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**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION**

CASSIA GRANDIN,

Plaintiff,

Vs.

GREAT RIVERS BEHAVIORAL HEALTH
ADMINISTRATIVE SERVICES
ORGANIZATION LLC, GREAT RIVERS
BEHAVIORAL HEALTH ORGANIZATION
LLC, AND COMMUNITY INTEGRATED
HEALTH SERVICES LLC,

Defendants.

No.

Complaint for Damages

Jury Trial Requested

Plaintiff Cassia Grandin, through her attorneys, Beck Chase Gilman PLLC, alleges as follows:

I. PARTIES

1.1. Plaintiff Cassia Grandin (Grandin) was a Washington resident at all relevant times.

1.2. Great Rivers Behavioral Health Administrative Services Organization LLC (BH-ASO), UBI Number 604 497 793, operates in Cowlitz, Grays Harbor, Lewis, Pacific, and Wahkiakum counties.

1.3. Defendant Great Rivers Behavioral Health Organization, LLC (Great Rivers), UBI Number 604 410 263, operates in Cowlitz, Grays Harbor, Lewis, Pacific, and Wahkiakum counties.

1.4. Defendant Community Integrated Health Services, LLC (CIHS), UBI Number 604 473 830, operates in Cowlitz, Grays Harbor, Lewis, Pacific, and Wahkiakum counties.

II. JURISDICTION & VENUE

2.1. The United States District Court for the Western District of Washington has jurisdiction over this matter under 28 U.S.C. § 1331 (Federal Question Jurisdiction) via 42 U.S.C. § 2000e *et seq.*, 29 C.F.R. § 1614.407, 42 U.S.C. §§ 12101, *et seq.*, 31 U.S.C. § 3730(h), 29 U.S.C. § 2601 *et seq.*, and other applicable federal laws.

2.2. Venue is proper in the Tacoma Division pursuant to Western District of Washington Local Civil Rule 3(e)(1) because Defendants operate in Lewis County, Washington, and the acts and omissions described in this Complaint occurred in Lewis County, Washington.

III. FACTS

3.1 Plaintiff Grandin is a 52-year-old Black female. She and her husband live in Chehalis, Washington. Her husband has Hydrocephalus, a neurological disorder which prevents him from being able to perform one or more major life activities.

3.2 Upon information and belief, Defendants receive Medicaid funding to provide behavioral health services to individuals of all ages in Cowlitz, Grays Harbor, Lewis, Pacific, and Wahkiakum counties. See www.greatriversbho.org/ (last visited March 3, 2022).

3.3 Medicaid is a federal-state assistance program that provides health coverage to millions of Americans, including eligible low-income adults, children, pregnant women, elderly adults and people with disabilities. See www.medicaid.gov/ (last visited March 3, 2022). It is administered by state and local governments according to federal guidelines. *Id.*

3.4 Medicaid-eligible patients usually pay no or low costs for covered medical expenses, with medical providers being reimbursed by the government directly for medical costs. The Medicaid program is funded jointly by states and the federal government. The federal Centers for Medicare & Medicaid Services (CMS) is responsible for implementing laws passed by Congress related to Medicaid. See <https://www.cms.gov/> (last visited March 3, 2022).

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3.5 Grandin began working for Great Rivers Behavioral Health in April 2017 as an Administrative Assistant. Her position was split between doing administrative work for Great Rivers Behavioral Health Organization half of the time and Community Integrated Health Services the other half of the time.

3.6 At the time she was hired, she notified her employer that her husband was disabled and that she needed to care for him, including driving him to and from his place of employment.

3.7 At one point, Grandin's supervisor Heather Gamble called her "monkey" in front of another coworker and Human Resources (HR) director Darla Carlson. Later that day, given the applicable historic and racial connotations, Grandin communicated with Carlson regarding her discomfort about being called "monkey" by Gamble. Carlson responded that it was merely a term of endearment. Defendants did not investigate or follow up on this issue and, wanting to fit in with her supervisors and coworkers, Grandin did not raise it again.

3.8 In or about June 2019, Grandin applied for a Lead Administrative Assistant position. This would have been a promotion.

3.9 Instead of promoting Grandin, defendants promoted Marie Davis, a Caucasian administrative assistant who had been with the company less time than Grandin. With that promotion, Davis became a supervisor of Grandin along with Program Manager Jessica Stickley.

3.10 In October 2019, Grandin filed a charge of discrimination with the EEOC for differential treatment she experienced at work based on her race, including not being promoted to the job for which she was qualified and being treated differently than her non-Black coworkers, including being singled out, scrutinized, micromanaged, and undermined by management.

3.11 On or about October 30, 2019, in an internal communication with Program Manager Stickley and Chief Operations Officer (CEO) Todd Broderius, HR Director Carlson stated:

1 I just want to be sure that I can document the reason for marking [Grandin] as
2 unexcused appropriately since I know [Grandin] is aware of the attendance
3 practices outline **and has a tendency to complain to HR about being bullied or
targeted.**

4 (emphasis added).

5 3.12 Carlson was referring to Grandin's previous reports of race discrimination in her
6 correspondence with Program Manager Stickley and CEO Broderius. Grandin was not copied on
7 this correspondence about her.

8 3.13 In or about early November 2019, Grandin reported Marie Davis' treatment of her
9 to HR director Carlson. At that time, Grandin reported to Carlson that she felt micromanaged by
10 Davis and singled out because of her race.

11 3.14 A few weeks later, Carlson instructed Grandin to come to her office to further
12 discuss her discrimination reports regarding Davis and was surprised to find CEO Broderius
13 present. Grandin was not informed Broderius would be present and this felt intimidating to her.

14 3.15 During that November 2019 meeting, Broderius informed Grandin that if she felt
15 the agency was not a good fit for her, they could have a conversation about Grandin's departure
16 from employment.

17 3.16 In or about January 2020, Grandin was put on a Performance Improvement Plan
18 (PIP) by Davis, Carlson, and Stickley. The examples provided as the basis for the PIP dated back
19 six months in time. Grandin had not been made aware of these alleged performance concerns prior
20 to filing her charge of race discrimination with the EEOC or reporting her concerns to HR.

21 3.17 In the weeks following the PIP, Davis, Carlson, and Stickley conducted meetings
22 about Grandin. Grandin was notified that the meetings were occurring and that her performance
23 was being discussed at each meeting, but she was not permitted to attend the meetings.

24 3.18 Grandin began experiencing anxiety and panic attacks as a result of being singled
25 out, scrutinized, micromanaged, undermined, and reviewed on a weekly basis by management. She

1 feared that she was going to be terminated in retaliation for her protected activity. Added to her
2 fears was the reality that she was the primary wage earner for herself and her husband.

3 3.19 In or about March 2020, the COVID-19 pandemic hit the Pacific Northwest region.

4 3.20 In or about early Spring 2020, Grandin reported an issue with management
5 instructing staff to code their client progress notes to indicate they were seeing clients in the
6 community when they were not. Because Defendants were coding progress notes in order to trigger
7 reimbursement from the state and federal government for services that were not actually provided,
8 in her report Grandin expressed her concern that this practice amounted to Medicaid fraud.

9 3.21 In or about early April 2020, Grandin developed an upper respiratory infection and
10 was told to quarantine at home. Grandin requested to work from home during her quarantine
11 period and this request was denied. Grandin was instead instructed to utilize her paid time off
12 (PTO) for her days in quarantine.

13 3.22 Grandin did not have PTO available to cover the days of quarantine because of the
14 time off she needed to care for her husband and her own disabilities. She communicated this to
15 Carlson and Broderius, providing them examples of coworkers who were permitted to work from
16 home rather than using PTO and reiterating her request that she receive the same treatment.

17 3.23 Also in or about April 2020, Grandin was notified by Carlson and Broderius that
18 her Administrative Assistant position was being dissolved. What was previously her full-time role
19 would now be divided into two separate positions.

20 3.24 On or about April 24, 2020, Grandin requested leave under the Family Medical
21 Leave Act (FMLA) for her anxiety attacks, which had become more frequent and severe as her
22 work environment became more hostile and her position there became more precarious.

23 3.25 Grandin was initially hired into a new position within the agency and scheduled to
24 return from FMLA leave in June 2020.
25

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