

C. Ed Young:

There is especially compelling evidence that Ed Young, while a principal at Kokanee Elementary, had received several serious reports alleging Mr. Leede acted inappropriately and engaged in sexual harassment with female students. As the other principals before him, Mr. Young did not make any reasonable efforts to conduct further investigation and did not discipline Mr. Leede or take any action that could have stopped behaviors that essentially had become predatory by 1995.

He received complaints from Pamela Carlson, an instructional assistant in 1995 or 1996 in which she reported to him about a very intimate hug between Mr. Leede and a female student. See Exhibit N.

Mary Fenner, another instructional assistant, reported to Mr. Young in 1995 or early 1996 that Mr. Leede had a female student sitting on his lap and also reported a separate incident in which she saw him lift a female student off of the floor while she was sitting in her chair by wrapping his arms around her back and placing his hands across her chest. See Exhibit O. This latter incident was also reported by Kathy August, another teacher. See Exhibit P.

One of our clients, [REDACTED] reported an incident to Mr. Young in late spring, 1996 wherein her daughter, [REDACTED] was inappropriately fondled and hugged by Mr. Leede. See Exhibit Q. Mr. Young's response was to simply talk to Mr. Leede and [REDACTED] at the same time while having no sensitivity to the discomfort and anxiety of [REDACTED]. He consciously chose not to have an advocate for [REDACTED] such as a counselor or at least one of her parents present. Mr. Young took no further action, including no disciplinary action, against Mr. Leede despite by now having actual knowledge of many other prior instances of serious sexual harassment and acts of misconduct by Mr. Leede.

Additionally, Mr. Young had complaints about Mr. Leede treating girls more favorably than boys from various sources, including parents and students. See Exhibit R.

During the 1997-98 school year, Greg Waddle was the interim school principal at Kokanee Elementary and Mr. Young became the Personnel Director for the Northshore School District. Prior to starting as interim principal, Mr. Waddle was told by Mr. Young to keep any eye on Mr. Leede because of various reports of hugging and touching. See Exhibit S.

During that school year, Mr. Waddle advised Young, as Personnel Director, of a serious incident of inappropriate hugging and conduct as reported by two separate instructors, including Joanne Hjort, Librarian, and Ginger Seitz, tech assistant. This incident was documented on January 6, 1998. See Exhibit T.

December 14, 2000
Page 10

Both Ms. Hjort and Ms. Seitz reported that Mr. Leede had inappropriately hugged and kissed a student who was very uncomfortable and they further reported that this kind of touching "seemed to be occurring more often by Carl." Clearly, once again, another incident of conduct was coming to the attention of a principal, charged with supervisory responsibilities over Leede, and was personally observed by school personnel. Said conduct was clearly in violation of the district's own policies opposing sexual harassment.

Mr. Waddle provided this information to Mr. Young who told him to document it. See Exhibit S. Remarkably, Ed Young, notwithstanding his duties and role as Personnel Director for the Northshore District, undertook absolutely no further investigative action. This was despite the fact that Young clearly had knowledge of many other prior instances of sexual harassment and/or sexual misconduct by Mr. Leede. Mr. Young apparently had no contact with Mr. Leede regarding this new incident and Mr. Leede was never disciplined once again. Neither Mr. Waddle nor Mr. Young elected to pursue further investigation or take any disciplinary action other than having the incident documented in Leede's personnel file. Under District policies previously described, these administrative actions fell woefully short of the type of administrative action mandated under District policies in effect as of 1995.

In the fall of 1998, three additional separate instances came to the attention of Mr. Young, who now had returned to Kokanee School as principal, including complaints from the [REDACTED] family about inappropriate hugging and touching by Mr. Leede involving their daughter, [REDACTED]. This occurred in October 1998. See Exhibit U.

About one month later, around Thanksgiving 1998, two separate teachers, namely Debbie Martens and Cheryl Sablen, informed Mr. Young about yet another incident when Mr. Leede was inappropriately touching and intimately holding and caressing a female student with his hands on her hips for a prolonged period of time and then kissing her. See Exhibits V and W.

Both incidents again were documented by the complaining parties, yet no further steps were taken by Mr. Young to notify the District properly and undertake prompt and remedial action, such as conducting a thorough investigation and contacting Child Protective Services.

Contacting CPS was one further step that should have been considered by Mr. Young, since it should have been apparent to Young by this time that Mr. Leede continued to be engaging in this harassing, and arguably predatory behavior, notwithstanding prior warnings by Young. Instead, we believe Mr. Young sought only to protect Leede and minimize his behavior by telling others that Leede was a "hugging type of individual" whose actions kept being misinterpreted.

Unfortunately for the female students at Kokanee, including our three clients, Mr. Young seemed to be wholly indifferent to Mr. Leede's actions. He simply provided Mr. Leede with a copy of the District policy on appropriate and inappropriate touching along with a letter to Leede dated October 16, 1998 (See Exhibit X), Mr. Young seemed almost apologetic and simply suggested that Leede "may want to look at it" (the District policy

December 14, 2000

Page 11

against inappropriate touching) and thanked Leede for "listening and responding to the concerns."

These kinds of attitudes and documented comments by Mr. Young, given his prior knowledge of other instances of sexual harassment, and his added knowledge of the responsibilities of school personnel as Personnel Director for the entire District, amount to nothing less than gross and reckless indifference as to the welfare and protection of female students at Kokanee to be free from this type of sexual molestation and inappropriate and unwanted touching by Leede.

Finally, in December 1998, Mr. Young was contacted by Detective Henry Simon of the Bothell Police Department about a complaint from the [REDACTED] family that related back to the 1996 incident referred to previously herein. Mr. Young confirmed in a letter dated December 16, 1998 (see Exhibit Y) that the hugging incident had occurred and that he had allegedly warned Mr. Leede about the District policy on inappropriate touching and had directed him not to do it again.

However, in that same letter sent to Detective Simon, Mr. Young goes on to contend that there had been "no further incidents" of inappropriate touching by Leede. Young knew this information not only to be misleading but categorically untrue given two serious incidents that had been reported to him within the prior two months (the [REDACTED] complaint and the Martens/Sablen complaints), as well as other complaints he had received from Mr. Waddle (Hjort and Seitz complaints). It demonstrates again the reckless disregard that Mr. Young had for the safety of female students at the school as he sought once again to minimize the conduct and instead protect and cover for Leede.

D. Summary:

In summary, four separate principals having supervisory responsibilities over Mr. Carle Leede had actual notice of a number of different and troubling instances over several years when Mr. Leede engaged in unwanted and unwelcomed touching or physical hugging with female students at their schools. Each incident clearly met the District board policy and state and federal definitions of sexual harassment. And yet, in each case, the principals acted with complete disregard and indifference to the safety and welfare concerns of their students. They completely failed to take any appropriate and reasonable investigative action, including any remedial action to stop this conduct as minimally mandated and required under Northshore School District policies and federal and state law.