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4.

Plaintiff works for Defendant District and is assigned to work out of fire stations in Washington, Multnomah, and Clackamas counties. He works as a “floater.” He has been employed by Defendant since 2013.

5.

Plaintiff is a lieutenant. He was promoted to lieutenant in August 2018. He holds a paramedic certification and fire certifications and works as a fire fighter-paramedic.

6.

Plaintiff is a military veteran. Plaintiff has a disability rating because of his military service. Defendants are aware of his veteran status and his disability status as a result of his military service.

7.

Plaintiff is a qualified individual with a disability. His disability substantially impacts one or more major life activities. He has a record of a disability.

8.

In July 2019, Plaintiff began the process of promoting to captain. That process includes a civil service examination, an interview, and hours spent in an acting in capacity (“AIC”) role as captain. While an employee is in the AIC role, they receive ongoing evaluative feedback from supervisors. They are also paid at the captain rate. After an employee goes through the civil service process they are placed on a ranked list. Promotions are made from the current list for each position. If you are not on the list, you cannot be promoted. Promotions generally occur in the ranked order of the list with the highest score being “1” on the list and receiving the first promotion. When the promotional list was first established on or about August 2019, Plaintiff was placed at number 4 on the list. As promotions occurred, Plaintiff’s rank moved up on the list.

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9.

At times, Defendant District has failed to comply with laws relating to military members and veterans, including the Uniformed Services Employment and Reemployment Rights Act (“USERRA”) and application of veteran’s preference points under Oregon law.

10.

In the Spring of 2019, Plaintiff submitted documentation to Defendant District’s human resources department to ensure that his veteran’s preference points would be appropriately applied to upcoming captain interviews. Plaintiff met with Steven Phartain, a human resources representative for the District to ensure his veteran’s preference points were applied correctly during the promotional process. Defendant District was resistant to complying with the law and only agreed to apply the veteran’s preference points after Plaintiff pushed the issue through his civil service representative and pointed out the District was required by law to apply the points.

11.

Plaintiff is a member of International Association of Fire Fighters Local 1660 (“the Local”), a labor union. Defendant District allows members of the Local to e-mail, including sending mass e-mails, on their e-mail servers to District employees. Defendant District also allows employees to post other information to the listserv that is not directly related to work, including information about medical issues, items for sale and other topics. Plaintiff is not aware of any employee being investigated or disciplined for using the employer’s e-mail server and/or listserv to convey or share information or opinions.

12.

On October 15, 2019, Plaintiff sent an email using the District’s server to union members about the upcoming union election in which he was critical of one of the candidates for president of the Local and questioned his ability to lead the Local should he be elected. There were some

1 heated responses from Local members and Plaintiff responded to those emails on or about  
2 October 16, 2019. Plaintiff did not use profanity or otherwise violate any of Defendant District's  
3 communication policies in his original email or his responses.  
4

5 13.

6 Shortly thereafter, on or about October 18, 2019, Defendant District decided to  
7 investigate Plaintiff's October emails and whether they violated any policies. The Local and  
8 Plaintiff asserted to Defendant District that the emails were protected concerted activity under  
9 the Public Employees Collective Bargaining Act, ORS Chapter 243.650-243.806, a law that  
10 protects Oregon labor unions and their members' rights under the act to engage in protected  
11 concerted activities.

12 14.

13 While Defendant District ultimately agreed that the October emails were protected  
14 speech and that it could not discipline Plaintiff for it, one of Defendant's agents, Division Chief  
15 Greg Ladrow ("Defendant Ladrow"), used the communication as a basis for requiring a private  
16 meeting with Plaintiff on or about November 8, 2019. The November 8<sup>th</sup> meeting between  
17 Plaintiff and Defendant Ladrow occurred weeks after the Local and Plaintiff believed the issue  
18 had been put to rest and no discipline would issue. During the meeting, which occurred in a tiny  
19 room about the size of a supply closet, Defendant Ladrow was visibly angry, referenced the  
20 October emails negatively and expressed to Plaintiff that he would never be promoted within the  
21 organization. Plaintiff was shocked and upset by the November 8<sup>th</sup> meeting and Defendant  
22 Ladrow's statements.

23 15.

24 Plaintiff continued to receive positive performance evaluations and assessments of his  
25 skills as a fire fighter officer and supervisor throughout 2019 and 2020. He received no negative  
26 feedback.

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16.

On January 1, 2021, Plaintiff was placed in an acting in capacity (“AIC”) captain assignment at Station 66. Co-workers Chris Pfeifer and Ryan Robinson were also placed in AIC captain assignments at other stations at about the same time.

17.

On January 1, 2021, Plaintiff was listed as number 2 on the promotional list.

18.

On January 5, 2021, Defendant District interviewed Plaintiff for a vacant permanent captain position. A co-worker was also interviewed for the position. The co-worker is not a veteran. Plaintiff and his co-worker were the only two candidates interviewed.

19.

Both Plaintiff and his co-worker were interviewed by three panelists, Defendant Greg Ladrow, Battalion Chief Frank Adams, and Division Chief James Whyte, who each made comments on evaluation sheets. These sheets listed the question, what Defendant District was looking for in the response, along with space for the interviewer to enter notes about the candidate response, and a space for evaluator comments and observations. Defendant Ladrow provided his evaluator comments and observations for the other candidate in the assigned space, but failed to do the same for Plaintiff.

20.

Out of the three evaluators, only Defendant Ladrow was able to assign a quantitative score for those interviewed for the captain’s position. These quantitative scores, solely decided by Defendant Ladrow, were used to justify the District’s promotional decisions for the January 2021 vacant permanent captain’s position. Plaintiff and his co-worker were assigned numerical

1 scores by Defendant Ladrow for three categories: Personal/Interpersonal skills, Managerial  
2 Courage, and Organizational Ability. Defendant Ladrow scored Plaintiff approximately half as  
3 many points in each category as he scored the other candidate in those same categories. After the  
4 interview, both candidate scores were converted to percentages of available points, with Plaintiff  
5 at 50% and the other candidate at approximately 93%. Plaintiff's veteran's preference points  
6 were then applied raising his overall score to 60%. The District promoted the other candidate to  
7 the vacant permanent captain's position.  
8

9 21.

10 On or about February 24, 2021, Defendant Ladrow and Plaintiff met regarding the  
11 January 2021 captain's interview. During the meeting, Defendant Ladrow pressured Plaintiff to  
12 remove himself from any other promotional processes and indicated to Plaintiff that he would  
13 not be promoted by Defendant District's senior leadership. Defendant Ladrow told Plaintiff to  
14 stop participating in any projects or positive work for the District because people in the District's  
15 senior leadership were "tired of seeing his face." Defendant Ladrow also warned Plaintiff that  
16 any attempt to change the current political process for promotions within the department would  
17 not end up well for Plaintiff. Plaintiff understood Defendant Ladrow to mean that any attempt to  
18 change the current system of the District's administrator selecting a favored candidate regardless  
19 of objective merits would cause trouble for Plaintiff. Defendant Ladrow told Plaintiff that while  
20 he could not "tell" Plaintiff to remove his name from the promotional list, it would signify to the  
21 Fire Chief that Plaintiff understood his place in the hierarchy of the department if he removed his  
22 name. Defendant Ladrow went on to explain that even if he did bring Plaintiff's promotional  
23 paperwork to the Fire Chief, the Fire Chief had stated that he would not sign it. After saying this,  
24 Defendant Ladrow said that he did not want to have to put the Fire Chief in that position.  
25 Plaintiff was stunned by Defendant Ladrow's comments.

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22.

Plaintiff understood from this February 24, 2021, meeting that any further attempt on his part to promote to captain would be futile, no matter what scores or achievements he obtained.

23.

Plaintiff was upset about the conversation he had with Defendant Ladrow. Up until that conversation with Defendant Ladrow, Plaintiff had believed that the promotional process was reasonably fair. After the conversation, he learned that his ability to promote at the District would be blocked no matter what he did to show that he was capable and deserving of promotion. Plaintiff went to his Local to report the conversation and to express his concern that he would never be promoted.

24.

The Local leadership was concerned about Defendant Ladrow's comments to Plaintiff. The Local's President, Rocky Hanes, stated that after receiving the report from Plaintiff, he communicated with Fire Chief Weiss about Plaintiff and the Local's concerns about fairness during the promotional process. President Hanes conveyed that Defendant Ladrow's comments and actions were inappropriate and wrong. President Hanes also told Fire Chief Weiss that Defendant Ladrow claimed that his message to Plaintiff was coming directly from the Fire Chief. The Fire Chief took no action to remedy or even address the concerns.

25.

On March 11, 2021, Plaintiff sent out an email to the Local's members on the union listserv discussing his personal life, service in the military, and the high rate of post-traumatic stress disorders ("PTSD") and resulting suicides among military members. He shared some of his personal history and that he had now had 10 friends he had served with who committed suicide. The email ended with a video link to a documentary that was being made about PTSD and Plaintiff's and other veterans' struggles with PTSD and coming out on the other side. Plaintiff

1 expressed his gratitude to his family and co-workers for helping him to get through his  
2 difficulties. The email also sought donations to help fund the documentary.  
3

4 26.

5 When Plaintiff sent the March 11, 2021, email he was ranked at Number 1 on the  
6 promotional list for captain. He had also received positive evaluations from his immediate  
7 supervisor for the AIC captain's position.

8 27.

9 On or about March 11, 2021, one of the District's supervisors, Battalion Chief Luke  
10 Kieffer ("BC Kieffer"), contacted Plaintiff about the March 11, 2021 email and expressed that  
11 District administration was upset about it, indicating that there might be an investigation and  
12 discipline. BC Kieffer was in an acting Division Chief position when he called Plaintiff. The  
13 explanation for possible discipline included: (a) lack of approval from the District to use the  
14 TVF&R logo (even though there was no logo in the video); (b) not having permission from the  
15 family of the child who appeared on the back of a fire engine in one of the video shots (the child  
16 was Plaintiff's son); (c) that Plaintiff is not allowed to use the District for personal profit or gain  
17 and that management was looking to punish Plaintiff for asking for money (the email was clear  
18 that it was a fundraising effort to support the documentary and that Plaintiff was receiving no  
19 money personally from this request); and (d) that Plaintiff should be prepared for the District to  
20 discipline and possibly demote him because of the email. Plaintiff explained that no policies  
21 were violated by the email or video shots. BC Kieffer agreed with Plaintiff that there did not  
22 appear to be a violation of policy or violation of email norms within the District, but explained  
23 that Defendant Ladrow "had it out" for Plaintiff and that this email had opened him up for  
24 [Ladrow's] "ire."

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28.

On March 12, 2021, the day after Plaintiff sent the email, Plaintiff was suddenly removed from his AIC captain position at Station 66 and assigned to be a "floater in place" from March 12 to April 1. On April 1, Plaintiff was official demoted to "lieutenant floater." This meant that he would "float" to any station in need of a lieutenant or paramedic or both and would no longer be a captain. On or about March 23<sup>rd</sup>, 2021, Plaintiff reached out to Kelly Bach, the chief in charge of staffing, to inquire about the change to his captain status. Bach told Plaintiff that he was to be removed from his current AIC captain's position. He informed Plaintiff that he would not be likely to be promoted on his next captain's interview even though Bach 'personally' was a fan of Plaintiff's leadership. Bach told Plaintiff that his removal from the temporary promotion to captain was officially related to his three-month time frame for AIC being up and that is all he could say. Plaintiff was replaced in the AIC captain position at Station 66 by a District employee who was not even on the promotional list for captain. The notice from the District that he was being removed occurred on March 12, 2021 – the day after Plaintiff sent his email. Employees at the District are paid at the rate of the position they are filling. Plaintiff had been paid at the captain rate and because of the removal, was only paid at the lieutenant rate, a lower rate of pay.

29.

All other officers that were given an AIC promotion to captain or to battalion chief at the same time as Plaintiff continued with their AIC promotional status, even after their three-month AIC period ended. Plaintiff was the only person among five other officers in acting positions who was removed from the position and demoted.

30.

Other non-work-related emails, similar to the one Plaintiff sent on March 11, 2021, have been sent by other employees using the District's listserv, both before and after Plaintiff's March 11, 2021, email and have not resulted in investigations, discipline, or other adverse employment

1 actions. For example, several other District employees posted information to the employee  
2 listserv in March of 2021, including an employee who expressed distress due to a family  
3 member's suicide and a request for help from co-workers, an advertisement for massage therapy,  
4 and a solicitation for a charity golf tournament.

5 31.

6 On March 31, 2021, Plaintiff and one of his co-workers were interviewed for a vacant  
7 captain position. The co-worker was not a veteran.

8 32.

9 Plaintiff and his co-worker were interviewed by three panelists, Division Chief Steven  
10 Boughey, Battalion Chief Case Brown, and Battalion Chief (then Captain) Alex Haven, who  
11 each made comments on evaluation sheets. These sheets listed the question, what Defendant  
12 District was looking for in the response, along with space for the interviewer to enter notes about  
13 the candidate response, and space for evaluator comments and observations. Only Division Chief  
14 Boughey was able to assign a quantitative score for those interviewed, with the scores used to  
15 justify hiring decisions. In the scoring of the candidates, DC Boughey noted both the October  
16 2019 email from Plaintiff and the March 2021 email as negative factors against Plaintiff.  
17 Despite including positive comments about Plaintiff's interview, Boughey scored plaintiff at  
18 approximately 50% or 40% (5/10 or 4/10) for each of the three categories. His scores for the  
19 other candidate were 90% (or 9/10) in each of the three categories.

20 33.

21 Based on information and belief, before the March 31<sup>st</sup> captain interviews Defendant  
22 Ladrow had briefed Division Chief Boughey on who the District wanted to promote and told DC  
23 Boughey that Plaintiff was not to be promoted. Based on information and belief, Defendant  
24 Ladrow also told Division Chief Boughey that the panel should focus their questions on  
25 Plaintiff's October 2019 and March 2021 emails.  
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34.

During Plaintiff's captain's interview on March 31, 2021, the promotional board spent a significant amount of time asking questions related to Plaintiff's "perception" within the District. In particular, the questioning focused on the two emails Plaintiff sent via the District's employee listserv (in October 2019 and March 2021). Most of the questions in the interview were focused on those emails. The interview took around two hours, although it was only scheduled for thirty minutes. Plaintiff was taken aback by the focus on the emails and the posture of the interview as more akin to an investigation than a promotional interview. Plaintiff tried to redirect the interview and asked to be able to answer the questions listed on the interview sheet that were supposed to be asked of the candidates pursuant to the civil service process.

35.

Two days later, on April 2, 2021, Deputy Chief of Operations Kenny Frentress and Deputy Chief of Administration Laura Hitt wrote a memo to District HR recommending removal of Plaintiff from captain consideration. The memo called for his removal from consideration as Plaintiff's interview scores in January and March 2021 had "failed to demonstrate the ability to meet the required competencies and is not qualified to perform the duties of the captain position." Fire Chief Weiss supported the removal of Plaintiff's name from the promotional list.

36.

BC Kieffer asked Defendant Ladrow if he could call Plaintiff directly and give him the grace to at least pull his own name off the list rather than having Civil Service force his hand. Defendant Ladrow told BC Kieffer to convey to Plaintiff that he is not fit to be a captain based on the October 2019 and March 2012 emails he sent out and should remove his name before we remove it. BC Kieffer called Plaintiff and told him that administration at the District would pull his name off the list and, while he could not tell him what to do, conveyed that Plaintiff should take his own name off because he might have another chance at promotion someday if he did. He

1 also told Plaintiff that Defendants were considering filing a complaint against him and  
2 investigation him for alleged dishonesty during the March 31, 2021, captain’s interview.  
3 Plaintiff understood that if he did not pull his own name off the list there would be an  
4 embarrassing investigation targeted to hurt his reputation and standing at the District and  
5 possibly lead to discipline.

6 37.

7 Plaintiff struggled with the decision but ultimately, on April 9, 2021, requested that his  
8 name be removed from the promotional list for captain. Plaintiff was pressured into the decision  
9 to remove his name from the list by the District administration and Defendants. He feared that if  
10 he did not do so, he would be subjected to an investigation targeted to discredit and ruin him  
11 within the District. He feared his reputation and livelihood would be negatively affected.

12 38.

13 On April 9, 2021, BC Kieffer wrote Defendant Ladrow a memo about Plaintiff which  
14 referenced the October 2019 email concerning protected concerted activity and the March 2021  
15 email concerning military veterans, PTSD, and suicides. He included the statement: "Lt. Krug  
16 comes from a long career in [m]ilitary service and has attempted to use his past experience in  
17 that environment and relate it to the Fire Service (which has proven challenging on multiple  
18 levels) ..." BC Kieffer advised Defendant Ladrow that Plaintiff had reported the emails he sent  
19 in October 2019 related to “union business” and his actions were protected. BC Kieffer also  
20 referenced the email Plaintiff sent on or about March 11, 2021, stating that the email did not  
21 violate any of the District’s rules but that the subject matter made some people feel  
22 “uncomfortable.” In the Memo he reported that he had told Plaintiff to refrain from sending such  
23 emails if he wanted to become a captain someday.

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45.

Defendant District discriminated against Plaintiff in the terms and conditions of his employment as alleged herein in substantial motivating part due to Plaintiff's disability.

46.

Defendant District's conduct as described herein is in violation of ORS 659A.112(1).

47.

Defendant District discriminated against Plaintiff on the basis of his disability including by:

- (a) Treating Plaintiff less favorably than other candidates in January 2021 during the promotional process, including giving him extremely low interview scores that were undeserved and would disqualify him from promotion, even after the District applied his veteran's preference points.
- (b) Treating Plaintiff less favorably than other candidates in March 2021 during the promotional process, including focusing on his email communication about PTSD, not asking him the same questions as the other candidate, and giving him extremely low interview scores that were undeserved and would disqualify him from promotion, even after the District applied his veteran's preference points.
- (c) Pressuring Plaintiff to remove his name from the captain's promotional list.
- (d) Removing Plaintiff from his AIC captain's position in or about March 12, 2021, and demoting Plaintiff to a lieutenant on April 1, 2021.
- (e) Compelling Plaintiff to remove his name from the captain's promotional list by indicating that his name would be removed by the District if he did not do so and that he would be subject to investigation if he did not do so.
- (f) Telling Plaintiff his statements about PTSD made others uncomfortable.

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48.

Plaintiff has been economically harmed by the District's actions. Plaintiff's income decreased when he was removed from his AIC captain's position and demoted to his lieutenant's position and pay. Plaintiff's income has remained at the lieutenant's level when he was not promoted to a permanent captain's position in January 2021 or March of 2021.

49.

Plaintiff's current economic damages are not less than \$25,000 at the date of filing. Plaintiff's future earning capacity has been adversely affected because the District indicates it will never promote him to a position higher than lieutenant. Plaintiff will experience future economic damages of approximately \$20,000-25,000 annually for each subsequent year he is not promoted until his projected retirement in February of 2038. Total economic damages are approximately \$425,000, plus interest.

50.

Plaintiff has suffered noneconomic damages by the District's discriminatory actions, including humiliation, shame, harm to reputation, disappointment, and distress. Plaintiff is entitled to an award of \$400,000 for the harm caused by the District.

51.

Plaintiff is entitled to his attorney's fees, expert witness fees, and costs plus prejudgment and post judgment interest.

**Claim 2**

**Veterans Discrimination in Violation of ORS 659A.082(2)(b),(c).**

**(Against Defendant District)**

52.

Plaintiff realleges and incorporates paragraphs 1-41 of this Complaint.

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53.

Defendant District discriminated against Plaintiff in the terms and conditions of his employment as alleged herein in substantial motivating part due to Plaintiff's status as a veteran.

54.

Defendant District discriminated against Plaintiff on the basis of his status as a veteran including by:

- (a) Treating Plaintiff less favorably than other candidates in January 2021 during the promotional process, including giving him extremely low interview scores that were undeserved and would disqualify him from promotion, even after the District applied his veteran's preference points.
- (b) Treating Plaintiff less favorably than other candidates in March 2021 during the promotional process, including focusing on his email communication about PTSD, not asking him the same questions as the other candidates, and giving him extremely low interview scores that were undeserved and would disqualify him from promotion, even after the District applied his veteran's preference points.
- (c) Pressuring Plaintiff to remove his name from the captain's promotional list.
- (d) Removing Plaintiff from his AIC captain's position in or about March 12, 2021 and demoting Plaintiff to lieutenant on April 1, 2021.
- (e) Compelling Plaintiff to remove his name from the captain's promotional list by indicating that his name would be removed by the District if he did not do so and that he would be subject to investigation if he did not do so.
- (f) Telling Plaintiff his statements about PTSD made others uncomfortable.

55.

Defendant District's conduct as described herein is in violation of ORS 659A.082(2)(c).



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56.

Plaintiff has been damaged as alleged and reincorporated by reference in paragraphs 49-51.

**Claim 3**  
**Whistleblower retaliation in violation of 659A.199(1).**  
**(Against Defendant District)**

57.

Plaintiff realleges and incorporates paragraphs 1-41 of this Complaint.

58.

It is an unlawful employment practice for an employer to discharge, demote, suspend or in any manner discriminate or retaliate against an employee with regard to promotion, compensation, or other terms, conditions, or privileges of employment for the reason that the employee has in good faith reported information that the employee believes is evidence of a violation of a state or federal law, rule or regulation.

59.

Plaintiff in good faith made reports and complaints to Defendant District relating the violations as alleged herein which constituted protected conduct under ORS 659A.199. These reports include:

- (a) Pressuring the District to apply veteran’s preference points during the captain promotional process;
- (b) Reporting to District leadership that the October 2019 email was protected concerted union activity; and

1 (c) Reporting during his March 31, 2021 interview that he wanted to be asked the  
2 questions on the civil services interview sheet, not questions about emails.

3 60.

4 Defendant District discriminated against Plaintiff in the terms and conditions of his  
5 employment because of such protected conduct in violation of ORS 659A.199.

6  
7 61.

8  
9 Plaintiff has been damaged as alleged and reincorporated by reference in paragraphs 49-  
10 51.

11 **Claim 4**

12 **Whistleblower retaliation in violation of ORS 659A.203(1)(b)(A), (B)**

13 **(Against Defendant District)**

14 62.

15 Plaintiff realleges and incorporates paragraphs 1-41 and paragraph 59 of this Complaint.

16  
17 63.

18 It is an unlawful employment practice for any public employer to take or threaten to take  
19 disciplinary action against an employee for the disclosure of any information that the employee  
20 reasonably believes is evidence of a violation of any federal, state, or local law, rule or regulation  
21 or mismanagement, gross waste of funds or abuse of authority or substantial and specific danger  
22 to public health and safety resulting from the public employer's actions.

23 64.

24 Plaintiff's good faith reports and complaints to Defendant District of violations of  
25 federal, state, or local law, rule or regulation or mismanagement, gross waste of funds or abuse  
26

1 of authority or substantial and specific danger to public health and safety resulting from the  
2 public employer's actions as alleged herein constituted protected conduct under ORS 659A.203.  
3

4 65.

5 The District discriminated against Plaintiff in the terms and conditions of his employment  
6 as alleged herein because of such protected conduct in violation of ORS 659A.203.

7 66.

8 Plaintiff has been damaged as alleged and incorporated by reference in paragraphs 49-51.  
9

10 **Claim 5**

11 **Aiding and Abetting Violation of ORS 659A.030(g)**

12 **(Against Defendant Gregory Ladrow)**

13 67.

14 Plaintiff realleges and incorporates paragraphs 1-41.

15 68.

16 Pursuant to ORS 659A.030(g), it is an unlawful practice for any person whether an  
17 employer or an employee to aid, abet, incite, compel, or coerce the doing of any of the acts  
18 forbidden under ORS Chapter 659A.

19 69.

20 Defendant Ladrow violated ORS 659A.030(g) by aiding and abetting Defendant District  
21 to discriminate against and retaliate against Plaintiff in violation of ORS 659A.112, ORS  
22 659A.082(2)(b),(c), ORS 659A.199(a), and ORS 659A.203(1)(b)(A),(B), as described in  
23 paragraphs 8-38.

24 70.

25 As a direct result of Defendant Ladrow's conduct, Plaintiff suffered damages as  
26 described in paragraphs 49-51.

1  
2  
3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff prays for judgment as follows:

- 5 1. Economic damages against Defendants as alleged herein,  
6 2. Non-economic damages against Defendants as alleged herein,  
7 3. Attorney fees and costs as allowed by law, as well as prejudgment and post-judgment  
8 interest,  
9 4. Injunctive and/or declaratory relief in favor of Plaintiff as may be appropriate on each  
10 of Plaintiff's claims for relief, and  
11 5. Any other relief the Court deems just and equitable.

12 DATED this 25<sup>th</sup> day of August, 2022.

13  
14 OLDHAM LAW OFFICE, LLC

15 /s/ Katelyn S. Oldham

16 Katelyn S. Oldham, OSB No. 024115

17 [Katelyn@oldhamlawoffice.com](mailto:Katelyn@oldhamlawoffice.com)

18 Phone: 503.596.2696

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20 Attorney for Plaintiff  
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