

Hon. Lauren King

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSHUA A. DIEMERT, an individual,)	
)	Civil Action No. 2:22-cv-01640-LK
Plaintiff,)	
)	
v.)	FIRST AMENDED COMPLAINT FOR
)	DECLARATORY RELIEF AND
THE CITY OF SEATTLE, a municipal)	DAMAGES
Corporation; BRUCE HARRELL, in his)	
official capacity as the Mayor of the City of)	
Seattle,)	
)	
Defendants.)	

INTRODUCTION

1. Joshua Diemert began his employment with the City of Seattle in 2013. He was excited to use his skills and expertise to serve vulnerable and marginalized communities as a social worker in Seattle's Human Services Department (HSD). As a devoted father with a background in government work, Mr. Diemert believed his new job would provide stability for his family.

2. Mr. Diemert quickly developed good relationships across several City departments and excelled. During his first year, he received the HSD's "maximum achievement" award. But alongside that positive experience, Mr. Diemert began to understand that his race would negatively impact not only his day-to-day work life, but his opportunities for career advancement.

1 3. That his race would be an albatross around his neck is a deliberate outgrowth of the City's
2 Race and Social Justice Initiative (RSJI). The RSJI is a city-wide program that requires race-based
3 thinking and decision-making in an effort to end "structural racism." Paramount within the RSJI
4 are the tenets that white male individuals like Mr. Diemert "are bolstered by racism," that they
5 "internalize it," and that "individuals, institutions, and communities are often unconsciously and
6 habitually rewarded for supporting white privilege and power."

7 4. As his career developed, the discrimination at HSD became increasingly pervasive and
8 hostile. The City routinely urged Mr. Diemert to join race-based affinity groups and required him
9 to participate in training sessions that demeaned and degraded him based on his racial and ethnic
10 identity. He was chastised and punished for combatting racially discriminatory hiring practices by
11 HSD colleagues. And he was denied opportunities for advancement by the City based on his racial
12 and ethnic identity. His supervisors and other colleagues continually dismissed his concerns over
13 a period of years and claimed he could not be a victim of racism and discrimination because he
14 possessed "white privilege."

15 5. This discrimination had a significantly negative impact on Mr. Diemert's mental and
16 physical health.

17 6. Mr. Diemert was compelled to take a constructive discharge from his employment with the
18 City when it became clear that Defendants had no intention of correcting this dysfunctional work
19 environment, that he would continue suffering retaliation, that he was endangering his health by
20 remaining employed with the City, and that because of his race, there was no hope of advancement.

21 7. Accordingly, Mr. Diemert brings this action under the Equal Protection Clause of the
22 Fourteenth Amendment, Title VII of the Civil Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e,
23 *et seq.*, and the Washington Law Against Discrimination, RCW 49.60, to vindicate his rights, seek
24 compensation for his injuries, and to prevent the City of Seattle from treating individuals
25 differently because of their race.

26 ///

JURISDICTION AND VENUE

8. This case arises directly under the Equal Protection Clause of the Fourteenth Amendment, 42 U.S.C. § 1983, Title VII of the Civil Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e, *et seq.*, and the Washington Law Against Discrimination, RCW 49.60.

9. The Court has jurisdiction over Plaintiff's federal claims pursuant to 28 U.S.C. §§ 1331 and 1343, and 42 U.S.C. § 2000e-5(f)(3). The Court has supplemental jurisdiction to adjudicate Plaintiff's WLAD claims pursuant to 28 U.S.C. § 1367(a). The events, parties, witnesses, and injuries that form the basis of the Title VII claims are the same or related to the events, parties, witnesses, and injuries that form the basis of the WLAD claims.

10. This Court has authority to issue a declaratory judgment, attorneys' fees, and other necessary and proper relief under 28 U.S.C. §§ 2201 and 2202.

11. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) and 42 U.S.C. § 2000e-5(f)(3) as the acts or omissions giving rise to the claims of this suit occurred within the Western District of Washington.

PARTIES

12. Plaintiff Joshua A. Diemert is a former City of Seattle employee who worked as a program intake representative in the City of Seattle's Department of Human Services from January 2013 to September 2021.

13. Defendant City of Seattle is a municipality created under the laws of the State of Washington. The Seattle City Council is its governing body. The City of Seattle is an employer within the meaning of 42 U.S.C. § 2000e(b) and RCW 49.60.040 (11).

14. Defendant Bruce Harrell is the Mayor of Seattle. As Mayor, he collaborates with the City Council, City Departments, Race and Social Justice Initiative Coordinating Team, and the Race and Social Justice Initiative Sub-Cabinet to implement and enforce the Race and Social Justice Initiative across all City functions.

///

EXHAUSTION OF ADMINISTRATIVE REMEDIES

15. On December 23, 2020, Mr. Diemert filed a charge of retaliation and discrimination on the basis of race, color, sex, and national origin with the U.S. Equal Employment Opportunity Commission (EEOC) (No. 551-2020-04009). *See* **Exh. 1**.

16. On January 16, 2021, Mr. Diemert also filed an amended charge of retaliation and discrimination on the basis of race, color, sex, and national origin with the EEOC. *See* **Exh. 2**.

17. On June 30, 2022, Mr. Diemert filed an additional charge with the EEOC (No. 551-2022-05568), detailing additional, continuing acts of discrimination he experienced between December 23, 2020, and September 7, 2021. *See* **Exh. 3**.

18. Mr. Diemert received the Notice of Right to Sue for charge 551-2020-04009 (Notice 04009) on August 19, 2022. The EEOC issued a corrected Notice of Right to Sue on August 22, 2022. *See* **Exh. 4**.

19. Mr. Diemert received the Notice of Right to Sue for charge 551-2022-05568 on November 15, 2022. *See* **Exh. 5**.

20. Mr. Diemert filed his complaint with this Court on November 16, 2022. Therefore, the suit was timely filed within the 90 days allowed from the receipt of both Right to Sue letters.

21. Defendants were served with the complaint on January 17, 2023.

22. Mr. Diemert files this First Amended Complaint as a matter of course on January 19, 2023, and within 21 days after initial service pursuant to Fed. R. Civ. P. 15(a)(1)(A).

23. The City of Seattle received Mr. Diemert's Tort Claim Form on November 14, 2022. *See* **Exh. 6**. Pursuant to RCW 4.96.020, more than sixty calendar days have elapsed.

24. The racially hostile work environment persisted both before and after filing the initial EEOC Charge (No. 551-2020-04009).

25. All required conditions precedent under Title VII (42 U.S.C. § 2000e, *et seq.*) have been exhausted and/or performed by Mr. Diemert before filing this complaint.

///

FACTUAL BACKGROUND

A. Mr. Diemert's Employment with the City of Seattle

26. Plaintiff Joshua Diemert is a former City of Seattle employee. Seattle classifies Mr. Diemert as a white male.

27. Mr. Diemert was hired in January 2013 as a full-time program intake representative in the Human Services Department. He remained in this position from January 2013 until September 2021; the only exception being from 2016 to March 2017, when Mr. Diemert served in a "lead" role in the HSD.

28. Mr. Diemert had been working as a "lead" in HSD since 2014, but he only received a slight pay increase and title change from 2016 until he was forced to resign from the role in March 2017.

29. As he began working, Mr. Diemert was in high demand across several City departments. In 2014, he obtained a "maximum achievement" award. This is awarded to HSD employees whose "performance and efforts have made a noticeable difference to their colleagues, the Department and/or the clients and communities" served.

30. Mr. Diemert was instrumental in creating and developing an electronic database for the City. Afterwards, Mr. Diemert was responsible for interdepartmental and internal training for the new database and served as a liaison between IT and different departments utilizing this database. Mr. Diemert helped launch the Vehicle License Fee Rebate Program and assisted with the creation of an internal rules and policies handbook for the Utility Discount Program. Mr. Diemert also assisted Department Director Jason Johnson (Mr. Johnson) in data gathering and analyzing, preparing reports, as well as other projects for the Mayor's Office. All these tasks and work projects were done in addition to Mr. Diemert's regular job duties and responsibilities.

31. When Mr. Diemert was serving in a "lead" position in HSD in 2016, he repeatedly informed his supervisors that the role of the position had changed and that the amount of work had drastically increased due to new responsibilities created from the new technology being utilized and new city programs that had been created. It was also around this time that Mr. Diemert was managing a chronic medical issue and taking FMLA leave.

32. In or around April of 2017, Mr. Diemert's supervisor Tina Inay (Supervisor Inay) refused to give him any assistance, telling him that he should step down because his FMLA needs conflicted with "business needs."

33. At first, Mr. Diemert did not step down from his "lead" position and told Supervisor Inay that he would not do so. Supervisor Inay berated Mr. Diemert for using his "white privilege" to keep the position and told him he was responsible for denying a "person of color" an opportunity for promotion.

34. As a result of Supervisor Inay's unrelenting coercion and racial harassment, and with Mr. Diemert's own health in the balance, Mr. Diemert stepped down from the "lead" position he valued despite faithfully fulfilling his job duties. On the day that he stepped down, Mr. Diemert met with Brian Sharkey (Mr. Sharkey), the Deputy Director of Human Resources, Finance and Administrative Services, to discuss Ms. Inay's verbal abuse and to sign certain documents. However, Mr. Diemert did not receive any support as Mr. Sharkey supported Supervisor Inay's racial views.

35. Based on the explicit discussions of his race by management, Mr. Diemert was punished for taking FMLA leave because of his race and the City coerced him to resign from his supervisory role in order to fill the "lead" position according to the racially discriminatory objectives of the City's Race and Social Justice Initiative.

36. Moreover, City documents reveal that Mr. Diemert's position was not renewed, and it was terminated before the full expiration of the position. The City then filled the intermittent lead position with an employee that identified as a woman of color and who had significantly less experience than Mr. Diemert. However, Mr. Diemert was still expected to fulfill some of his lead duties as a "subject matter expert," but without the title or pay increase. The City would later replace this intermittent lead. The City also waited until after Mr. Diemert had stepped down to follow his recommendation to divide the work of the intermittent lead position between two people. Not only did the Department promote two people of color with no supervisory experience, Shamsu Said (Mr. Said) and Trinh Nguyen (Ms. Nguyen), but the Department required Mr.

1 Diemert to assist both leads for over a year since neither knew the program rules or how to perform
2 the functions of their new jobs.

3 37. All the aforementioned intermittent leads, including Mr. Said and Ms. Nguyen, were
4 selected over Mr. Diemert because of their race.

5 **B. Seattle's Race and Social Justice Initiative**

6 38. The Race and Social Justice Initiative is a citywide effort that purports to end institutional
7 racism in City government, and to achieve racial equity.

8 39. The Race and Social Justice Initiative is based on the foundational premise that American
9 society has "internalized and normalized" culture and practices that are "rooted in white
10 supremacy, colonialism, classism, Christian hegemony, sexism, heterosexism, physical ableism,
11 mental health oppression, all of the above or other systems of oppression." See **Exh. 7**.

12 40. The RSJI aims to end American culture because it was created by "white, wealthy,
13 Christian, cis-gender, straight, non-disabled men coming from Europe who wanted to protect their
14 place within hierarchy and empire." In its place, it seeks to create a "relational culture" that
15 "interrupt[s] the many overlapping aspects of white supremacy culture." **Id.** Traits such as
16 "individualism," "perfectionism," a "sense of urgency," and "objectivity" are based in "white
17 supremacy culture" and need to be rooted out. See **Id.**

18 41. Moreover, RSJI posits that race is the most important factor, that employees must lead with
19 race, "center People of Color," "de-center whiteness," that all white employees should work at
20 undoing their "whiteness" and "prioritize the leadership of Black, Indigenous, and People of
21 Color ..." See **Exh. 8**.

22 42. RSJI divides people into two main categories, white and "Black, Indigenous and People of
23 Color" (BIPOC), or "oppressor" and "oppressed." City training promotes "BIPOC Affinity
24 Spaces" and encourages the exclusion of "white folks." See **Exhs. 7-8**.

25 43. Since 2005, all City departments have developed and implemented annual RSJI work plans
26 and City employees are encouraged to attend training to look at "program and budget change
27 decisions from a race and social equity perspective." To accomplish this, employees are asked to
28 use a Racial Equity Toolkit.

44. The City's Office for Civil Rights believes that institutionalizing the Racial Equity Toolkit is its "most pressing priority" because it "know[s] that the impacts of racial iniquities cannot be assessed or addressed *without interrupting the color blind ways* departments make decisions." See **Exh. 9** (emphasis added). The City instructs its employees that "colorblindness" is a form of white supremacy and HSD has been at the forefront of implementing these policies.

45. Mr. Diemert experienced severe discrimination and harassment because of the City and HSD's pervasive focus on race and supposed "white supremacy."

C. Mr. Diemert Reported Incidents of Discrimination Prior to Filing His EEOC Charge in 2020

46. Mr. Diemert repeatedly reported incidents of discrimination and objected to discriminatory conduct throughout the entirety of his employment with the City.

47. Mr. Diemert reported discrimination he had experienced from Supervisor Inay and others to Mr. Sharkey, Andi Morales (Ms. Morales), his union representative, HR representatives, as well as other supervisors and managers. His complaints of discrimination were never redressed.

48. For example, in August of 2015, department restructuring led to the Utility Discount Program being included in the Youth and Family Empowerment Division (YFE). Upon introducing himself to YFE Manager Javier Pulido, Mr. Pulido condescendingly asked Mr. Diemert, "what could a straight white male possibly offer our department?" Mr. Diemert informed multiple supervisors and managers of this incident, including Javier Pulido's brother, Supervisor Carlos Pulido.

49. In 2016, Director Gloria Hatcher-Mays (Director Hatcher-Mays) called Mr. Diemert to her office and berated him for attempting to correct co-worker Sabrina Budner's discriminatory behavior towards a white applicant. Director Hatcher-Mays stated that it was impossible to be racist toward "white people." She did not initiate any employment actions against Ms. Budner. Mr. Diemert reported this incident to multiple managers and directors, including his HR representative, but the City took no action. Mr. Diemert also reported this issue in a June 21, 2021, email to Senior Officer Ryan Groce (Senior Officer Groce), Supervisor Chaney Kilpatrick-Goodwill (Supervisor Kilpatrick-Goodwill), and Ron Mirabueno (Mr. Mirabueno).

50. Between March and June of 2017, Mr. Diemert also informed the City's Attorney's Office of the discriminatory acts and unethical practices that occurred in his department. Director Hatcher-Mays filed a discrimination suit against the City, and Mr. Diemert provided information to the City attorneys investigating Director Hatcher-Mays' complaint. Mr. Diemert was asked to keep all emails and documents pertaining to all incidents and was told that the City attorneys would contact him in the future to retrieve them. The lawsuit against the City was dropped and the City's Attorney's Office never contacted Mr. Diemert or elevated his concerns for further investigation.

51. On July 13, 2017, Mr. Diemert informed Supervisor Inay of the "divisive and discriminatory" comments he received from a fellow coworker, Fabiola Arvizu. Mr. Diemert also noted "this is not the first time I have dealt with the increased discrimination in the City," and explained that "the lack of concern for this blatant discrimination from past management and a valid fear of retribution" had led him to believe it is better for him to be silent than to disrupt the "city of Seattle status quo."

52. On November 14, 2018, Mr. Diemert contacted his union representative, Shaun van Eyk (Mr. van Eyk), about the racially hostile work environment he was experiencing and the toll it was taking on his health.

53. Mr. Diemert met with Mr. van Eyk for two hours on November 27, 2018, and discussed many of his concerns in detail. Mr. van Eyk told Mr. Diemert that he would meet with Felicia Caldwell from the Seattle Department of Human Resources about the racially segregated trainings, but Mr. Diemert never received a clear answer to his concerns, which Mr. van Eyk ultimately ignored.

54. On December 4, 2018, Mr. Diemert received an email from Leslea Bowling, a Planning and Development Specialist from the Human Services Department, inviting him to review a meeting agenda for the white caucus, one of the City's racially segregated groups designed for staff members the City classified as "white." Mr. Diemert responded by telling her to remove him from the email list and noted that he found Ms. Bowling's actions to be racially offensive and that he would file harassment charges with the EEOC if she continued.

55. In 2018 or 2019, Mr. Diemert met with a Senior Human Resource Specialist, Ms. Morales for almost two hours and reported his concerns about the toxic environment created by the City through its promotion and enforcement of the RSJI, the effects it had on his health, and possible solutions that could alleviate the hostility in the office. Ms. Morales told Mr. Diemert that she would look into a lateral position change into a different department for him as a solution, but also reminded him that the advancement of RSJI was part of his job responsibilities no matter what department he worked for.

56. In October 2019, Mr. Diemert believed that his team lead, Mr. Said, a City employee, had been misusing the HSD system for personal gain. Mr. Diemert reported the incident to the Mayor's Office Operations Manager, Rodrigo Sanchez (Mr. Sanchez), who then informed Supervisor Kilpatrick-Goodwill about the incident. Mr. Diemert provided them with evidence, but nothing was done to address Mr. Said's actions. Instead, Mr. Sanchez and Supervisor Kilpatrick-Goodwill told Mr. Diemert to keep quiet and to be silent.

57. Shortly after Mr. Diemert reported Mr. Said in November 2019, Mr. Said verbally accosted Mr. Diemert, claiming that he was complicit in the sins of slavery, parroting language promoted in the City's RSJI program. Subsequently, Mr. Said would publicly accost Mr. Diemert in the office.

58. On February 19, 2020, Mr. Said chest bumped Mr. Diemert, got in his face, told him that he had "white privilege," and suggested that Mr. Diemert had racist motives for reporting him. Mr. Said also asserted that Mr. Diemert and his race were to blame for the atrocities in the world, like slavery, segregation, and wealth disparities, and implied that Mr. Said was not responsible for his actions because the "racist" system drove him to commit fraud. Mr. Diemert immediately reported the altercation to the Ethics Department, but the City took no action against Mr. Said.

59. In February 2020, Mr. Diemert met with Director Tanya Kim, where he discussed the unethical and illegal behavior he witnessed during his time at HSD, as well as the City's failure to address incidents when he reported them.

60. Mr. Diemert reported incidents of discrimination and harassment on several occasions to supervisors, coworkers, and other City employees prior to filing his EEOC charges. The City knew

1 Mr. Diemert was experiencing a racially hostile work environment and did not make any serious
2 effort to redress it.

3 61. During employee orientations, the City explains that there are “mandatory reporters,”
4 which it defines as “a person or entity that is obligated to immediately report or investigate claims
5 of harassment, discrimination, retaliation, or misconduct.” See **Exh. 10**. “Management
6 Representatives,” including supervisors, managers, leads, crew chiefs, and directors are all
7 identified as “mandatory reporters.” **Id.** Mr. Diemert alerted supervisors, managers, leads,
8 directors, and fellow coworkers to the discrimination and racial harassment he was experiencing.
9 Moreover, Mr. Diemert continued reporting the discrimination and harassment he experienced
10 after he filed his EEOC charges.

11 **D. Mandatory RSJI Training Created a Racially Hostile Work Environment**

12 62. The Department requires that all employees participate in Race and Social Justice Initiative
13 training that aggressively promotes the concept of “white privilege” and the collective guilt that
14 white employees like Mr. Diemert purportedly bear for societal inequality. See **Exhs. 11 and 12**.

15 63. As a member of the Department, Mr. Diemert’s annual reviews included his supervisor’s
16 assessments of whether Mr. Diemert completed RSJI activities or events.

17 64. As part of his Race and Social Justice Initiative training in 2019, Mr. Diemert attended a
18 two-day “Undoing Institutional Racism” (UIR) workshop. This was hosted by El Centro De La
19 Raza and taught by the People’s Institute for Survival and Beyond.

20 65. The UIR workshop is rooted in critical race theory, and the facilitators at the event stated
21 that “white people are like the devil,” that “racism is in white people’s DNA,” and that “white
22 people are cannibals.”

23 66. When Mr. Diemert objected, the facilitators used their platform to belittle and attack Mr.
24 Diemert. Other coworkers that were present continued the mockery in the workplace and made
25 Mr. Diemert the office pariah. Mr. Diemert’s coworkers called him a “white supremacist.”

26 67. Mr. Diemert’s supervisor, Supervisor Kilpatrick-Goodwill, told him during one of their
27 meetings in 2020 that coworkers were still talking about his comments from the UIR workshop.
28 Coworkers treated Mr. Diemert differently and would call him “racist” and “hateful.”

68. Mr. Diemert's colleagues used their work emails to berate and entertain violence against him, referring to him as "some asshole," the "reincarnation of the people that shot native Americans from trains, rounded up jews for the camps, hunted down gypsies in Europe and runaway slaves in America," noting that it was not worth addressing his concerns because he would "just come back with more stupidity," and that someone should "get a guy to swing by when Josh is in the restroom and beat him bloody."

69. Nor was Mr. Diemert able to avoid discriminatory messaging and harassment once his training requirements were completed. Every meeting, activity, and City summit incorporated RSJI training. The diffused nature of the Race and Social Justice Initiative further ensured that Mr. Diemert had no opportunity for a reprieve from racial harassment.

70. On multiple occasions between 2014 and 2020, Mr. Diemert was forced to play "Privilege Bingo" that divisively singles out employees based on characteristics such as "Christian", "white" and "male" to identify if the employee is privileged compared with other colleagues and the clients they serve. The City believes that employees must "acknowledge" the privileges afforded to them by living in a "white supremacy culture" before they can "acknowledge the impacts of white supremacy."

71. In addition to the formal training, the City pressured Mr. Diemert into participating in team-specific RSJI training, unit RSJI-created training, department RSJI-created training, City-wide RSJI-created training, and external RSJI-created training.

72. For Mr. Diemert to receive HSD's "fully performing" rating and to meet expectations, he was required to participate in all assigned RSJI activities. These would include the additional training added to summits, retreats, unit meetings, or other meetings. To receive a rating of "exceeding expectations," Mr. Diemert was required to embrace RSJI principles and encourage others to participate in training.

73. During a required department retreat, Mr. Diemert was forced to participate in a "racist/anti-racist continuum" line where employees were all asked to stand up and place themselves in a single file line with other co-workers based on how "racist" or "anti-racist" each is in comparison with each other, with one end of the line being "racist" and the other end of the

1 line being “anti-racist.” Employees would move around based on the racial stereotypes promoted
2 by RSJI and get behind or in front of other employees. These types of required exercises caused
3 extreme emotional distress to Mr. Diemert.

4 74. Another example of these additional training sessions was a 2020 “Theory of Change”
5 workshop Mr. Diemert attended, where he was required to evaluate his Department according to
6 the standards described in a document entitled “Characteristics of White Supremacy Culture.” See
7 **Exh. 13 and 14.**

8 75. The City also strongly encouraged Mr. Diemert to participate in race-based affinity groups,
9 caucuses, and employee resource groups at the unit and department levels despite his repeated
10 objections to the exercises and materials.

11 76. For example, Mr. Diemert was invited to attend a discussion on “white racial literacy,”
12 which was “open to all people who identify as white in HSD.” On another occasion, he received
13 an invitation from Owen Kajfasz, a senior data analyst with the City, to a “White Caucus” meeting,
14 which asked attendees to read an article entitled, “White People Are Cowards.”

15 77. The City’s Office for Civil Rights promotes segregated training for City employees. In
16 June 2020, the Office of Civil Rights emailed Mr. Diemert stating that it was hosting a training on
17 “Internalized Racial Superiority,” and that this was “specifically targeted for White employees.”
18 The training focused on examining white employees’ “complicity in the system of white
19 supremacy,” and how white employees “internalize and reinforce” racism. See **Exh. 15.** The goal
20 of the training was to turn these employees into white “accomplices” who would interrupt the
21 “whiteness” that they saw in their colleagues.

22 78. Employees who attempted to attend a training that was not designated for their race would
23 be harassed or reprimanded for their decision.

24 79. In 2018, Mr. Diemert asked to sign up for a training reserved only for people of color. Mr.
25 Diemert’s union representative, Mr. van Eyk, became very agitated and told Mr. Diemert that he
26 should not sign up. Mr. Diemert later discovered emails that suggested that Mr. van Eyk was not
27 interested in genuinely advocating for Mr. Diemert’s concerns, but instead focused on advocating
28

1 for the very discriminatory policies that were harming Mr. Diemert and contributing to his hostile
2 work environment.

3 80. The City's use of race and social justice training came under scrutiny in 2020. On August
4 26, 2020, the United States Department of Justice sent a letter to Seattle's City Attorney regarding
5 public reports that the City had conducted "training sessions for its white employees and
6 employees of color in June 2020," potentially in violation of Title VII of the Civil Rights Act.
7 While DOJ did not reach any conclusions in the letter about whether a violation had occurred, it
8 requested additional information from the City.¹

9 **E. Harassment and Coercion to Participate in Race-Based Affinity Groups**

10 81. In addition to pressuring employees to attend race-based training, the City of Seattle and
11 HSD created and promoted race-specific "affinity groups" or "caucuses." As one City training
12 material notes, "caucuses are times when people of color and white people within an organization
13 meet separately in order to do our different work."

14 82. These groups are focused on "forwarding the City of Seattle's Race and Social Justice
15 Initiative's efforts to eliminate racial disparities and achieve racial equity in Seattle."

16 83. The City expected white employees to join the white affinity group and pressured them to
17 accept that white employees and individuals of European origin are all inherently racist, privileged,
18 powerful, and consciously or unconsciously to blame for systemic racism in the workplace and
19 society due to their "white privilege."

20 84. White caucus groups are expressly "accountable" to the "change team" and to the "Latinx,
21 African Descent, and Asian and Pacific Islander (API) Caucuses."

22 85. In these caucuses Mr. Diemert was encouraged to "work through guilt" that he should bear
23 due to his race.

24 86. Mr. Diemert consistently opposed invitations to join the City of Seattle's "white caucus."
25 Despite expressing his discomfort and communicating how these types of communications and
26 programs were taking a toll on his health, and that he did not want to receive further

27 ¹ [https://www.documentcloud.org/documents/7203169-Seattle-Notice-Ltr-8-26-20-via-
28 Email.html](https://www.documentcloud.org/documents/7203169-Seattle-Notice-Ltr-8-26-20-via-Email.html)

communications from the City's white caucus, he continued to receive communications from the group.

87. City staff never encouraged or told Mr. Diemert that he was allowed to attend any other affinity groups other than the "white caucus," and based on how coworkers were treated if they attempted to attend training for the wrong "race," Mr. Diemert knew that any attempt to attend other affinity groups would result in a reprimand or further harassment.

88. On June 21, 2021, Mr. Diemert sent Senior Officer Groce an email where he explained that he felt that "all of the Race & Social Justice training (RSJ), including the affinity caucuses, are blatantly racist, stereotype people based on superficial characteristics and apply negative attributes to entire groups of people based off the color of their skin." Mr. Diemert expressed his concern about "constantly being bombarded with racially denigrating material on the City of Seattle intranet, splash pages, incoming emails and in material dispersed around the workplace" so that he was not allowed to "just do the work" he was hired to do. In 2021, Mr. Diemert proposed the creation of a non-race-based affinity group that opposes stereotypes. He was told by Senior Officer Groce that he was not authorized to begin work on it and that it would need to support the City's commitment to workforce equity based on the principles of the City's RSJI.

89. In a subsequent email, the HR Director described how Mr. Diemert "requested to start an affinity group that opposes Change Team Values," and that he was told that he "wasn't authorized to move forward based on City business needs." Mr. Diemert also learned that rather than addressing his criticisms of RSJI, Senior Officer Groce apologized to his immediate supervisors for "the potentially harmful things" Mr. Diemert had stated in the email and forwarded his email to Nikki Dias (Ms. Dias), a union representative and political organizer, who suggested that Mr. Diemert was taking "a position that could result in insubordination."

F. Mr. Diemert Experienced Severe and Recurring Stereotyping and Harassment Based on His Race

90. City-approved workshops and affinity groups not only promulgated racist RSJI ideology, but employees in director and supervisory roles over Mr. Diemert also frequently reiterated these same principles. For example, in a 2016 unit meeting, Mr. Johnson, former division director, told

1 staff that “all white people” have “white privilege” and are “racist.” He also noted that it was
2 impossible for black people to be racist, and that white people can never experience racism.

3 91. On another occasion in 2020, Supervisor Kilpatrick-Goodwill, Mr. Diemert’s supervisor
4 and supervisor of HSD’s utility-assistance programs, told Mr. Diemert that it is impossible for one
5 to be racist towards “white people,” that all “white people” are racist, and that “black people”
6 cannot be racist, thereby echoing the same racially hostile messaging disseminated in RSJI training
7 and related workshops.

8 92. Throughout the entirety of his employment, Mr. Diemert also attended meetings where
9 supervisors forced their employees to identify their race and to stand and affirm where they ranked
10 themselves on a defined “continuum of racism.” He felt pressured into conforming to some of
11 these exercises for fear of retaliation and hostility from his supervisors and coworkers.

12 93. The City also disseminated and encouraged racist messaging in emails, lunchroom
13 conversations, meetings, and training. City meetings and summits often started with a
14 proclamation that the land upon which they all stood was stolen by “white people,” who are blamed
15 for legacies of genocide, enslavement, exploitation, displacement, and all other forms of structural
16 violence.

17 94. These attitudes are also present when City employees interact with one another in training
18 and other work contexts. It was commonplace for Mr. Diemert to hear statements like: “HSD is
19 still a white institution,” and that “white people” have to give up “power, priorities, and privilege.”

20 95. Mr. Diemert experienced numerous severe and pervasive incidents of harassment that
21 altered the conditions of his employment and created an abusive working environment.

22 96. In 2017, for example, Mr. Diemert’s co-worker, Consuelo Crow (Ms. Crow), began a
23 discussion in the lunchroom in which she stated that “white people” are to be blamed for “all
24 atrocities” and that the United States was built upon a system of “white supremacy.” She told Mr.
25 Diemert that he was “privileged” and labeled him a “racist” because he favored capitalism. Ms.
26 Crow also said that his words were “violence” and that he was invading her “safe space.”

27 97. This type of discrimination and harassment was regular and routine, often occurring several
28 times a week, and was encouraged by the RSJI framework, programming, and training.

98. In 2020, while Mr. Diemert was attempting to cook his food, a group of co-workers was sitting at one of the few lunchroom tables, openly talking about “white privilege.” The group consisted of Supervisor Kilpatrick-Goodwill, a supervisor from Seattle City Light, Monica Jones, and other co-workers. Mr. Diemert joined their conversation. Members of the group told Mr. Diemert that his response was invalid because he was “white” and “did not have a right to speak about black oppression” and that Mr. Diemert was attempting to discredit their lived experiences with his “white privilege.” They also proceeded to make general disparaging comments about “white people.”

99. In June 2021, Race and Social Justice Lead/Chief Equity Officer Edward Odom (Mr. Odom) shared an article regarding Critical Race Theory (CRT) and laws attempting to ban the teaching of it, drawing specific attention towards the 1921 Tulsa Race Massacre. Mr. Diemert commented on the post that Mr. Odom shared. Mr. Odom responded to Mr. Diemert’s comment by saying that white people like him should feel guilty for atrocities like the Tulsa Race Massacre. Mr. Odom then sent Mr. Diemert an aggressive and condescending email further attacking him for his comments.

100. Mr. Odom shared his criticism of Mr. Diemert with many other senior staff members in the IT Department and elsewhere who disparaged Mr. Diemert in both public and private.

101. This adverse treatment contrasted with the welcoming reception the City demonstrated towards employees that identified as “BIPOC” whenever such employees would share concerns over City articles, resources, and training.

102. Moreover, City documents further reveal that the City was not concerned about Mr. Diemert’s well-being, but it was instead actively investigating Mr. Diemert for no apparent reason, going so far as to assemble a “confidential file” on him.

G. The City’s Discriminatory Conduct Negatively Impacted Mr. Diemert’s Health

103. The hostile work environment created by the City took a heavy toll on Mr. Diemert’s health, to the point that his doctor noted in a December 5, 2018, letter that “a major source of stress for him ... are his cultural sensitivity training classes. These events are causing significant effects on him and are severely detrimental to his health. For the next few months, he needs to be excused

1 from attending these classes.” Mr. Diemert submitted medical documentation to the City to
2 demonstrate the impact his hostile work environment was having on his health, but HSD never
3 honored his doctor’s request to have him excused from RSJI-type training.

4 **H. Blatant Acts of Discrimination Against White Job Applicants and Benefit Seekers**
5 **Are Encouraged and Ignored**

6 104. Between the years of 2015 and 2017, Mr. Diemert regularly participated in interview panels
7 to screen prospective City employees. He was told by Director Hatcher-Mays that he should
8 specifically focus on hiring “black female refugees that speak Farsi.”

9 105. On multiple occasions, upper-level managers told Mr. Diemert and other Department
10 employees that when new jobs become available, particularly in senior roles, they were looking to
11 fill those positions with people of color and that white men should not apply. Acting Director of
12 HSD, Tanya Kim (Acting Director Kim), and former director Mr. Johnson would both encourage
13 City employees to push job openings toward “BIPOC” (Black, Indigenous, and People of Color)
14 communities.

15 106. Mr. Diemert also witnessed HSD’s data gathering in 2018 systematically exclude white
16 people. The Department teamed up with the University of Washington to complete a
17 disaggregation study to assess racial and ethnic subgroups that were underserved. Mr. Diemert
18 noticed that his Department only wanted to break down race and ethnic subgroups for non-white
19 groups. When he asked why they were not considering doing this for white individuals as well,
20 Department staff told him that white people are “privileged” and that there was no reason to
21 subgroup them. Mr. Diemert explained that they had many clients that were extremely poor and
22 would benefit if they were not just stereotyped as white. His department told him that this was not
23 needed because they benefitted by living in a system of “white supremacy.”

24 107. In 2016, Mr. Diemert learned from his subordinates that they had been denying eligible
25 white applicants program benefits solely because of their race.

26 108. Mr. Diemert audited some of the cases and found that his co-worker, Ms. Budner, had
27 denied an eligible white applicant for an assistance program. When Mr. Diemert questioned her
28 about this, she stated that the eligible person was denied because he had “white privilege.”

1 109. Mr. Diemert told Ms. Budner that she was not permitted to process applications in a
2 discriminatory manner. The City took no action against this blatant act of discrimination.

3 110. After the start of the pandemic, and throughout 2020 and 2021, Department leadership and
4 co-workers openly discussed the need to carry out layoffs based on race during Department all-
5 staff video meetings. Mr. Diemert felt denigrated and humiliated, as he had to attend these
6 meetings and listen to Department staff and other City leaders brainstorming how they could lay
7 off white workers, and how this could be done using the Racial Equity Toolkit or the Race and
8 Social Justice Initiative. They discussed how BIPOC employees would be negatively affected
9 under a seniority system, and methods to give BIPOC more “time” so that they could effectively
10 “bump” white employees who had seniority. These types of discussions also occurred in other
11 departments.

12 **I. The City Denied Mr. Diemert Opportunities to Advance Within His Office**
13 **Because of His Race**

14 111. Mr. Johnson, the former division director for homelessness, promised Mr. Diemert that he
15 would eventually see a title change and corresponding pay upgrade, and for Mr. Diemert to not be
16 concerned about working outside of his department.

17 112. Relying on Mr. Johnson’s communication, Mr. Diemert assumed work responsibilities that
18 exceeded the scope of his job title and worked with employees across several City departments.
19 However, despite Mr. Diemert having a positive employment record, receiving an award for his
20 good work, and consistently complying with City policies and procedures, he never received a
21 permanent promotion nor a substantial pay increase during his over eight years as a City employee.

22 113. His lack of promotion was a result of his race and his willingness to question the City’s
23 Race and Social Justice Initiative.

24 114. One specific example of the City denying Mr. Diemert a promotion and recognition that
25 was due to him on account of his race pertains to his work on the “Vehicle License Fee Rebate
26 Program” that occurred sometime in 2015. Former Director Hatcher-Mays had not done the proper
27 hiring or preparation for the program launch in June of 2015. Mr. Diemert worked overtime to
28 help her launch the program and run it. He developed the internal policies for the program. It was

1 supposed to have been staffed with a supervisor, two line workers, an outreach coordinator, and
2 one administrative staff member. Mr. Diemert ended up doing the work for all these positions, and
3 he worked alongside other departments to make the program work.

4 115. Director Hatcher-Mays told the other departments that Mr. Diemert was the supervisor
5 even though he received neither the title nor the corresponding pay increase. As a result of doing
6 the work of six positions, Mr. Diemert was delayed in completing a certain task for the program.
7 This resulted in someone making a complaint to the Customer Service Bureau.

8 116. In August of 2015, Director Hatcher-Mays hired Iris Guzman (Ms. Guzman), a person of
9 color, as a supervisor and had Mr. Diemert train her. Previously, Director Hatcher-Mays had
10 advised Mr. Diemert not to apply for the supervisor position because she was looking for someone
11 who was bilingual and who had contacts within one of the marginalized communities they were
12 targeting. She had also noted that she was planning on expanding the Utility Discount Program
13 supervisor role into two positions, knowing that Mr. Diemert would want to be considered for one
14 of the positions. However, after hiring Ms. Guzman, Director Hatcher-Mays advised Mr. Diemert
15 that there had been a change of plans and there would no longer be a supervisory position for him
16 to vie for. Moreover, even after hiring Ms. Guzman, Director Hatcher-Mays directed Mr. Diemert
17 to continue running the program because Ms. Guzman had no supervising experience.

18 117. Ms. Guzman was chosen over Mr. Diemert for the position because of her race.

19 118. Despite Ms. Guzman's lack of experience and involvement in the project, she still received
20 the pay and title, even though Mr. Diemert continued to perform substantial work. As a result of
21 these conditions, Mr. Diemert eventually communicated that he would no longer do anything in
22 support of the program. Shortly after, he was ordered by Department Director Tiffany Washington
23 to continue in the role, and he was required to work overtime on October 23, 2015, to meet with
24 SDOT and to review and authorize an outgoing email for the VLFR program (a responsibility of
25 the VLFR Program Supervisor, Ms. Guzman). Less than a week later, Mr. Diemert suffered from
26 his first grand mal seizure.

27 119. The City also discriminated against Mr. Diemert when he sought back pay for performing
28 out of class work. When Supervisor Kilpatrick-Goodwill brought her back pay request to the HR

Department, her request was honored. When Mr. Diemert requested back pay, he was told that while the City acknowledged that he performed out of class work, and that he could note this experience on his resume, he would have to hire a lawyer and file a lawsuit in order to obtain any back pay.

J. The Department Required Mr. Diemert to Work Under Mr. Said Despite Mr. Diemert Reporting Mr. Said for Misconduct, and Experiencing Racial Harassment and Discrimination from Him

120. Despite Mr. Said racially harassing Mr. Diemert on several occasions, the City did not offer any solution apart from suggesting Mr. Diemert move away from his preferred workstation. But when Mr. Diemert complained that it would be unfair to punish him for reporting discrimination, Mr. Said was ultimately moved just a few feet away from Mr. Diemert's workstation. The City's investigation into Mr. Said's discriminatory behavior was inadequate and did not include any interviews with any of the employees that had been witnesses.

121. In its report to the EEOC, the City claimed that Mr. Said was no longer Mr. Diemert's supervisor and no longer worked in that office. But this was not true. Following Mr. Said's harassing behavior toward Mr. Diemert, Mr. Said continued to supervise Mr. Diemert directly and evaluate his work product. As a Lead Program Intake Representative (PIR), Mr. Said was in a position of authority and control over Mr. Diemert. Lead PIRs review the work of non-lead PIRs like Mr. Diemert regarding approval into the Utility Discount Program. Supervisor Kilpatrick-Goodwill required Mr. Diemert to include Mr. Said in his emails and report his absences to Mr. Said. Following Mr. Diemert's allegations, Mr. Said's role overseeing Mr. Diemert's work did not change.

122. In April 2020, Marc Mayo (Mr. Mayo), an Ethics and Whistleblower Advisor, Trainer, and Investigator for the City of Seattle Ethics and Elections Commission contacted Mr. Diemert and informed him of the results of the investigation. He told Mr. Diemert that the investigation had determined that while line workers were not allowed to work on cases regarding family members, the rules technically did not apply to those in leadership positions. Mr. Mayo claimed that Mr. Said was exempt from ethical requirements regarding self-dealing because he was in a leadership role.

123. Department management allowed Mr. Said's hostility and discriminatory conduct towards Mr. Diemert to continue. Mr. Said continued to be Mr. Diemert's lead, resulting in Mr. Diemert having to report to the very individual he had turned in for misconduct.

124. Mr. Said was not reprimanded for physically threatening Mr. Diemert or for the racist remarks he made toward Mr. Diemert.

125. Mr. Diemert was disturbed and distressed about the City's inaction against Mr. Said. He decided to go public with his allegations against Mr. Said. On August 31, 2021, Mr. Diemert tried to send an email to his colleagues at the Department, outlining Mr. Said's improprieties and highlighting the City's total inaction. The email to the Department bounced because the City had been monitoring and limiting Mr. Diemert's email privileges in light of his complaints about RSJI. He subsequently sent the email to his unit, which successfully went through.

126. The Ethics Department eventually found that Mr. Diemert's allegations had merit and that Mr. Said's actions were unethical and a violation of City rules.²

127. An administrator in Mr. Diemert's unit, John Fields, Jr., quit over what he saw as the City's prior sham investigation. The City then again attempted to defend and protect Mr. Said from any accountability by requesting administrative dismissal of the complaint against Mr. Said from the Seattle Ethics and Elections Commission because it claimed the offense was "minor." The City misled and minimized Mr. Said's knowledge and involvement with the fraud by characterizing the issue as only a procedural review error, despite Mr. Said being aware that his sister was ineligible for the program, submitting the application on her behalf, and being directly involved in the business as confirmed by business filings with the State of Washington. At its April 6, 2022, meeting, the Commission rejected the request for administrative dismissal and commissioners expressed their discomfort with the effort to dismiss a claim of self-dealing as a "minor" violation.³

128. The City's protection and discriminatory preference for Mr. Said traces back to its Race and Social Justice Initiative.

///

² <http://www.seattlechannel.org/ethics?videoid=x136993> at 12:55–31:15

³ *Id.*

K. The City Placed a RSJI Change Team Member in Charge of the Investigation of Mr. Diemert's Claims of a Hostile Work Environment

129. Mr. Diemert filed his first complaint with the EEOC on December 23, 2020, which was amended in January 2021. The filing of that complaint triggered an internal investigation by the City's Department of Human Resources (SDHR).

130. The SDHR investigation did not constitute a serious effort from the City to investigate Mr. Diemert's claims. The lead investigator assigned to his case, Brandon Kuykendall (Mr. Kuykendall), was an active volunteer and member of a Change Team, one of the many entities specifically tasked with infusing RSJI principles into all City operations. Mr. Diemert felt that this created an unavoidable conflict of interest. As Mr. Diemert explained in an email to Mr. Kuykendall and the head of SDHR, "that means you have someone who is part of my complaint investigating himself while simultaneously involved in the overt racism and discrimination my complaint details." But SDHR refused to appoint a different investigator.

131. Mr. Kuykendall conducted a haphazard investigation and wrote a report that exonerated the Change Team. Mr. Kuykendall wrote the first draft of his report finding no fault even before he completed his investigation and without thoroughly investigating Mr. Diemert's claims. Mr. Kuykendall did not interview key witnesses or take the necessary steps to engage in a thorough investigation. Mr. Kuykendall approached Mr. Diemert's claims with skepticism and hostility and interviewed Senior Officer Groce, Mr. Mirabueno, Mr. Sharkey, and Supervisor Kilpatrick-Goodwill, all of whom had ignored Mr. Diemert's previous reports of discrimination. It is also Mr. Diemert's understanding that Mr. Kuykendall interviewed Casey Tonnelly, the same RSJI trainer that encouraged excluding white employees from work spaces, "decentering whiteness," and who helped prepare the PowerPoint contained in Exh. 8.

132. On August 27, 2021, Mr. Diemert received the final report from Mr. Kuykendall. The incomplete investigation and the inaccurate and one-sided nature of the report once again showed Mr. Diemert that there was no chance that the Department or the City would abandon its relentless RSJI push. To Defendants, Mr. Diemert was merely a member of a disfavored racial group.

L. The City's Treatment of Mr. Diemert Grew Worse After He Filed His EEOC Complaint

133. Mr. Diemert was subject to increasingly adverse treatment after he submitted his EEOC complaint and continued to raise his concerns about the RSJI program in the workplace.

134. In January 2021, Supervisor Kilpatrick-Goodwill retaliated against Mr. Diemert because he had filed his EEOC charge on December 23, 2020, and because he had voiced his objections to the City's RSJI on numerous occasions. In response to Mr. Diemert inquiring about why the inbox for public emails was not being checked and the length of time it was taking for emailed applications to be assigned to staff, Ms. Kilpatrick sent out an email asking, "how many applications does Josh have sitting in the drawer ... what is the oldest date of his applications and delays?" She did not question other employees about the same issue, despite other employees having delayed applications.

135. Mr. Diemert's co-workers confirmed Supervisor Kilpatrick-Goodwill's retaliatory targeting of Mr. Diemert.

136. Mr. Diemert normally met with Supervisor Kilpatrick-Goodwill, his direct supervisor, monthly. In February or March 2020, Mr. Diemert had his usual monthly meeting with Supervisor Kilpatrick-Goodwill and raised his concerns about the racialized training and RSJI material. After that, their monthly meetings became increasingly infrequent. For most of 2021, nearly all of Mr. Diemert's monthly meetings with Supervisor Kilpatrick-Goodwill were canceled even though his other colleagues were having their regular meetings. By August 2021, he had not had a monthly meeting in months and was not receiving any support for his work. For instance, when Mr. Diemert suffered severe tech problems, he received no support from Supervisor Kilpatrick-Goodwill and had to reach out to upper management to get that assistance. He had to spend months getting approval to use the Adobe PDF software even though it was crucial for his day-to-day work.

137. Mr. Diemert also experienced issues with an FMLA request in 2021. In July 2021, the Department of Labor found that the City violated Mr. Diemert's FMLA rights by denying him a reduced work schedule and leave for biannual medical treatment. The DOL report also noted that "Tina Ng-Rudell in Human Resources had caused roadblocks in the employee's ability to be

1 approved for FMLA leave” by giving Mr. Diemert incorrect instructions on how to correct the
2 medical certification submitted on May 5, 2021. The report further noted that the City “did not
3 provide an explanation for why the violations occurred.”

4 138. Mr. Diemert was denied FMLA leave on account of his race and in retaliation for his
5 criticism of the RSJI initiative.

6 139. Throughout 2021, Mr. Diemert continued to tell his supervisors and others that his health
7 was suffering because of the racial harassment that he experienced.

8 140. One of the few things that helped Mr. Diemert continue to carry out his duties despite his
9 concerns was the ability to work from home following the onset of the COVID-19 pandemic. He
10 also felt that being able to work from home was a health necessity given that he was in a high-risk
11 category. But in August 2021, he was informed that due to staffing shortages, the City could no
12 longer accommodate his request to work from home. He came to understand that the decision of
13 whether he would be allowed to work from home would be made using the “equity toolkit” and
14 that “BIPOC” applicants would be given priority to telework over him based on their race. He
15 expressed his concern that “I believe it is becoming quite clear that the disregard for my high risk
16 status is solely because of the color of my skin” and that he felt “like the actions by the City of
17 Seattle are purposeful to ensure I have no other choice but be compelled to quit a job I put my
18 heart and soul into.”

19 141. As a result of the racial discrimination and the hostile work environment Mr. Diemert
20 experienced, he felt compelled to take a constructive discharge from further employment in the
21 City of Seattle rather than endure continued abuse.

22 142. The Defendants forced Mr. Diemert to terminate his employment based upon racial animus
23 and/or retaliatory motive, in violation of Title VII and WLAD. Defendants made Mr. Diemert’s
24 working conditions so intolerable that a reasonable person in his position would feel compelled to
25 quit.

26 143. As Mr. Diemert told Mr. Mayo just a few days before he resigned, “ever since I reported
27 Shamsu to Ethics and filed a charge with the EEOC I have felt like I am being pressured to quit ...
28

the workplace is not conducive to my health, I feel like I am constantly ... on defense from being attacked or discriminated against because the environment is toxic and hostile ...”

CLAIMS FOR RELIEF

COUNT I

(Equal Protection)

144. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 143.

145. “Classifications based on race carry a danger of stigmatic harm,” and can “promote notions of racial inferiority and lead to a politics of racial hostility.” *Richmond v. J.A. Croson Co.*, 488 U.S. 469, 493 (1989).

146. Public employees are entitled under the Equal Protection Clause to be “free of purposeful workplace harassment on the basis of protected status.” *Rodriguez v. Maricopa Cnty. Cmty. Coll. Dist.*, 605 F.3d 703, 707 (9th Cir. 2010).

147. Racial classifications that are motivated by “prejudice or stereotype”—even when narrowly tailored—violate the Equal Protection Clause of the Fourteenth Amendment. *Croson*, 488 U.S. at 493.

148. Defendants treated Plaintiff differently from his colleagues because of his race when they intentionally segregated staff meetings by race, offered and required race-based programming, promoted affinity groups, and maintained a commitment to making racial distinctions among City staff.

149. Defendants treated Plaintiff differently on account of his race throughout the entirety of his employment with the City.

150. Defendants’ discriminatory actions towards Plaintiff do not serve a compelling interest, nor are they narrowly tailored.

151. Defendants’ discriminatory actions violated the Equal Protection Clause of the Fourteenth Amendment.

///

COUNT II

(Hostile Work Environment - Violation of Title VII)

152. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 151.

153. Defendants subjected Plaintiff to severe, pervasive, and objectively offensive racial harassment through mandatory race-based training, segregated staff meetings, encouraging race-based affinity groups, frequent and repeated affirmations by Defendants about the City's commitment to making racial distinctions among City staff through the RSJI, and all the adverse employment actions described above.

154. The harassment Mr. Diemert experienced at the hands of the Defendants was motivated by his race.

155. Mr. Diemert repeatedly expressed his objections not only towards RSJI training, affinity groups, and other racial distinctions made by the City, but also objected to the harassment he experienced from coworkers, thereby clearly communicating that the harassment was unwelcome.

156. The harassment deprived Mr. Diemert of access to adequate professional development, altered the conditions of his employment, and had a systemic effect on the work environment within the City as a whole.

157. During the entirety of Mr. Diemert's employment with the City, he was subjected to race-based messaging and humiliation.

158. Mr. Diemert's career stagnation and lack of promotion because of his race and willingness to object to the race and social justice initiative caused him extreme mental distress.

159. Mr. Diemert had no recourse for resolving the conditions of his hostile work environment.

160. The harassment created an objectively hostile and abusive work environment, which a reasonable person would find hostile or abusive.

161. Mr. Diemert experienced a tremendous amount of stress over the hostile work environment created by the City of Seattle, requiring him not only to take time off from work and to seek counseling but ultimately forcing him to take a constructive discharge from employment with the City of Seattle altogether.

162. Defendants knew of the harassment and were deliberately indifferent to it.

163. The harassment that Mr. Diemert experienced was a direct and foreseeable consequence of the policies and practices adopted by Defendants.

164. The deliberate indifference of the Defendants to the racially hostile environment violated Title VII of the Civil Rights Act.

165. As a direct and proximate cause of Defendants' discriminatory actions, Mr. Diemert suffered lost wages and benefits, emotional distress and mental anguish, humiliation, seizures, and other damages in amounts to be proved at trial.

COUNT III

(Disparate Treatment on the Basis of Race - Violation of Title VII)

166. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 165.

167. Under Title VII, it is unlawful for an employer to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment because of the individual's race.

168. Mr. Diemert is a Caucasian male that was subjected to ongoing harassment and discrimination because of his race in violation of Title VII.

169. Mr. Diemert was qualified to perform the duties of his job.

170. Defendants engaged in unlawful employment practices and discriminated against Mr. Diemert with respect to his compensation, and the terms, conditions, and privileges of his employment with the City.

171. The unlawful employment practices include, but are not limited to, giving similarly situated workers more favorable treatment in work/project assignments, hours, and promotions; requiring Mr. Diemert to attend discriminatory training sessions and promoting specific trainings based on his racial identity; denying Mr. Diemert's request to form a non-race-based affinity group; failing to address Mr. Diemert's discrimination concerns; creating a confidential file about him; subjecting him to increased scrutiny; assigning a member of the change team, Mr. Kuykendall, to investigate his claims of discrimination; interfering with his FMLA rights; denying Mr. Diemert

back pay for out of class work; reducing Mr. Diemert's workload; cancelling his regularly scheduled meetings with his supervisor; delaying the provisions of remote work support; and forcing Mr. Diemert to continue reporting to Mr. Said, a supervisor that had physically accosted and made discriminatory remarks against Mr. Diemert.

172. The effect of these practices, in conjunction with the City's implementation and enforcement of the Race and Social Justice Initiative, singled out Mr. Diemert, deprived him of equal employment opportunities, and otherwise adversely affected his employment status because of his race while similarly situated individuals outside of Mr. Diemert's protected class were treated more favorably.

173. As a direct and proximate result of Defendants' unlawful conduct, Mr. Diemert suffered lost wages and benefits, emotional distress and mental anguish, humiliation, seizures, and other damages in amounts to be proved at trial.

COUNT IV

(Retaliation - Violation of Title VII)

174. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 173.

175. Title VII, 42 U.S.C. § 2000e-3, provides that "it shall be an unlawful employment practice for an employer to discriminate against any of his employees ... because he has opposed any practice made an unlawful employment practice by this subchapter."

176. At all relevant times hereto, Title VII, 42 U.S.C. § 2000e, *et seq.*, was in full force and effect and was binding on Defendants.

177. Title VII required Defendants, and their employees and agents, to refrain from discriminating against any employee because of their race. Mr. Diemert engaged in protected activity when he complained about discrimination and harassment based on race and when he filed his EEOC charges.

178. There was a causal connection between Mr. Diemert's discrimination complaints and the materially adverse actions taken against him by Defendants.

179. In retaliation for Mr. Diemert's complaints, the City subjected Mr. Diemert to increased hostile behavior designed to force him to quit and ultimately leading to his constructive discharge, including, but not limited to, his direct supervisor canceling nearly all of his monthly meetings and ceasing to support him in his work; HR refusing to process Mr. Diemert's FMLA paperwork; attempting to make him do things that were beyond the scope of the law and were explicitly discriminatory towards him until he reported them to the Department of Labor. The DOL subsequently charged the City with 11 violations and forced them to process his FMLA request, and other actions detailed above.

180. There was a causal connection between Mr. Diemert's discrimination complaints and the materially adverse actions taken against him by Defendants.

181. Mr. Diemert had to constantly be on defense, as his work environment became increasingly toxic and hostile. He was forced to continue looking at degrading and racist material disseminated in the office that labeled him a white supremacist. The effect of the practices complained about in Paragraphs 1 through 143 has been to deprive Mr. Diemert of equal employment opportunities and otherwise adversely affected his status as an employee because of his race.

182. The retaliation endured by Mr. Diemert would dissuade a reasonable employee from making complaints of discrimination and harassment.

183. Defendants retaliated against Mr. Diemert for engaging in protected activity in violation of Section 704(a) of Title VII, 42 U.S.C. § 2000e-3(a).

184. As a direct and proximate result of Defendants' unlawful conduct, Mr. Diemert suffered lost wages and benefits, emotional distress and mental anguish, humiliation, seizures, and other damages in amounts to be proved at trial.

COUNT V

(Disparate Treatment on the Basis of Race- Violation of the WLAD)

185. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 184.

186. The WLAD prohibits employers from discriminating against any person in compensation or in other terms or conditions of employment because of race. Mr. Diemert is a Caucasian male

that was subjected to ongoing harassment and discrimination because of his race in violation of the WLAD.

187. Mr. Diemert was qualified to perform the duties of his job.

188. Defendants acted with a discriminatory motive and violated the WLAD because Mr. Diemert's race was a substantial or significant factor in Defendants' actions of subjecting Mr. Diemert to ongoing unlawful employment practices, including, but not limited to, giving similarly situated workers more favorable treatment in work/project assignments, hours, and promotions; requiring Mr. Diemert to attend discriminatory training sessions and promoting specific trainings based on his racial identity; denying Mr. Diemert's request to form a non-race-based affinity group; failing to address Mr. Diemert's discrimination concerns; creating a confidential file about him; subjecting him to increased scrutiny; assigning a member of the change team, Mr. Kuykendall, to investigate his claims of discrimination; interfering with his FMLA rights; denying Mr. Diemert back pay for out of class work reducing Mr. Diemert's workload; cancelling his regularly scheduled meetings with his supervisor; delaying the provisions of remote work support; and forcing Mr. Diemert to continue reporting to Mr. Said, a supervisor that had physically accosted and made discriminatory remarks against Mr. Diemert.

189. As a direct and proximate result of Defendants' unlawful conduct and disparate treatment discrimination in violation of RCW 49.60 *et seq.*, Mr. Diemert suffered lost wages and benefits, emotional distress and mental anguish, humiliation, seizures, and other damages in amounts to be proved at trial.

COUNT VI

(Racially Hostile Work Environment-Violation of the WLAD)

190. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 189.

191. Defendants harassed and discriminated against Mr. Diemert because of his race, subjecting him to a hostile work environment in violation of RCW 49.60.

192. Defendants subjected Plaintiff to severe, pervasive, and objectively offensive racial harassment through mandatory race-based training, segregated staff meetings, encouraging race-

1 based affinity groups, and frequent and repeated affirmations by Defendants about the City's
2 commitment to making racial distinctions among City staff through the RSJI, and other actions.

3 193. Mr. Diemert's race was a substantial factor in the harassment and in all the adverse
4 employment actions the City initiated against him.

5 194. Mr. Diemert repeatedly expressed his objections not only towards RSJI training, affinity
6 groups, and other racial distinctions made by the City, but also objected to the harassment he
7 experienced from coworkers, thereby clearly communicating that the harassment was unwelcome.

8 195. The harassment deprived Mr. Diemert of access to adequate professional development,
9 altered the conditions of his employment, and had a systemic effect on the work environment
10 within the City as a whole.

11 196. During the entirety of Mr. Diemert's employment with the City, he was subjected to race-
12 based messaging and humiliation.

13 197. Mr. Diemert had no recourse for resolving the conditions of his hostile work environment.

14 198. The harassment created an objectively hostile and abusive work environment, which a
15 reasonable person would find hostile or abusive.

16 199. Mr. Diemert experienced a tremendous amount of stress over the hostile work environment
17 created by the City of Seattle, requiring him not only to take time off from work and to seek
18 counseling but ultimately forcing him to take a constructive discharge from his employment with
19 the City of Seattle altogether.

20 200. Mr. Diemert's career stagnation and lack of promotion because of his race and willingness
21 to object to the race and social justice initiative caused him extreme mental distress.

22 201. Defendants participated in and/or knew of the harassment and were deliberately indifferent
23 to it.

24 202. The harassment that Mr. Diemert experienced was a direct and foreseeable consequence of
25 the policies and practices adopted by Defendants.

26 203. Through their actions described above, Defendants have discriminated against Mr. Diemert
27 in compensation or in other terms or conditions of employment because of race, in violation of

28 RCW49.60.030, RCW 49.60.180.

204. As a direct and proximate cause of Defendants' discriminatory actions, Mr. Diemert has suffered and continues to suffer damages for economic losses and emotional distress in an amount to be proved at trial.

COUNT VII

(Retaliation- Violation of the WLAD)

205. Plaintiff hereby realleges and incorporates by reference the allegations contained in Paragraphs 1 through 204.

206. The WLAD prohibits employers from discriminating against any person because he or she has opposed any practice forbidden by the WLAD.

207. By reporting racial harassment described above to Defendants and filing his EEOC charges, Plaintiff opposed practices forbidden by the Washington Law Against Discrimination and engaged in protected activity under RCW 49.60.210.

208. Defendants violated the WLAD because Mr. Diemert's protected activities were a substantial factor in Defendants' actions of subjecting Mr. Diemert to increased hostile behavior designed to force him to quit and ultimately leading to his constructive discharge, including, but not limited to, his direct supervisor canceling nearly all of his monthly meetings and ceasing to support him in his work; HR refusing to process Mr. Diemert's FMLA paperwork; the City attempting to make Mr. Diemert do things that were beyond the scope of the law and were explicitly discriminatory towards him until he reported them to the Department of Labor. The DOL subsequently charged the City with 11 violations and forced them to process his FMLA request, and other actions detailed above.

209. Mr. Diemert had to constantly be on defense, as his work environment became increasingly toxic and hostile. He was forced to continue looking at degrading and racist material disseminated in the office that labeled him a white supremacist. The effect of the practices complained about in Paragraphs 1 through 144 has been to deprive Mr. Diemert of equal employment opportunities and otherwise adversely affected his status as an employee because of his race.

210. Defendants are liable to Plaintiff for unlawful retaliation in violation RCW 49.60.210.

211. There was a causal connection between Mr. Diemert's discrimination complaints and the materially adverse actions taken against him by Defendants. Mr. Diemert's complaints of discrimination were a substantial factor Defendants' retaliation against him.

212. The retaliation endured by Mr. Diemert would dissuade a reasonable employee from making complaints of discrimination and harassment.

213. As a direct and proximate cause of Defendants' unlawful conduct, Mr. Diemert suffered lost wages and benefits, emotional distress and mental anguish, seizures, embarrassment, humiliation, and other damages in amounts to be proved at trial.

RESERVATION OF RIGHTS

214. Plaintiff reserves the right to add, revise, or withdraw any claims, or add additional claims during the course of litigation as information is gained through litigation.

PRAYER FOR RELIEF

Wherefore, the Plaintiff prays for relief as follows:

1. For a declaration that the City of Seattle's acts, policies, practices, and procedures complained of herein violated Plaintiff's rights as secured by the Equal Protection Clause of the Fourteenth Amendment, Title VII of the Civil Rights Act, and the Washington Law Against Discrimination;

2. Enjoin Defendants from discriminating on the basis of race in any aspect of employment or retaliating against employees who complain of discriminatory or unfair employment practices;

3. Retain jurisdiction over this action to assure full compliance with the orders of the Court and with applicable law and require Defendants to file such reports as the Court deems necessary to evaluate compliance;

4. Award Plaintiff all the damages to which he is entitled, including but not limited to all wage loss, emotional distress, special, general, compensatory, and/or other damages pursuant to RCW 49.60, Title VII of the Civil Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e, *et seq.*, 42 U.S.C.A. § 1981a(b)(3), and as otherwise authorized by law;

5. Award Plaintiff pre-litigation interest, in an amount to be proved at trial;

6. Award Plaintiff post-litigation interest on his judgment;

7. Award Plaintiff tax consequences relief as provided by law;
8. Award Plaintiff his reasonable attorneys' fees and costs of litigation as authorized by law;
9. Award Plaintiff such other relief as the Court deems just and proper.

DATED: January 19, 2023.

Respectfully submitted:

PACIFIC LEGAL FOUNDATION

s/ Brian T. Hodges

BRIAN T. HODGES, WSBA # 31976
1425 Broadway, # 429
Seattle, Washington 98122
Telephone: (425) 576-0484
Fax: (916) 419-7747
BHodges@pacificlegal.org

s/ Laura M. D'Agostino

LAURA M. D'AGOSTINO
Virginia Bar # 91556 *
3100 Clarendon Blvd., Suite 1000
Arlington, Virginia 22201
Telephone: (916) 503-9010
Fax: (916) 419-7747
LDAgostino@pacificlegal.org

s/ Andrew R. Quinio

ANDREW R. QUINIO
California Bar # 288101 *
555 Capitol Mall, Suite 1290
Sacramento, California 95814
Telephone: (916) 419-7111
Fax: (916) 419-7747
AQuinio@pacificlegal.org

* Pro hac vice

Counsel for Plaintiff

EXHIBIT - 1

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 551-2020-04009	
WASHINGTON STATE HUMAN RIGHTS COMMISSION and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) MR. JOSHUA A DIEMERT		Home Phone (425) 591-6719	Year of Birth
Street Address City, State and ZIP Code 27517 156TH AVE SE, KENT, WA 98042			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name CITY OF SEATTLE		No. Employees, Members 501+	Phone No.
Street Address City, State and ZIP Code 700 5TH AVE SUITE 5400, SEATTLE, WA 98104			
Name		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input checked="" type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 12-01-2019 12-16-2020 <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I began working for Respondent on or around the beginning of January 2013 as a Program Intake Representative. I have satisfactorily performed my duties and have been presented awards for my work. Since several years ago, the City of Seattle implemented the Race and Social Justice Initiative (RSJI) which is based on Critical Race Theory. It mandates that I take mandatory training sessions that degrade, stereotype and demean people based on inherent identities and national origin. The trainings blanket and stereotype entire groups of people based solely on race. Examples of definitions taught in class are 'ALL white people are born white supremacist racists non-dependent of their actions (inherently white supremacist)'. They teach the definition that 'white supremacy is American culture' or 'Capitalism' which they define as 'white culture'. Employees that disagree are called racist, and trainers say the 'defensiveness is evidence of being a white supremacist'. They also define employees who are perfectionists and always strive to be better as white supremacists declaring 'perfectionism is a trait of white supremacy'. They instruct white employees not to apply for promotions, they advise white employees to atone for their whiteness and give up resources			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct. Digitally signed by Joshua Diemert on 12-23-2020 07:17 PM EST		NOTARY - When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):
☐ FEPA
☒ EEOC **551-2020-04009**

WASHINGTON STATE HUMAN RIGHTS COMMISSION

and EEOC

State or local Agency, if any

to 'People of Color' and encourage trauma asking white employees to self-degrade themselves. Some of the trainings are segregated by race with specific racial prerequisites stating employees are not permitted to attend any training sessions outside of their identified racial group. This is hurtful to see. City management also encourages employees to take what they learn in the biased trainings based on CRT and apply it to their work. We were asked to 'look at our work thru the lense of race'. I've seen this lead to employees taking action and denying eligible applicants for benefits due to skin color because they had 'white privilege'. When I reported this to my manager at the time I was reprimanded by her for saying the action was racist because 'you can't be racist towards a white person'. No action was taken on the employees denying people because of their skin color and the incident was never elevated which makes me, and others, perceive this behavior as acceptable to the city. I reported this incident multiple times to multiple people and nothing was ever done. The trainings have led to a hostile work environment and an increase in open discrimination including comments and actions. I've been told to be quiet in meetings or that I couldn't offer insight because of my sex or color of skin. Racist emails, stereotypes and discriminatory material is regularly posted in the workplace, discussed openly and passed around in emails. It's normal for superiors to tell their subordinates that they have privilege or are racist based solely on their skin color. For example, my Department Director told me that all white people are racist in a meeting when he was reporting back to my unit on a (RSJI) training he had attended and wanted us to know about. He also made other accusations that stereotyped entire groups of people based solely by race. In the Winter of 2020 I was told by a Senior level employee, whom also overseas my work, that I have white privilege and that I am responsible for the plight of black Americans because I'm white and white people did all the slavery. My opposition to the biased trainings has been affecting the terms and conditions of my employment. Trainings are mandated and are a part of our work performance reviews and overall job performance records. When I don't take classes, I receive a low-performance evaluation for refusing to attend the training. I have repeatedly expressed my opinion that the trainings are racist, divisive and demeaning to all levels of management, HR and Union leaders but my concerns about the demeaning material have never been addressed. I have also been subjected to harassment by management within the city. For example, after departments were merged I was asked by a manager 'what a straight white cis-male could possibly offer the HSD (City of Seattle)'. Furthermore, due to all of the harassment, hostile work environment, disparate treatment, and unfair terms and conditions of employment subjected by Respondent, my health has degraded, and my conditions worsened. My neurologist believes that the mandatory RSJI trainings have a direct negative effect on my mental and physical health and has exacerbated health issues. I am forced to take intermittent leave of absence due to poor health exacerbated by my hostile work environment. I believe I have been discriminated against because of my sex (male), race (Caucasian), national origin (American, USA Citizen), color (white) and retaliated for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

**Digitally signed by Joshua Diemert on 12-23-2020
07:17 PM EST**

NOTARY - *When necessary for State and Local Agency Requirements*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. FORM NUMBER/TITLE/DATE. EEOC Form 5, Charge of Discrimination (11/09).

2. AUTHORITY. 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.

3. PRINCIPAL PURPOSES. The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.

4. ROUTINE USES. This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.

5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION. Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an

investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

EXHIBIT - 2

EEOC Form 5 (11/09)

AMENDED CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC 551-2020-04009	
WASHINGTON STATE HUMAN RIGHTS COMMISSION and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) MR. JOSHUA A DIEMERT		Home Phone (425) 591-6719	Year of Birth
Street Address City, State and ZIP Code 27517 156TH AVE SE, KENT, WA 98042			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name CITY OF SEATTLE		No. Employees, Members 501+	Phone No.
Street Address City, State and ZIP Code 700 5TH AVE SUITE 5400, SEATTLE, WA 98104			
Name		No. Employees, Members	Phone No.
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input checked="" type="checkbox"/> RACE <input checked="" type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 12-01-2019 12-16-2020 <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): I began working for Respondent on or around the beginning of January 2013 as a Program Intake Representative. I have satisfactorily performed my duties and have been presented awards for my work. Since several years ago, the City of Seattle implemented the Race and Social Justice Initiative (RSJI) which is based on Critical Race Theory. It mandates that I take mandatory training sessions that degrade, stereotype and demean people based on inherent identities and national origin. The trainings blanket and stereotype entire groups of people based solely on race. Examples of definitions taught in class are 'ALL white people are born white supremacist racists non-dependent of their actions (inherently white supremacist)'. They teach the definition that 'white supremacy is American culture' or 'Capitalism' which they define as 'white culture'. Employees that disagree are called racist, and trainers say the 'defensiveness is evidence of being a white supremacist'. They also define employees who are perfectionists and always strive to be better as white supremacists declaring 'perfectionism is a trait of white supremacy'. They instruct white employees not to apply for promotions, they advise white employees to atone for their whiteness and give up resources			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
Digitally signed by Joshua Diemert on 01-16-2021 02:05 PM EST		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/09)

AMENDED CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA

☒ EEOC **551-2020-04009**

WASHINGTON STATE HUMAN RIGHTS COMMISSION

and EEOC

State or local Agency, if any

to 'People of Color' and encourage trauma asking white employees to self-degrade themselves. Some of the trainings are segregated by race with specific racial prerequisites stating employees are not permitted to attend any training sessions outside of their identified racial group. This is hurtful to see. City management also encourages employees to take what they learn in the biased trainings based on CRT and apply it to their work. We were asked to 'look at our work thru the lense of race'. I've seen this lead to employees taking action and denying eligible applicants for benefits due to skin color because they had 'white privilege'. When I reported this to my manager at the time I was reprimanded by her for saying the action was racist because 'you can't be racist towards a white person'. No action was taken on the employees denying people because of their skin color and the incident was never elevated which makes me, and others, perceive this behavior as acceptable to the city. I reported this incident multiple times to multiple people and nothing was ever done. The trainings have led to a hostile work environment and an increase in open discrimination including comments and actions. I've been told to be quiet in meetings or that I couldn't offer insight because of my sex or color of skin. Racist emails, stereotypes and discriminatory material is regularly posted in the workplace, discussed openly and passed around in emails. It's normal for superiors to tell their subordinates that they have privilege or are racist based solely on their skin color. For example, my Department Director told me that all white people are racist in a meeting when he was reporting back to my unit on a (RSJI) training he had attended and wanted us to know about. He also made other accusations that stereotyped entire groups of people based solely by race. In the Winter of 2020 I was told by a Senior level employee, whom also overseas my work, that I have white privilege and that I am responsible for the plight of black Americans because I'm white and white people did all the slavery. My opposition to the biased trainings has been affecting the terms and conditions of my employment. Trainings are mandated and are a part of our work performance reviews and overall job performance records. When I don't take classes, I receive a low-performance evaluation for refusing to attend the training. I have repeatedly expressed my opinion that the trainings are racist, divisive and demeaning to all levels of management, HR and Union leaders but my concerns about the demeaning material have never been addressed. I have also been subjected to harassment by management within the city. For example, after departments were merged I was asked by a manager 'what a straight white cis-male could possibly offer the HSD (City of Seattle)'. Furthermore, due to all of the harassment, hostile work environment, disparate treatment, and unfair terms and conditions of employment subjected by Respondent, my health has degraded, and my conditions worsened. My neurologist believes that the mandatory RSJI trainings have a direct negative effect on my mental and physical health and has exacerbated health issues. I am forced to take intermittent leave of absence due to poor health exacerbated by my hostile work environment. I believe I have been discriminated against because of my sex (male), race (Caucasian), national origin (American, USA Citizen), color (white) and retaliated for engaging in protected activity, in violation of Title VII of the Civil Rights Act of 1964, as amended. I believe a class has similarly been discriminated against, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

**Digitally signed by Joshua Diemert on 01-16-2021
02:05 PM EST**

NOTARY - *When necessary for State and Local Agency Requirements*

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. FORM NUMBER/TITLE/DATE. EEOC Form 5, Charge of Discrimination (11/09).

2. AUTHORITY. 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.

3. PRINCIPAL PURPOSES. The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.

4. ROUTINE USES. This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.

5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION. Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an

investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

EXHIBIT - 3

EEOC Form 5 (11-09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> EEOC 551-2022-05568 </div> <div style="display: flex; justify-content: space-between;"> FEPA </div>	
Washington State Human Rights Commission and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) Mr. Joshua A. Diemert		Home Phone <div style="background-color: black; width: 100px; height: 1.2em;"></div>	Year of Birth
Street Address <div style="background-color: black; width: 150px; height: 1.2em;"></div> GRAND SALINE, TX 75140			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others (If more than two, list under PARTICULARS below.)			
Name CITY OF SEATTLE		No. Employees, Members 201 - 500 Employees	Phone No.
Street Address 610 5TH AVE SEATTLE, WA 98104			
Name 		No. Employees, Members 	Phone No.
Street Address City, State and ZIP Code 			
DISCRIMINATION BASED ON Disability, National Origin, Race, Retaliation, Sex		DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> Farthest 12/23/2020 Latest 09/07/2021 </div>	
THE PARTICULARS ARE: (If additional paper is needed, attach extra sheets.) I began working for the City of Seattle (hereafter Respondent), in or around January 2013, and most recently worked as a Program Intake Representative. Over the course of my employment with Respondent, I have been subjected to discrimination and retaliation for engaging in protected activity, including for my EEOC Charge filed December 23, 2020. After I filed my EEOC Charge, Respondent left me under the supervision of a supervisor, Shamsu Said, who I had reported for improper conduct in 2020 and 2021. Moreover, this is the same supervisor that lashed out at me based on my race. On one occasion, Mr. Said physically accosted me. He chest-bumped me, got in my face, told me I had white privilege, and said that I and my race were to blame for the atrocities in the world like slavery and segregation. I reported this to Respondent's Ethics Department, but nothing was done to address this behavior. Respondent condoned Mr. Said's conduct by featuring him in promotional materials and never holding him accountable for his discriminatory behavior. On or around January 2021, Respondent, including Steven Zwerin, Director of the Human Resources Investigations Unit, let Brandon Kuykendall, a member of the Race and Social Justice Initiative (RSJI) change team, the group tasked with implementing RSJI, lead a sham investigation into my complaints regarding the racially discriminatory consequences of RSJI. On or around August 2021, Respondent, including Ryan Groce, a senior officer in the Human Services Department, refused my request to create a non-race-based			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NO FEAR When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct. Digitally Signed By: Mr. Joshua A. Diemert 06/30/2022 <div style="text-align: center;"><i>Charging Party Signature</i></div>		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/09)

<p align="center">CHARGE OF DISCRIMINATION</p> <p align="center">This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</p>	<p>Charge Presented To: Agency(ies) Charge No(s):</p> <p align="center">EEOC 551-2022-05568</p> <p align="center">FEPA</p>
<p align="center">Washington State Human Rights Commission and EEOC</p> <p align="center"><i>State or local Agency, if any</i></p>	

affinity group as an alternative to its racist affinity groups. I experienced increasing hostility and adverse employment conditions because of my opposition to RSJI and willingness to speak out. In January 2021, my supervisor, Chaney Kilpatrick-Goodwill, increasingly scrutinized my performance and responded with hostility when I raised concerns about the processing of program claims. In June 2021, Chief Equity Officer Edward Odom, and others, treated me with hostility after I responded to a post on Sharepoint. Respondent, including HR Director Terry McLellan, kept a confidential folder about me and considered an investigation of me for my social media posts exposing Respondents RSJI program. My monthly meetings with Kilpatrick-Goodwill became less frequent compared with my colleagues since I raised concerns to her regarding RSJI in February or March of 2020, which culminated in no monthly meetings for most of 2021 and receiving no support after August 2021. In May 2021, Respondent improperly attempted to block me from utilizing FMLA leave, which I had used for several years previously for my disability. Respondent, including Kilpatrick-Goodwill, Groce, and others ignored the impact that racial discrimination had on my emotional and physical well-being in 2021. In accordance with RSJI principles and sentiment, departmental and Respondents leadership promoted race-based layoffs for Respondents workers because they claimed that using merit would be inequitable. On or about September 7, 2021, I was forced to resign my employment as a result of Respondents ongoing and worsening discriminatorily hostile conduct and intolerable work conditions, as described in the events above and those in my prior EEOC complaint (No. 551-2020-04009), over which I felt I had no choice but to resign my employment. Respondent continued to retaliate against me after my constructive discharge/involuntary resignation by refusing for almost a year to provide me with the proof of the length of my employment that I need to submit to the federal government to receive public interest employee debt forgiveness for my student loans. Respondent explicitly denigrates employees who identify as straight, White, American-born, Christian males through their policies, trainings, and communications. In particular, the Respondents RSJI, a discriminatory program that all departments in the city are required to implement, is the cause of the events above. RSJI promotes notions such as white privilege and the collective guilt I allegedly bear for societal inequality because of my skin color. Anti-white talk is normalized by Respondent and occurs regularly. Respondent mandated my participation in RSJI-related programs and trainings, and RSJI forms the foundation of the Respondents discrimination and hostility towards me. I believe I have been discriminated against in retaliation for engaging in protected activity (prior EEOC charge, filed December 23, 2020), and subjected to a discriminatorily hostile work environment based on my race (White), national origin (American), sex (male), disability, and/or in retaliation for engaging in protected activity in violation of Title VII of the Civil Rights Act of 1964, as amended and the Americans with Disabilities Act of 1990, as amended.

<p>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p>	<p>NOTARY <i>When necessary for State and Local Agency Requirements</i></p>
<p>I declare under penalty of perjury that the above is true and correct.</p> <p>Digitally Signed By: Mr. Joshua A. Diemert</p> <p>06/30/2022</p> <p align="center"><i>Charging Party Signature</i></p>	<p>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</p> <p>SIGNATURE OF COMPLAINANT</p> <p>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE</p> <p align="center"><i>(month day year)</i></p>

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

EXHIBIT - 4



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Los Angeles District Office
255 East Temple St. 4th Floor
Los Angeles, CA 90012
(213) 785-3090
Website www.eeoc.gov

DISMISSAL AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 08/19/2022

To: Mr. Joshua A. Diemert

██████████
Grand Saline, TX 75140

Charge No: 551-2020-04009

EEOC Representative and email: Anita Ramos
Federal Investigator
anita.ramos@eeoc.gov

DISMISSAL OF CHARGE

The EEOC has granted your request that the agency issue a Notice of Right to Sue, where it is unlikely that EEOC will be able to complete its investigation within 180 days from the date the charge was filed.

The EEOC is terminating its processing of this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 551-2020-04009.

On behalf of the Commission,

Digitally Signed By Christine Park-Gonzalez
08/19/2022

Christine Park-Gonzalez
Acting District Director

Cc:

Ray D Sugarman
CITY OF SEATTLE
700 5th Ave Ste 5400
Seattle, WA 98104

Andrew Quinio
Pacific Legal Foundation
555 Capitol Mall, Suite 1290
Sacramento, CA 95814

Please retain this notice for your records.

Enclosure with EEOC Notice of Closure and Rights (01/22)

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

(This information relates to filing suit in Federal or State court under Federal law. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)

IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive this Notice**. Receipt generally means the date when you (or your representative) opened this email or mail. You should **keep a record of the date you received this notice**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving it (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of this Notice **and** within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

ATTORNEY REPRESENTATION

For information about locating an attorney to represent you, go to:
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS

There are two ways to request a charge file: 1) a FOIA Request or 2) a Section 83 request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of this notice, please submit your request for the charge file promptly to allow sufficient time for EEOC to respond and for your review. Submit a signed written request stating it is a "FOIA Request" or a "Section 83 Request" for Charge Number 551-2020-04009 to the District Director at Christine Park-Gonzalez, 255 East Temple St 4th Floor

Los Angeles, CA 90012.

You can also make a FOIA request online at <https://eeoc.arkcase.com/foia/portal/login>.

Enclosure with EEOC Notice of Closure and Rights (01/22)

You may request the charge file up to 90 days after receiving this Notice of Right to Sue. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA Requests and Section 83 Requests, go to:

<https://www.eeoc.gov/eeoc/foia/index.cfm>.



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Los Angeles District Office
255 East Temple St, 4th Floor
Los Angeles, CA 90012
(213) 785-3090
Website www.eeoc.gov

DISMISSAL AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161 & 161-A)

Issued On: 08/22/2022

To: Mr. Joshua A. Diemert

Grand Saline, TX 75140

Charge No: 551-2020-04009

EEOC Representative and email: Anita Ramos
Federal Investigator
anita.ramos@eeoc.gov

DISMISSAL OF CHARGE

The EEOC has granted your request for a Notice of Right to Sue, and more than 180 days have passed since the filing of this charge.

The EEOC is terminating its processing of this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign-in to the EEOC Public Portal and upload the court complaint to charge 551-2020-04009.

On behalf of the Commission.

Digitally Signed By Christine Park-Gonzalez
08/22/2022

Christine Park-Gonzalez
Acting District Director

Cc:

Ray D Sugarman
CITY OF SEATTLE
700 5th Ave Ste 5400
Seattle, WA 98104

Andrew Quinio
Pacific Legal Foundation
555 Capitol Mall, Suite 1290
Sacramento, CA 95814

Please retain this notice for your records.

Enclosure with EEOC Notice of Closure and Rights (01/22)

**INFORMATION RELATED TO FILING SUIT
UNDER THE LAWS ENFORCED BY THE EEOC**

(This information relates to filing suit in Federal or State court under Federal law. If you also plan to sue claiming violations of State law, please be aware that time limits may be shorter and other provisions of State law may be different than those described below.)

IMPORTANT TIME LIMITS – 90 DAYS TO FILE A LAWSUIT

If you choose to file a lawsuit against the respondent(s) named in the charge of discrimination, you must file a complaint in court **within 90 days of the date you receive this Notice**. Receipt generally means the date when you (or your representative) opened this email or mail. You should **keep a record of the date you received this notice**. Once this 90-day period has passed, your right to sue based on the charge referred to in this Notice will be lost. If you intend to consult an attorney, you should do so promptly. Give your attorney a copy of this Notice, and the record of your receiving it (email or envelope).

If your lawsuit includes a claim under the Equal Pay Act (EPA), you must file your complaint in court within 2 years (3 years for willful violations) of the date you did not receive equal pay. This time limit for filing an EPA lawsuit is separate from the 90-day filing period under Title VII, the ADA, GINA or the ADEA referred to above. Therefore, if you also plan to sue under Title VII, the ADA, GINA or the ADEA, in addition to suing on the EPA claim, your lawsuit must be filed within 90 days of this Notice and within the 2- or 3-year EPA period.

Your lawsuit may be filed in U.S. District Court or a State court of competent jurisdiction. Whether you file in Federal or State court is a matter for you to decide after talking to your attorney. You must file a "complaint" that contains a short statement of the facts of your case which shows that you are entitled to relief. Filing this Notice is not enough. For more information about filing a lawsuit, go to <https://www.eeoc.gov/employees/lawsuit.cfm>.

ATTORNEY REPRESENTATION

For information about locating an attorney to represent you, go to:
<https://www.eeoc.gov/employees/lawsuit.cfm>.

In very limited circumstances, a U.S. District Court may appoint an attorney to represent individuals who demonstrate that they are financially unable to afford an attorney.

HOW TO REQUEST YOUR CHARGE FILE AND 90-DAY TIME LIMIT FOR REQUESTS

There are two ways to request a charge file: 1) a FOIA Request or 2) a Section 83 request. You may request your charge file under either or both procedures. EEOC can generally respond to Section 83 requests more promptly than FOIA requests.

Since a lawsuit must be filed within 90 days of this notice, please submit your request for the charge file promptly to allow sufficient time for EEOC to respond and for your review. Submit a signed written request stating it is a "FOIA Request" or a "Section 83 Request" for Charge Number 551-2020-04009 to the District Director at Christine Park-Gonzalez, 255 East Temple St 4th Floor

Los Angeles, CA 90012.

You can also make a FOIA request online at <https://eeoc.arkcase.com/foia/portal/login>.

Enclosure with EEOC Notice of Closure and Rights (01/22)

You may request the charge file up to 90 days after receiving this Notice of Right to Sue. After the 90 days have passed, you may request the charge file only if you have filed a lawsuit in court and provide a copy of the court complaint to EEOC.

For more information on submitting FOIA Requests and Section 83 Requests, go to:
<https://www.eeoc.gov/eeoc/foia/index.cfm>.

EXHIBIT - 5

EEOC Form 161-B (01/2022)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: Mr. Joshua A. Diemert
[REDACTED]
GRAND SALINE, TX 75140

From: Los Angeles District Office
255 East Temple St, 4th Floor
Los Angeles, CA 90012

EEOC Charge No.
551-2022-05568

EEOC Representative
Patricia Kane,
Enforcement Manager

Telephone No.
(213) 785-3021

(See also the additional information enclosed with this form.)

NOTICE TO THE PERSON AGGRIEVED:

Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA): This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA must be filed in a federal or state court **WITHIN 90 DAYS** of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Less than 180 days have elapsed since the filing date. I certify that the Commission's processing of this charge will not be completed within 180 days from the filing date.

The EEOC is terminating its processing of this charge.

Equal Pay Act (EPA): You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

Digitally Signed By Christine Park-Gonzalez/
11/15/2022

Enclosures(s)

Christine Park-Gonzalez
Acting District Director

cc: Tamara Gerrard
City of Seattle
701 5TH AVE STE 2050
Seattle, WA 98104
Terry McLellan
City of Seattle
700 5TH AVE STE 5800
Seattle, WA 98104
Ryan D Groce
City of Seattle
700 5TH AVE STE 5800
Seattle, WA 98104
Kimberly Loving
kimberly.loving5@Seattle.gov

Andrew Quinio
aquinio@pacificlegal.org

EXHIBIT - 6

Tracking Number:

70212720000226029154



Copy



Add to Informed Delivery

Latest Update

Your item has been delivered and is available at a PO Box at 2:46 pm on November 14, 2022 in SEATTLE, WA 98124.

Get More Out of USPS Tracking:



USPS Tracking Plus®



Delivered

Delivered, PO Box

SEATTLE, WA 98124

November 14, 2022, 2:46 pm

[See All Tracking History](#)

Delivery Section	
Signature	DRB
City	Daniel Brown
Address	City of Seattle

Enter up to 35 items separated by commas.

EXHIBIT - 7



BUILDING A RELATIONAL CULTURE

Adapted for the City of Seattle Race and Social Justice Initiative in collaboration with Our Bodhi Project (www.OurBodhiProject.com) from White Supremacy Culture by Kenneth Jones and Tema Okun (ChangeWork, 2001), Antidotes for Taking Down White Supremacy Culture by IfNotNow (ifnotnowmovement.org) and the People's Institute for Survival and Beyond (www.pisab.org)

See also the updated website on White Supremacy Culture by Tema Okun (<https://www.whitesupremacyculture.info>)

Transformation and culture shift begin with us. The culture that has been internalized and normalized by organizations throughout our U.S. society – from government to non-profits and even some grass roots organizations – was created by white, wealthy, Christian, cis-gender, straight, non-disabled men coming from Europe who wanted to protect their place within hierarchy and empire. Because of that, particular patterns in our organizational cultures are rooted in white supremacy, colonialism, classism, Christian hegemony, sexism, heterosexism, physical ableism, mental health oppression, all of the above or other systems of oppression. These are the systems that those early creators of organizations of all kinds, including government and non-profits, depended on to maintain their power over resources, other people, and the planet, and dominate society.

These patterns exist today within our institutions and organizations as norms, behaviors and practices that are consciously or unconsciously valued even as they disconnect us from the resilient and liberatory ways of being and doing that our many diverse human cultures have relied on to thrive for millennia. These patterns are so woven into the culture of our organizations and so tied to notions of success and the ability to survive that all of us, regardless of our agent and target positionalities, have learned to perform and perpetuate them in order to “achieve” and “succeed,” or to merely survive. **By recognizing and learning to interrupt these patterns in a holistic way – within ourselves, within our teams and throughout our organizations – we can create a relational culture that is fertile soil for our collective care, health, wellbeing, creativity, power and coliberation.** A soil that supports the reality of the interdependence of all living systems. A soil that allows us to truly be servants of the public good.

Those who are most targeted by white supremacy and those who have the least positional authority are often those who end up having to – and often are expected to – carry out the labor (emotional, physical, intellectual, spiritual) of interrupting these patterns that directly harm them. There is a greater risk of harm associated with interrupting these patterns for Black, Indigenous and People of Color (BIPOC), especially those living other targeted identities (women, transgender or gender expansive people, LGBTQIA+ people, disabled people, low-income people, immigrants, non-Christians, etc.) and those with less decision-making power and influence within an organization. It's also important to remember that white people, non-trans men, straight people, able-bodied people and others who hold agent positionalities and who name manifestations of white supremacy and advocate for relational culture are

often also labeled as “not a team player” or “confrontational” and sometimes marginalized or pushed out of positions of influence. There is therefore a great need for people with positional authority to create environments and accountable relationships that promote interruption by all people, including those who hold agent identities and/or have hierarchical positional power. All of this is required to cultivate and sustain a relational culture.

Relational culture practices are essential to interrupting the many overlapping aspects of white supremacy culture in ways that allow us to be with honest truths, tension, conflict, disconnection, pain, possibility, care and change. So that we can take action, together.

Use this resource for reflection and action, a guide toward building practices for ourselves, on our teams and across our organizations that create changes that are part of a larger movement that’s committed to liberation for all. **Each manifestation of relational culture contains practices that can serve as “antidotes” to counter the dominance of the corresponding manifestations of white supremacy culture at the expense of a culture that promotes racial equity, social justice and belonging.** These lists are not comprehensive. You are encouraged to add and edit, drawing from your own experiences.

There may be aspects of the manifestations of white supremacy culture that are useful in a particular context. For example, the “Sense of Urgency” manifestation mentions the prioritization of timelines and deadlines over relational aspects of a process. Timelines and deadlines can be useful in moving forward work designed to eliminate harms and meet the needs of those impacted by multiple forms of systemic oppression. The intention is not to create an either/or situation, where we either completely disregard the value of timelines and deadlines or we are “bad” if we tend to timelines and deadlines. Rather, the intention is to counter the existing and potential harmful impacts of over-emphasizing timelines and deadlines at the expense of humans and other living systems, especially those most impacted by the inequities and harm we’re trying to address. We do this by living into the practices described in “Spaciousness, Flexibility & Planning,” the aspect of Relational Culture offered to help orient us back toward a culture that supports racial equity, social justice and belonging.

You are also invited to note how your awareness and ideas for action shift and grow as you practice using the [Our Bodhi Project Frame](#) and its five primary guideposts: Beloved, Bestill, Behold, Believe, and Becoming. The Our Bodhi Project Frame calls for centering collective health, coliberation, and belonging throughout the culture of our organizations. These elements are part and parcel of relational culture.

Manifestations of Relational Culture Reinforce power with	Manifestations of White Supremacy Culture Reinforce power over
Embodiment & Interconnection <ul style="list-style-type: none"> Focus on interconnection of mind, body, emotion, spirit and inner life (of individuals and communities). 	Disembodiment & Disconnection <ul style="list-style-type: none"> Focus on intellect (head) and ignoring or de-emphasizing body, emotion, spirit and inner life (of individuals and communities). De-spiritualized.

<ul style="list-style-type: none"> • Emphasize and integrate arts, culture, mindfulness, and body-based learning and knowing as natural and necessary aspects of processes and experiences of all kinds; treat these as fundamental parts of a healthy whole. Treat all experiences as opportunities for “collective care” and directly contributing to the whole. • Promote the narrative that embodiment and interconnection are truths about how humans connect, communicate and make meaning, and therefore exist and belong in all spaces, institutional and community. • Recognize the inherent creativity and drive to connect and belong within all people. 	<ul style="list-style-type: none"> • Exclude arts, culture, mindfulness, and body-based learning and knowing from processes and experiences; treats these as “enrichment” or “self care” separate from the whole. • Promote, either consciously or unconsciously, the narrative that these truths about how humans connect, communicate and make meaning don’t belong in certain (often institutional) spaces. • Does not recognize the inherent creativity and drive to connect and belong within all humans.
<p style="text-align: center;">Valuing Creativity & Healing</p> <ul style="list-style-type: none"> • Recognize, encourage and cultivate creative and healing practices in all people. • Acknowledge healing for all people as an essential component of racial equity and social justice work. • Honor/give credit to and respect the boundaries and intended uses of others’ cultural, emotional, intellectual, spiritual and/or physical labor. • Honor the knowledge, experience and histories of artists and healers (individuals and communities) who have cultivated creative and healing practices. 	<p style="text-align: center;">Extraction</p> <ul style="list-style-type: none"> • Use others’ cultural, emotional, intellectual, spiritual and/or physical labor without their permission and/or without crediting them. • Use resources, ideas or relationships of others, in particular those with less social or hierarchical positional power, for one’s personal or personal-professional benefit without crediting them or even letting them know. • Rely on disrespecting the Earth and denying or failing to take into account historical realities of extraction for economic purposes that have led to the destruction of communities of living systems such as people, animals and natural ecosystems.
<p style="text-align: center;">Cooperation & Strength through Trust in the Collective</p> <ul style="list-style-type: none"> • Include <u>process goals</u> in planning and strategy work. (For example make sure that your <i>goals speak to how you want to do your work and how you want those involved in a process to feel</i>, not just what you want to do/solve/achieve.) • Evaluate people based on their ability to collaborate with others and provide proactive, caring support. • Evaluate people based on their ability to work as part of a team to accomplish shared goals. • Check your motives: Are you acting to preserve your own or other individuals’ power or control? Are you using existing teams and structures, or are you building new ones based on your own comfort or 	<p style="text-align: center;">Individualism; Progress is Bigger, More</p> <ul style="list-style-type: none"> • Value individual problem-solving. • See accountability as one-directional and to higher ups in chain of command. • Concentrate decision-making power among a small few who surround the top-most leader, with superficial inclusion of those in lower ranks. • Hold and wield an unexamined desire for individual recognition, credit or other forms of power. • Value competition over cooperation. • Believe that “doing it better” means less or no delegation. • Seek expansion – doing more, serving more – as the goal and value.

<p>needs? Did you involve those whose job it is to do a certain body of work – especially if this work is about racial equity and social justice – in the work?</p> <ul style="list-style-type: none"> • Lean on the collective to problem-solve, even when this makes you feel uncomfortable or like you are losing power. Notice these feelings without judgment and begin to recognize when they come up for you and how they get in the way of racial equity and social justice. 	<ul style="list-style-type: none"> • Focus on gains related to size not depth of relationship or quality of work. • Consciously or unconsciously prioritize or view the individual as superior to the collective or other living systems (including other people, the planet and animals).
<p>Appreciation, Experimentation & Learning</p> <ul style="list-style-type: none"> • Develop a culture of appreciation, where the organization takes time to make sure that people's work and efforts are consistently and meaningfully appreciated. • Develop a learning organization where it is expected that everyone will make mistakes and those mistakes will offer opportunities for learning. • Recognize that failure and mistakes are important parts of the process, helping to decrease shame around natural learning experiences. • Separate the person from the mistake. • When offering feedback, always speak to the things that went well before offering criticism. • Ask people to offer specific suggestions for how to do things differently when offering criticism. 	<p>Perfectionism</p> <ul style="list-style-type: none"> • Lack consistent expression of appreciation or has strict rules about how to appreciate. • Focus on inadequacies and/or mistakes after the fact rather than proactive check-ins about how things are going. • Consciously or unconsciously experience fear and/or shame from making mistakes. • Do little-to-no learning from mistakes. If learning happens, keep it to yourself or one or two people, but don't share that learning for others to better understand you or learn themselves. • Promote and reward conforming, what's needed to fit in to existing norms.
<p>Spaciousness, Flexibility & Planning</p> <ul style="list-style-type: none"> • Cultivate being responsive, not reactive, to transformational strategies. • Make realistic work plans that include intentional moments for relationship building, even and especially in times of crisis. These moments can be brief – even a few minutes at the beginning of a meeting. • Cultivate an understanding among leadership that things take longer than anyone expects. • Discuss and plan for what it means to set goals of racial equity, social justice and belonging, particularly in terms of time (allotted and spent). • Learn from past experiences how long things take to move through. 	<p>Sense of Urgency</p> <ul style="list-style-type: none"> • Focus on timelines and getting it done now over investing in relationships and change that can transform systems and outcomes. • Not looking at the whole picture of contributing factors to success or failure; does not integrate an historical analysis as part of the whole picture. • As a result, prioritize white communities or historically white led organizations serving BIPOC communities over BIPOC communities that are of/by/for them; can also result in prioritizing BIPOC communities in a tokenizing way (without meaningfully engaging those communities in what they actually need/want).

<ul style="list-style-type: none"> • Be clear about how you will make decisions that are rooted in racial equity, social justice and belonging in an atmosphere of urgency or crisis. • When you are still feeling anxious, scattered or fearful, be transparent in ways that center the needs of all people in the room. Be mindful of the impact or “weight” you carry based on any power you hold in your social positionality and/or positionality within the institutional hierarchy. • Allow time for pause and quiet reflection. • Be up front about decision making processes, especially when there is lack of alignment in the room: Who holds what roles to support something moving forward? How do others get to contribute to the process? • Build a culture of trust that makes addressing urgent issues possible and rooted in relationship rather than feeling shaky or uncertain. • Maintain a sense of urgency around the overall need to address historic inequities and experiences of oppression and engage communities of color and Indigenous communities in identifying which areas are most urgent and in need of focus. 	
<p style="text-align: center;">Open-heartedness, Receptivity & Relaxed Acceptance</p> <ul style="list-style-type: none"> • Acknowledge when you have made mistakes, whether that’s in large group, small group or 1:1 contexts. • When receiving in-the-moment feedback from others, receive it with open heartedness, trying to avoid feeling defensive or combative, or even trying to explain yourself. Notice your own defensive reactions and work on them. Try to listen actively and welcome the person’s genuine experience. It’s not about you. If need be, invite the person to meet with you later so you can receive their full story with your best attention. • Identify someone who you can go to when you feel defensive. Build regular space with this trusted person where you can both hear each other’s struggles when it comes to feeling misunderstood or attacked and give 	<p style="text-align: center;">Defensiveness/Protection of Power Structures</p> <ul style="list-style-type: none"> • Power structure and individuals who hold power are set up to protect status quo, including their own comfort, power and influence. • View as “disrespectful,” “rude” and/or “not being a team player” anyone who names patterns of individuals participating in white dominant norms or of practices, policies and procedures that reinforce these norms. This occurs even in organizations that have stated commitments to racial equity. Attention is diverted to the person or people who named the patterns and this shuts down any conversation about the patterns themselves. (See Fear of Open Conflict, below.)

<p>each other space to share and unpack why those feelings are coming up. Just listening and affirming and giving ourselves space to be heard makes a big difference in how we will be able to show up next time.</p> <ul style="list-style-type: none"> • Understand that structure cannot in and of itself facilitate or prevent abuse; when we are in deep, honest spaces with each other, there will likely be moments when some harm is caused. • Understand how defensiveness works to maintain the status quo, even among those who promote antiracist ideas. • Understand the link between defensiveness and fear (of losing power, face, comfort or privilege). • Discuss the ways in which defensiveness or resistance to new ideas gets in the way of the mission. 	
<p>Authentic Process & Values Alignment</p> <ul style="list-style-type: none"> • Include process or quality goals in your planning. • Make sure your organization has a values statement that expresses your principles, the ways in which you want to do your work. Check in on these regularly so this is a living document that people are held accountable to as individuals and as a collective, and can use in day-to-day work. • Be conscious of, ask about and tend to how people experience strategies and actions. Consider these experiences on mental, emotional, physical and spiritual dimensions. • Look for ways to measure process goals (e.g.: if you have a goal of belonging, think about ways you can measure whether or not people are experiencing that). • Create buffer space in your agendas for important conversations as they emerge. • Return back to group norms and practices regularly throughout your meeting, process or event, to maintain accountability to the process. • Learn how to hear people's underlying concerns and ask questions to understand them better. • Recognize when you need to diverge from agendas in order to address people's underlying concerns. Lean on your facilitation team and intuition in these 	<p>Quantity over Quality</p> <ul style="list-style-type: none"> • Does not value/value very little process or other things that can't be measured like many aspects of relationship building (spending time in community spaces, collective decision-making, creative practices, taking time to constructively deal with conflict, intentionally focusing on trust-building and power analyses). • Focus largely on measurable goals that are more valued in white-dominant spaces such as things that can be counted and things that are already politically viable. • Ignore process (people's needs to be heard or engaged) for the sake of timelines or desired outcomes even though this leads to lack of cohesion. This includes ignoring collective health as a central organizing strategy, as well as aspects of health that are deemed to 'soft,' 'not valuable' such as emotional and mental well-being.

<p>moments and be transparent about your decision making.</p> <ul style="list-style-type: none"> • Create realistic outcomes for meetings, workshops, trainings, etc. so that you don't feel rushed in group space. 	
<p>Multiplicity of Wisdoms & Realities</p> <ul style="list-style-type: none"> • Accept that there are many ways to get to the same goal. • Once the group has made a decision about which way will be taken, honor that decision and see what you and the organization will learn from taking that way, even and especially if it is not the way you would have chosen. • Work on developing the ability to notice when people do things differently and how those different ways might improve your approach. • Look for the tendency for a group or a person to keep pushing the same point over and over out of a belief that there is only one right way and then name it. • When working with communities from a different culture than yours or that of your organization, be clear that you have some learning to do about the communities' ways of being and doing. • Never assume that you or your organization know what's best for a community in isolation from meaningful relationships with that community in which social positional (race, gender, ability, sexuality, immigrant status, etc.) and other power dynamics (such as funder/funded, service provider/service recipient, policy maker/resident) are named and openly discussed. • Create spaces in any team meetings and division or all-department meetings for group-wide decision-making points. • Strive to deemphasize the intellectual and cognitive as the sole or leading ways to understand and make meaning. (Words and phrases follow ways of thinking and making meaning.) • When posing a strategic question to the group, first do a go-around in which everyone can share or pass, before opening it up to a larger group discussion. 	<p>Over-Emphasis on the Written Word</p> <ul style="list-style-type: none"> • In a broader sense, believes in one "right" way (such as what's written on paper), a way that reinforces the status quo. • More literally, values written communication most; those with "strong" writing skills (according to certain academic or institutional criteria) are valued over others with other communication skills. • These manifestations of white supremacy culture can lead to either critique and missed opportunities for those who don't have certain writing skills, avoidance of direct feedback about written communications and/or denial of opportunities for people whose communication strengths are non-written to grow those strengths.

<ul style="list-style-type: none"> • Encourage your teams to identify what underlying assumptions of what is strategic/smart are guiding your choices, and how those assumptions may be rooted in particular traditions of knowledge and understandings of the world. • Celebrate when your leaders offer a different process idea to achieving a goal, and recognize what the group might learn by trying on something new. • Understand that to appeal to the community, using the white normative glorification of the written word is sometimes strategic but that to make a lasting culture shift, we must begin to model a commitment to believing and trusting a multiplicity of approaches and work to bring our people along. • Remember that many communities are rooted in strong written, oral, visual and movement-based traditions. The complimentary gifts that all of these traditions offer have contributed to the thriving of our species and our partnership with the Earth. 	
<p>Transparency & Shared Leadership</p> <ul style="list-style-type: none"> • Define success by the measures of the communities most affected by racial and social injustices. • Define success by models that focus on collective health and belonging as central components of racial and social justice. • Make sure that everyone knows and understands who makes what decisions in the organization and why. • Make sure everyone knows and understands their level of responsibility and authority in the organization. • “Nothing about us without us.” Include people who are affected by decisions in the decision-making and process design for making those decisions. Listen to their feedback and openly discuss any areas in which there is and is not agreement. • Discuss what good leadership looks like and make sure people understand that a good leader develops the power and skills of others. 	<p>Paternalism & Power Hoarding</p> <ul style="list-style-type: none"> • Success is defined unilaterally by those who shape the dominant narratives and realities. This often includes executive leadership, board members, donors/funders and elected officials. • Decision-making is clear to those who hold power (not to those who don’t). • Decision-making on important matters is kept to a small few. • Sometimes there are “shared decision-making” processes, but often those are for less-significant decisions or are prescribed/designed by those who hold power with no input from others or consideration for unintended consequences. • Those with hierarchical power often make decisions for others and don’t find it necessary to understand or behave differently based on what those they’re making decisions for express they need. • Those without power know they don’t have it and don’t know how decisions get made, but they know the impacts very well.

<ul style="list-style-type: none"> • Create opportunities for those you supervise and manage to build relationships and networks. • Understand that change is inevitable and challenges to your leadership can be healthy and productive. • Make sure the organization is focused on the mission and that the mission has an explicit connection to racial and social justice as an outcome. Ensure the organizational vision and values name <i>how</i> the organization is/moves and that relational culture is required for racial equity and social justice efforts to move beyond diversity and inclusion. • Create a map where leaders can clearly identify who holds which responsibilities and decision making. Make this accessible to all people within the organization. • Train yourself out of your role by engaging in deep leadership development of other folks in your organization or team. Always be thinking about how you are growing and transitioning in your leadership. • When coming to folks for feedback on projects or processes, be clear about what exactly you are asking of them: Are you simply sharing a decision with them to get red flags, or do you want their input in shaping the outcomes? Either way, be explicit about why you are seeking this level of their engagement and how you will integrate this feedback moving forward. • Openly name power dynamics in group spaces from the outset, recognizing the impacts of social positionality (race, gender, etc.) and positionality within institutional hierarchy. 	<ul style="list-style-type: none"> • Those in power hold onto it even unconsciously and feel suggestions for how to change the culture and patterns of behavior within the organization are a threat to their leadership or a sign of a lack of appreciation, yet they don't see themselves as hoarding power, feeling threatened or acting defensive.
<p>Embracing the Both/And & Complexity</p> <ul style="list-style-type: none"> • Look for intersections between race, gender and other social positionalities. • Notice when people use either/or language and push to come up with more than two alternatives. • Notice when people are simplifying complex issues, particularly when the stakes seem high or an urgent decision needs to be made. • Slow it down and encourage people to do a deeper analysis. 	<p>Either/Or Thinking</p> <ul style="list-style-type: none"> • Reinforce binaries. Can increase conflict because people feel they have to decide between this or that. • Does not acknowledge the complexity of life and the adaptive, changing nature of relationships and anything involving living systems. • This can include focusing on the “positive” or “forward moving” only and not giving attention to critiques voiced both by those

<ul style="list-style-type: none"> • When your organization or team is faced with an urgent decision, take a break and give people some breathing room to think creatively; better decisions emerge when we are feeling (emotional) safety and calm. • Start planning events/activities/actions far in advance so that decisions don't have to be made under extreme pressure. • When there is disagreement between two choices, try to assess what the underlying values under each of these choices are, and see if there is a third way that can be guided particularly by these values. • If there is a conflict between two options, consider if both might be possible. Could a conversation about sequencing be more supportive than a conversation about which option is correct? • Openly name in group spaces when folks are in a space of binary thinking and encourage folks to think of all the options that fall in-between. • Be careful not to let attempts at "both/and" obscure dynamics of oppression, such as neglecting to recognize or address an oppression-based harm because the person experiencing the harm acted in a harmful way toward the person perpetrating the harm. For example, a BIPOC person expresses strong emotions regarding a decision that a white staff person made that led to a harmful impact on a group of Black women and the group/supervisor conversation is centered around how "both people were out of line." The angry expression is a response to an action that had a racist impact. Instead of focusing on the angry expression, focus on the impact on the Black women. Seek responses that acknowledge all harms and name the specific, systemic and interpersonal conditions that breed oppression-based harm. 	<p>targeted by oppression and/or hierarchical power imbalances, or by those with social or hierarchical agency who point out these harms.</p> <ul style="list-style-type: none"> • Does not often take into account intersecting target positionalities such as race (people of color) and gender (women and transgender or non-binary people), race and ability, gender and sexuality, etc.
<p>Respect for Real Talk and Resilience Through Conflict</p> <ul style="list-style-type: none"> • Role play ways to handle conflict before conflict happens. 	<p>Fear of Open Conflict</p> <ul style="list-style-type: none"> • When someone raises an issue that causes discomfort, the response is to blame the person who raised it and avoid addressing the conflict.

<ul style="list-style-type: none"> ● Build individual and collective muscle to distinguish between being polite and raising hard issues. ● Don't require those who raise hard issues to raise them in acceptable ways, especially if you are using the ways in which issues are raised as a diversion from addressing the issues being raised. ● Once a conflict is resolved, take the opportunity to revisit it and see how it might have been handled differently. ● Build in regular space in 1:1, team, division and all-staff meetings for bringing up hard issues or dynamics. Don't cut this time or schedule over even if there doesn't seem to be anything to talk about at first. When the time and space for addressing conflict exists and is honored, it normalizes the fact that many humans working together will bring up hard or sticky dynamics that otherwise feel safer under the surface. When space is carved out for it, people will have the option to begin to use it. ● When conflict comes to the surface, remember, it isn't a personal attack. This is work we <u>get</u> to do together. You are not alone in figuring this out. When we do hard work together, it brings up hard dynamics. Notice if your reaction is about what is currently happening or if this situation be reminding you of an earlier messier/harder conflict? ● Identify a couple of buddies who are positioned similar to you in terms of race, gender and other salient positionalities who are also committed to a practice of racial equity and social justice and willing to process dynamics or situations that are hard to figure out by yourself. Commit to talking about things with the goal of moving through them, bringing them up and solving them, and not as gossip. ● Note that fear of open conflict is a pattern that can be rooted in whiteness, patriarchy and in a middle or owning class drive not to "lose it," to keep things "looking good," "put together," or calm. Avoiding conflict has also been a survival mechanism for women, people of color and many other oppressed groups. 	<ul style="list-style-type: none"> ● Emphasis is placed on being polite, "all getting along," and/or "all harms being equal." ● Emotion around oppression is equated with being rude, disrespectful, insubordinate, aggressive. ● Leaders cultivate feedback in ways that reinforce these norms and keep power-over structures in place.
---	---

<p>Living into Discomfort, Vulnerability & Healthy Agitation</p> <ul style="list-style-type: none"> • Understand that discomfort is at the root of all growth and learning; welcome it as much as you can. • Deepen your political analysis of racism and other forms of oppression so you have a strong understanding of how your personal experience and feelings fit into a larger picture. • Don't take everything personally. • Realize that everybody has a world view and that everybody's world view affects the way they understand things; realize this means you too. • Push yourself to sit with discomfort when people are expressing themselves in ways that are not familiar to you. • Model vulnerability. Say, "I feel vulnerable sharing this..." "I'm just reflecting for a moment because I realize I'm feeling vulnerable." • Assume that everybody has a valid point and your job is to understand what that point is. • Open meetings, trainings, workshops, listening sessions and retreats with questions that encourage folks to share genuinely about how they are arriving. Be open to diverse experiences coming into the space. • In training spaces or other teaching moments, don't offer leading questions where you have a "right answer" you're hoping others guess. This reinforces someone being in the right and someone being in the wrong (a binary) and a pressure to get it right. • Consider that racial equity and social justice work should offer you a healthy amount of agitation if it will be a place for you to do deep personal growth. If you come to city government to be around people who look and think just like you, take some time to reevaluate that need and where else you could get that need met so that this space can be a place of healthy discomfort. • In decision-making, look around at the group gathered and consider if there is representation from different perspectives present. Consider: race, ethnicity, class, religion, age, ability, gender, sexuality, 	<p>Right to Comfort & Objectivity</p> <ul style="list-style-type: none"> • Believe that those with power have the right to emotional and psychological comfort. • Equate discomfort among agent group members (such as white people) with actual oppression (such as racism). • Scapegoat those (regardless of social positionality) who causes discomfort by speaking up about patterns of oppression, including those that manifest in the norms of the organization, team or relationship. • Believe that there is such a thing as objectivity. • Oriented toward objects (vs. toward relationships, all living systems) • Invalidate or diminish the role of emotion. • Often do one or many of these without being conscious of it. • Often do one or many of these in concert with insisting that others are accountable for their impact on you.
---	--

<p>geography and other identities that may be different from the dominant culture. Be wary of coming to quick conclusions or easy answers to big questions: Who still needs to be consulted?</p> <ul style="list-style-type: none"> ● Reflect on how right to comfort is a pattern that can be rooted in racism, sexism, classism (middle/owning class) and/or ableist perspectives about feeling deserving of good or nice things, of good health, of having “earned the right” to get what you want or feel well. 	
--	--

EXHIBIT - 8



**ADVANCE OPPORTUNITY.
ACHIEVE EQUITY.**

Why Lead with Race?

***Challenging Institutional
Racism to Create an
Equitable Society for All***

The City of Seattle and the Seattle Office for Civil Rights challenge many forms of oppression, including racism, sexism, heterosexism, ableism and many others. The Race and Social Justice Initiative (RSJI) focuses on eliminating institutional racism and racial inequity. We are sometimes asked, “Why lead with race?” RSJI leads with race because of:

1. The pervasive and deep disparities faced by people of color. We recognize that challenging institutional and structural racism is essential if we are to support the creation of a just and equitable society;
2. The many years of community organizing that demanded the City to address racial inequity. To this end, we recognize the necessity of supporting all communities in challenging racism; and
3. The necessity of focus. We recognize that efforts to eliminate racism are essential to achieving an equitable society, and that those efforts by themselves are insufficient. We “lead with race,” and are also working on institutionalized sexism, heterosexism, ableism and other oppressions.

Why focus on institutions?

RSJI focuses on institutional racism because we recognize that while individual racism deserves our attention, for long term change to take place, it is necessary to elevate the discussion to how eliminating institutional racism can help lead to racial equity. By focusing on policies, practices and programs which advantage white communities while disadvantaging communities of color, we are able to better impact racial inequities.

Just as institutions work to the benefit of white people, they also work to the benefit of men, heterosexuals, non-disabled people and so on. We understand how critical it is to address all social justice issues, and that an institutional approach is necessary across the board. The definitions and tools we use to eliminate institutional racism can also be used to eliminate institutional sexism, heterosexism, ableism and other oppressions. As we deepen our ability to eliminate racial inequity, we will be better equipped to transform systems and institutions towards collective liberation for all.

What about people experiencing multiple oppressions?

All historically disadvantaged groups – people of color, lesbians, gay men, people who are transgendered, women, people with disabilities, low-income households, to name a few – experience systemic inequity. Many people and communities live at the intersection of these identities, for example lesbians of color, experiencing multiple inequities at once. By centering on race and using tools that can be applied across oppressions, we increase the ability of all of us to work for equity.

Are you saying racism is worse than other oppressions?

No. We know that racism is deeply embedded in the institutions in this society leading to inequities in all major indicators of success and wellness. We must look at how this country was founded on the attempted genocide of Native people and the enslavement of African people. This legacy was institutionalized in all aspects of our society, and continues to create racialized impacts born from structural policies, practices and procedures, often unintentionally. In fact, race is consistently a primary indicator of a person’s success and wellness in society.

By focusing on race and racism, we recognize that we have the ability to impact all communities, including addressing the impacts of racism on LGBTQ people of color. We are prioritizing an anti-racist strategy in order to create an equitable society for all. This prioritization is not based on the intent to create a ranking of oppressions (i.e. a belief that racism is “worse” than other forms of oppression). For an equitable society to come into being, we need to challenge the way racism is used as divisive issue keeping communities from coming together to organize for change.

While the RSJI leads with race, we recognize that all oppressions are perpetuated by the interplay of institutions, individuals, and culture operating amidst the weight of history. For all people and communities to experience liberation, we must transform all aspects of our society.

I am focusing on addressing another form of oppression (for example, heterosexism, sexism, etc.). How does RSJI address these?

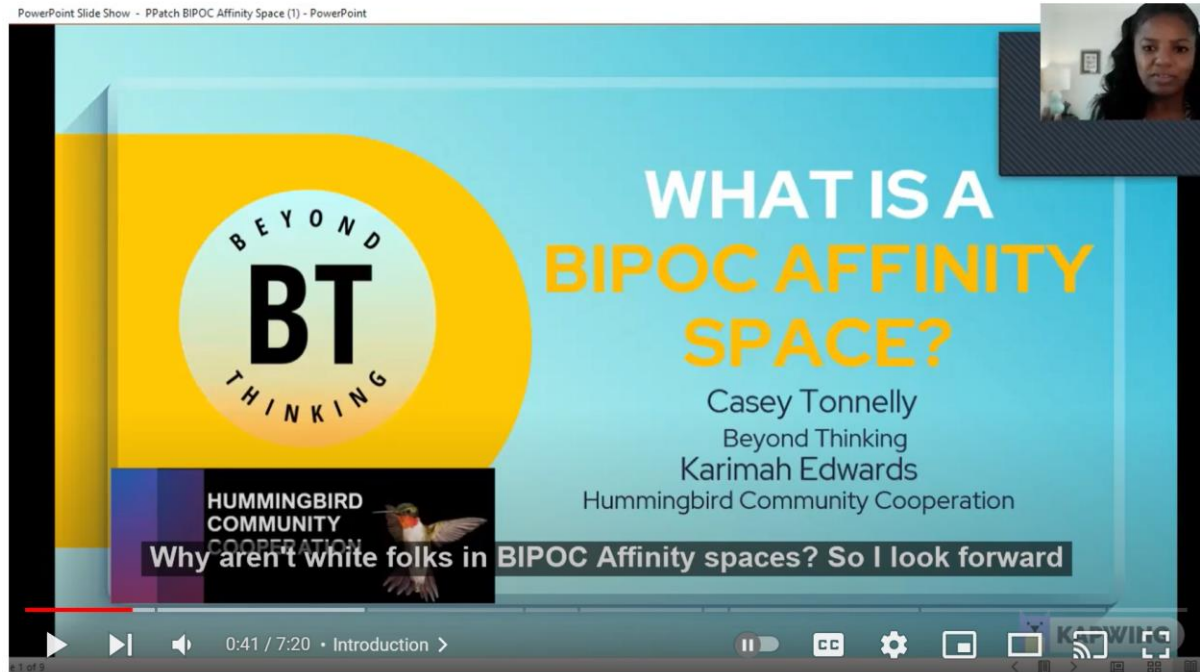
It is important that we all are committed to ending oppression to create an equitable society. It is crucial that as we prioritize our strategies, we maintain an approach that recognizes that all oppressions are inter-connected. Racism is one barrier keeping all marginalized communities from uniting to work towards their own liberation.

Recognizing the structural interplay between all oppressions, RSJI has supported many communities in addressing issues of racial justice and the inter-relationship between racism and other forms of oppression. RSJI has done workshops and presentations for a wide range of communities, including women, LGBTQ, people with disabilities, and so on. We continue to leverage resources to challenge all forms of oppression to create an equitable and just society for all.

I am primarily focused on addressing another form of oppression, but am supportive of efforts to eliminate racial inequities as well...How can I be supportive of RSJI?

For City of Seattle employees, we encourage you to: join or actively support your department's RSJI Change Team; attend RSJI sponsored trainings and events; insure that the Racial Equity Toolkit is implemented in your department and in your community; get to know your department's RSJI workplan and how you can help with implementation.

Whether a City employee or not, intentionally center the experiences and perspectives of people and communities of color as you do work towards ending oppressions other than racism. Strengthen your ability to understand how racism intersects with other forms of oppression and privileges, and how policies might have unintended consequences for communities of color. Support the efforts of the Race and Social Justice Community Roundtable in ending racial inequity in Seattle.



P-Patch Anti-Racism Learning Library: BIPOC Affinity Space



Seattle Department of Neighborho...
144 subscribers

Subscribe

5



Share

Save



136 views 1 year ago

P-Patch Community Gardening Anti-racism Learning Library: BIPOC Affinity Space.
Created by Beyond Thinking and Hummingbird Community Cooperation,
Casey Tonnely, Karimah Edwards, [Show more](#)



Cultivating **Inclusive** Communities

Casey Tonnelly
Beyond Thinking

Karimah Edwards
Hummingbird Community Cooperation



Shared Learning (Community) Agreements

- **Together we know a lot;** alone we don't know it all.
- **Center People of Color:** We deliberately take action to acknowledge and center people of color, and the diversity that exists within the spectrum of our present-day work, and we give reverence to that strength, resilience and talent without appropriation.
- **Make space: We will invite BIPOC gardeners to speak first. This includes sharing thoughts, ideas, experiences, and asking questions. If time allows, white participants will be invited to share.**
- **Liberation as a focus:** we aim to create a space where people can show up fully in who they are, how they are. We commit to healing, self-awareness and service to others.
- **De-Center Whiteness:** We openly acknowledge the history of oppression in the U.S, and consciously prioritize the leadership of Black, Indigenous, and People of Color, queer and trans people, people with different body sizes, and people living with disabilities.
- **Lean into discomfort,** it's how we grow.
- **Multiple Truths:** We acknowledge that there are multiple and concurrent truths everywhere, all the time. Using the "both/and" framework, we recognize that all truths can exist, support and conflict with each other in the same space.

Meeting Logistics

- Rev and Closed Captioning
- Zoom Tips on computers
- Zoom Tips on your phone
- No Breakout Rooms
- Zoom Driver





Reflection Question

I garden because.....





P-Patch Community Gardens



Harms in the P-Patch Community Gardens



Micro-Aggressions

Microaggression is a term used for brief and commonplace daily verbal, behavioral or environmental slights, whether intentional or unintentional, that communicate hostile, derogatory, or negative attitudes toward stigmatized or culturally marginalized groups.

Below are a few of the micro-aggressions faced by Black gardeners, Indigenous gardeners, and gardeners of color

- "Who are you?!"
- "Where are you from? No, where are you really from?"
- "I cannot believe your garden looks so good, I mean, you are so young!"

- “That idea won’t work, we have never done it that way!”
- “Do you even belong here?”
- “I have been here for X years, you can’t do that!”
- Intrusive behaviors and questioning
- Avoidant behaviors



Bystander Intervention

- Distract
- Delegate
- Delay
- Direct
- Document





Fostering Inclusion and Belonging

- Understand your lens and biases
- Understand and accept that diverse gardeners have diverse needs, tools, ways of gardening, and what is planted
- Understand and accept there are multiple lived realities
- Welcome others into garden space (even when you do not know them)
- Approach folx with curiosity instead of judgement
- Communicate in a variety of ways
- What else?



Calling in vs. Calling Out

Accountability vs. Cancel Culture

- Halle Berry
- Micheal B. Jordan
- Harvey Wienstien
- Jeffery Epstein

Calling in: If you call someone in, you circle back to a hurtful or oppressive comment they made in private.

Calling out: If you call someone out, **you let them know their comment was hurtful in a public space.**

Thanks!

Reflections, Invitations, Gratitude, and Practice



Any questions?

You can find us at:

www.beyondthinkingwithcasey.com

karimah@hummingbirdcoop.com



EXHIBIT - 9



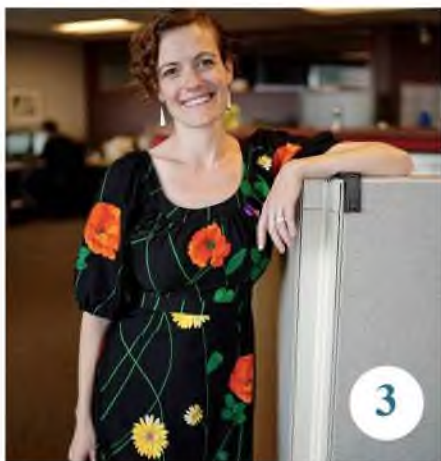
RACE AND SOCIAL JUSTICE INITIATIVE



SEATTLE OFFICE FOR CIVIL RIGHTS

The Race and Social Justice Initiative (RSJI) is a citywide effort to end institutionalized racism and race-based disparities in City government. To accomplish this mighty endeavor, we have added team members, and connected with more RSJI advocates inside City government and in our community. We are excited about this work – we know we must be targeted in our approach and prioritize to address the greatest need.

MEET THE TEAM



1 Senait Brown

Community Coordinator

2 Scott Winn

Policy & Development Lead

3 Diana Falchuk

Strategic Advisor

4 Patricia Lally

Director

5 Tamar Zere

Strategic Advisor



6 Casey Connelly

Trainer

7 Teddy McGlynn-Wright

Strategic Advisor

8 Caedmon Magboo Cahill

Criminal Justice Strategic Advisor

9 Kyana Wheeler

Strategic Development Specialist

WHAT WE'VE BEEN UP TO

RACIAL EQUITY TOOLKIT

RSJI has always been about transformative, systemic change. One of our greatest tools to bring about this systemic change is disrupting inequitable decision-making processes. This cannot be accomplished without applying the Racial Equity Toolkit (RET). As all of our City departments begin to apply the RET to policy, projects, programs, services, procedures and capital improvements – we will begin to see the requisite transformation. Because we know that racism and resources are indelibly interconnected.

In 2015, Mayor Murray mandated that each department apply four RET's per calendar year. Since that time, the RSJI team has conducted dozens of RET trainings, department-specific RET seminars, technical advice and department-driven RETs.

Institutionalizing the Racial Equity Toolkit has become our most pressing priority because we know that the impacts of racial inequities cannot be assessed or addressed without interrupting the color blind ways departments make decisions.

TRAININGS

Trainings: Since 2015, RSJI has rolled out **Implicit Bias**, the **Racial Equity Toolkit** and **Leading with Race for Structural Transformation** trainings. In addition to Cornerstone, at the request of Department Directors, we are providing customized trainings for entire departments. Our RSJI team has **NEVER** conducted as many trainings as it has this past year.

For the first time ever, RSJI conducted a training for all City Council members, legislative aides and central staff. We concluded with four additional RET trainings.

We also continue to provide trainings for our community and institutional partners across King County, such as: Washington State Departments, UW Law School, UW Evans School, and Leadership Tomorrow, to name a few.

TURNING COMMITMENT TO ACTION

SOCR began a training partnership the Office of Arts & Culture to help Seattle arts groups turn their commitment to racial equity into actions for real change. Participating organizations – including the Pacific Northwest Ballet, Seattle Art Museum and a host of smaller arts organizations – used the training to develop plans to create racial equity within their own organizations, as well as with other artists, their audiences and partners.

CHANGE TEAM SUPPORT

The internal change agents are the City's most valuable resource. We have enhanced our support and resources to folks carrying racial justice work in their departments, by providing more direct services, including technical assistance, training and facilitation.





NATIONAL SPEAKER SERIES

The RSJI Speaker Series brings thoughtful, provocative and powerful speakers from across the country to Seattle to speak on the racial equity issues of today.

RESTORATIVE JUSTICE

RSJI worked with community leaders to advocate for Restorative Justice at the Seattle School District. This effort culminated on November 12 as we welcomed **Fania Davis**, co-founder and Executive Director of Restorative Justice for Oakland Youth, to speak on restorative approaches that engage families, communities, and systems to end violence and incarceration.

INDIGENOUS PEOPLES' DAY

The City of Seattle celebrated the second annual Indigenous Peoples' Day on October 12 with an appearance by **Winona LaDuke**, Native American activist, environmentalist and author. Indigenous Peoples' Day recognizes that Seattle is built upon the homelands and villages of the Indigenous Peoples of this region and honors the many contributions that Native American communities have made to our community.

BLACK LIVES MATTER

Our Human Rights Day event focused on Black Lives Matter and featured **Kimberle Crenshaw**, a critical race theory scholar, who spoke about the intersection of race and gender. This event brought 800 people to Seattle's Town Hall.

COMMUNITY ENGAGEMENT

Our community engagement model has undergone a tremendous shift as we reimagine and center communities most impacted in our racial justice practice. What does it mean to be accountable to communities of color? How do communities inform and guide our work? How do institutions minimize harm and maximize benefits for communities of color?

As we expand our outreach and engagement efforts, we are striving to align our racial justice efforts with community organizations who are organizing and working towards transformation and liberation.

These organizations include: Youth Undoing Institutional Racism, Ending the Industrial Complex, The Village of Hope, El Centro de la Raza and many other organizations representing Chinatown/International District, Southeast Seattle and the Central District. We continue to fund the Racial Equity Fund supporting organizations (primarily people of color led organizations) who are working to dismantle institutional barriers in our community.

CRIMINAL JUSTICE REFORM

In 2015, Office for Civil Rights conducted a Racial Equity Toolkit on the King County Youth facility. The RET coupled with intense and unwavering community organizing created the pathway for the City's Zero Youth Detention and Re-entry resolution. We have a fully dedicated staff member bringing together: community leaders, City Departments, Municipal Court, City Attorney's Office and King County to begin the challenging work of addressing the glaring racial disparity and contradictions of our criminal justice system.



WHERE WE'RE HEADED

In addition to the programming, training and projects that RSJI has been working on and developing over the years, we will pursue new and enriching endeavors in 2017.

CORE TEAM V

We are excited to roll out RSJI Core Team V. In addition to learning from past Core Team members, we are refreshing the curriculum and providing more resources to draw race experts to the table. This Core Team will learn from racial justice thought leaders and delve into a year-long practicum designed to enhance their racial equity analysis.

RACIAL EQUITY LAB

As we continue to look for ways to institutionalize the practices and principles of RSJI, the Mayor has approved our newest endeavor: The Race & Social Justice Initiative's Equity Lab will enable the City of Seattle to bring together key RSJI policy and project leaders to connect with one another; foster innovation and creativity in racial equity work; develop programmatic linkages across significant RSJ actions; and take advantage of promising practices.

NEW TRAININGS

In 2017 we will roll out a new training on White Privilege and Building White Allyship.

To learn more about RSJI and our incredible team,
please visit seattle.gov/rsji.

SEATTLE OFFICE FOR CIVIL RIGHTS
seattle.gov/civilrights
206.684.4500

EXHIBIT - 10



Virtual Citywide New Employee Orientation

Seattle Department of Human Resources



City of Seattle

What is a Mandatory Reporter?

- A person or entity that is obligated to immediately report or investigate claims of harassment, discrimination, retaliation, or misconduct



Who is a Mandatory Reporter?

“Management Representatives”

- Supervisors
- Managers
- Leads
- Crew Chiefs
- Directors

Who is a Mandatory Reporter?

- Department of Human Resources staff
- Employees in a human resources role
- Strategic Advisors
- Departmental Equal Employment Opportunity (EEOC) Officers

- Excludes staff in Alternative Dispute Resolutions (ADR) and the Office of the Employee Ombud (OEO).

FAQ: What if I *think* I am experiencing or witnessing workplace harm?



You don't have to be the expert



- Human Resources
- Supervisors
- Human Resources Investigation Unit
- Seattle Office for Civil Rights
- Office of Employee Ombud
- Alternative Dispute Resolutions



EXHIBIT - 11

Focus on RACIAL EQUITY

In our roles of planning, grantmaking, and provision of direct services, HSD works to ensure that funding processes, programs, and policy decisions are made with a focus on racial equity. These efforts to include racial equity in our work aim to create accountability between our department and the people we serve. This work to center racial equity continued in 2019.

HSD's Race and Social Justice Initiative (RSJI) history and the work of the HSD RSJI Change Team are grounded in the principles of Undoing Institutional Racism. Significant work was undertaken in 2019 to identify where individuals, divisions, and the department stood on the Continuum on Becoming an Anti-Racist Multi-Cultural Institution (<http://www.seattle.gov/Documents/Departments/HumanServices/Continuum.pdf>). While there was overall acknowledgment of the white supremacist culture of the department and inequities experienced by people of color, it was also clear that anti-racist principles are not embedded in HSD's programs, policies, and funding processes and that we still have much work to do. Building on this foundation, staff and Change Team members developed the following workplan goals for 2019:

- Build relationships with community, engage them in our work, and move toward sharing power—internally and externally.
- Serve as partners with Human Resources staff and divisions to ensure that hiring practices and policies are equitable and support the hiring and retention of People of Color.
- Make recommendations for transparent and inclusive appointment and hiring processes in order to actualize our stated Citywide commitments to racial and social justice.
- Incorporate a race and social justice lens into HSD funding processes and other planning and policy initiatives.

The Race and Social Justice work of the department is further strengthened by the African Descent, Asian and Pacific Islander, Latinx, and White caucuses that meet individually and bring collective racial and cultural lenses to the work of the department.

ADS Supports Success for African American Elders

In 2019, Aging and Disability Services coordinated Memory Sunday, a special event promoting Alzheimer's awareness. Five African American faith communities participated. ADS also coordinated Legacy of Love, an annual forum attended by 100 African American caregivers, during National Caregiver Month (November).



Engaging African American Males in Ending Gender-Based Violence



In September, the Mayor's Office on Domestic Violence and Sexual Assault held a conversation with Bettie Williams-Watson and Dr. Oliver Williams on gender-based violence in the African American community. The event was recorded by Seattle Channel and can be viewed online. It focused on working with males as allies in prevention, supporting individual and collective male accountability in reversing and reducing harm, and increasing safety, health, and healing for their community.

Innovative Family Support Programming

In 2019, fourteen agencies funded through the 2018 Family Support RFP created innovative, new programming using the Systems Navigation and Family Support strategies. Thanks to these programs, families gained improved access to technology, education, health care, and more. Following are examples of the new services:

- With new funding, Divine Alternatives for Dads (DADS) expanded their services beyond family reunification into parenting support. Their first parenting classes for fathers explored a wide variety of topics and continued the peer support model DADS has successfully used in their work with formerly incarcerated fathers.
- Horn of Africa Services were able to develop workshops specifically for refugee and immigrant families to learn about college. Families who thought college was not possible, especially for their daughters, learned about financial aid, the right classes to take in high school, and career possibilities beyond the STEM subjects many parents favored.
- Open Arms was able to increase doula support for new moms and families for up to two years after the birth of a baby, including helping families understand their rights in medical settings, how to find culturally appropriate medical care, and how to manage costs of care.
- Chinese Information and Service Center (CISC) held workshops to help immigrant families find an Internet provider and understand the legal and financial responsibilities of signing a contract for Internet service. CISC also worked with providers to translate materials and help them understand family needs and where cultural and linguistic issues may arise.



Family Support

2,454 families (unduplicated) were served by programs focusing on System Navigation and Child Development.



Focus Populations

Families of color and limited English speaking families with children/youth up to age 24

EXHIBIT - 12

Race and Social Justice

Anti-Racist Principles for Institutional Change

In 2018, RSJI adopted [The People's Institute for Survival and Beyond's](#) Anti-Racist Principles as our framework for institutional change. In doing so, we align our racial justice work with community-led anti-racist efforts and recognize our accountability to the same principles.

This requires that anti-racist organizers within the institution of the City of Seattle grapple with:

- 1) the history of governmental and institutional co-opting of community-owned work
- 2) the meaning of accountability to anti-racist principles
- 3) the nature of anti-racist work within a government institution permeated by structural racism

Principle	Description
LEARNING FROM HISTORY	History is a tool for effective organizing. Understanding the lessons of history allows us to create a more humane future.
ANALYZING POWER	As a society, we often believe that individuals and/or their communities are solely responsible for their conditions. Through the analysis of institutional power, we can identify and unpack the systems external to the community that create the internal realities that many people experience daily.
DEVELOPING LEADERSHIP	Anti-racist leadership needs to be developed intentionally and systematically within local communities and organizations.
GATEKEEPING	Persons who work in institutions often function as gatekeepers to ensure that the institution perpetuates itself. By operating with anti-racist values and networking with those who share those values and maintaining accountability in the community, the gatekeeper becomes an agent of institutional transformation.
IDENTIFYING AND ANALYZING MANIFESTATIONS OF RACISM	Individual acts of racism are supported by institutions and are nurtured by the societal practices such as militarism and cultural racism, which enforce and perpetuate racism.
MAINTAINING ACCOUNTABILITY	To organize with integrity requires that we be accountable to the communities struggling with racist oppression.
UNDOING RACISM®	Racism is the single most critical barrier to building effective coalitions for social change. Racism has been consciously and systematically erected, and it can be undone only if people understand what it is, where it comes from, how it functions, and why it is perpetuated.
UNDOING INTERNALIZED RACIAL OPPRESSION(IRO)	<p>Internalized Racial Oppression (IRO) manifests itself in two forms:</p> <p>Internalized Racial Inferiority (IRI) is the acceptance of and acting out of inferior definition of self, given by the oppressor, is rooted in the historical designation of one's race. Over many generations, this process of disempowerment and disenfranchisement expresses itself in self-defeating behaviors.</p> <p>Internalized Racial Superiority (IRS) is the acceptance of and acting out of a superior definition and is rooted in the historical designation of one's race. Over many generations, this process of empowerment and access expresses itself as unearned privileges, access to institutional power and invisible advantages based upon race.</p>
SHARING CULTURE	Culture is the life support system of a community. If a community's culture is respected and nurtured, the community's power will grow.

Race and Social Justice

Additional Resources



Becoming an antiracist takes lifelong work and commitment, and no one gets it right just by reading, listening, and watching about it or understanding the concepts. It takes questioning our socialization, unlearning the lifelong lessons that we have been taught, listening deeply to, following the different perspectives and wisdom of people who have been silenced or marginalized in our society. It also involves sharing and transferring power and integrating new models of being and interacting in the world.

Below are some resources to help you get started on this journey. We invite you to continue to do this work with us, both as partners with Seattle IT's RSJI Change Team as well as in your everyday work and life. While ending racism may seem daunting, by working together, we can create liberation for all. You can find more content on the Change Team's [Resource library](#).

Resource	Description	Media Type	Audience
National Museum of African American History & Culture	Talking About Race	Website	All
Yes! Magazine for Teachers	Let's Talk About Anti-Blackness	Website/Magazine	white, non-Black POC
white supremacy culture from dismantlingracism.org	A list of characteristics of white supremacy culture that show up in our organizations, along with antidotes.	Website/Article	All
13th	In this thought-provoking documentary, scholars, activists and politicians analyze the criminalization of African Americans and the U.S. prison boom.	Movie (requires Netflix subscription)	All
Me and White Supremacy	Using a step-by-step reflection process, Layla F. Saad encouraged people with white privilege to examine their racist thoughts and behaviors. Thousands of people participated in the challenge, and more than ninety thousand people downloaded the Me and White Supremacy Workbook. Since then, the work has spread to families, book clubs, educational institutions, nonprofits, corporations, event spaces, and more.	Book/Journal	white
1619	An audio series on how slavery has transformed America, connecting past and present through the oldest form of storytelling.	Podcast	All
Blindspot: Hidden Biases of Good People	In Blindspot, Mahzarin Banaji and Anthony Greenwald explore hidden biases that we all carry from a lifetime of experiences with social groups – age, gender, race, ethnicity, religion, social class, sexuality, disability status, or nationality.	Book	All
The Asian American Response to Black Lives Matter Is Part of a Long, Complicated History	A brief article on "the complex histories of both anti-Blackness and anti-racist solidarity within the Asian American community."	Article	Asian, All
Stamped from the Beginning: The Definitive History of Racist Ideas in America	Some Americans cling desperately to the myth that we are living in a post-racial society, that the election of the first Black president spelled the doom of racism. In fact, racist thought is alive and well in America - more sophisticated and more insidious than ever. And as award-winning historian Ibram X. Kendi argues in Stamped from the Beginning, if we have any hope of grappling with this stark reality, we must first understand how racist ideas were developed, disseminated, and enshrined in American society.	Book	All



Race and Social Justice

Glossary

Becoming antiracist includes learning new language and concepts to provide a deeper insight and awareness into the structures and systems that either support racism and white supremacy or support antiracist actions. Below you'll find an antiracist starter glossary and resources for deeper analysis.

Word/Phrase	Definition* (sources: RSJI/OCR staff, Elite daily , ThoughtCo , Black Lives Matter)	Further Reading
Anti-Blackness	<p>The Council for Democratizing Education defines anti-Blackness as being a two-part formation that both voids Blackness of value, while systematically marginalizing Black people and their issues.</p> <p>The first form of anti-Blackness is overt racism. Beneath this anti-Black racism is the covert structural and systemic racism which categorically predetermines the socioeconomic status of Blacks in this country. The structure is held in place by anti-Black policies, institutions, and ideologies.</p> <p>The second form of anti-Blackness is the unethical disregard for anti-racist institutions and policies. This disregard is the product of class, race, and/or gender privilege certain individuals experience due to anti-Black institutions and policies. This form of anti-Blackness is protected by the first form of overt racism.</p>	https://blackyouthproject.com/anti-blackness-preschool-classrooms-combatting-conditioning-early-save-kids/
Anti-racism	Anti-racism means to explicitly address racist policies, procedures, practices in order to reduce racial inequities. This also includes addressing power and gatekeeping within the organization. It requires a root cause and structural analysis. Anti-racist practices include centering the most impacted by racism, such as the Black, Indigenous, and People of Color (BIPOC)	https://www.ibraxkendi.com/how-to-be-an-antiracist-1
BIPOC	<p>An acronym for Black, Indigenous, People of Color. Activists have started using the term BIPOC more frequently than "people of color" to highlight the disproportionate forms of oppression faced by Black and Indigenous people, while still building solidarity among all people of color.</p> <p>However, this term should not be used when speaking to or about a specific group of people — if the issues you're discussing specifically affect, say, Black people, make sure you say that, rather than use an umbrella term like "BIPOC" or "people of color."</p>	https://www.thebipocproject.org/
Black Lives Matter (BLM)	<p>The #BlackLivesMatter movement and network was launched in 2013 by three Black organizers: Patrisse Cullors, Alicia Garza, and Opal Tometi. Seven years later, Black Lives Matter is both a rallying cry and an activist network demanding justice and humanity for Black people — not only in light of police killings, but also in fields ranging from education and housing to electoral politics and health care. The phrase "Black Lives Matter" refers to the fact that Black lives should matter, but that existing systems and institutions do not currently treat them as though they do. (Source: https://blacklivesmatter.com/)</p>	https://blacklivesmatter.com/
Cultural Appropriation	Cultural appropriation is the act of taking fashion, music, style, or other trends from another culture. More specifically, cultural appropriation refers to when someone from a dominant culture takes elements from the culture of a group that has historically been oppressed or marginalized and uses them for the dominant group's benefit. (This is what distinguishes cultural appropriation from acts of cultural exchange.) Examples of cultural appropriation including donning a Halloween costume depicting Indigenous people, or sporting looks that "borrow" Black hairstyles.	https://everydayfeminism.com/2015/06/cultural-appropriation-wrong/
Microaggression	<p>Microaggressions are subtly discriminatory incidents, statements, or other experiences. Examples of racist microaggressions can include being asked to explain your origins, being compared to other people of your race, or assumptions about your intentions based on your race and appearance. Unlike explicit racial slurs or racist attacks, microaggressions manifest in more insidious ways, and can have a lifelong negative impact on physical and mental health, particularly when they happen frequently and the effects are compounded. The term "microaggression" was originally coined by Dr. Chester Pierce in 1970 and subsequently used by Columbia professor Derald Sue.</p>	https://www.npr.org/2020/06/08/872371063/microaggressions-are-a-big-deal-how-to-talk-them-out-and-when-to-walk-away
Intersectionality	Intersectionality, an approach developed by Kimberle' Crenshaw, exposes the compounded impact of structural oppression on multiple marginalized identities, and provides a framework for centering those most impacted.	https://www.vox.com/the-highlight/2019/5/20/18542843/intersectionality-conservatism-law-race-gender-discrimination
Institutional Racism	Institutional racism looks at the big picture of how racism is enshrined in systems at every level of society, and affects people of color in all aspects of their lives. You may also hear the related terms "structural racism" and "systemic racism" to describe how the social structures and systems in place today were designed to benefit people in positions of power — namely, straight cisgender white men. Institutional racism has manifested in things like voter suppression, the disproportionate incarceration of Black and Latinx people, and the War on Drugs.	https://www.pbs.org/newshour/nation/watch-to-read-listen-to-and-watch-to-learn-about-institutional-racism
Internalized Racism	Internalized racism describes what happens when people of color accept or normalize the racism in the society around them, often due to the racism and stigma they have experienced. People who internalize racism may not know they are doing it, but doing so may cause them to hold negative beliefs about their own identity, race, and community. While the experience of internalized racism will differ depending on a person's individual community, on a systemic level, internalized racism is often the product of systems that reward people of color for upholding or colluding with systems of whiteness, power, and privilege. People of color can't force white people to confront their own racism and privilege, but they can work on their own internalized racism.	https://www.racialequitytools.org/resources/What_is_Internalized_Racism.pdf
Prejudice	A preconceived opinion of another person not based on reason or experience	https://www.thoughtco.com/racism-vs-prejudice-3026086
Race	A social political construct (or political classification) that divides people into different groups based on physical characteristics and supposed intellectual, psychological, and social differences.	https://www.nationalgeographic.com/magazine/2018/04/race-genetics-science-africa/
Racism	<p>Racism is a complex system of beliefs and behaviors, grounded in a presumed superiority of the white race. These beliefs and behaviors are conscious and unconscious; personal and institutional; and result in the oppression of people of color and benefit the dominant group, whites.</p> <p>A simpler definition is racial prejudice + power = racism</p>	https://www.elitedaily.com/life/racism-prejudice-understanding/1363914
For additional information about Racial Equity terms and language please visit https://www.racialequitytools.org/glossary		

RACE

the power of an illusion



What is
this thing
called race?

itvs community connections project



Table of contents

TABLE OF CONTENTS



03	Letter from the Executive Producer
03	Using This Guide
04	Ten Things Everyone Should Know about Race
05	Program Descriptions
05	Facilitation Tips
06	Suggestions for Viewing
07	Discussion Starters: Episode I
09	Discussion Starters: Episode II
11	Discussion Starters: Episode III
14	Resources and Acknowledgments



Letter from the executive producer

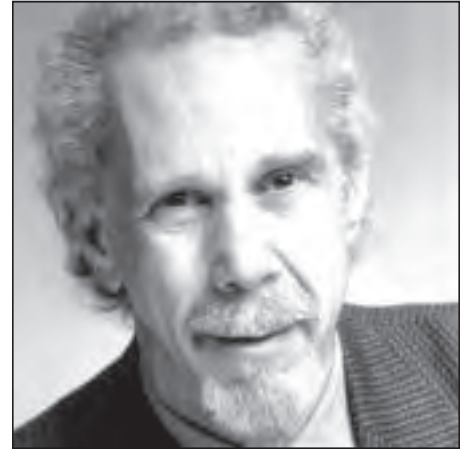
Dear Viewer,

Race is one topic where we all think we're experts. Yet ask 10 people to define race or name "the races," and you're likely to get 10 different answers. Few issues are characterized by more contradictory assumptions and myths, each voiced with absolute certainty.

In producing this series, we felt it was important to go back to first principles and ask, What is this thing called "race"? - a question so basic it is rarely raised. What we discovered is that most of our common assumptions about race - for instance, that the world's people can be divided biologically along racial lines - are wrong. Yet the consequences of racism are very real.

How do we make sense of these two seeming contradictions? Our hope is that this series can help us all navigate through our myths and misconceptions, and scrutinize some of the assumptions we take for granted. In that sense, the real subject of the film is not so much race but the viewer, or more precisely, the notions about race we all hold.

We hope this series can help clear away the biological underbrush and leave starkly visible the underlying social, economic, and political conditions that disproportionately channel advantages and opportunities to white people. Perhaps then we can shift the conversation from discussing diversity and respecting cultural difference to building a more just and equitable society.



— Larry Adelman
Executive Producer

using this guide

Using This Guide

To help people get the most from their viewing experience, we strongly recommend engaging audiences in the "Before Viewing" questions for each episode. Then take a look at the wide range of questions in the remainder of the guide and choose the ones that best meet the needs and interests of your group.

For each episode, you'll find six kinds of discussion starters and resources:

- > **Before Viewing Questions:** These prompts are designed to help people become more conscious of the ideas they hold as they enter this discussion. Asking people to reflect upon what they think prior to viewing can sharpen their focus as they consider issues raised in the films.
- > **Comprehension Questions:** RACE—The Power of an Illusion presents a lot of complex information that may be new to viewers. These questions can help make sure that everyone understands the core content of the program.
- > **Discussion Questions:** These are open-ended questions designed to help participants deepen their understanding.
- > **Activity Suggestion:** The ideas in this section can be tried after viewing as a way to delve more deeply into key concepts, or as before & after exercises to help make people aware of their beliefs and how those beliefs are challenged by the film(s).
- > **Web Site Tips:** This section highlights activities on the companion Web site (www.pbs.org/race) to help you further explore the themes of each episode.
- > **Key References:** For more advanced groups, we include this list of key historical documents, court cases, and laws cited in each episode.

Ten Things everyone should know

Ten Things Everyone Should Know about Race

There's less—and
more—to race
than meets
the eye.



- 1 Race is a modern idea.** Ancient societies, like the Greeks, did not divide people according to physical differences, but according to religion, status, class or even language. The English word "race" turns up for the first time in a 1508 poem by William Dunbar referring to a line of kings.
- 2 Race has no genetic basis.** Not one characteristic, trait or even gene distinguishes all the members of one so-called race from all the members of another so-called race.
- 3 Human subspecies don't exist.** Unlike many animals, modern humans simply haven't been around long enough, nor have populations been isolated enough, to evolve into separate subspecies or races. On average, only one of every thousand of the nucleotides that make up our DNA differ one human from another. We are one of the most genetically similar of all species.
- 4 Skin color really is only skin deep.** The genes for skin color have nothing to do with genes for hair form, eye shape, blood type, musical talent, athletic ability or forms of intelligence. Knowing someone's skin color doesn't necessarily tell you anything else about them.
- 5 Most variation is within, not between, "races."** Of the small amount of total human variation, 85% exists within any local population. About 94% can be found within any continent. That means, for example, that two random Koreans may be as genetically different as a Korean and an Italian.
- 6 Slavery predates race.** Throughout much of human history, societies have enslaved others, often as a result of conquest or debt, but not because of physical characteristics or a belief in natural inferiority. Due to a unique set of historical circumstances, North America has the first slave system where all slaves shared a common appearance and ancestry.
- 7 Race and freedom were born together.** The U.S. was founded on the principle that "All men are created equal," but the country's early economy was based largely on slavery. The new idea of race helped explain why some people could be denied the rights and freedoms that others took for granted.
- 8 Race justified social inequalities as natural.** The "common sense" belief in white superiority justified anti-democratic action and policies like slavery, the extermination of American Indians, the exclusion of Asian immigrants, the taking of Mexican lands, and the institutionalization of racial practices within American government, laws, and society.
- 9 Race isn't biological, but racism is still real.** Race is a powerful social idea that gives people different access to opportunities and resources. The government and social institutions of the United States have created advantages that disproportionately channel wealth, power and resources to white people.
- 10 Colorblindness will not end racism.** Pretending race doesn't exist is not the same as creating equality.

Program Descriptions

RACE—The Power of an Illusion is a provocative three-hour series that questions the very idea of race as biology. Scientists tell us that believing in biological races is no more sound than believing the sun revolves around the earth. So if race is a biological myth, where did the idea come from? And why should it matter today? **RACE—The Power of an Illusion** provides an eye-opening discussion tool to help people examine their beliefs about race, privilege, policy, and justice.

Episode I – “The Difference Between Us” examines how recent scientific discoveries have toppled the concept of biological race. The program follows a dozen diverse students who sequence and compare their own DNA. They discover, to their surprise, that their closest genetic matches are as likely to be with people from other “races” as their own. The episode helps us understand why it doesn’t make scientific or genetic sense to sort people into biological races, as it dismantles our most basic myths about race, including natural superiority and inferiority.

Episode II – “The Story We Tell” uncovers the roots of the race concept, including the 19th-century science that legitimated it and the hold it has gained over our minds. It’s an eye-opening tale of how America’s need to defend slavery in the face of a radical new belief in freedom and equality led to a full-blown ideology of white supremacy. Noting the experience of Cherokee Indians, the U.S. war against Mexico and annexation of the Philippines, the film shows how definitions of race excluded from humanity not only Black people, but anyone who stood in the way of American expansion. The program traces the transformation of tentative suspicions about difference into a “common-sense” wisdom that people used to explain everything from individual behavior to the fate of whole societies, an idea of race that persists to this day.

Episode III – “The House We Live In” focuses not on individual behaviors and attitudes, but on how our institutions shape and create race, giving different groups vastly unequal life chances. Who defines race? In the early 20th century, the courts were called upon to determine who was white, employing contradictory logic to maintain the color line. After World War II, government policies and subsidies helped create segregated suburbs where Italians, Jews and other not-quite-white European ethnics were able to reap the full advantages of whiteness. The episode reveals some of the ordinary social institutions that quietly channel wealth and opportunity, so that white people benefit from a racist system without personally being racist. It concludes by looking at why we can’t just get rid of race.

Facilitation Tips

RACE—The Power of an Illusion can challenge long and deeply held assumptions. People react to such challenges differently. Some will be inspired. Others may be disturbed. Either way, the power of the film can infuse discussions with emotion.

You can best help people engage in open and deep inquiry if you:

- > View the film beforehand so you are not processing your own reactions at the same time that you are trying to facilitate a discussion.
- > Know who is present and let their interests guide the discussion topics.
- > Establish ground rules so that everyone knows they will be heard and no one can dominate the discussion or silence others.
- > Encourage active listening.
- > Invite people to participate.



suggestions for viewing

Suggestions For Viewing

You can significantly increase the impact of your discussion by asking people to assess their ideas about race prior to viewing the film. Here are some ways you can evoke people's beliefs and get them to reflect on their experience and preconceptions:

- > Photocopy the “Ten Things Everyone Should Know about Race” in this guide and ask people to review and comment.
- > Discuss the “Before Viewing” questions tied to the episode you're watching (see the “Discussion Starters” in the following pages). Ask people to make note of their answers. After viewing, return to those questions to see if answers were changed or challenged by anything in the films.



general questions

General Questions

After viewing, you might want to get the discussion started with a general question. Here are some possibilities:

- > Reconsider your answers to the “Before Viewing” questions. Did the film change or challenge any of your assumptions? Did anything in the film(s) surprise you? Why?
- > Two weeks from now, what will you most remember from the film(s) and why?
- > How is this film different from or similar to other films you’ve seen about race?
- > Review the “Ten Things Everyone Should Know about Race” handout. Do you understand each of the items? Which things in the list challenge your responses to the pre-viewing questions?

episode 1 — The Difference Between us

Discussion Starters

Episode I—The Difference Between Us

“Race is not based on biology, but race is rather an idea that we ascribe to biology.”

— Alan Goodman,
biological anthropologist

Before Viewing

- > How would you define race? What does it mean to you?
- > How many races do you think there are? What are they? How do you decide which race someone belongs to?
- > Look around the room or around your community. Who do you think is likely to be most similar to you, biologically or genetically? Why?
- > Where do your ideas about race come from? What are the sources of your information?



Comprehension Questions

- > What is the difference between a biological and a social view of race?
- > Excluding your immediate family members, are you more likely to be genetically like someone who looks like you or someone who does not?
- > Why is it impossible to use biological characteristics to sort people into consistent races? Review some of the concepts such as "non-concordance" and "within-group vs. between group variation."
- > Who has benefited from the belief that we can sort people according to race and that there are natural or biologically based differences between racial groups?
- > Besides race, what other things explain why some people might be more susceptible than others to disease? Think about the girl in the film with sickle cell anemia. How is ancestry different from race?

Discussion Questions

At the beginning of the film, the students are asked to predict whom they will be most like when they compare their DNA samples. How did the results compare with your expectations? Did you share the students' surprise? If so, why?

Anthropologist Alan Goodman says that "to understand why the idea of race is a biological myth requires a major paradigm shift." Do you agree? Did the film present anything that shifted your thinking in a major way? If so, what? Is it difficult to make this shift? Why?

episode 1 - The Difference Between us

Discussion Questions continued

Web Site Tip:

Prior to viewing, visit the companion Web site at www.pbs.org/race and take the "Genetic Diversity Quiz" in the Human Diversity section. As you watch, see if any of your answers change. To follow up on the suggested activities, try the site's Sorting People activity. See if you can match people with their backgrounds just by looking at them.

Should doctors and other health professionals take biological race into account when diagnosing and treating illness? Why? Can you think of a situation where thinking about race as biological might be misleading or have a negative effect? How would considering social race be different?

Towards the end of this episode, the students are asked if they would trade their skin color. Would you trade your skin color? How do you think your life would be different if you looked like someone of a different race?

Turn-of-the-century scientists like Frederick Hoffman drew scientific conclusions based on what they believed to be true. How are scientists today influenced by their beliefs or their social context?

For many people, race is an important part of their identity. How do the following two comments from the film affect the way you think of yourself:

- > "There's as much or more diversity and genetic difference within any racial group as there is between people of different racial groups." - Pilar Ossorio, microbiologist
- > "Every single one of us is a mongrel." - student

Athletics is one arena where talking about ideas of inborn racial differences remains common. Why do you think some populations or groups seem to dominate certain sports but not others? What does it mean that the groups that dominate those sports have changed over time?

Try This Activity

Use the following list of inherited, biological traits to divide people into groups (i.e., first group people by hair color, then regroup by blood type, etc.):

- Hair color
- Blood types (A, B, O, A/B)
- Whether or not your tongue curls
- Lactose tolerance or intolerance (ability to digest milk products)
- Left-handedness or right-handedness
- Fingerprint types (loop, whorl, arch or tented arch)
- Skin color (compare the inside of your arm)

Does the composition of the groups remain consistent from one criterion to the next? If the groups change depending on the criteria, what does that tell us about "group racial characteristics"? What are some reasons why we might classify using some traits, but not others?

Key References

- 1896 - Frederick Hoffman, *Race Traits and Tendencies of the American Negro*
- 1972 - Richard Lewontin, "The Apportionment of Human Diversity," *Evolutionary Biology*, Vol. 6, 381-398.

Discussion Starters

Episode II—The Story We Tell

episode 2 — The story we tell

“Race was never just a matter of how you look, it’s about how people assign meaning to how you look.”

— Robin D. G. Kelley,
historian

Before Viewing

- > How long do you think the idea of race has been around? Where did it come from?
- > Do you think Africans were enslaved in the Americas because they were deemed inferior, or were they deemed inferior because they were enslaved?

Comprehension Questions

- > What are some ways that race has been used to rationalize inequality? How has race been used to shift attention (and responsibility) away from oppressors and toward the targets of oppression?
- > What is the connection of American slavery to prejudices against African-descended peoples? Why does race persist after abolition?
- > Why was it not slavery but freedom and the notion that “all men are created equal” that created a moral contradiction in colonial America, and how did race help resolve that contradiction?
- > Contrast Thomas Jefferson’s policy to assimilate American Indians in the 1780s with Andrew Jackson’s policy of removing Cherokees to west of the Mississippi in the 1830s. What is common to both policies? What differentiates them?
- > What did the publications of scientists Louis Agassiz, Samuel Morton, and Josiah Nott argue, and what was their impact on U.S. legal and social policy?
- > What role did beliefs about race play in the American colonization of Mexican territory, Cuba, the Philippines, Guam and Puerto Rico?

Discussion Questions

What is the significance of the episode’s title, “The Story We Tell”? What function has that story played in the U.S.? What are the stories about race that you tell? What are the stories you have heard? Did the film change the way you think about those stories? If so, how?

Organizers of the 1904 St. Louis World’s Fair put on display people whom they defined as “other.” Although few would do this today, many still see others as distinctly different from themselves. In your community, who is seen as “different”? What characterizes those who are defined as different?

In the film, historian James Horton points out that colonial white Americans invented the story that “there’s something different about ‘those’ people” in order to rationalize believing in the contradictory ideas of equality and slavery at the same time. Likewise, historian Reginald Horsman shows how the explanation continued to be used to resolve other dilemmas: “This successful republic is not destroying Indians just for the love of it, they’re not enslaving Blacks because they are selfish, they’re not overrunning Mexican lands because they are avaricious. This is part of some great inevitability... of the way races are constituted.” What stories of difference are used to mask or cover up oppression today? Why do we need to tell ourselves these kinds of stories?



episode 2 - the story we tell

Discussion Questions continued

How did expanding democracy and giving opportunities to more white men intersect with American society becoming increasingly "race based"? How did racism benefit white men? Are these practices still the case today? Is there an inevitable trade-off where one group gains privilege at the expense of another or can reversing racial inequality benefit all people, including white people who have traditionally benefited from racism? What might that look like?

Historian Matthew P. Guterl observes, "Most Americans believed that race was one of the most important parts of national life; that race mattered because it guaranteed this country a [glorious] future in the history of the world." While few would admit it today, do you think the definition of progress is still tied to being white? Can you think of historical or current instances in which those who are not defined as white are blamed for American weakness or problems?

How was the notion of Manifest Destiny shaped by beliefs about race? What is the relationship of Manifest Destiny to current foreign policies?

Compare current responses to racial inequity - e.g., calls for reparations or affirmative action - with the response of those who believed in the "White Man's Burden." Which solutions reinforce biological notions of race and/or white superiority? Which acknowledge the social construct of race without reinforcing those myths? Is it possible to address racial inequities without reinforcing biological notions of race? If so, how?

Try This Activity

Prior to viewing, define what it means to be "civilized." Make a list of what characteristics a civilized person possesses. After viewing, re-examine your list. How does your list compare to 18th & 19th century policies on American Indians, slaves, colonizing the Philippines, annexing Mexican land, etc.? How do beliefs about race influence beliefs about what it means to be civilized?

Key References

1776 - Johann Blumenbach, *On the Natural Varieties of Mankind*

1871 - Thomas Jefferson, *Notes on the State of Virginia*

1839 - Samuel Morton, *Crania Americana*

1854 - Josiah C. Nott, *Types of Mankind*

1830 - Indian Removal Act forcibly relocates thousands of Indians from the southeastern United States to west of the Mississippi River.

1857 - Supreme Court rules in *Dred Scott* that African Americans are ineligible for citizenship

1899 - Treaty of Paris - Spain cedes Guam, Puerto Rico & Philippine Islands to the U.S.

Web Site Tip:

Visit the Race Timeline section of the companion Web site (www.pbs.org/race) to explore key moments in the history and evolution of the race concept. See how ideas and definitions of race have changed over time, and how different groups were affected by these changes.

Discussion Starters

Episode III—The House We Live In

episode 3 - The house we live in

Before Viewing

- > Does race affect your life? Why or why not? If so, in what ways?
- > Forty years ago, the Civil Rights Act declared that forced racial segregation was illegal. In light of this, why do you think some neighborhoods, schools and workplaces are still segregated?
- > What stereotypes have you heard or seen about different racial groups? Where do they come from?
- > Do you think people today should be held accountable for past discrimination? Why or why not?
- > Define “racial preferences.” List a couple of current examples. Do the preferences you see in practice today tend to most benefit whites, Blacks, or others?

Comprehensive Questions

- > Who was allowed to become a naturalized citizen before 1954 and who wasn't? What rights and privileges do citizens have that non-citizens don't have? What were the consequences for those denied citizenship?
- > How did European “ethnics” become white? What changes made this possible?
- > How did federal housing policies institutionalize segregation and wealth disparities?
- > Why do property values go down when a neighborhood changes from white to nonwhite? Who plays a role in this?
- > What happens to measures of racial disparities in places like education and welfare rates when groups of similar income AND wealth are compared?

Discussion Questions

The film shows how government policies have created unfair advantages for whites in the past, resulting in a substantial wealth gap between whites and nonwhites. What examples of disparity exist in your community today? Will the wealth gap go away if we ignore race?

In the early part of this century, Asian immigrants were not eligible for citizenship, no matter how long they lived in the U.S. What is the legacy of those laws in terms of how Asian Americans are viewed today? What role does race play in current U.S. policy on immigration and granting of citizenship? How is our idea of citizenship still tied to race?

Commenting on the idea that the U.S. is a melting pot, sociologist Eduardo Bonilla-Silva says, “That melting pot never included people of color. Blacks, Chinese, Puerto Ricans, etc. could not melt into the pot.” Think about the phrase “melting pot”—what does it imply? If this does not appropriately describe the U.S., what phrase would aptly describe the relationship between its various peoples?

Central to the concept of the American Dream is the notion that anyone who works hard enough will be rewarded—that anyone can “pull themselves up by their bootstraps.” How has this been made more difficult for people not defined as white? What is the long-term impact of that denial? What difference does access to financial resources make in terms of your life opportunities?

“The slick thing about whiteness is that you can reap the benefits of a racist society without personally being racist.”

— john a. powell,
legal scholar



episode 3 - The house we live in

Discussion Questions continued

Cartoonist Bill Griffith comments on the all-white suburb where he grew up: "It certainly doesn't promote a feeling of a wider world to live in a place where there are only people who look like you." Do you agree? What does your neighborhood, workplace or school look like? Should geographical integration be a goal of public policy? Why or why not?

Psychologist Beverly Daniel Tatum summarizes the impact of institutionalized racial policies like FHA loan practices: "To the child of that parent, it looks like, 'My father worked hard, bought a house, passed his wealth on to me, made it possible for me to go to school....How come your father didn't do that?'" How would you answer the child of that privileged parent? How would you explain the situation to the child of the parent who was disadvantaged by government policies?

Supreme Court Justice Henry Blackmun said, "To get beyond racism we must first take account of race. There is no other way." Do you agree? Contrast Blackmun's statement with people who strive to be "colorblind" and judge people by the "content of their character rather than the color of their skin." Who benefits if we adopt a colorblind approach to society? How is colorblindness different from equality?

Given that race isn't biological, should we get rid of racial categories? Why might racial classifications still be useful? If we stop tracking racial information, how will we tell if disparities still exist?

How would you respond to Beverly Daniel Tatum's closing questions in the film:

- > What can I influence?
- > How am I making this a more equitable environment?
- > Who is included in this picture and who isn't; who has had opportunities in my environment and who hasn't?
- > What can I do about that?

Try This Activity

Ask each person to read through this list and give themselves a point for each item that is true for them:

- 1 My parents and grandparents were able to purchase or rent housing in any neighborhood they could afford.
- 2 I can take a job with an employer who believes in affirmative action without having co-workers suspect that I got it because of my race.
- 3 I grew up in a house that was owned by my parents.
- 4 I can look in mainstream media and see people who look like me represented fairly and in a wide range of roles.
- 5 I live in a safe neighborhood with good schools.
- 6 I can go shopping most of the time, pretty well assured that I will not be followed or harassed.
- 7 If my car breaks down on a deserted stretch of road, I can trust that the law enforcement officer who shows up will be helpful.
- 8 I don't have to worry about helping my parents out when they retire.
- 9 I never think twice about calling the police when trouble occurs.
- 10 Schools in my community teach about my race and heritage and present it in positive ways.
- 11 I can be pretty sure that if I go into a business and ask to speak to the "person in charge" that I will be facing a person of my race.



episode 3 - The house we live in

Discussion Questions continued

For additional examples of advantage, ask the group to brainstorm from their own experience or from the film. The list above is based partly on "White Privilege: Unpacking the Invisible Knapsack" by Peggy Macintosh, available in many places online.

After reviewing the list, ask people to notice who ends up with the most and fewest points. Do patterns emerge? Would people's answers have been different if they were a different race?

Conclude this activity by discussing legal scholar John A. Powell's observation that in a racist system, privilege is often conveyed, not earned: "Most of the benefits can be obtained without ever doing anything personally. For whites, they are getting the spoils of a racist system, even if they are not personally racist." Talk about the difference between personal racism, where the beliefs and/or actions of an individual reflect prejudice or result in discrimination, and institutional racism, where people benefit or are disadvantaged without necessarily doing anything themselves. How might people address the institutional racism they identify during the activity?

Key References

1909 - U.S. Court of Appeals in Massachusetts case *In Re Halladjian* declares Armenians legally white

1913 - first alien land law passed in California

1922 - Supreme Court case of *Ozawa v. United States* declares Japanese ineligible for citizenship

1923 - Supreme Court case of *United States v. Thind* declares Asian Indians ineligible for citizenship

1924 - Johnson-Reed Immigration Act establishes immigration quotas based on national origin

1930-1940s - federal housing programs created, making home ownership possible for millions of white Americans for the first time

1954 - McCarran-Walter Act removes racial barriers from naturalization

1968 - Fair Housing Act passes, making housing discrimination illegal

Web Site Tip:

To learn more about housing and wealth, visit the **Where Race Lives** section of the companion Web site (www.pbs.org/race). You might also view the slide shows examining people's different perspectives on race in the **Me, My Race, and I** section.

resources

Resources

The companion Web site for RACE—The Power of an Illusion (www.pbs.org/race) includes a wealth of interactive exercises and in-depth resources, including background articles, lesson plans, and links to related organizations.

Acknowledgments

Copyright 2003 California Newsreel

Developed by Dr. Faith Rogow, Insighters Educational Consulting, with contributions from Jean Cheng, Larry Adelman, Jim Sommers, and Timothea Howard.

Reviewers: Linda Li, Moses Howard, Marian Urquilla, and Amy Quinn.

Design: Brad Bunkers

Photos: Library of Congress, American Museum of Natural History, UCLA/Visual Communications, Howard University, Oregon Historical Society, Truman State University, New York Public Library, Armed Forces Institute of Pathology, Southern California Library for Social Studies Research, Cardona-Bagai Family Library

RACE—The Power of an Illusion was produced by California Newsreel in association with the Independent Television Service (ITVS). ITVS was created by Congress to “increase the diversity of programs available to public television, and to serve underserved audiences, in particular minorities and children.” For downloadable educational and outreach resources from ITVS’s Community Connections Project, visit www.itvs.org/outreach/toolkits.htm.

Major funding for this program was provided by Ford Foundation and the Corporation for Public Broadcasting Diversity Fund. Additional funding by Annie E. Casey Foundation, the John D. and Catherine T. MacArthur Foundation, Akonadi Foundation, Lida and Alejandro Zaffaroni, the Wallace Alexander Gerbode Foundation, and Nu Lambda Trust.

For more information about ITVS or to obtain additional copies of this guide, contact us at 415-356-8383; fax 415-356-8391 or visit the Web site: www.itvs.org/outreach/toolkits.htm.

To purchase the video, call 1-877-811-7495 or go to www.newsreel.org/films/race.htm.

Visit the companion Web site at www.pbs.org/race.



FORD FOUNDATION



RACE & SOCIAL JUSTICE INITIATIVE



Seattle
Office for Civil Rights

Racial disparities have been eliminated and racial equity achieved.



Pages 1-4: 15-20 minutes

Welcome

The RSJI vision that unifies this work across City departments and connects us with community goals

Intro RSJI Teams, Change Teams, CORE Team, Sub-cabinet and RET's.

This is a training about framing, how we frame and center our work.

Think about how this affects you as a city employee and how you and your role can help the city work towards racial equity.

RSJI Change Agents Video



A little more about the RSJI from some of the change agents from around the city.

Share personal journey:

Examples

Experienced racism

Awareness of systematic racism

Reflecting on whiteness

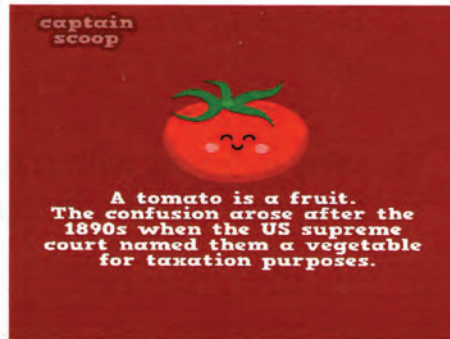
Internalized oppression

Internalized superiority

How the elements of white supremacy culture affect us all: relationship to time, perfectionism, sense of urgency, right to comfort, defensiveness, paternalism, either/or thinking, individualism, etc.

INTRODUCTIONS

1. Name and department
2. How you identify racially



Let's do introductions, please share your name, what you do for the City & your primary racial (identity(ies)). We are **all members of the human race** and all of us **live in the United States and so can call ourselves residence of America or Americans**. This is an opportunity to notice what "racial" groups are represented in the room today and who is not and for us to increase our comfort level with naming race. (*Go around room-facilitators model first*).

LEARNING OBJECTIVES

1. How and why differences matter in our society
2. Define privilege and explore how it shows up
3. Why leading with a racial equity lens is the strategy to create equity for all.

A Brief History

1. How was our country formed?
2. Who was the Constitution written to protect?
3. How was the economy developed?
4. Who can name laws that restricted and/or increased people's rights?



At the formation of the US, back in 1492, who was here? How did the colonizers deal with indigenous people?

Genocide: Ask for examples of this (Native American)

Enslavement: Ask for examples of this (African American)

Bordering: Ask for example of this (Chinese Exclusion Act of 1882)

Who wrote the Constitution? White, Christian, Male, Land-owners

Examples to explore:

How white indentured servants were elevated with positionality over African slaves and offered a small payment for this and how that created an economic ladder for white folks out of poverty and ensured black folks remained poor.

When white labor movements were being organized for fair wages, fair employment conditions, safety conditions, black laborer's were brought in as strike breakers and provided temporary access to jobs otherwise inaccessible to them.

The documentary 13th: how it explores how law, policies and economics can create a system of oppression without naming race specifically and still have incredibly racialized outcomes.

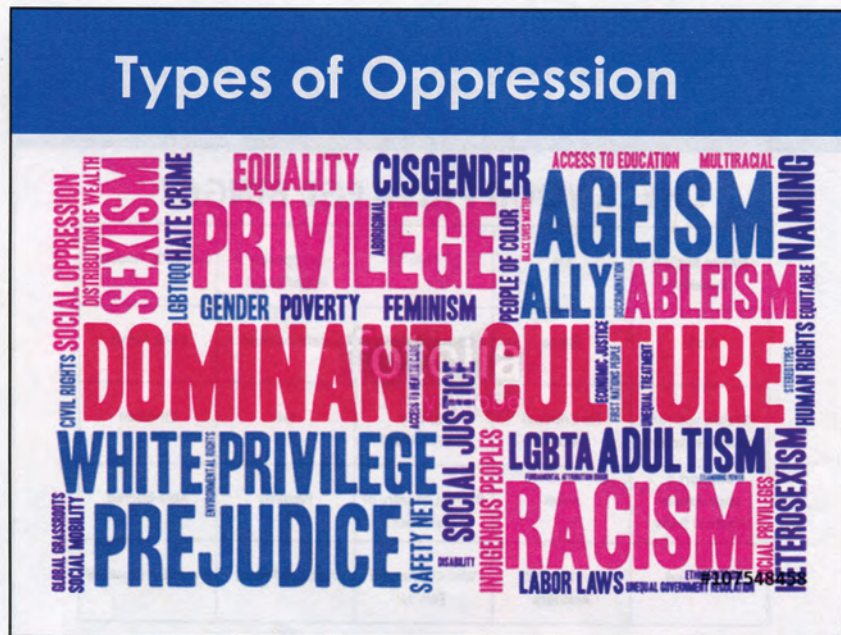
Table Discussion

At your table discussion the types of oppressions that exist in our society?



Have participants discuss oppression they have felt and/or seen in the United States, Seattle and at work.





Debrief Table discussion



BINGO				
CHECK YOUR PRIVILEGE BINGO!				
Native English Speaker	Cis	Thin	No Speech impediment	Currently Housed
Male	White	Conventionally Attractive	Heterosexual	Book Smart
Speaks with an American Accent	No Criminal Record	Human (FREE SPACE)	Tall	Christian
Support a Mainstream Political Party	Adult	Born in country of residence	Wealthy	Able-bodied
Employed	First-World Resident	Well-Connected Family	Not a red-head	Formally Educated

Privilege Bingo: Have participants take a minute to circle words that are true for them.

Have them pair with a partner to discuss their results.

See who has multiple bingos. Debrief.



CHECK YOUR PRIVILEGE BINGO!

Native English Speaker	Cis	Thin	No Speech impediment	Currently Housed
Male	White	Conventionally Attractive	Heterosexual	Book Smart
Speaks with an American Accent	No Criminal Record	Human (FREE SPACE)	Tall	Christian
Support a Mainstream Political Party	Adult	Born in country of residence	Wealthy	Able-bodied
Employed	First-World Resident	Well-Connected Family	Not a red-head	Formally Educated

Individual Exercise

Privileged Group	Target/Oppressed Group	Oppression
White	People of Color	Racism
Non-Native	Native/Indigenous	Colonialism
Non-Trans Men	Women and Trans people	Sexism
Non-Disabled	People with a disability	Ableism
Christian	Other religions or spiritual practices	Christian hegemony
Heterosexual	Lesbian, Gay, Bi, Queer, etc.	Heterosexism
Adult	Youth/Elder	Ageism
Wealthy	Poor and working class	Classism
Citizen	Non-citizen	Nationalism
Formally educated	Non-formally educated	Elitism

This is a description of a power system

Review four privileged (VALUED) groups, oppressed (DE-VALUED) groups, the type of oppressions (POWER DYNAMIC) and intersectionality (NON-BINARY, binary is oppositional and can be hierarchical).

Ask if there are any folks didn't know of or are curious about?

Color-blindness centers whiteness

Multi-culturalism celebrates our differences

Resistance to multi-culturalism can look like: "I don't see race", "I'm a good person" or focusing on intention verses impact

What does it look like to acknowledge and embrace differences?

Dealing with Difference

- Explicit Bias
- Implicit Bias
- Micro-Aggressions
- Invalidating other people's experiences

**"PRIVILEGE IS WHEN
YOU THINK SOMETHING
IS NOT A PROBLEM
BECAUSE IT'S NOT A
PROBLEM TO YOU
PERSONALLY."**

FACEBOOK/STOPTHETEAPARTY

Walk through the definition of each bullet point and ask for examples of each one

Ask participants how does oppression show up?

Ask participants how does resistance show up?
(Ex: Harper's Ferry, Black Lives Matter, etc.)

SEATTLE LEADS WITH A RACIAL EQUITY LENS



Share example of Seattle Public Schools graduation rates (or something else near and dear to you) and how graduation rates in general pretty poor (75%-80%) but with kids of color the graduation rate hovers around 50%. It is important to ask what are the barriers to kids graduating? What are the additional barriers kids of color are facing in graduating? If you remove the barriers kids of color are facing, everyone benefits.

Language shift: we are failing 50% of Black students vs. 50% of Black students are failing.

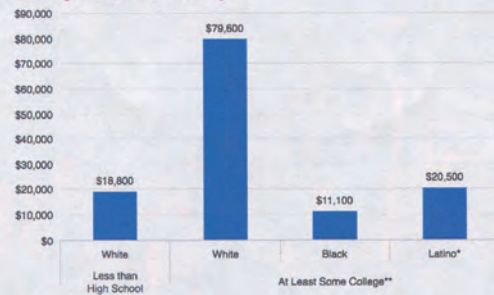
What are the consequences of us failing them?

We have failed solutions: More schooling for kids (pre-K, summer school, etc) without supporting student needs, teachers, parents and not acknowledging the dynamic of white folks teaching kids of color.

Here at the city of Seattle, we employ more folks of color statistically than our current population, however, it is still very racially stratified. This does not get us to an Anti-racist outcome.

Educational Attainment & Race national data

Figure 1. Median Wealth by Educational Attainment for Working Households under Age 55



The Asset Value of Whiteness: Understanding the Racial Wealth Gap
Brandeis University and Demos (2017)

This slides explores certain myths of the United States: our society is equal and there is equal access to social mobility.

So, for example, a 2014 Brookings Institute study looked at class mobility by race and determined that if you're white, you have a 16% chance of making it from the bottom quintile to the top quintile by age 40. But if you're Black, that chance is only 3%.

The same study showed that if you're white, you have a 23% chance of remaining in that same bottom quintile until you're 40. And if you're Black, that chance that you will remain among the most poor goes up to 51%.

When we leave race off the table, the differences that people experience in relation to institutions, because of their race, do not get addressed. Why do we do that?

In dyads, discuss how you have been impacted by racism? White Supremacy Culture?

Class Mobility & Race

national data

Class Mobility by Race

Race	% likelihood will move from bottom 1/5 to top 1/5 by age 40
White	16%
Black	3%

Lack of Class Mobility by Race

Race	% likelihood will still be counted among poorest by age 40
White	23%
Black	51%

Brookings Institute (2014)

So, for example, a 2014 Brookings Institute study looked at class mobility by race and determined that if you're white, you have a 16% chance of making it from the bottom quintile to the top quintile by age 40. But if you're Black, that chance is only 3%.

The same study showed that if you're white, you have a 23% chance of remaining in that same bottom quintile until you're 40. And if you're Black, that chance that you will remain among the most poor goes up to 51%.

What are additional barriers to folks of color in gaining social mobility?

When we leave race off the table, the differences that people experience in relation to institutions, because of their race, do not get addressed.

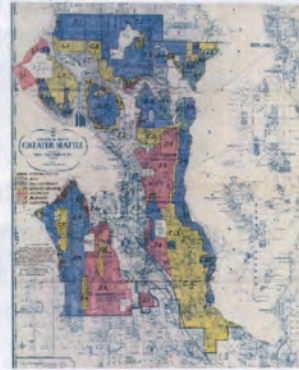
STRUCTURAL ISSUES NEED STRUCTURAL SOLUTIONS

Attending college does not
close the racial wealth gap.

Raising children in a two-
parent household does not
close the racial wealth gap.

Working full time does not
close the racial wealth gap.

Spending less does not
close the racial wealth gap.



The Asset Value of Whiteness: Understanding the Racial Wealth Gap
Brandeis University and Demos (2017)

This slide explores additional myths told in our society about how people achieve mobility.

- Even so, the median white adult who attended college has 7.2 times the wealth of the median black adult who attended college, according to the study.
- Likewise with working full-time and raising children in a two-parent household: whites who do those things have greater wealth than blacks who do those things.

Why?

-- Inheritance = jump start wealth accumulation for whites: whites are five times as likely as Black folks to receive substantial inheritances and gifts while parents are still alive

-- racial segregation in neighborhoods

-- restricted access to affordable credit (for Black people)

-- consumer racial discrimination for Blacks and Latinos (e.g. 2012 Wells Fargo settlement of \$175M to Blacks and Latinos for racial steering in mortgage lending = a "racial surtax")

-- in a related Duke study: Retail desertification in racially segregated neighborhoods, restricted access to affordable credit for blacks, and consumer racial discrimination, we argue, result in lower overall spending for blacks at all income levels

racial steering in mortgages. In 2012, for example, Wells Fargo & Co. paid at least \$175 million to settle allegations that it steered thousands of black and Latino borrowers into subprime mortgages when non-Hispanic white borrowers with similar credit profiles received prime loans. Prosecutors called the steering a "racial surtax."

In pairs, consider what would close the racial wealth gap? Debrief.

WHY DO WE LEAD WITH A RACIAL EQUITY LENS?

OPPORTUNITY & LIFE OUTCOMES

Across all measures, one's race is the most persistent and salient predictor of opportunities and life outcomes.

CENTER THOSE MOST IMPACTED

Achieving equity for all requires that we design policies and practices that address the needs of those who are most impacted.

IT INCLUDES ALL OF US

Racial equity is not just about better outcomes for people of color. It's about a world in which we all get to be whole and valued, where white supremacy culture – including the ableist, classist, heteropatriarchal norms it upholds – no longer dominates.

It is strategic.

HOW DO WE LEAD WITH A RACIAL EQUITY LENS?

- **USE RACE-EXPLICIT LANGUAGE**
- **LIFT UP INTERSECTING OPPRESSIONS**
- **SHIFT OUR CULTURE**
- **MAKE IT A LIFE PRACTICE**
- **ACKNOWLEDGE HISTORY & HOW IT PLAYS OUT TODAY**

Talk about who is in the room and who is not, name race equity when setting goals and looking at programming.

Center the most disenfranchised when designing services. Ex: Homelessness: If you focus on creating supportive pathways to housing for people who are black, trans, disabled and unsheltered, everyone benefits. People with these identities have more barriers than those without these identities and so everyone benefits.

Antidotes to WSC: develop a culture of appreciation, develop a culture of curiosity and continuous learning, understand and appreciate different work styles, include quality goals and process goals, value people's experiences, acknowledge the value of the voices in the room, be clear about who makes what decisions and who has what responsibilities, notice and challenge either/or thinking, role play ways to handle conflict, be willing to be uncomfortable, etc.

Commit to conversations, learning and growing for life.

TABLE DISCUSSION

What can you do as a city employee?



How does your work shift when leading with a racial equity lens?

Popcorn out, if there is time, or offer a few minutes for self-reflection.

What you can do

- Diversify your media and information sources
- Apply a Racial Equity Lens to your work.
- Slow down rushed processes and use the Racial Equity Toolkit
- Get Involved!
- Track and report racial outcomes in your sphere of influence – articulate your racial equity thinking process

Diversify your media

Be intentional about looking for and paying close attention to diverse voices of color on the tv, on the internet and on the radio to help shape your awareness, understanding and thinking about political, economic and social issues. Check out [Colorlines](#), [The Root](#) or [This Week in Blackness](#) to get started.

Slow Down rushed processes/avoid ambiguity

- Use the RET
- Question valuing efficiency over equitable outcomes

Join your Change Team, take more trainings, have conversations in your spheres of influence.



- Encourage continued learning & awareness building
- Questions
- If time allows, one take away from each participant.
- Thank you

EXHIBIT - 13

RACE & SOCIAL JUSTICE INITIATIVE



Seattle
Office for Civil Rights

Racial disparities have been eliminated and racial equity achieved.



Pages 1-4: 15-20 minutes

Welcome

The RSJI vision that unifies this work across City departments and connects us with community goals

Intro RSJI Teams, Change Teams, CORE Team, Sub-cabinet and RET's.

This is a training about framing, how we frame and center our work.

Think about how this affects you as a city employee and how you and your role can help the city work towards racial equity.

RSJI Change Agents Video



A little more about the RSJI from some of the change agents from around the city.

Share personal journey:

Examples

Experienced racism

Awareness of systematic racism

Reflecting on whiteness

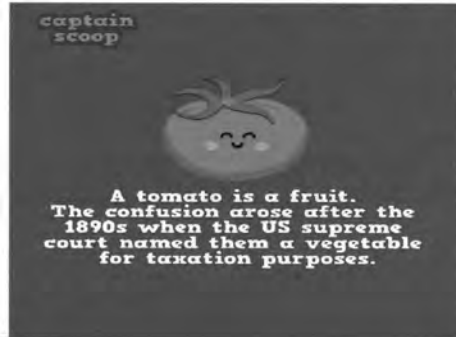
Internalized oppression

Internalized superiority

How the elements of white supremacy culture affect us all: relationship to time, perfectionism, sense of urgency, right to comfort, defensiveness, paternalism, either/or thinking, individualism, etc.

INTRODUCTIONS

1. Name and department
2. How you identify racially



Let's do introductions, please share your name, what you do for the City & your primary racial (identity(ies)). We are **all members of the human race** and all of us **live in the United States and so can call ourselves residence of America or Americans**. This is an opportunity to notice what "racial" groups are represented in the room today and who is not and for us to increase our comfort level with naming race. (*Go around room-facilitators model first*).

LEARNING OBJECTIVES

1. How and why differences matter in our society
2. Define privilege and explore how it shows up
3. Why leading with a racial equity lens is the strategy to create equity for all.

A Brief History

1. How was our country formed?
2. Who was the Constitution written to protect?
3. How was the economy developed?
4. Who can name laws that restricted and/or increased people's rights?



At the formation of the US, back in 1492, who was here? How did the colonizers deal with indigenous people?

Genocide: Ask for examples of this (Native American)

Enslavement: Ask for examples of this (African American)

Bordering: Ask for example of this (Chinese Exclusion Act of 1882)

Who wrote the Constitution? White, Christian, Male, Land-owners

Examples to explore:

How white indentured servants were elevated with positionality over African slaves and offered a small payment for this and how that created an economic ladder for white folks out of poverty and ensured black folks remained poor.

When white labor movements were being organized for fair wages, fair employment conditions, safety conditions, black laborer's were brought in as strike breakers and provided temporary access to jobs otherwise inaccessible to them.

The documentary 13th: how it explores how law, policies and economics can create a system of oppression without naming race specifically and still have incredibly racialized outcomes.

Table Discussion

At your table discussion the types of oppressions that exist in our society?



Have participants discuss oppression they have felt and/or seen in the United States, Seattle and at work.



Types of Oppression



Debrief Table discussion



BINGO

CHECK YOUR PRIVILEGE BINGO!

Native English Speaker	Cis	Thin	No Speech impediment	Currently Housed
Male	White	Conventionally Attractive	Heterosexual	Book Smart
Speaks with an American Accent	No Criminal Record	Human (FREE SPACE)	Tall	Christian
Support a Mainstream Political Party	Adult	Born in country of residence	Wealthy	Able-bodied
Employed	First-World Resident	Well-Connected Family	Not a red-head	Formally Educated

Privilege Bingo: Have participants take a minute to circle words that are true for them.

Have them pair with a partner to discuss their results.

See who has multiple bingos. Debrief.



CHECK YOUR PRIVILEGE BINGO!

Native English Speaker	Cis	Thin	No Speech impediment	Currently Housed
Male	White	Conventionally Attractive	Heterosexual	Book Smart
Speaks with an American Accent	No Criminal Record	Human (FREE SPACE)	Tall	Christian
Support a Mainstream Political Party	Adult	Born in country of residence	Wealthy	Able-bodied
Employed	First-World Resident	Well-Connected Family	Not a red-head	Formally Educated

Individual Exercise

Privileged Group	Target/Oppressed Group	Oppression
White	People of Color	Racism
Non-Native	Native/Indigenous	Colonialism
Non-Trans Men	Women and Trans people	Sexism
Non-Disabled	People with a disability	Ableism
Christian	Other religions or spiritual practices	Christian hegemony
Heterosexual	Lesbian, Gay, Bi, Queer, etc.	Heterosexism
Adult	Youth/Elder	Ageism
Wealthy	Poor and working class	Classism
Citizen	Non-citizen	Nationalism
Formally educated	Non-formally educated	Elitism

This is a description of a power system

Review four privileged (VALUED) groups, oppressed (DE-VALUED) groups, the type of oppressions (POWER DYNAMIC) and intersectionality (NON-BINARY, binary is oppositional and can be hierarchical).

Ask if there are any folks didn't know of or are curious about?

Color-blindness centers whiteness

Multi-culturalism celebrates our differences

Resistance to multi-culturalism can look like: "I don't see race", "I'm a good person" or focusing on intention verses impact

What does it look like to acknowledge and embrace differences?

Dealing with Difference

- Explicit Bias
- Implicit Bias
- Micro-Aggressions
- Invalidating other people's experiences

**"PRIVILEGE IS WHEN
YOU THINK SOMETHING
IS NOT A PROBLEM
BECAUSE IT'S NOT A
PROBLEM TO YOU
PERSONALLY."**

FACEBOOK/STOPTHETEAPARTY

Walk through the definition of each bullet point and ask for examples of each one

Ask participants how does oppression show up?

Ask participants how does resistance show up?

(Ex: Harper's Ferry, Black Lives Matter, etc.)

SEATTLE LEADS WITH A RACIAL EQUITY LENS



Share example of Seattle Public Schools graduation rates (or something else near and dear to you) and how graduation rates in general pretty poor (75%-80%) but with kids of color the graduation rate hovers around 50%. It is important to ask what are the barriers to kids graduating? What are the additional barriers kids of color are facing in graduating? If you remove the barriers kids of color are facing, everyone benefits.

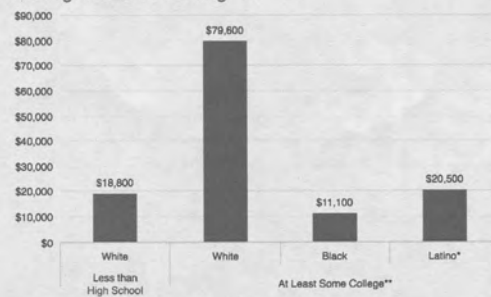
Language shift: we are failing 50% of Black students vs. 50% of Black students are failing. What are the consequences of us failing them?

We have failed solutions: More schooling for kids (pre-K, summer school, etc) without supporting student needs, teachers, parents and not acknowledging the dynamic of white folks teaching kids of color.

Here at the city of Seattle, we employ more folks of color statistically than our current population, however, it is still very racially stratified. This does not get us to an Anti-racist outcome.

Educational Attainment & Race national data

Figure 1. Median Wealth by Educational Attainment for Working Households under Age 55



The Asset Value of Whiteness: Understanding the Racial Wealth Gap
Brandeis University and Demos (2017)

This slide explores certain myths of the United States: our society is equal and there is equal access to social mobility.

So, for example, a 2014 Brookings Institute study looked at class mobility by race and determined that if you're white, you have a 16% chance of making it from the bottom quintile to the top quintile by age 40. But if you're Black, that chance is only 3%.

The same study showed that if you're white, you have a 23% chance of remaining in that same bottom quintile until you're 40. And if you're Black, that chance that you will remain among the most poor goes up to 51%.

When we leave race off the table, the differences that people experience in relation to institutions, because of their race, do not get addressed. Why do we do that?

In dyads, discuss how you have been impacted by racism? White Supremacy Culture?

Class Mobility & Race

national data

Class Mobility by Race

Race	% likelihood will move from bottom 1/5 to top 1/5 by age 40
White	16%
Black	3%

Lack of Class Mobility by Race

Race	% likelihood will still be counted among poorest by age 40
White	23%
Black	51%

Brookings Institute (2014)

So, for example, a 2014 Brookings Institute study looked at class mobility by race and determined that if you're white, you have a 16% chance of making it from the bottom quintile to the top quintile by age 40. But if you're Black, that chance is only 3%.

The same study showed that if you're white, you have a 23% chance of remaining in that same bottom quintile until you're 40. And if you're Black, that chance that you will remain among the most poor goes up to 51%.

What are additional barriers to folks of color in gaining social mobility?

When we leave race off the table, the differences that people experience in relation to institutions, because of their race, do not get addressed.

STRUCTURAL ISSUES NEED STRUCTURAL SOLUTIONS

Attending college does not
close the racial wealth gap.

Raising children in a two-
parent household does not
close the racial wealth gap.

Working full time does not
close the racial wealth gap.

Spending less does not
close the racial wealth gap.



The Asset Value of Whiteness: Understanding the Racial Wealth Gap
Brandeis University and Demos (2017)

This slide explores additional myths told in our society about how people achieve mobility.

- Even so, the median white adult who attended college has 7.2 times the wealth of the median black adult who attended college, according to the study.
- Likewise with working full-time and raising children in a two-parent household: whites who do those things have greater wealth than blacks who do those things.

Why?

-- Inheritance = jump start wealth accumulation for whites: whites are five times as likely as Black folks to receive substantial inheritances and gifts while parents are still alive

-- racial segregation in neighborhoods

-- restricted access to affordable credit (for Black people)

-- consumer racial discrimination for Blacks and Latinos (e.g. 2012 Wells Fargo settlement of \$175M to Blacks and Latinos for racial steering in mortgage lending = a "racial surtax")

-- in a related Duke study: Retail desertification in racially segregated neighborhoods, restricted access to affordable credit for blacks, and consumer racial discrimination, we argue, result in lower overall spending for blacks at all income levels

racial steering in mortgages. In 2012, for example, Wells Fargo & Co. paid at least \$175 million to settle allegations that it steered thousands of black and Latino borrowers into subprime mortgages when non-Hispanic white borrowers with similar credit profiles received prime loans. Prosecutors called the steering a "racial surtax."

In pairs, consider what would close the racial wealth gap? Debrief.

WHY DO WE LEAD WITH A RACIAL EQUITY LENS?

OPPORTUNITY & LIFE OUTCOMES

Across all measures, one's race is the most persistent and salient predictor of opportunities and life outcomes.

CENTER THOSE MOST IMPACTED

Achieving equity for all requires that we design policies and practices that address the needs of those who are most impacted.

IT INCLUDES ALL OF US

Racial equity is not just about better outcomes for people of color. It's about a world in which we all get to be whole and valued, where white supremacy culture – including the ableist, classist, heteropatriarchal norms it upholds – no longer dominates.

It is strategic.

HOW DO WE LEAD WITH A RACIAL EQUITY LENS?

- **USE RACE-EXPLICIT LANGUAGE**
- **LIFT UP INTERSECTING OPPRESSIONS**
- **SHIFT OUR CULTURE**
- **MAKE IT A LIFE PRACTICE**
- **ACKNOWLEDGE HISTORY & HOW IT PLAYS OUT TODAY**

Talk about who is in the room and who is not, name race equity when setting goals and looking at programming.

Center the most disenfranchised when designing services. Ex: Homelessness: If you focus on creating supportive pathways to housing for people who are black, trans, disabled and unsheltered, everyone benefits. People with these identities have more barriers than those without these identities and so everyone benefits.

Antidotes to WSC: develop a culture of appreciation, develop a culture of curiosity and continuous learning, understand and appreciate different work styles, include quality goals and process goals, value people's experiences, acknowledge the value of the voices in the room, be clear about who makes what decisions and who has what responsibilities, notice and challenge either/or thinking, role play ways to handle conflict, be willing to be uncomfortable, etc.

Commit to conversations, learning and growing for life.

TABLE DISCUSSION

What can you do as a city employee?



How does your work shift when leading with a racial equity lens?

Popcorn out, if there is time, or offer a few minutes for self-reflection.

RACE & SOCIAL JUSTICE INITIATIVE



Seattle
Office for Civil Rights

Racial disparities have been eliminated and racial equity achieved.



Pages 1-4: 15-20 minutes

Welcome

The RSJI vision that unifies this work across City departments and connects us with community goals

Intro RSJI Teams, Change Teams, CORE Team, Sub-cabinet and RET's.

This is a training about framing, how we frame and center our work.

Think about how this affects you as a city employee and how you and your role can help the city work towards racial equity.

RSJI Change Agents Video



A little more about the RSJI from some of the change agents from around the city.

Share personal journey:

Examples

Experienced racism

Awareness of systematic racism

Reflecting on whiteness

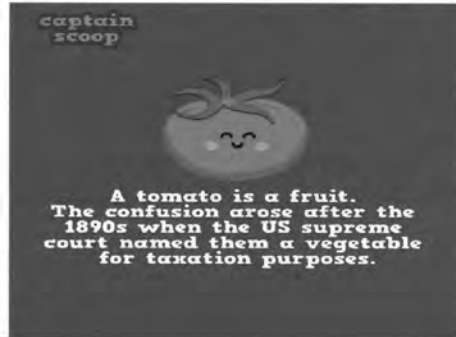
Internalized oppression

Internalized superiority

How the elements of white supremacy culture affect us all: relationship to time, perfectionism, sense of urgency, right to comfort, defensiveness, paternalism, either/or thinking, individualism, etc.

INTRODUCTIONS

1. Name and department
2. How you identify racially



Let's do introductions, please share your name, what you do for the City & your primary racial (identity(ies)). We are **all members of the human race** and all of us **live in the United States and so can call ourselves residence of America or Americans**. This is an opportunity to notice what "racial" groups are represented in the room today and who is not and for us to increase our comfort level with naming race. (*Go around room-facilitators model first*).

LEARNING OBJECTIVES

1. How and why differences matter in our society
2. Define privilege and explore how it shows up
3. Why leading with a racial equity lens is the strategy to create equity for all.

A Brief History

1. How was our country formed?
2. Who was the Constitution written to protect?
3. How was the economy developed?
4. Who can name laws that restricted and/or increased people's rights?



At the formation of the US, back in 1492, who was here? How did the colonizers deal with indigenous people?

Genocide: Ask for examples of this (Native American)

Enslavement: Ask for examples of this (African American)

Bordering: Ask for example of this (Chinese Exclusion Act of 1882)

Who wrote the Constitution? White, Christian, Male, Land-owners

Examples to explore:

How white indentured servants were elevated with positionality over African slaves and offered a small payment for this and how that created an economic ladder for white folks out of poverty and ensured black folks remained poor.

When white labor movements were being organized for fair wages, fair employment conditions, safety conditions, black laborer's were brought in as strike breakers and provided temporary access to jobs otherwise inaccessible to them.

The documentary 13th: how it explores how law, policies and economics can create a system of oppression without naming race specifically and still have incredibly racialized outcomes.

Table Discussion

At your table discussion the types of oppressions that exist in our society?



Have participants discuss oppression they have felt and/or seen in the United States, Seattle and at work.



Types of Oppression



Debrief Table discussion



BINGO				
CHECK YOUR PRIVILEGE BINGO!				
Native English Speaker	Cis	Thin	No Speech impediment	Currently Housed
Male	White	Conventionally Attractive	Heterosexual	Book Smart
Speaks with an American Accent	No Criminal Record	Human (FREE SPACE)	Tall	Christian
Support a Mainstream Political Party	Adult	Born in country of residence	Wealthy	Able-bodied
Employed	First-World Resident	Well-Connected Family	Not a red-head	Formally Educated

Privilege Bingo: Have participants take a minute to circle words that are true for them.

Have them pair with a partner to discuss their results.

See who has multiple bingos. Debrief.



CHECK YOUR PRIVILEGE BINGO!

Native English Speaker	Cis	Thin	No Speech impediment	Currently Housed
Male	White	Conventionally Attractive	Heterosexual	Book Smart
Speaks with an American Accent	No Criminal Record	Human (FREE SPACE)	Tall	Christian
Support a Mainstream Political Party	Adult	Born in country of residence	Wealthy	Able-bodied
Employed	First-World Resident	Well-Connected Family	Not a red-head	Formally Educated

Individual Exercise

Privileged Group	Target/Oppressed Group	Oppression
White	People of Color	Racism
Non-Native	Native/Indigenous	Colonialism
Non-Trans Men	Women and Trans people	Sexism
Non-Disabled	People with a disability	Ableism
Christian	Other religions or spiritual practices	Christian hegemony
Heterosexual	Lesbian, Gay, Bi, Queer, etc.	Heterosexism
Adult	Youth/Elder	Ageism
Wealthy	Poor and working class	Classism
Citizen	Non-citizen	Nationalism
Formally educated	Non-formally educated	Elitism

This is a description of a power system

Review four privileged (VALUED) groups, oppressed (DE-VALUED) groups, the type of oppressions (POWER DYNAMIC) and intersectionality (NON-BINARY, binary is oppositional and can be hierarchical).

Ask if there are any folks didn't know of or are curious about?

Color-blindness centers whiteness

Multi-culturalism celebrates our differences

Resistance to multi-culturalism can look like: "I don't see race", "I'm a good person" or focusing on intention verses impact

What does it look like to acknowledge and embrace differences?

Dealing with Difference

- Explicit Bias
- Implicit Bias
- Micro-Aggressions
- Invalidating other people's experiences

**"PRIVILEGE IS WHEN
YOU THINK SOMETHING
IS NOT A PROBLEM
BECAUSE IT'S NOT A
PROBLEM TO YOU
PERSONALLY."**

FACEBOOK/STOPTHETEAPARTY

Walk through the definition of each bullet point and ask for examples of each one

Ask participants how does oppression show up?

Ask participants how does resistance show up?

(Ex: Harper's Ferry, Black Lives Matter, etc.)

SEATTLE LEADS WITH A RACIAL EQUITY LENS



Share example of Seattle Public Schools graduation rates (or something else near and dear to you) and how graduation rates in general pretty poor (75%-80%) but with kids of color the graduation rate hovers around 50%. It is important to ask what are the barriers to kids graduating? What are the additional barriers kids of color are facing in graduating? If you remove the barriers kids of color are facing, everyone benefits.

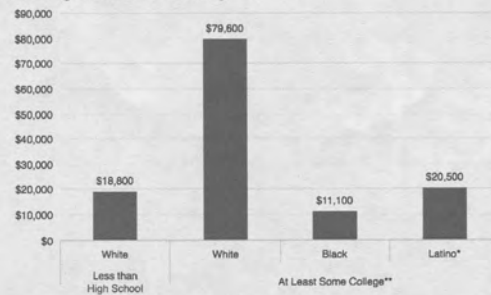
Language shift: we are failing 50% of Black students vs. 50% of Black students are failing. What are the consequences of us failing them?

We have failed solutions: More schooling for kids (pre-K, summer school, etc) without supporting student needs, teachers, parents and not acknowledging the dynamic of white folks teaching kids of color.

Here at the city of Seattle, we employ more folks of color statistically than our current population, however, it is still very racially stratified. This does not get us to an Anti-racist outcome.

Educational Attainment & Race national data

Figure 1. Median Wealth by Educational Attainment for Working Households under Age 55



The Asset Value of Whiteness: Understanding the Racial Wealth Gap
Brandeis University and Demos (2017)

This slides explores certain myths of the United States: our society is equal and there is equal access to social mobility.

So, for example, a 2014 Brookings Institute study looked at class mobility by race and determined that if you're white, you have a 16% chance of making it from the bottom quintile to the top quintile by age 40. But if you're Black, that chance is only 3%.

The same study showed that if you're white, you have a 23% chance of remaining in that same bottom quintile until you're 40. And if you're Black, that chance that you will remain among the most poor goes up to 51%.

When we leave race off the table, the differences that people experience in relation to institutions, because of their race, do not get addressed. Why do we do that?

In dyads, discuss how you have been impacted by racism? White Supremacy Culture?

Class Mobility & Race

national data

Class Mobility by Race

Race	% likelihood will move from bottom 1/5 to top 1/5 by age 40
White	16%
Black	3%

Lack of Class Mobility by Race

Race	% likelihood will still be counted among poorest by age 40
White	23%
Black	51%

Brookings Institute (2014)

So, for example, a 2014 Brookings Institute study looked at class mobility by race and determined that if you're white, you have a 16% chance of making it from the bottom quintile to the top quintile by age 40. But if you're Black, that chance is only 3%.

The same study showed that if you're white, you have a 23% chance of remaining in that same bottom quintile until you're 40. And if you're Black, that chance that you will remain among the most poor goes up to 51%.

What are additional barriers to folks of color in gaining social mobility?

When we leave race off the table, the differences that people experience in relation to institutions, because of their race, do not get addressed.

STRUCTURAL ISSUES NEED STRUCTURAL SOLUTIONS

Attending college does not
close the racial wealth gap.

Raising children in a two-
parent household does not
close the racial wealth gap.

Working full time does not
close the racial wealth gap.

Spending less does not
close the racial wealth gap.



The Asset Value of Whiteness: Understanding the Racial Wealth Gap
Brandeis University and Demos (2017)

This slide explores additional myths told in our society about how people achieve mobility.

- Even so, the median white adult who attended college has 7.2 times the wealth of the median black adult who attended college, according to the study.
- Likewise with working full-time and raising children in a two-parent household: whites who do those things have greater wealth than blacks who do those things.

Why?

- Inheritance = jump start wealth accumulation for whites: whites are five times as likely as Black folks to receive substantial inheritances and gifts while parents are still alive
- racial segregation in neighborhoods
- restricted access to affordable credit (for Black people)
- consumer racial discrimination for Blacks and Latinos (e.g. 2012 Wells Fargo settlement of \$175M to Blacks and Latinos for racial steering in mortgage lending = a "racial surtax")

-- in a related Duke study: Retail desertification in racially segregated neighborhoods, restricted access to affordable credit for blacks, and consumer racial discrimination, we argue, result in lower overall spending for blacks at all income levels

racial steering in mortgages. In 2012, for example, Wells Fargo & Co. paid at least \$175 million to settle allegations that it steered thousands of black and Latino borrowers into subprime mortgages when non-Hispanic white borrowers with similar credit profiles received prime loans. Prosecutors called the steering a "racial surtax."

In pairs, consider what would close the racial wealth gap? Debrief.

WHY DO WE LEAD WITH A RACIAL EQUITY LENS?

OPPORTUNITY & LIFE OUTCOMES

Across all measures, one's race is the most persistent and salient predictor of opportunities and life outcomes.

CENTER THOSE MOST IMPACTED

Achieving equity for all requires that we design policies and practices that address the needs of those who are most impacted.

IT INCLUDES ALL OF US

Racial equity is not just about better outcomes for people of color. It's about a world in which we all get to be whole and valued, where white supremacy culture – including the ableist, classist, heteropatriarchal norms it upholds – no longer dominates.

It is strategic.

HOW DO WE LEAD WITH A RACIAL EQUITY LENS?

- **USE RACE-EXPLICIT LANGUAGE**
- **LIFT UP INTERSECTING OPPRESSIONS**
- **SHIFT OUR CULTURE**
- **MAKE IT A LIFE PRACTICE**
- **ACKNOWLEDGE HISTORY & HOW IT PLAYS OUT TODAY**

Talk about who is in the room and who is not, name race equity when setting goals and looking at programming.

Center the most disenfranchised when designing services. Ex: Homelessness: If you focus on creating supportive pathways to housing for people who are black, trans, disabled and unsheltered, everyone benefits. People with these identities have more barriers than those without these identities and so everyone benefits.

Antidotes to WSC: develop a culture of appreciation, develop a culture of curiosity and continuous learning, understand and appreciate different work styles, include quality goals and process goals, value people's experiences, acknowledge the value of the voices in the room, be clear about who makes what decisions and who has what responsibilities, notice and challenge either/or thinking, role play ways to handle conflict, be willing to be uncomfortable, etc.

Commit to conversations, learning and growing for life.

TABLE DISCUSSION

What can you do as a city employee?



How does your work shift when leading with a racial equity lens?

Popcorn out, if there is time, or offer a few minutes for self-reflection.

What you can do

- Diversify your media and information sources
- Apply a Racial Equity Lens to your work.
- Slow down rushed processes and use the Racial Equity Toolkit
- Get Involved!
- Track and report racial outcomes in your sphere of influence – articulate your racial equity thinking process

Diversify your media

Be intentional about looking for and paying close attention to diverse voices of color on the tv, on the internet and on the radio to help shape your awareness, understanding and thinking about political, economic and social issues. Check out [Colorlines](#), [The Root](#) or [This Week in Blackness](#) to get started.

Slow Down rushed processes/avoid ambiguity

- Use the RET
- Question valuing efficiency over equitable outcomes

Join your Change Team, take more trainings, have conversations in your spheres of influence.

What you can do

- Diversify your media and information sources
- Apply a Racial Equity Lens to your work.
- Slow down rushed processes and use the Racial Equity Toolkit
- Get Involved!
- Track and report racial outcomes in your sphere of influence – articulate your racial equity thinking process

Diversify your media

Be intentional about looking for and paying close attention to diverse voices of color on the tv, on the internet and on the radio to help shape your awareness, understanding and thinking about political, economic and social issues. Check out [Colorlines](#), [The Root](#) or [This Week in Blackness](#) to get started.

Slow Down rushed processes/avoid ambiguity

- Use the RET
- Question valuing efficiency over equitable outcomes

Join your Change Team, take more trainings, have conversations in your spheres of influence.



- Encourage continued learning & awareness building
- Questions
- If time allows, one take away from each participant.
- Thank you

EXHIBIT - 14

THEORY OF CHANGE ALL-DAY RETREAT ANTI-RACIST CONTINUUM ACTIVITY

February 28, 2020 – Seattle Municipal Tower 1650 – 9:30am to 4:00pm

Attendees include representatives from:

Lived Experience Coalition

King County Department of Community and Human Services

City of Seattle Human Services Department

King County Department of Executive Services

All Home King County

FINAL REPORT ON THE ANTI-RACIST CONTINUUM ACTIVITY

KEY THEMES FROM THE RETREAT:

1. City of Seattle and King County do not reflect the communities we serve – particularly in leadership roles.
 - a. People with lived experience and from affected communities should be in these positions:
 - i. They are familiar with the impacts of these systems, and
 - ii. Should be directly informing these systems' design.
 - b. People of Color are not hired into positions of power and are not given career growth opportunities at the same rate as white counterparts.
2. Systems addressing homelessness need to center voices of those with lived experience and give this perspective more weight.
3. Systems addressing homelessness show more accountability to homeowners than to the communities it serves.
4. Staff often feel disempowered to influence positive change across the City of Seattle and King County.
5. There is a lot of talk throughout the City of Seattle and King County about promoting equity, but very little action.

BACKGROUND:

Three separate entities addressing homelessness in the King County area are preparing to merge into a

Theory of Change Workgroup Final Report

Over the past 5 months, the Theory of Change Workgroup has been undertaking the task of further development, adoption, and operationalization of the Theory of Change. During this time, the Theory of Change Workgroup held biweekly meetings and was able to organize one theory of Change retreat. The Theory of Change work was done under the understanding that its work and integration was the foundational lynchpin in order for the new King County Regional Homelessness Authority to be able to truly live into the principles and values named as priorities by people experiencing homelessness, non-profits providing homeless housing services, and staff teams of across all organizations conjoined under it.

From this work and meetings, the workgroup has developed six recommendations and created a racial theory of change framework. The framework and a thorough report from the retreat's anti-racist continuum activity are compiled here in this Theory of Change Workgroup Final Report as Appendices A and B.

The Theory of Change Workgroup makes the following recommendations to the transitional leadership team:

- Adoption of the racial equity theory of change framework by the new regional authority for the remainder of the interim period and co-location.
- The Theory of Change workgroup continues its work and operationalizes responses to real-time issues throughout co-location.
- Part II for the Becoming an Anti-Racist, Multi-Cultural Organization is conducted once all staff are co-located.
- Presentations on current recommendations and any new findings from colocation to the new Governing Committee and CEO.
- The creation and maintenance of internal space for ethnic and cultural expression, healing, and restorative practices throughout co-location
- The continued engagement of the Consumer Advisory Council, Youth Action Board, and Lived Experience Coalition as planning and implementation partners in all work.

APPENDIX A

King County Regional Homelessness Authority Racial Theory of Change Framework V.1

This is a living document that can and should be updated as necessary and by how needs change. This is the framework throughout colocation.

Mission

The Regional Homelessness Authority is committed to actively creating racial equity within our institution and eliminating racial disparity, disproportionality, and the negative impact of intersectionality in the King County Homeless System.

Vision

By 2021, The King County Regional Homelessness Authority has fully implemented the racial equity analysis tool, defined racially equitable partnerships, practices, and processes.

The KCRHA has an internal culture dedicated to addressing racial inequity and intersectionality for ourselves and those we serve

Our Work

Organizational Transformation:

- Engage in ongoing structured activities, trainings, and conversations on race equity and cultural relevancy for ALL staff and volunteers
- Recruit and retain board and staff of disproportionately impacted demographics
- Adopt equitable best practices and processes (HR, Board, Programs, Contracts, Etc.)
- Authority will ensure equitable pay among employees across gender and racial

Partnerships:

- Seek partnerships with organizations and coalitions to work on race equity issue
- Engage in mutually beneficial partnerships that also deal with systems intersectional and/or adjacent to homelessness
- Stakeholders have full understanding and buy-in the centrality of racial equity work

Continuum of Care:

- All services and programs implement and normalize the use of the racial equity analysis tool as modus operandi
- All Contracts with providers have racial equity framework and language embedded

Policy:

- Evaluate public and internal policies through a racial equity lens

- Build public will for race equity work and an understanding of its impact on children, youth, adults, and families impacted by homelessness

Measuring Success

- Institution, boards, committees, reflect racial and demographic makeup of population served
- Institutional Communication and narrative align with race equity work
- All staff, committee, board members, and consumers can bring their full racial and ethnic identities to work and when interacting with the authority
- Continuum of care, partnerships, and policies are structured to evaluate racial equity and disproportionately
- The authority as a toolbox of resources and vocabulary to guide ongoing race equity conversations
- The authority will have adopted the racial equity impact analysis tool
- The authority has adopted and instituted rigorous analysis tools for disparity across the organization
- Has successfully incorporated a historical grounding via Native and African American land and forced labor acknowledgement in meetings throughout the entity
- The Authority has created a governing body or committee comprised of the Ombud's office, governing committee board members, consumer groups, CEO or their representative to ensure the successful implementation of the Theory of Change
- The authority has created an accountability and feedback chain to the serviced population via the Lived Experience Coalition, Youth Action Board of Seattle, Advisory group, Continuum of Care Board, and general community for major policy, fiscal decisions.

Foundation

Stakeholders & Resource:

- Governing Committee
- Implementation Board
- Continuum of Care
- Advisory committee
- Consumer Groups
- Youth/young adults, families, veterans, singles adults, seniors, disabled folk
- Legislators
- Faith/religious groups
- Neighborhood/community associations
- Local businesses
- Philanthropy
- Data

Commitment Statements:

- Undoing the effects of anti-blackness and indigenous invisibility in our institution and services

- Acknowledge the role institutional racism plays in outcome disparities for all families and individuals experiencing homelessness and homeless systems in Seattle and King County
- Centering resources and services around those most directly impacted by disparities

APPENDIX B

THEORY OF CHANGE ALL-DAY RETREAT ANTI-RACIST CONTINUUM ACTIVITY

February 28, 2020 – Seattle Municipal Tower 1650 – 9:30am to 4:00pm

Attendees include representatives from:

Lived Experience Coalition
King County Department of Community and Human Services
City of Seattle Human Services Department
King County Department of Executive Services
All Home King County

FINAL REPORT ON THE ANTI-RACIST CONTINUUM ACTIVITY

KEY THEMES FROM THE RETREAT:

1. City of Seattle and King County do not reflect the communities we serve – particularly in leadership roles.
 - a. People with lived experience and from affected communities should be in these positions:
 - i. They are familiar with the impacts of these systems, and
 - ii. Should be directly informing these systems' design.
 - b. People of Color are not hired into positions of power and are not given career growth opportunities at the same rate as white counterparts.
2. Systems addressing homelessness need to center voices of those with lived experience and give this perspective more weight.
3. Systems addressing homelessness show more accountability to homeowners than to the communities it serves.
4. Staff often feel disempowered to influence positive change across the City of Seattle and King County.
5. There is a lot of talk throughout the City of Seattle and King County about promoting equity, but very little action.

BACKGROUND:

Three separate entities addressing homelessness in the King County area are preparing to merge into a new single countywide authority on homelessness: King County Regional Homelessness Authority (KCRHA):

1. King County Department of Community and Human Services (DCHS),
2. All Home King County, and
3. City of Seattle Human Services Department (HSD)

This all-day Theory of Change Retreat was an opportunity for everyone who will become a part of the new entity, including the Lived Experience Coalition (LEC), to work together to embed the Theory of Change core principles and anti-racism into this transition to the new entity.

In March 2020, these three entities will be moving to the Yesler Building and begin co-locating together. This all-day Theory of Change retreat is the first opportunity staff from these three entities have had to all be together in one room.

ANTI-RACIST CONTINUUM ACTIVITY

PURPOSE:

We can't get where we're going if we don't know where we are.

The purpose was to ground participants in the principles and language of anti-racism to honestly assess where everyone feels they are on the Anti-Racist Continuum in terms of how our systems address homelessness.

Because multiple entities are merging together, it is important to have courageous and open conversations about the work each entity is doing to undo systemic racism to more effectively address the needs of people experiencing homelessness. It is equally important to openly discuss how far there is to go and what work needs to be done.

SUMMARY:

Group Norms were established to set expectations for the group. The group reviewed Tema Okun's characteristics of White Supremacy Culture¹ to establish a common language to use in the activities.² The group then reviewed the Anti-Racist Continuum.³

Activity 1: Every person took a minute to reflect individually on where they felt the systemic approach to homelessness falls on the Anti-Racist Continuum. They then wrote their number on green post-it notes for display on the Continuum poster. Everyone paired off and shared their reflections with a neighbor. Folks then grouped into 3-4 for a larger discussion before returning to share out with everyone.

Activity 2: The group broke up into their separate entities: All Home, Lived Experience Coalition, HSD, and DCHS to discuss as a team where their entity falls on the Anti-Racist Continuum. Each entity was given a different color of post-it and members wrote their assessed number on that color for display on the Continuum poster.

Final ask: After returning to the group to share out their discussions with everyone, the group was asked to reflect over lunch where each person thinks they fall, as an individual, on the Anti-Racist Continuum – are they holding up progress or moving it along?

GOALS & LIMITATIONS:

This activity is intended to be Part One of a two-part workshop. Part One was meant to spark courageous, honest, and productive conversations about the areas of growth needed within all the institutions addressing homelessness in order to more effectively serve our community. The new KCRHA cannot hope to

¹ Okun, T. (2001). From Dismantling Racism: A Workbook for Social Change Groups. Retrieved from <http://www.dismantlingracism.org/uploads/4/3/5/7/43579015/whitesupcul13.pdf>

² This tool was selected to better facilitate conversations about systemic racism by encouraging more personal discussions about how the often-invisible structures of cultural racism manifest specifically in our approach to homelessness and in our institutions. By exposing these specific instances of racial inequity, we can more effectively address the roots of the problem.

³ The Anti-Racist Continuum charts where an organization might find itself on a scale of 1-6: 1 representing a "Segregated Institution" where no people of color are allowed in, and 6 representing a "Changing Institution in a Changing Society."

make strides in efforts to end homelessness without an honest assessment of where the systems are lacking.

Part Two would focus on assets, barriers, and how the Theory of Change core principles can be leveraged to embed transformative social change into the new KCRHA. Part Two has been suggested to continue this work at a later date, but not yet confirmed.

The result from this activity was the honest reflections of the staff and people with lived experience who were in the room, and does not yet identify strategies to improve our systems. Underlying problems need to be identified before strategies can be developed. Part One is only a two-hour activity and the early steps of a much longer process in applying Theory of Change principles to the transition into KCRHA.

NOTES FROM THE ANTI-RACIST CONTINUUM ACTIVITY:

Group Norms: setting expectations for the group

1. Safety vs Comfort
 - recognize the difference between feeling “unsafe” and “uncomfortable;” no one should feel unsafe, but it is ok to feel uncomfortable in these conversations
2. Courageous Conversations
3. Sharing your experiences
4. Be Present
5. Respect Others
6. Listen
7. Be Open
8. E.L.M.O (Enough let’s move on)
 - if a topic has been discussed at length and begins to feel repetitive, someone can say “ELMO” to move the conversation along
9. Be Loud
 - room is large and want everyone to be able to hear
10. Today is a start; expect more work
11. Agree to disagree
12. Make space to take care of yourself without shame. Come back to the space. Stay in relationship
13. Intent vs Impact
14. Reciprocity
15. Grace
16. Oops...Ouch
 - ability to take a step back and apologize if you misspoke, but no one should feel obligated to apologize for anything
17. Be Direct
18. What is said in here will stay here
 - what anyone says won’t be held against them once we leave the room
19. Remove names and keep experiences

ACTIVITY #1: WHERE DOES SYSTEMIC APPROACH TO HOMELESSNESS FALL ON THE ANTI-RACIST CONTINUUM?

A major takeaway from this conversation was the struggle the group felt in identifying one number to sum up where the systemic approach to homelessness lies. Most identified elements in #s 2 (A Club Institution) and 3 (A Multicultural Institution). The discussion recognized areas in which the approach has been successful, but that there was a lot of work left to do.

Each person identified where they think the systemic approach to homelessness countywide falls on the Anti-Racist Continuum:

Continuum on Becoming an Anti-Racist Multi-Cultural Institution

WHERE INSTITUTIONS ARE NOW			WHERE INSTITUTIONS NEED TO GO		
MONOCULTURAL	MULTICULTURAL	MULTICULTURAL	ANTI-RACIST	ANTI-RACIST	MULTICULTURAL
<p>1. A SEGREGATED INSTITUTION</p> <ul style="list-style-type: none"> • Pre-1960's legalized structures of segregation • Intentional and exclusion of African-Americans, Native-Americans, Hispanics, Asians, and Arab-Americans • White power and privilege and dominance of People of Color is inscribed throughout institution • Intentional and public enforcement of racist status quo throughout institution • Institutionalization of racism includes formal policies and practices, teachings, and decision making on all levels • Institution usually has similar intentional policies and practices toward other socially oppressed groups such as women, gays and lesbians, Third World citizens, etc. 	<p>2. A "COLOR-BLIND" INSTITUTION</p> <ul style="list-style-type: none"> • Publicly obeys the desegregation; resists segregationist status quo • Tolerant of a limited number of People of Color with no active anti-racist stance • But colorism is still inscribed in its services and actions, and often declares, "We don't have a problem." • Colorism is organizational and self-referencing as a White institution as a predominantly White institution • Comes to gain White power and privilege through its de facto policies. • Institutional decision making of People of Color is inscribed in institutional life • May still secretly limit to exclude People of Color in contradiction to public policies." 	<p>3. A MULTICULTURAL INSTITUTION</p> <ul style="list-style-type: none"> • Publicly offers policies and practices regarding racial diversity • Seen as "non-racist" institution with open doors to People of Color • Carries intentional inclusiveness efforts, recognizing someone of status from minority • "Non-racist" who make have little or no real change in power structure • Is still relatively unaware of continuing terms of White supremacy and control • Institutional discord about diversity, and signs of failure of programs of cultural diversity • People of Color increasingly express dissatisfaction or leave institution 	<p>4. IDENTITY CHANGE - AN ANTI-RACIST INSTITUTION</p> <ul style="list-style-type: none"> • Program of anti-racism training is instituted, resulting in a common analysis of systemic racism and a growing understanding of racism as a barrier to effective diversity • A consciousness of White power and privilege emerges, and an increasing commitment to eliminate inherent White advantage • Cross-racial relationships are deepened and White people begin to develop accountability to People of Color. • Through auditing and evaluation, the analysis is applied to all levels of the institution • A critical mass of leadership claims an anti-racist identity and a vision of an anti-racist institution. • A transition to Stage Five is initiated by a formal decision to institutionalize an anti-racist identity within the institution's identity documents and throughout the structures and culture of the institution. 	<p>5. STRUCTURAL CHANGE - A TRANSFORMING INSTITUTION</p> <ul style="list-style-type: none"> • Institution commits to new stage of redesigning, restructuring, and institutionalizing anti-racist identity. • Restructuring ensures full participation of People of Color in decision making and other forms of power sharing on all levels of the institutions life and work. • Inclusion of workviews, cultures and lifestyles of People of Color is ensured in all aspects of institutional life. • Authentic and mutually accountable anti-racist relationships are structured between People of Color and White people within the institution. • There are similar institutional changes toward other socially oppressed groups, including women, gays and lesbians, Third World citizens, etc. • There is within the institution a sense of restored community and mutual caring. 	<p>6. A CHANGING INSTITUTION IN A CHANGING SOCIETY</p> <ul style="list-style-type: none"> • Institutions affirm the necessity of anti-racist relationships between the institution and the larger society. • Institutions commit to participation in the struggle to dismantle racism in the wider community. • All relationships and activities between institutions and communities are redefined and rebuilt based on anti-racist commitments • Clear lines of mutual accountability are built between the institution and racially oppressed people in the larger society. • Institutional alliances with others in society ensure links to all aspects of social justice, particularly to issues of global interdependence and international structures of justice and equality

© by Crossroads Ministry: Adapted in 2013 by Joseph Barnard

Below are the scribed notes from open discussions around the room:

- Picking one number to sum up a very complicated system is a struggle
- Initially rated lower, but there is still some lip service that ranks higher
- Not a lot of implementation of rules/policies /procedures to put words into action even if we're trying to be the same
- Get lost in the thinking that this is about us rather than the communities we serve
- #2 specifically for indigenous people, maybe #3. Struggle between these numbers
- Being a person of color in the system means you are made to feel like gatekeepers even though you have no power. People of color are often on the front lines, which means they are the face of

power to the community and must be the one to deliver the message- difficult position of having to explain to those who have trusted you to do better

- System appeals to white constituency and not those on the streets experiencing homelessness
- More value on upholding value of white homeowner's property than on human lives
- The people that are in power need to get into the community
- New entity has space to hire people with lived experience because of their expertise, who can come from a "lens of love" – heartfelt love for the individuals we are serving
- Use lived experience individuals' connections within the community to connect clients with the services they need. Center and lift the client up – give them jobs and walk with them long term, not just the 3-6 months or until a contract deliverable is met. Walk with the individual until they are stabilized
- Work has to come from the heart
- Ableism – need to look at what peoples' abilities are and what they can do (rather than what they can't do), maybe need a different lens to ensure we are being inclusive to all the abilities so they are not pathologized
 - Different gifts they offer- truth heart, voice for other people who have none. Truth is powerful when spoken.
- Collective voice together

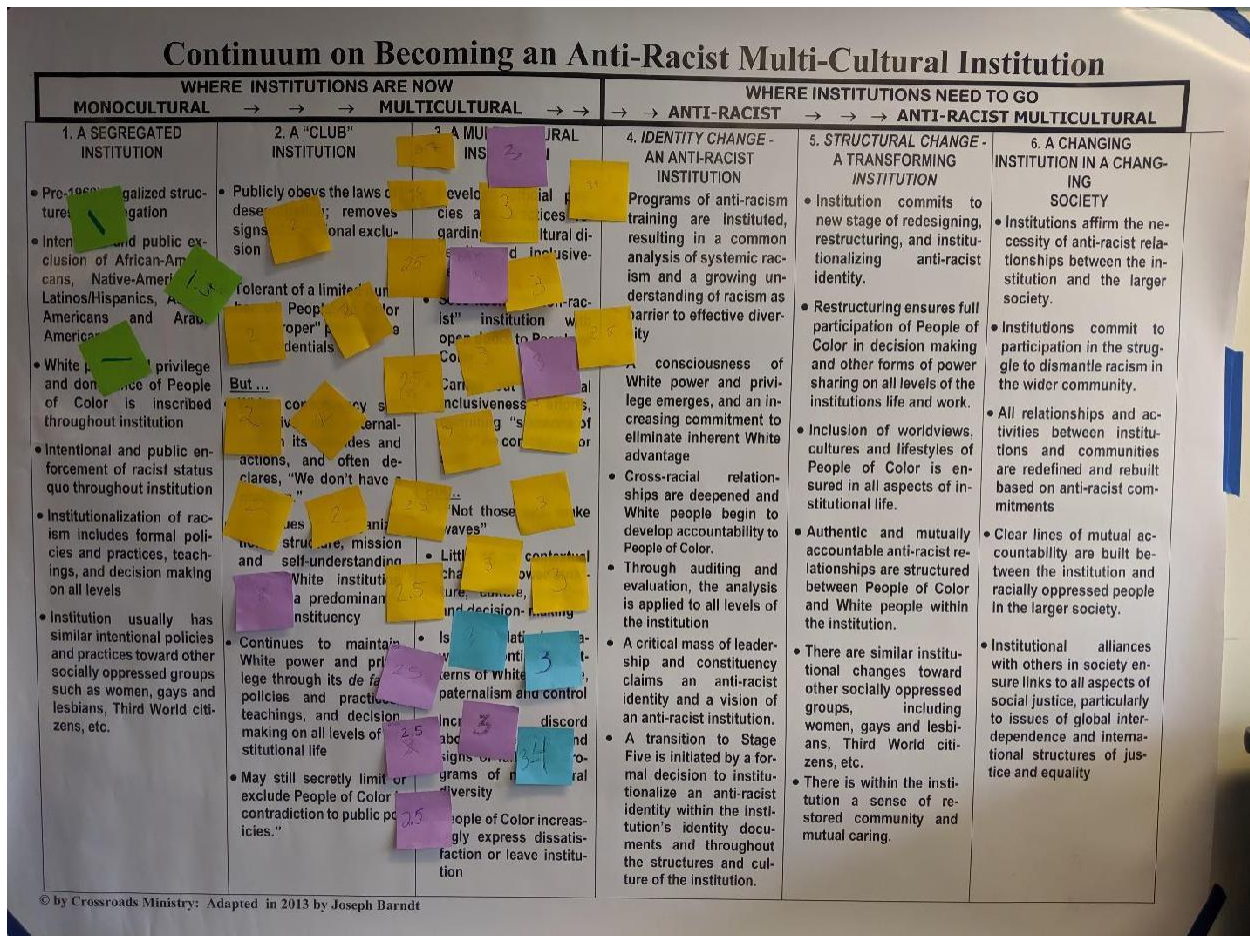
ACTIVITY #2: WHERE DOES YOUR ENTITY FALL ON THE ANTI-RACIST CONTINUUM?

Before beginning group discussions, each individual assessed where their institution falls on the Anti-Racist Continuum:

Green = Lived Experience Coalition
Gold = DCHS

Purple = HSD
Blue = All Home

Each entity recognized areas of success and value that it offered to the system as well as serious concerns and areas for improvement. The groups seemed to agree that the entities each recognized a need for inclusiveness and diversity, but did little to effect meaningful change in this area.



Below are the scribed notes from discussions in the room by entity:

LEC – Green

- LEC offers a collective voice
- Youth, fresh ideas revolutionize thinking
- Misogyny and male privilege are dominant in LEC, which means many of the members are impacted by this while trying to change the system that also impacts them
- LEC experiences tokenism – the system uses their voice for free instead of being paid for their expertise, which feels disrespectful

- LEC members are not seen as equals and not taken seriously. They are asked their opinions, and then often dismissed
 - o Cultural dismissiveness
 - o Feel isolation and sabotage
- LEC perspectives are dismissed by leadership who respond with “that’s not what’s happening” or told they don’t have the “proper” perspective
- A lot of re-victimization as members are asked to share their stories, which are very personal and can be quite painful to revisit
- Members bring wisdom and can help with the solutions
- Members are able to bend in places, able to show grace, compassion, and bring heart
- Can be honest, transparent, and vulnerable when giving and hearing testimony/truth. Members bring dignity to the work.
- To be seen is very big (not sitting in offices)

ALL HOME – Blue

- Intentional about integrating Theory of Change, Lived Experience Coalition (LEC), Consumer Advisory Council (CAC), and the Youth Advisory Board (YAB) – all in leadership
- Continuum of Care policies
- All Home staff reflect community
- Intentional about how the team is representative while acknowledging that All Home works with entities that make the work more challenging.
- Political/Elected’s push against LEC leadership and anti-racist principles
- All Home operates within other institutions and partners with other institutions
- Adopt strategies that reinforce non-traditional practices for government services and access to power
- The pressure to be a person of color in this system is high – pushes you towards assimilation and gatekeeping and you find yourself answering to both community and to higher ups

DCHS – Gold

The number of people from DCHS was large enough that they split into 2 groups:

Coordinated Entry for All (CEA) Group:

Biggest theme: everyone could identify elements of 2,3,4. Unclear where to reasonably place entity. Constantly cycling through these numbers.

- Need a system of accountability. Resonates in CEA in particular. Don’t have power to call for change. Given unfunded mandates deletes capacity of the group to do work.
- “Perfectionism” limits people of color to move up because they don’t have 100% listed qualifications, BUT certain people they are willing to train. King County has lost the ability to learn and train.
- Quantity over Quality- just focused on getting people off streets, not serving them
- Inevitably, always people of color in our communities who are flagged/stopped from getting into a new unit. Money put before people who are homeless.
- Not looking at end result for marginalized communities
- Coordinated Entry (CE) system spelled out by HUD, different from what implementation has been. No basic understanding of what this is going into the new entity, which leads to silos
- CEA has no resources to get adequate housing into the system, and instead has to rely on owners of housing to self-report their existence. Not sure what units are on the table.
- Need more systems talking to systems all dealing with disproportionality. Schools not talking to prisons.

- Holding up discrimination under the guise of being anti-discriminatory
- Another way of red-lining, can't live in a building because of income, buildings staying open longer than they need to if people don't qualify perfectly. Also don't give people a choice of where to live.
 - Housing by income = discriminatory
- Systems designed to serve white culture – must meet everything to the letter to qualify
- Apparent to those in direct services that there is an effort to protect contracts. Hard to address and ALWAYS at the expense of the household.
 - How contracts are designed to cater to white culture and white supremacy versus the communities we serve
- Culture of King County is that clients are the agencies we contract with and not community we are serving. Hoping for “trickle-down effect”
- Important to give credit to progress, but let's not romanticize: if no people of color, or representations of those communities served in positions of leadership, then we can never move forward to an anti-racist multicultural institution.
- Seeing recurring themes that reinforce white supremacy culture
- Hard for some people in the room to see the number of 3's and 4's identified as where we are. If you go back to your desk with ineffective lack of change and are ok with that, then need to look at yourself, and not just say “well we're are working on it”

Housing, Homelessness & Community Development Group:

- Housing Homeless & Community Development is on the continuum of 2-4
 - o Talk about values of #4, but elements of #2 and #3 on the Anti-Racist Continuum
- Recognize that we're not there
- Actions are driven by voter pressure
 - o Who are the voters?
- Continue with de facto white supremacist policies
- Trying to use data to identify more disparities, but still need to implement change
- Employee evaluations trying to collect issues and correct
- Recognition of work to improve how we prioritize resources

HSD – Purple

- View from newer staff is that HSD = 2 or 3
- HSD tries not to do the “BUT” section under #2 in the Anti-Racist Continuum, but often we do = white culture
- We are acknowledging the problem, but don't always act on it
- Some harms in HSD – sometimes in other divisions

2 Primary themes from this discussion:

1. Tension between acknowledging the problems and “walking the talk”
2. Intersectionality. Being anti-racist focused often doesn't weave in other considerations (e.g. LGBTQIA, sexism, ableism). Do we solve racism 1st and then move onto intersectionality, or can we do all of it together?
 - a. Intersectionality is discussed, but not much action taken, and often redirected to race/racism.

CONCLUSION

The group identified several important areas in which the core principles of Theory of Change need to be applied to the transition to KCRHA.

Consistently across organizations, members of the group identified several problem areas, including:

1. People of color and people with lived experience are prevented from moving into positions of influence in King County and the City of Seattle. Because they are typically placed in public-facing positions, they are often in the position to defend policies and strategies they do not agree with and cannot influence to the communities who trusted them to do better.
 - a. Even in situations where staff is more reflective of the community we serve, there is pressure to conform to the needs of leadership over the needs of the community.
2. A lot of lip service is paid to promoting equity and including people with lived experience in decision-making, but the organizations' actions, policies, and practices do not reflect those promises.
 - a. Instead, the systemic actions, policies, and practices serve homeowners and white constituencies.
3. There are many specific areas within the approach to homelessness that serve the needs of the system itself more than the needs of the individuals and families seeking housing.

Recommendations for next steps:

The conversations from this activity revealed several areas the Theory of Change approach can address. As a next step, the group seemed to feel it was worthwhile moving to Part Two of this workshop, which would identify:

- Assets the group can leverage;
- Barriers to be mindful of; and
- Specific strategies for how KCHRA can make progress in the areas identified in this report.

None of the solutions are quick fixes and all require buy-in and commitment from staff, the community, and leadership.

EXHIBIT - 15

Diemert, Joshua

From: Kim, Tanya
Sent: Thursday, June 11, 2020 11:49 PM
Subject: FW: Time sensitive: Training on Internalized Racial Superiority -Tomorrow Morning (6/12):

YFE Everyone,

I'm so sorry for the very last minute notice. FYI.

Best,
Tanya



Tanya Kim
Division Director, Youth and Family Empowerment
City of Seattle, [Human Services Department](#)
PO Box 34215; Seattle, WA 98124-4215
O: 206-684-5977 | M: 206-643-2358 | tanya.kim@seattle.gov
[Facebook](#) | [Twitter](#) | [Blog](#)

From: McLellan, Terry <Terry.McLellan@seattle.gov>
Sent: Thursday, June 11, 2020 1:29 PM
To: McLellan, Terry <Terry.McLellan@seattle.gov>
Subject: Time sensitive: Training on Internalized Racial Superiority -Tomorrow Morning (6/12):

Good afternoon,

I hope this message finds you well.

The Office of Civil Rights is hosting a training on Internalized Racial Superiority tomorrow morning, specifically targeted for White employees (see below). Feel free to share this training with White Caucus members or other colleagues, if appropriate.

With peace,
Terry

(This message was blind copied to HSD SLT, White Caucus co-lead & Change Team co-lead)

From: Falchuk, Diana <Diana.Falchuk@seattle.gov>
Sent: Thursday, June 11, 2020 11:25 AM
To: RSJI_Citywide_Change_Team <RSJICitywideChangeTeam@seattle.gov>; RSJI_Sub_Cabinet <RSJISubCabinet@seattle.gov>; OCR_RSJI_Strategy_Team <OCR_RSJI_Strategy_Team@seattle.gov>
Subject: PLEASE SHARE: Tomorrow Morning (6/12): Training on Internalized Racial Superiority for White People

Hello everyone,

We're opening up this Friday's long-scheduled Citywide RSJI training on Internalized Racial Superiority, a training for white people, to additional white City employees. We'll hold the training on Microsoft Teams from 9:30 am - 12:00 pm. White employees not already registered can sign up at the link below.

Tomorrow, many City employees will be using paid or unpaid leave to take a day of reflection and action. We're inviting City employees who identify as white to join this training to learn, reflect, challenge ourselves, and build skills and relationships that help us show up more fully as allies and accomplices for racial justice. We'll examine our complicity in the system of white supremacy -- how we internalize and reinforce it -- and begin to cultivate practices that enable us to interrupt racism in ways that are accountable to Black, Indigenous and People of Color (BIPOC) folks within our community, including our friends and colleagues at the City.

White employees are invited to [sign up here](#) so we know you're joining us and can send you the meeting appointment and training materials.

Thank you,

IRS Training Facilitators

Diana Falchuk, Katie Sheehy and Dayo Vice

From: ECF@wawd.uscourts.gov
To: ECF@wawd.uscourts.gov
Subject: Activity in Case 2:22-cv-01640-LK Diemert v. City of Seattle et al Amended Complaint
Date: Thursday, January 19, 2023 6:02:37 PM

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

United States District Court for the Western District of Washington

Notice of Electronic Filing

The following transaction was entered by Hodges, Brian on 1/19/2023 at 3:01 PM PST and filed on 1/19/2023

Case Name: Diemert v. City of Seattle et al

Case Number: [2:22-cv-01640-LK](#)

Filer: Joshua A Diemert

Document Number: [11](#)

Docket Text:

AMENDED COMPLAINT for Declaratory Relief and Damages against defendant(s) City of Seattle, Bruce Harrell, filed by Joshua A Diemert. (Attachments: # (1) Exhibit 1 - Dec 2020 EEOC Charge, # (2) Exhibit 2 - Amended EEOC Charge, # (3) Exhibit 3 - June 2022 EEOC Charge, # (4) Exhibit 4 - Right to Sue Letters, # (5) Exhibit 5 - Right to Sue Letter, # (6) Exhibit 6 - Tracking info, State Tort Claim form, # (7) Exhibit 7 - RSJI Training Material, # (8) Exhibit 8 - Lead with Race, # (9) Exhibit 9 - OCR Report, # (10) Exhibit 10 - Reporting Instructions, # (11) Exhibit 11 - HSD Implementing RSJI, # (12) Exhibit 12 - Other RSJI Training, # (13) Exhibit 13 - RSJI Training PowerPoint, # (14) Exhibit 14 - Theory of Change workshop, # (15) Exhibit 15 - White Training Email)(Hodges, Brian)

2:22-cv-01640-LK Notice has been electronically mailed to:

Andrew R Quinio aquinio@pacificlegal.org

Brian T Hodges bth@pacificlegal.org, bpb@pacificlegal.org, IncomingLit@pacificlegal.org

Laura M D'Agostino LDagostino@pacificlegal.org

2:22-cv-01640-LK Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-0]
] [37d06c15af77e9c780b33be44b536bfc5598f8ae30e9d7ca65cf7ccd869dc48d265
38cefd7af1b8b93b8671db392e78bf81a143d3ad309edf2f5051cc83e2d7d]]

Document description:Exhibit 1 - Dec 2020 EEOC Charge

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1]
] [6542375e7ef3e7132c26b666dfbbbe1e32aa72c101446e838e8bbbc3da83bf98202
d12d3d2eb3882837e61e624a35b3b09c28251a0f7dbc5b3b295ebbaddaa79]]

Document description:Exhibit 2 - Amended EEOC Charge

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-2]
] [d2c22790a7c6a025e5bc30913539771625c8c9c66166d1230d614229feda57f8e84
045508cc0c1e9639d9aeaa18bd4f432cb95de71619f317959acb885cfb76e]]

Document description:Exhibit 3 - June 2022 EEOC Charge

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-3]
] [a02f91da5ec88a58b72ed05ea6afdd1fd5a89e2296e49128f3cdbbe02a3fb47867a
ccf6d6ad6f6210a79b87bf5ee09ba25045f9bef92cdabc4930fe35ea2ef4c]]

Document description:Exhibit 4 - Right to Sue Letters

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-4]
] [b35da3f5e24aff7e66f15203fac1ae2e5ccbf835a6a74c45f6f65850c49868e8892
06af71f708638dea81ba0c75ec9f018af54334d94cfb7ab86c3512b4e298f]]

Document description:Exhibit 5 - Right to Sue Letter

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-5]
] [5de28fda60454a3726b8317191afa8d9aaf1e78d3cd059adf743b089b557a171b79
6f143a77948180458706c18ecc4792ff61873e4dcd77131371e097ee1ed21]]

Document description:Exhibit 6 - Tracking info, State Tort Claim form

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-6]
] [8396c189ff33c3512a115f745112cc75a00ae0daaaa8d6d0e3905a0096b068637e4
2e140726dbe2a852ef6c03e7e1b13659534a062c0489bea8e0abe665d2cb8]]

Document description:Exhibit 7 - RSJI Training Material

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-7

] [07b04c2da259e3a933488c42cb86f587cf242b77f9fe5122e2c12da1d6ffd26aec1dde062fe7856e8ee425947ba9de548ed8d13f9dc07b2af9da3d1a72e43f05]]

Document description:Exhibit 8 - Lead with Race

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-8]
] [63b99ce32c494a4b6de5778d622019baf0ad9f9b598dbe229e0e54311072ca983bc
f0583ebdc03f30e8255e2c995c8dd765d8c9b1ea165cf9e8fde965476d996]]

Document description:Exhibit 9 - OCR Report

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-9]
] [7a74b0009880f503c31a11d273618da3ab7cdb365c3b55ae22990c37f5f3eda5810
e20545372b095a54293f3e61b81f3f6c04e09e41a56379a2a228be41f226f]]

Document description:Exhibit 10 - Reporting Instructions

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1
0] [8ece37e1b836388c531913c46b27734fc8a17fd7636e04b8b024e70fa388112428
cf493dd15d0c7473c46a1331afe93c53ccbfc1779d9fe7de100fc90422d2e9]]

Document description:Exhibit 11 - HSD Implementing RSJI

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1
1] [1df1e69daa4a465aa8a75d1d97e174784fe0f5cf6cdb1dcc0a9fe94f5848d7fae
8751f0e4d83e4936519623ff1713ec2ba4059c41cd0c1ca9c9583d42160a2a]]

Document description:Exhibit 12 - Other RSJI Training

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1
2] [642337e431799996186434bac22a770d7a4005176fc0bcbfb6eff75c797a0b033d
83fe3b65606e950b373531f51ae23cf717e78774502b41e2cda66baa782c55]]

Document description:Exhibit 13 - RSJI Training PowerPoint

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1
3] [b83879b0c4ddfb8d52808352256ae156365cf4a4ab19b45a71674e4b21b601fb08
571ce4c8a3dd4d21b4a5bec47465d4e5db89d1bd76ce229a40ecf6bf102d77]]

Document description:Exhibit 14 - Theory of Change workshop

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1
4] [0586edacef185019b999c3cce373f002e890d9b81c084ceea4bf9617705d490d9a
a8e18faceed9e5be90aea97cb518b7ccdfbb97f3d5e37477c4153a4dee167e]]

Document description:Exhibit 15 - White Training Email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1035929271 [Date=1/19/2023] [FileNumber=9251363-1
5] [64e2b9aea181b8b39b62ea80111dce6ac4ea47b64b9bdc21fd490698a5ab94616c
4b9ab534231a143d969c2bf4509dcbe0262273479ce4c9421843f8cdec8edc]]