate key GAL placements (*e.g.* Ex. G)

16 6.5 This collusion was achieved through private communications and off-the-record discussions
17 between Canfield Madow and administrator Norris, circumventing the mandatory disclosure
18 requirements of GR 31.1. Plaintiff's requests for public records under GR 31.1 were
19 obstructed, with Snohomish Superior Court Administration actively delaying, denying, or
20 concealing records that would expose the extent of this collusion (Ex. M).

21 6.6 Analysis of GAL reports filed by the GAL in cases for Canfield Madow clients shows a
22 consistent pattern of biased recommendations favoring Canfield Madow's position. In these
23 reports, the GAL would routinely omit evidence that was favorable to the opposing party
24 (including the Plaintiff), downplay documented allegations of misconduct or abuse when it

1 reflected poorly on Canfield Madow’s clients, and highlight unsubstantiated claims against
2 opposing parties, regularly relying on allegations of parental alienation and abusive use of
3 conflict seemingly without factual basis.

4 6.7 The County’s custom, policy or procedure that facilitates and permits this “appointment”
5 process of GALs, violates, and here did violate, Plaintiff’s substantive and procedural due
6 process rights as guaranteed under the Fourteenth Amendment to the United States
7 Constitution by forgoing neutrality and as well as evidentiary and substantive standards
8 required for equal protection under the law.

9 6.8 The County maintains a custom policy or practice of ignoring, or summarily dismissing, or
10 covering-up GAL complaints without procedural adherences. which here assured that
11 Plaintiff was systematically denied a fair and impartial Guardian ad Litem, a fair and
12 impartial tribunal and proceedings.

13 6.9 The actions, or lack thereof, of the Snohomish County Superior Court GAL Program
14 Deprived Plaintiff of her due process rights, including her right to fair adjudication, and the
15 right to be free from judicial manipulation influenced by administrative shielding and
16 collusion with Canfield Madow Law Group, without due process or remedy in review or
17 appeal.

18 6.10 The policy of lack of oversight and finality of grievance dismissals following no
19 procedural due process within the Snohomish County GAL Program is both customary by
20 the County and provided for under Snohomish County Local Guardian ad Litem Rule
21 (LGALR) 7(e), (Ex. Q).¹¹ The local rule establishes that all decisions made by the GAL
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24 ¹¹ Decisions of the GAL Committee regarding grievances are final and not subject to further review or appeal by the
complaining party. The only exception is if the decision involves removal of the GAL from the registry, in which
case, the GAL may appeal the decision to the Presiding Judge

1 Committee, here led by Thompson, concerning GAL grievances are final and non-appealable
2 (unless the decision involves removal from the GAL registry then the Guardian ad Litem
3 (only) themselves may appeal) however there is no such option available to an aggrieved
4 party.

5 6.11 This custom, practice or policy, creates a closed-loop system where only the GAL can or
6 may seek judicial review, even when credible allegations of perjury, ethical violations, or
7 misconduct arise. This effectively shields GALs from oversight, denying due process to those
8 affected by their recommendations. The one-sided “appeal” process undermines procedural
9 fairness and violates Plaintiff’s constitutional rights, systematically preventing aggrieved
10 litigants from challenging biased or harmful GAL reports, even when they directly impact
11 core outcomes like the custody of children.

12 6.12 Here, the County's GAL Program operates under the supervision of Thompson, in his role
13 as Chair of the GAL Committee. Thompson does not serve as a judge for the committee, but
14 rather in an administrative and managerial role. Thompson's decisions regarding GAL
15 applications, appointments, grievances, and disciplinary measures are administrative in
16 nature, defined under SCLGALR 7.1 and GR 31.1, and those decisions are final, without a
17 right to appeal or review (Ex. Q).

18 6.13 The dismissal of grievances and the selection of GALs, specifically in this case GAL
19 Brian J. Parker, were handled exclusively under administrative protocols, completely
20 detached from judicial procedures, protocols or oversight. Thompson’s unilateral dismissal of
21 Plaintiff's grievances against the GAL without formal review highlights a clear failure to
22 provide accountability or even a procedural review, underscoring deliberate indifference to
23 the ongoing violation of Plaintiff’s core constitutional rights (*e.g.* Ex. B).

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1 6.14 This administrative shielding enabled the County to continue the GAL in his crucial role
2 despite numerous allegations of misconduct, fraud, and unreasonable bias. Then the County
3 dismissed or ignored those complaints without transparency or proper investigation. The
4 administrative (closed door and private) nature of these decisions disqualifies them from
5 judicial immunity, reinforcing Plaintiff's position that Snohomish County's GAL Program is
6 complicit in systemic misconduct under *Monell*.¹²

7 6.15 Paul Thompson, as Chair of the Snohomish County GAL Committee, and final
8 policymaker, acted with deliberate indifference to the pervasive GAL misconduct in this
9 case, by denying two (2) formal grievances filed by Plaintiff, the first one in August 2021
10 and the other in January 2023, without due process or right of appeal. These denials are
11 emblematic of a broader systemic failure to investigate, adjudicate, and remedy substantiated
12 complaints against County Court-appointed GALs whose actions have repeatedly been called
13 into question.

14 6.16 The County's unilateral, closed door, grievance dismissals executed by Thompson reflect
15 a systemic failure in oversight, shielding GALs from any outside overview or accountability.
16 Conducted without judicial review as required under SCLGALR, these dismissals denied
17 Plaintiff any opportunity to appeal, even though the rule mandates judicial assessment of
18 GAL's misconduct. Paul Thompson, acting unilaterally, dismissed these grievances without
19 adjudication, leaving no appeals process and reinforcing a conflict of interest in his
20 administrative ties to Parker that would ensure continued appointment despite substantiated
21 complaints (Ex. B & Q). This institutionalized policy of obstruction protects GAL
22 misconduct, blocks scrutiny, and denies due process to those harmed by GALs.

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¹²*Id.*, 436 U.S. 658, 1978

1 6.17 Further, the County's failure to investigate or take corrective measures in attorney
2 Gallagher's case serves as specific third-party proof of the County's de facto policy of non-
3 supervision and non-investigation. Despite direct and clear warnings from legal counsel
4 Gallagher, and the implication of risk to children and other vulnerable constituents, GAL
5 Parker's misconduct was again ignored, thus endorsed by the County's non-action (Ex. E).

6 6.18 The County maintains a custom policy or practice of withholding, delaying or obstructing
7 GAL and GAL related records from public requests, here that of Plaintiff. Despite proper and
8 timely requests, Snohomish County, through Lisa Galvin and Andrew Somers, delayed,
9 obstructed, and refused to release crucial records (Ex. L, M and P). This deliberate
10 withholding of records reflects County misconduct identified by the court in the case of *In re*
11 *Dependency of A.E.T.H.*, 9 Wn. App. 2d 502 (2019), where it was determined Snohomish
12 County affirmatively concealed evidence to prevent scrutiny of its (Volunteer) GAL
13 misconduct.

14 6.19 The Defendant(s) obstruction constituted deliberate spoliation of evidence, impacting
15 Plaintiff's ability to challenge GAL recommendations and introduce evidence of bias and
16 misconduct. By withholding access to public records, the County obstructed Plaintiff's right
17 to due process and transparency, actively preventing oversight, evaluation and judicial
18 scrutiny of GAL misconduct.

19 6.20 The practice of withholding records is part of a systemic administrative effort to suppress
20 evidence of GAL misconduct and County, court staff, and administrative complicity.
21 Plaintiff's attempts to retrieve public records were stonewalled through excessive delays and
22 denials, further indicating a deliberate policy to obstruct.

23 6.21 These administrative actions, or inaction, amount to failures in oversight, the suppression
24 of documentation and destruction of material records, like those found under *Lockett v.*

1 *County of Los Angeles*, No. 19-55898 (9th Cir. 2020) and should be evaluated accordingly
2 and as actionable under *Monell*.¹³ Plaintiff asserts that Snohomish County's deliberate
3 spoliation of evidence directly contributed to the violation of constitutional rights, including
4 due process and equal protection.

5 6.22 The County and GAL Chair Thompson's deliberate indifference to transparency
6 constitutes a clear violation of well-established procedural due process and Plaintiff asserts
7 that Snohomish County's actions reflect a long-standing custom of obstructing evidence,
8 preventing discovery of GAL misconduct, and shielding judicial impropriety, amounting to
9 systemic constitutional violation under *Monell*.¹⁴

10 6.23 Plaintiff alleges that such delays are not isolated but instead reflect a custom, practice and
11 policy of obstructing access to records implicating the GAL Program. The same
12 administrative body responsible for managing the GAL registry, namely, the Snohomish
13 County Superior Court's GAL Program under the management of Nancy Norris, is also
14 responsible for coordinating and delaying responses to GR 31.1 requests, under Andrew
15 Somers, Snohomish Superior Court Administration.

16 6.24 This administrative entanglement constitutes a single policymaking entity under *Monell*,
17 leaving the County and the Chair of the GAL Committee, the final policy maker, liable for
18 both the procedural violations of the Records Act and constitutional violations resulting from
19 the County's failure to provide Plaintiff with critical evidence needed for her litigation.

20 6.25 The delays in record production directly prejudiced Plaintiff's ability to plead her claims,
21 file motions based on the GAL's misconduct, and present supporting evidence in both state
22 and federal court filings. These injuries are not merely procedural but rise to the level of
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24 ¹³ *Id.*, 436 U.S. 658, 1978

¹⁴ *Id.*, 436 U.S. 658, 1978

1 constitutional harm, denying Plaintiff the right to a fair adjudication and impeding her access
2 to the courts pursuant to the Fourteenth Amendment.

3 6.26 As examined in *A.E.T.H.*,¹⁵ where systemic suppression of oversight documents was
4 found to be actionable under *Monell*, Snohomish County's repeated, unjustified obstruction
5 of access to GAL misconduct records and case history reflects deliberate indifference to
6 Plaintiff's constitutional rights.

7 6.27 The County's custom practice or policy of non-training and non-oversight or negligent
8 training and negligent supervision of County GALs and the GAL program allowed for
9 deliberate and systemic constitutional violations, including Plaintiff's civil rights.

10 6.28 Snohomish County breached its duties and obligations to Plaintiff, including failing to
11 establish, implement, and maintain a separate GAL Program independent of the court's
12 influence, thereby violating the mandate of Washington State RCW 26.12.175. Instead, the
13 County adheres to a custom, practice or policy of non-training.

14 6.29 As a result of the lack of training and supervision by the County, the GALs and the Court
15 GAL Program, in Plaintiff's case the GAL worked expressly and unreasonably against her,
16 violating her due process and equal protection rights. The County knowingly allowed the
17 GAL to misrepresent facts, withhold information, and engaged in administrative shielding
18 that blocked evidence from being introduced into court proceedings.

19 6.30 The action or inaction of the County in its failure to train, supervise and manage its GALs
20 and the GAL Program, deprived Plaintiff of her Fourteenth Amendment due process rights,
21 including her right to fair adjudication, the right to the care, custody, and control of her
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24 ¹⁵ *Id.*, 9 Wn. App. 2d 502 (2019)

1 children, and the right to be free from judicial manipulation influenced by administrative
2 shielding and collusion with Canfield Madow Law Group.

3 6.31 Snohomish County has systematically failed to implement oversight and accountability
4 mechanisms for its Guardian ad Litem (GAL) Program, allowing appointed GALs to operate
5 without supervision, transparency, or meaningful review. This deficiency was explicitly
6 acknowledged in a public records response by Lisa Galvin, Public Records Officer, dated
7 March 15, 2025, regarding request number K177236-SSCGR311 (*above at 6.15, Ex. N*).

8 6.32 The gaps in oversight mechanisms identified and confirmed in request response to
9 K177236-SSCGR311, directly reflect a deliberate administrative choice to forgo
10 accountability and disregard Plaintiff's constitutional rights, resulting in an unchecked
11 exercise of authority by GALs like Parker. The ongoing allowance of GAL's unfettered
12 actions, without scrutiny or evaluation, enabled the fraudulent and unlawful custodial
13 recommendations that directly violated Plaintiff's constitutional rights.

14 6.33 The absence of these fundamental oversight structures allows GALs to submit
15 recommendations to the County Court with no formal process for verification or
16 accountability. The County maintains a custom policy or practice of *carte blanche* accepting
17 GAL reports, testimony and evidence however there is no formalized review of GAL conduct
18 or performance, even in the face of documented complaints; GAL recommendations are
19 accepted by the Court without scrutiny, facilitating judicial favoritism and manipulation and
20 GALs, here Parker, operate(d) without the risk of administrative sanctions or disciplinary
21 measures (*Ex. N*).

22 6.34 This lack of regulatory mechanisms and adherence to the policy of accepting GAL
23 recommendations and reports, without procedural and substantive protections, violates the
24 principles of due process and creates a procedural void, enabling GALs to influence judicial

1 decisions without the transparency or accountability required by due process and equal
2 protection.

3 6.35 The County’s apparent refusal to maintain records or implement policies for GAL
4 oversight further underscores the County’s administrative indifference to Plaintiff’s
5 constitutional rights and its administrative shielding of GAL misconduct reflects a broader
6 custom of avoiding scrutiny, concealing judicial bias, and obstructing the discovery of
7 misconduct.

8 6.36 Moreover, this deliberate omission in the creation of oversight policies enabled spoliation
9 of evidence and judicial obstruction by failing to hold GALs accountable for unethical or
10 biased recommendations. Plaintiff’s inability to access public records concerning the GAL
11 conduct directly impaired her ability to challenge the accuracy and fairness of custodial
12 recommendations (Ex M).

13 6.37 The Snohomish County GAL Program's failure to even enforce its own application and
14 oversight rules demonstrates a broader pattern of administrative neglect and protectionism.
15 This is consistent with the *Monell*¹⁶ claims asserted, as it evidences a deliberate indifference
16 to the due process rights of parties involved in family law cases where the County assigned
17 GAL Parker.

18 6.38 To make matters worse, in 2024, while Parker was actively serving as a GAL for the
19 County and also appearing within the Court as a family law attorney, and also under EPD
20 investigation, he was at least nine (9) separate times during that same year also appointed as
21 judge Pro Tem. The appointments were unilaterally authorized and signed by Thompson for
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¹⁶*Id.*, 436 U.S. 658, 1978

1 the County, illustrating a concerning pattern of administrative indifference or willful lack of
2 oversight in the County (Ex. T).

3 6.39 According to the documented Pro Tem Oaths: Parker was sworn in as a Pro Tem
4 Commissioner on February 6, 2024, February 15, 2024, February 22, 2024, May 20, 2024,
5 May 29, 2024, June 24, 2024, July 16, 2024, July 17, 2024, October 4, 2024, November 27,
6 2024, and December 19, 2024 (Id.).

7 6.40 These multiple roles given and/or allowed Parker by the County reveal a troubling lack of
8 due diligence and oversight by the Snohomish County Superior Court's administration,
9 specifically under the supervision of Paul Thompson. Despite being formally suspended from
10 Pro Tem duties, The County reinstated Parker repeatedly without any measures taken to
11 evaluate his ongoing role as a GAL or investigate the impact of his criminal conduct on his
12 judicial capacity (Id.).

13 6.41 Furthermore, Parker's documented social connections with multiple attorneys at Canfield
14 Madow further support and exacerbates the perception of bias. This relationship is not merely
15 incidental; it is woven into the very fabric of his assignments. As reflected in the examples of
16 Sanchez/Reed Matter (20-3-01143-31), Yorks/Yorks matter (20-3-00465-31) and the
17 Pedroza Matter (19-3-02944-31), Parker was directly appointed to Canfield cases, allowed
18 for and completed by Nancy Norris, County Judicial Coordinator, without adherence to
19 standard registry-based selection processes, per the Administrative Order 36-10.

20 6.42 Plaintiff filed multiple public records requests with Snohomish County between late 2023
21 and mid-2024 seeking communications, emails, and documents relating to the GAL in her
22 case, the GAL Program, and GAL assignments, as part of her efforts to uncover patterns of
23 misconduct and support her constitutional claims (Ex. L, M, & P).

1 6.43 Despite statutory mandates under the Washington Public Records Act (RCW 42.56),
2 Plaintiff's requests were repeatedly delayed, partially fulfilled, or outright ignored. In
3 multiple instances, Plaintiff received no responsive records until she filed formal internal
4 review challenges (Ex. L, M, & P).

5 6.44 For example, in Request K177188-SSCGR311, Plaintiff requested communications
6 involving the GAL. The County failed to provide documents for over five (5) months. Only
7 after Plaintiff filed an additional formal internal review and paid a \$24 processing fee were
8 the seven (7) emails finally released. These delays materially obstructed Plaintiff's access to
9 evidence essential to pursuing her legal claims.

10 6.45 During the same time, records show that the GAL, then also under suspension from the
11 Pro Tem bench, and acting in his capacity as a private attorney for Port Gardner Law Group,
12 was directly furnished internal County communications regarding media inquiries and
13 administrative discussions and decisions related to him and Plaintiff's case. The County gave
14 these records, and communications, to Parker, without a formal records request, at no cost,
15 "as a courtesy" and in violation of state law and administrative norms GR 31.1 (Ex. O at Pg.
16 23, 24).

17 6.46 On November 22, 2023, despite his temporary suspension from the bench and ongoing
18 criminal investigation Parker received emails forwarded by Court staff, including
19 communications from the Everett Herald regarding the allegations against him. In response
20 to the County dissuading the Herald from pursuing contact with Parker, Parker explicitly
21 thanked courthouse staff for their support and the courtesy of bypassing formal records
22 procedures (Id. at Pg. 26).

23 6.47 This custom, policy or practice constitutes illegal selective treatment by the County of
24 individual citizens. While Plaintiff, a low-income litigant and survivor of domestic violence,

1 was denied a fee waiver and subjected to many months of delays and internal reviews,
2 Parker, an insider under criminal investigation, was offered open-door access, free
3 information, and institutional sympathy. This conduct is indicative of a systemic pattern of
4 favoritism and suppression (Ex. O).

5 6.48 This custom of discrepancy constitutes a violation of Plaintiff's rights to equal protection
6 and access to procedural due process. It mirrors the factual pattern in *In re Dependency of*
7 *A.E.T.H.*,¹⁷ where records manipulation and destruction were used to shield the GAL
8 program and impair litigants' access to justice.

9 6.49 The County administrative staff responsible for records fulfillment is part of the same
10 entity tasked with administering the GAL program. The shared oversight structure creates an
11 obvious conflict of interest that Plaintiff asserts further supports the County's liability under
12 *Monell*.¹⁸

13 6.50 The County's consistent failure to treat public records requests uniformly and fairly, and
14 its deliberate facilitation of Parker's access during a suspension, demonstrates deliberate
15 indifference to Plaintiff's constitutional rights and a policy of insider favoritism that denies
16 equal access to evidence for litigants raising legitimate civil rights concerns.

17 6.51 The County's action or inaction in response to her requests directly impaired Plaintiff's
18 ability to present her claims, rebut false accusations, and assert her parental and
19 constitutional rights in a timely and meaningful way.

20 6.52 Accordingly, Plaintiff asserts that Snohomish County has maintained a custom policy and
21 practice of obstructing and delaying disclosure of public records concerning GAL
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24 ¹⁷*Id.*, 9 Wn. App. 2d 502 (2019)

¹⁸ *Id.*, 436 U.S. 658, 1978

1 appointments, evaluations, and complaints, here specifically, those implicating the GAL in
2 her case and the GAL Program.

3 6.53 These delays constitute a policy of deliberate indifference to the constitutional rights of
4 family law litigants, specifically the right to access evidence necessary to pursue remedies for
5 misconduct and to present a full and fair case.

6 6.54 This pattern of conduct directly contributed to the deprivation of Plaintiff's procedural
7 and substantive due process rights, warranting exposure to *Monell* liability under 42 U.S.C. §
8 1983.

9 VII. SUMMARY AND CLAIMS

10 Plaintiff realleges and incorporates herein as if set forth in full all paragraphs written above.

11 7.1 Based on the foregoing, the included exhibits and imbedded references, Plaintiff alleges
12 Snohomish County's failure to supervise and train GALs constitutes deliberate indifference
13 under *Monell*.

14 7.2 Under *Monell v. Department of Social Services of the City of New York*, 436 U.S. 658 (1978),
15 a municipality can be held liable under 42 U.S.C. § 1983 when its policies, customs, or
16 practices cause a constitutional violation. The Ninth Circuit in *Lockett v. County of Los*
17 *Angeles*, 977 F.3d 737 (9th Cir. 2020) emphasized that a local government's failure to
18 adequately train or supervise its officers, despite knowledge of systemic issues, constitutes
19 deliberate indifference. The Court stated: "A local government may be held liable under §
20 1983 when its policies or customs inflict constitutional injury."

21 7.3 Here, Snohomish County continued endorsement Parker as a GAL, absent formal
22 investigation review and findings, despite documented evidence of perjury, ethical violations,
23 and bias, reflects the County's deliberate indifference to the constitutional rights of family
24 court litigants, here Plaintiff Ms. Bloom.

1 7.4 The Supreme Court of the United States of America has clearly held that an individual has a
2 fundamental liberty interest in equal protection under the law and a fundamental fairness in
3 proceedings against them, freedom of speech, and in the care, custody and control of their
4 children (*Santosky v. Kramer*, 455 U.S. 745 (1982)).

5 7.5 Likewise, the U.S. Supreme Court has consistently held the individual constitutional
6 interests: in the right to familial relations (*Morrison v. Jones* (1979); *Wallis v. Spencer*
7 (2000)); the right to fundamental fairness and that evidence not be fabricated (*Devereaux v.*
8 *Abbey* (2001); *Garnett v. Undercover Officer C0039* (2016)); the right to a an impartial
9 judicial process, (*Marshall v. Jerrico* (1980), *Caperton v. A.T. Massey Coal Co.* (2009)) and
10 the right to protection against retaliation, (*Hartman v. Moore* (2006); *Carey v. Piphus*
11 (1978)).

12 7.6 Further, the U.S. Supreme Court has held that the Defendant(s) Snohomish County may be
13 held accountable for customs, policies and practices that violate civil rights (*Monell v.*
14 *Department of Social Services* (1978); *Hardwick v. County of Orange* (2017)), *Lockett v.*
15 *County of Los Angeles*, 977 F.3d 737 (9th Cir. 2020).

16 7.7 The Defendant(s) refuse or are unable to police themselves. There is significant evidence of
17 saturated institutional impropriety, bias, nepotism and collusion, and the customs, policies
18 and procedures the County utilizes to facilitate and administer the same. The record in this
19 case is replete, from inception, with a failure to adhere to the U.S. Constitution, violations of
20 RCW, local County Code, administrative misconduct, and the failure to adhere to
21 Washington State Superior Court administrative rules and procedures.

22 7.8 Based on the facts presented and the underlying record, it's evident that Snohomish County
23 maintains a court system within its court system. One system, which is accessible only to
24 those in the "club": a select class of favored attorneys and their favored GALs who have been

1 developed to obtain outcomes through concealment and manipulation and operates through
2 the County's GAL Program, where registry protocols are bypassed, appointments are secured
3 through informal backchannels, and GAL misconduct, including fabrication, bias, and
4 perjury, are shielded from scrutiny by closed-door "investigations" that produce no findings,
5 no records, and no accountability. Complaints are reviewed, if at all, by County Court
6 administrators, often with clear ties to the misconduct, as alleged here, and then summarily
7 dismissed without input from the aggrieved party. Oversight is nonexistent and the County
8 overtly delays, obstructs, or conceals records that would expose their practices.

9 7.9 Meanwhile, for litigants outside this protected circle, such as Plaintiff, there exists a parallel
10 system: a hollow forum in which constitutional rights are not guaranteed, due process is not
11 observed, and proceedings unfold only to falsify the appearance of fairness. This bifurcated
12 judicial structure is not a product of error or neglect; it is the product of knowing and
13 deliberate design, known to and ratified by the County and its officials, and knowingly
14 maintained by the same, with full awareness of its constitutional consequences to individuals
15 disfavored by the County, such as Plaintiff.

16 7.10 Under *Monell v. Department of Social Services*, 436 U.S. 658, 694 (1978), these customs,
17 policies and practices culminate in an unlawful infringement on Plaintiff's rights, including
18 the Fourteenth Amendment to the U.S. Constitution, and Snohomish County must be held
19 accountable.

20 **VIII. PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief.

22 8.1 Compensatory damages against Defendant(s), as may be jointly and severally liable, for the
23 harm caused to Plaintiff in the violation of her constitutional rights, and the resulting
24 psychological, emotional, physical and financial damages due to the County's illegal removal

1 of her custodial rights, all incurred as a result of Defendant(s)' knowing and willful unlawful
2 acts and, or omissions, and an utter disregard for Plaintiff's rights.

3 8.2 Declaratory relief declaring that the policies, customs, and administrative practices of
4 Snohomish County, including the deliberate shielding of GAL misconduct, destruction of
5 evidence, and obstruction of public records, are unconstitutional under the Fourteenth
6 Amendment.

7 8.3 Attorney's fees and costs pursuant to 42 U.S.C. § 1988.

8 8.4 Monetary sanctions for the spoliation of evidence and deliberate obstruction of Plaintiff's
9 public records requests under GR 31.1.

10 8.5 Any other relief that the Court deems just and proper to ensure full restoration of Plaintiff's
11 due process rights and judicial transparency in GAL appointments.

12 **IX. JURY DEMAND**

13 Plaintiff demands a trial by jury for all issues so triable herein.

14
15 Entered and DATED this June 4, 2025, and hereby Respectfully submitted for Plaintiff,

16
17 Carnation Legal Services LLC

18
19 

20 /s/ Shannon Draughon

21 Shannon M. Draughon WSBA No. 35424

22 Carnation Legal LLC

23 Email: sdraughon@carnationlegal.com

24 Phone: (425) 945-6862

Counsel for Plaintiff, Ms. Gina Bloom

CERTIFICATE OF SERVICE

I, Shannon Draughon, am counsel of record in the above captioned matter in and for Plaintiff Ms. Gina Bloom, over the age of eighteen and competent to testify herein. On the date noted below, I provided a copy of the foregoing document to counsel of record in the manner indicated:

Chris Lee WSBA 58645
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For: SNOHOMISH COUNTY,

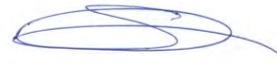
For: SNOHOMISH COUNTY.

By email to Chris.Lee@co.snohomish.wa.us and Erik.Ben-Zekry@co.snohomish.wa.us; and

I hereby certify that on June 4, 2025, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

DATED: This 4th day of June, 2025.



/s/ Shannon Draughon
Shannon M. Draughon, WSBA #35424