

**King County Superior Courthouse
516 Third Avenue
Seattle, WA 98104
Judge Veronica Alicea-Galván**

1. Purpose

The purpose of this media plan is to provide a working structure to avoid and resolve news coverage issues, and to provide an atmosphere of open communication between the court and the media. The plan includes guidelines for media coverage for future court proceedings.

Goals of Media Plan

- To maintain an appropriate and dignified atmosphere in the courthouse so that all litigants obtain an orderly hearing, preserving due process and equal protection.
- To ensure that the court adequately accommodates the news media and the general public during proceedings of great public interest.

Basic Tenets

- The media and the public have a right of access to our justice system
- Other court proceedings must not be adversely impacted by cases of great public interest.

2. General Policies

- All media coverage of court proceedings fall under the *Washington State Court Rules, Rule 16 and Bench-Bar Guidelines*.
- **King County Superior Court Judge Barbara Linde** as Chair of Washington's Bench-Bar-Press Liaison Committee, or the "Fire Brigade" as it is commonly known, is available as a contact point, as necessary. The Fire Brigade exists for the purpose of assisting the court, litigants, and the press in balancing their sometimes competing interests during the course of litigation. Most of its work is done behind the scenes as it seek to mediate or otherwise assist those involved in a court case in achieving the "fullest practicable attainment" of both related goals of fairness and openness of all court proceedings. Anyone having questions or concerns on this topic is welcome to contact the Fire Brigade Chair by phone at 206-477-1364 or by email at Barbara.Linde@kingcounty.gov. If Judge Linde is not available you may contact Snohomish County Superior Court Judge David Kurtz by phone at 425-388-3881 or by email at david.kurtz@snoco.org
- All media personnel are expected to be familiar with the Court's Media Coverage Orders. A copy of the media order dated May 4, 2017 is attached. (Attachment A)

3. Case #17-2-09152-9 SEA D.H. v. Mayor Edward Murray

On April 6, 2017, D.H. filed a Complaint for Damages alleging that he was sexually abused by Mr. Murray. (Attachment B) An Amended Complaint was filed on April 19, 2017 (Attachment C).

4. Website

Copies of any orders issued by the court throughout the pendency of this case can be obtained by accessing the King County Superior Court website at www.kingcounty.gov/courts/superior-court.aspx. The name of the link is yet to be determined, but should be available by the close of business Thursday May 4, 2017.

5. Media Representatives

Concerns from print and television should be directed to Paul Sherfey, chief Administrative Officer and Court Information Officer at 206-477-2472.

6. Courtroom Television Cameras

Any television camera(s) approved by the Court shall be permitted only in accordance with the Media Coverage Order.

7. Media Still Cameras

Media still cameras shall be permitted only in Court in accordance with the Media Coverage Order.

8. Reserved Seating

Television and print media outlets will be assigned seating. Please review the media order for specific details.

9. Electronic Equipment

All electronic equipment of spectators and media including laptop computers, cell phones, radios and pagers must be turned off or deactivated while inside the courtroom. Persons in violation will be immediately excluded from the courtroom.

10. Media Interviews

Plaintiff: TBD

Defense: TBD

11. Parking

Public parking, for vehicles other than satellite or live trucks, is available in lots and garages or in metered spots around the Courthouse vicinity.

12. Cables

All cables placed in corridors, and on sidewalk or streets shall be covered in such a manner as to avoid interference with pedestrian or vehicular traffic, and must conform to City of Seattle and King County ordinances.

13. Courthouse Security

All persons entering the Courthouse must pass through electronic security devices, and submit any and all equipment for search at the discretion of security officers. Media members are asked to refrain from bringing excess bags or backpacks into the Courthouse. Please bring only what is essential.

A

**SUPERIOR COURT OF WASHINGTON FOR
COUNTY OF KING**

D.H.,

Plaintiff,

vs.

Mayor Edward Murray
Defendant.

No. 17-2-09152-9SEA

ORDER RE: MEDIA COVERAGE

The following order applies to all future Superior Court proceedings in the above-captioned cause of action. The purpose of this order is to provide the parties a fair trial, to preserve the dignity of these proceedings, to protect jurors' privacy, and to allow the media reasonable access.

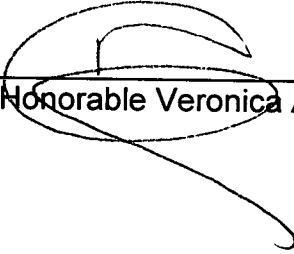
1. For purposes of this order and any other orders regarding media coverage, "camera" includes still cameras, television cameras and video recording devices. "Television camera" includes video camera and all other video or moving picture recording devices. "Photograph" includes still photography, televising, and videotaping.
2. One television camera will be allowed in the courtroom on a daily rotation to be arranged by members of the media. Only high definition broadcast cameras will be allowed for this purpose. The courtroom television camera will be a "pool" camera and shall share its video feed with media requesting the same. The television camera shall be on a tripod in a fixed location approved by the court. Any necessary cables shall run through the courtroom and courthouse hallways in a manner that does not interfere with the operation of the courtroom or the courthouse.

3. One still camera will be allowed in the courtroom on a daily rotation to be arranged by members of the media. The courtroom still camera will be a "pool" camera and shall share its pictures with media requesting the same. The still camera shall be on a tripod in a fixed location approved by the court, shall be a minimum of a professional grade DSLR camera and shall be operated by a photographer with experience in courtroom photography.
4. "Pooling" arrangements for camera and other equipment are the sole responsibility of the media.
5. Except as otherwise provided in this order, no camera or recording device shall be permitted in the courtroom without the express permission of the court.
6. Camera and recording device operators must be representatives of the media who have obtained the permission of the court. Camera and recording device operators must be familiar with and abide by the contents of this order, while keeping in mind the published Bench-Bar-Press Principles & Considerations and GR 16.
7. If the Court determines that there is a compelling reason why a witness or participant should not be photographed in the courtroom, camera operators shall abide by the Court's direction. Otherwise, camera operators will be free to photograph anyone who participates in the trial while court is in session, subject to the other requirements of this order.
8. No interviews of parties, witnesses, attorneys, or others shall be permitted in the courtroom during the proceedings. The court will designate locations for the purpose of these interviews and inform the media of such.
9. Cellular phones and pagers shall be set to silent mode in the courtroom. If the use of any cellular phone or pager becomes disruptive to the proceedings the individual will be removed from the courtroom.
10. No camera shall focus on the papers, exhibits, or other documents or laptop computers of counsel in such a manner that the contents of these materials can be read or otherwise discerned by the viewer. The restriction does not apply to documents displayed in open court while court is in session, or if the court gives permission to film exhibits when court is not in session.

11. Sidebar conferences shall not be recorded or photographed.
12. No flashbulbs, strobe lights, or other artificial lights shall be used anywhere in the courtroom.
13. One audio system for radio broadcast purposes will be allowed in the courtroom pursuant to pooling arrangements by members of the media. The courtroom audio system will be a "pool" system and shall share its recordings with the media requesting the same. The audio system shall be in a fixed location approved by the court. Any necessary cables shall run through the courtroom and courthouse hallways in a manner that does not interfere with the operation of the courtroom or the courthouse.
14. Television equipment, audio equipment, and tripod-mounted cameras shall not be placed in or removed from the courtroom while court is in session.
15. Any camera, radio, or recording equipment that is permitted in the courtroom shall operate only while the court is in session. Live streaming and coverage is permitted, so long as there are no disruptions to court proceedings. Any live blogging of the events must occur from the overflow courtroom so as not to disrupt court proceedings.
16. Microphones used by members of the media will be allowed at the bench, the lower bench, and near the witness stand. No microphones will be allowed at counsel table.
17. Media representatives are expected to present a neat appearance in keeping with the dignity of the court and to be sufficiently familiar with the court proceedings to conduct themselves so as not to interfere with the proceedings, or to distract counsel, witnesses, jurors, or the court.
18. Counsel's conduct is governed by Rules 3.6 and 3.8 of the Rules of Professional Conduct.
19. Seating in the courtroom is limited, approximately 14-20 seats will be reserved for media who will obtain their credentials from the court. All others will be seated in the overflow courtroom. With the exception of engineers and camera operators (both still and broadcast) passes will be limited to one per organization.

20. Communication between the court and media representatives shall be through the court's bailiff.

DATED this 4 day of May, 2017.


Honorable Veronica Alicea-Galván

B

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17 APR 06 PM 1:30

KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE NUMBER: 17-2-09152-9 SEA

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

D.H.,

Plaintiff,

v.

MAYOR EDWARD MURRAY,

Defendant.

NO.

**COMPLAINT FOR DAMAGES:
CHILD SEX ABUSE & ILLEGAL
CHILD PROSTITUTION**

COMES NOW the Plaintiff, by and through his attorneys of record, and by way of claim allege, and upon information and belief upon all other matters, as follows:

I. PARTIES

1. Plaintiff D.H. is an adult male born in February of 1971 and is the child sex victim Ed Murray.¹

2. Defendant the Honorable Mayor Edward Murray, now age 61, is a Seattle resident and at the time of most of these incidents previously resided at 303 Harvard Avenue E, Apt 304, Seattle, Washington.

¹ For the related privacy principles, *see R.P. v. Seattle School District*, WL 639408 (Feb 18, 2014) (holding that sex abuse victim's identity is protected from public disclosure).

II. FACTS

3. As a young child, at the age of fifteen (15), the plaintiff, D.H., would frequently ride the Metro Bus Number-7 in the Capitol Hill area. D.H. had recently dropped out of Nathan Hale high school during the 9th grade. D.H. was homeless and his parents were also on drugs. Young and curious, D.H. encountered Ed Murray upon the bus and developed a friendly interaction. Mr. Murray was approximately age thirty-two (32) at the time, and propositioned D.H. for private visits at his Capitol Hill apartment. D.H. recalls Mr. Murray's old phone number: 206-325-8294. D.H. recalls that as you enter the apartment, the bathroom is to the right, and across from the bathroom was the sole bedroom.

4. The interaction turned sexual. Prior to the sex acts, Mr. Murray asked D.H. his age, and he responded truthfully, age 15. Mr. Murray propositioned D.H. in the form of sex acts for money – a form of child prostitution. Addicted to drugs at the time, D.H. was willing to do whatever Mr. Murray asked for as little as \$10-20 dollars. The sex acts included various forms of intercourse – anal of course – and oral sex acts, with Mr. Murray always on the receiving end of oral interactions. At times, the sex turned aggressive, beyond a point to which D.H. was comfortable and/or felt that to which he had agreed. During the relevant time-frame back 1986, D.H. recalls discussing the sexual encounters with his friend, F.W. Eventually, D.H. came to understand that Mr. Murray was doing work in politics at a location “across the street from the King County Jail” at the time.

5. D.H. recalls that Mr. Murray most enjoyed having his nipples pinched during sex – Mr. Murray has a very freckled chest. At the time, and likely still so, Mr. Murray had a distinctive genital region including reddish pubic hair and a unique mole on his scrotum – it is

1 a small bump. Mr. Murray indicated that he enjoyed sex more if D.H. was dirty -- literally
2 unclean -- and told D.H. not to bathe prior to sex. The sexual interactions at issue -- underage
3 sex for small-amounts of money -- continued for an extended period of time. Admittedly,
4 D.H. was convicted of various charges that include an extensive drug addiction, and acts of
5 prostitution in 1990 during unrelated sting operation.
6

7 6. On at least one occasion, D.H. was at Mr. Murray's home when another
8 apparently under-aged boy was at the apartment. D.H. was of the understanding that Mr.
9 Murray was having sex with the other boy for money at the same time. D.H. recalled the
10 other light-skinned boy from the Broadway area, where everyone would hang out. Mr.
11 Murray wanted D.H. to participate in the sex acts as a group. D.H. participated indirectly, but
12 "did not fully indulge" out of embarrassment at the proposition.
13

14 7. As an independent contention that can be expressly admitted or denied: Mr.
15 Murray has had sex with at least one (1) underage boy for money. This question should be
16 easy to answer and not require *any* investigation by Mr. Murray. Mr. Murray has either (1)
17 had sex with an underage boy for money, or (2) Mr. Murray has not. To the extent that Mr.
18 Murray suggests an inability to respond to this overall Complaint based upon D.H. being
19 referenced solely by his initials, Mr. Murray can still respond to this contention. Mr. Murray
20 cannot reasonably respond, "*which boy*" to this contention.
21

22 8. Only within the immediate past was it that D.H.'s father died. This event, the
23 death of D.H.'s father, prompted moments of reflection and introspection that included
24 counseling at Sound Mental Health. These moments of reflection, and awareness that Mr.
25 Murray maintains a position of authority, prompted the filing of this lawsuit in an attempt at
26

1 accountability, and to hopefully give courage for other potential victims to come forward and
2 speak out. According to D.H., he and Mr. Murray have had a few brief telephone interactions
3 over the years. D.H. would be shocked if Mr. Murray does not recall *exactly* who he was.
4 D.H. is currently participating in the Reach Program and trying to stay clean and move his life
5 in a positive direction.
6

7 9. An early step in this lawsuit will be deposing Mr. Murray, which should occur
8 within the first ninety (90) days of filing. D.H. believes that it will be hard, if not nearly
9 impossible for Mr. Murray to deny the abuse. Notably, Mr. Murray has accepted collect calls
10 at his home from D.H. over the years. Natural speculation would lead some people to believe
11 that D.H.'s actions are politically motivated – which is not exactly true. In this regard, D.H. is
12 disturbed that Mr. Murray maintains a position of trust and authority, and believes that the
13 public has a right to full information when a trusted official exploits a child. To the extent
14 that D.H. has any political motivations for outing Mr. Murray, they stop there. It should be
15 noted that at no point in time, not even prior to filing this lawsuit, did D.H. make any financial
16 demands of Mr. Murray – other than trading sex acts for money as described herein. D.H. has
17 counseling records.
18

19 III. CHILDHOOD SEX ABUSE

20 10. Mr. Murray repeatedly and criminally raped and molested D.H. when he was
21 legally unable to consent. Mr. Murray's violations were repugnant and unlawful under
22 chapter 9A.44 RCW and/or RCW 9.68A.040. RCW 9.68A.005 explains that "The legislature
23 finds that the prevention of sexual exploitation and abuse of children constitutes a government
24 objective of surpassing importance. The care of children is a sacred trust and should not be
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1 abused by those who seek commercial gain or personal gratification based on the exploitation
2 of children. The legislature further finds that the protection of children from sexual
3 exploitation can be accomplished without infringing on a constitutionally protected activity.
4 The definition of 'sexually explicit conduct' and other operative definitions demarcate a line
5 between protected and prohibited conduct and should not inhibit legitimate scientific,
6 medical, or educational activities. The legislature further finds that children engaged in
7 sexual conduct for financial compensation are frequently the victims of sexual abuse.
8 Approximately eighty to ninety percent of children engaged in sexual activity for financial
9 compensation have a history of sexual abuse victimization. It is the intent of the legislature to
10 encourage these children to engage in prevention and intervention services and to hold those
11 who pay to engage in the sexual abuse of children accountable for the trauma they inflict on
12 children." According to RCW 9.68A.100, "(1) A person is guilty of commercial sexual abuse
13 of a minor if: (a) He or she pays a fee to a minor or a third person as compensation for a
14 minor having engaged in sexual conduct with him or her..." RCW 9.68A.102(3) explains
15 that "Consent of a minor to the travel for commercial sexual abuse, or the sexually explicit act
16 or sexual conduct itself, does not constitute a defense to any offense listed in this section.
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19 IV. STATUTE OF LIMITATIONS: RCW 4.16.340

20 11. According to RCW 4.16.340, (1) All claims or causes of action based on
21 intentional conduct brought by any person for recovery of damages for injury suffered as a
22 result of childhood sexual abuse shall be commenced within the later of the following periods:
23 (a) Within three years of the act alleged to have caused the injury or condition; (b) Within
24 three years of the time the victim discovered or reasonably should have discovered that the
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1 injury or condition was caused by said act; or (c) Within three years of the time the victim
2 discovered that the act caused the injury for which the claim is brought: PROVIDED, That the
3 time limit for commencement of an action under this section is tolled for a child until the child
4 reaches the age of eighteen years. (2) The victim need not establish which act in a series of
5 continuing sexual abuse or exploitation incidents caused the injury complained of, but may
6 compute the date of discovery from the date of discovery of the last act by the same
7 perpetrator which is part of a common scheme or plan of sexual abuse or exploitation. (3) The
8 knowledge of a custodial parent or guardian shall not be imputed to a person under the age of
9 eighteen years. (4) For purposes of this section, "child" means a person under the age of
10 eighteen years. (5) As used in this section, "childhood sexual abuse" means any act
11 committed by the defendant against a complainant who was less than eighteen years of age at
12 the time of the act and which act would have been a violation of chapter 9A.44 RCW or RCW
13 9.68A.040 or prior laws of similar effect at the time the act was committed.
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16 12. Finding—Intent—1991 c 212: "The legislature finds that: (1) Childhood
17 sexual abuse is a pervasive problem that affects the safety and well-being of many of our
18 citizens. (2) Childhood sexual abuse is a traumatic experience for the victim causing long-
19 lasting damage. (3) The victim of childhood sexual abuse may repress the memory of the
20 abuse or be unable to connect the abuse to any injury until after the statute of limitations has
21 run. (4) The victim of childhood sexual abuse may be unable to understand or make the
22 connection between childhood sexual abuse and emotional harm or damage until many years
23 after the abuse occurs. (5) Even though victims may be aware of injuries related to the
24 childhood sexual abuse, more serious injuries may be discovered many years later. (6) The
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1 legislature enacted RCW 4.16.340 to clarify the application of the discovery rule to childhood
2 sexual abuse cases. At that time the legislature intended to reverse the Washington supreme
3 court decision in *Tyson v. Tyson*, 107 Wn.2d 72, 727 P.2d 226 (1986). It is still the
4 legislature's intention that *Tyson v. Tyson*, 107 Wn.2d 72, 727 P.2d 226 (1986) be reversed, as
5 well as the line of cases that state that discovery of any injury whatsoever caused by an act of
6 childhood sexual abuse commences the statute of limitations. The legislature intends that the
7 earlier discovery of less serious injuries should not affect the statute of limitations for injuries
8 that are discovered later." D.H.'s statute of limitations is preserved under these assorted
9 provisions. By and through this civil litigation process, D.H. intends to seek answers
10 regarding the abuse, and the impact upon her life and personal well-being.

11
12 **V. PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiff requests a judgment against Defendant:

- 14 (a) Awarding Plaintiff general damages including loss of consortium and special
15 damages in an amount to be proven at trial;
- 16 (b) Awarding him reasonable attorney's fees and costs as available under law;
- 17 (c) Awarding him any and all applicable interest on the judgment; and
- 18 (d) Awarding him such other and further relief as the Court deems just and proper
19 under the circumstances of this case.

20 //

21 //

22 //

23 //

1 Respectfully submitted this 4th day of April, 2017.

2 CONNELLY LAW OFFICES, PLLC

3 *Lincoln C. Beauregard*

4 By _____
5 Lincoln C. Beauregard, WSBA No. 32878
6 Julie A. Kays, WSBA No. WSBA No. 30385
Attorney for Plaintiff

7 L.A. LAW & ASSOCIATES, PLLC

8 *Lawand Anderson*

9 By _____
10 Lawand Anderson, WSBA No. 49012
11 Attorney for Plaintiff

C

FILED

17 APR 19 AM 9:00

KING COUNTY
SUPERIOR COURT CLERK
E-FILED

CASE NUMBER: 17-2-09152-9 SEA

SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

D.H.,

Plaintiff,

v.

MAYOR EDWARD MURRAY,

Defendant.

NO. 17-2-09152-9 SEA

**AMENDED COMPLAINT
(CORRECTED) FOR DAMAGES:
CHILD SEX ABUSE & ILLEGAL
CHILD PROSTITUTION**

COMES NOW the Plaintiff, by and through his attorneys of record, and by way of claim allege, and upon information and belief upon all other matters, as follows:

I. PARTIES

1. Plaintiff D.H. (real name: Delvonn¹ Heckard) is an adult male born in February of 1971 and is the child sex victim Ed Murray.² D.H. is an openly gay man with no real political inclinations. Prior to filing this lawsuit, D.H. visited with other lawyers within the local legal community (who could/would not pursue the case) before retaining the Connelly Law Offices upon the invitation of his original lawyer, Lawand Anderson. D.H. is not a pawn

¹ The only correction in this Complaint is spelling "Delvonn" with two Ns.

² For the related privacy principles, *see R.P. v. Seattle School District*, WL 639408 (Feb 18, 2014) (holding that sex abuse victim's identity is protected from public disclosure). Delvonn is spelled with two n's.

AMENDED COMPLAINT (CORRECTED) FOR DAMAGES: CHILD SEX
ABUSE & ILLEGAL CHILD PROSTITUTION - 1 of 9

CONNELLY LAW OFFICES, PLLC

2301 North 30th Street
Tacoma, WA 98403
(253) 593-5100 Phone - (253) 593-0380 Fax

1 in any conspiracy, as alleged by Mr. Murray and his hit team. However, D.H.'s claims *are*
2 politically motivated in that he does not think a man who abuses children, and then lies about
3 it in office, should be in high office without the public being afforded full information.

4 2. Defendant the Honorable Mayor Edward Murray, now age 61, is a Seattle
5 resident and at the time of most of these incidents previously resided at 303 Harvard Avenue
6 E, Apt 304, Seattle, Washington.
7

8 II. FACTS

9 3. As a young child, at the age of fifteen (15), the plaintiff, D.H., would
10 frequently ride the Metro Bus Number-7 in the Capitol Hill area. D.H. had recently dropped
11 out of Nathan Hale high school during the 9th grade. D.H. was homeless and his parents were
12 also on drugs. Young and curious, D.H. encountered Ed Murray upon the bus and developed
13 a friendly interaction. Mr. Murray was approximately age thirty-two (32) at the time, and
14 propositioned D.H. for private visits at his Capitol Hill apartment. D.H. recalls Mr. Murray's
15 old phone number: 206-325-8294. D.H. recalls that as you enter the apartment, the bathroom
16 is to the right, and across from the bathroom was the sole bedroom.
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18 4. The interaction turned sexual. Prior to the sex acts, Mr. Murray asked D.H. his
19 age, and he responded truthfully, age 15. Mr. Murray propositioned D.H. in the form of sex
20 acts for money – a form of child prostitution. Addicted to drugs at the time, D.H. was willing
21 do whatever Mr. Murray asked for as little as \$10-20 dollars. The sex acts included various
22 forms of intercourse – anal of course – and oral sex acts, with Mr. Murray always on the
23 receiving end of oral interactions. At times, the sex turned aggressive, beyond a point to
24 which D.H. was comfortable and/or felt that to which he had agreed. During the relevant
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1 time-frame back 1986, D.H. recalls discussing the sexual encounters with his friend, F.W.
2 Eventually, D.H. came to understand that Mr. Murray was doing work in politics at a location
3 "*across the street from the King County Jail*" at the time.

4 5. D.H. recalls that Mr. Murray most enjoyed having his nipples pinched during
5 sex – Mr. Murray has a very freckled chest. At the time, and likely still so, Mr. Murray had a
6 distinctive genital region including reddish pubic hair and a unique mole on his scrotum – it is
7 a small bump. Mr. Murray indicated that he enjoyed sex more if D.H. was dirty -- literally
8 unclean -- and told D.H. not to bathe prior to sex. The sexual interactions at issue – underage
9 sex for small-amounts of money – continued for an extended period of time. Admittedly,
10 D.H. was convicted of various charges that include an extensive drug addiction, and acts of
11 prostitution in 1990 during unrelated sting operation.

12 6. On at least one occasion, D.H. was at Mr. Murray's home when another
13 apparently under-aged boy was at the apartment. D.H. was of the understanding that Mr.
14 Murray was having sex with the other boy for money at the same time. D.H. recalled the
15 other light-skinned boy from the Broadway area, where everyone would hang out. Mr.
16 Murray wanted D.H. to participate in the sex acts as a group. D.H. participated indirectly, but
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20 that D.H. has any political motivations for outing Mr. Murray, they stop there. It should be
21 noted that at no point in time, not even prior to filing this lawsuit, did D.H. make any financial
22 demands of Mr. Murray – other than trading sex acts for money as described herein. D.H. has
23 counseling records.
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1 10. Through this lawsuit, D.H. learned of the existence of Jeff Simpson and Lloyd
2 Anderson. D.H. learned of Mr. Simpson and Mr. Anderson through the Seattle Times. Mr.
3 Murray was almost charged with sodomizing Mr. Simpson back in 1984. Mr. Simpson fits
4 the description of the other boy in the room as alleged within this Complaint. D.H. does not
5 recognize Mr. Simpson and/or Mr. Anderson by name, or as adults, but feels affirmed in
6 knowing the similarities of their recollection of events. Mr. Murray has admitted having
7 relationships with Mr. Simpson and Mr. Anderson. As Mr. Simpson and Mr. Anderson have
8 been courageous in stepping forward publicly, D.H. feels as though he should not proceed in
9 anonymity
10

11 11. As of the filing of this Amended Complaint, Mr. Murray has proclaimed a lack
12 of knowledge as to D.H.³ Mr. Murray has undergone multiple public interviews, made public
13 statements, and even rushed off to his gastroenterologist to have his genitals examined. In
14 that regard, it should be noted that D.H. alleges that Mr. Murray had the noted genital
15 distinctions *thirty years ago* and not at present. Oddly, Mr. Murray's lawyers assisted Mr.
16 Murray in hosting press conferences, making public statements, and having his genitals
17 examined, but have not bothered, as of this day, to ask about D.H.'s real identity. Mr. Murray
18 is entitled to this information, and his lawyers could have asked for the first day the lawsuit
19 was filed. Instead, Mr. Murray has put on a public charade. Any normal person would have
20 asked his accusers name before having his genitals examined. D.H.'s real name is Delvonn
21 Heckard.
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26 ³ Mr. Murray's lawyers have still not followed normal protocol and filed a Notice of Appearance.

III. CHILDHOOD SEX ABUSE

12. Mr. Murray repeatedly and criminally raped and molested D.H. when he was legally unable to consent. Mr. Murray's violations were repugnant and unlawful under chapter 9A.44 RCW and/or RCW 9.68A.040. RCW 9.68A.005 explains that "The legislature finds that the prevention of sexual exploitation and abuse of children constitutes a government objective of surpassing importance. The care of children is a sacred trust and should not be abused by those who seek commercial gain or personal gratification based on the exploitation of children. The legislature further finds that the protection of children from sexual exploitation can be accomplished without infringing on a constitutionally protected activity. The definition of 'sexually explicit conduct' and other operative definitions demarcate a line between protected and prohibited conduct and should not inhibit legitimate scientific, medical, or educational activities. The legislature further finds that children engaged in sexual conduct for financial compensation are frequently the victims of sexual abuse. Approximately eighty to ninety percent of children engaged in sexual activity for financial compensation have a history of sexual abuse victimization. It is the intent of the legislature to encourage these children to engage in prevention and intervention services and to hold those who pay to engage in the sexual abuse of children accountable for the trauma they inflict on children." According to RCW 9.68A.100, "(1) A person is guilty of commercial sexual abuse of a minor if: (a) He or she pays a fee to a minor or a third person as compensation for a minor having engaged in sexual conduct with him or her..." RCW 9.68A.102(3) explains that "Consent of a minor to the travel for commercial sexual abuse, or the sexually explicit act or sexual conduct itself, does not constitute a defense to any offense listed in this section.

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IV. STATUTE OF LIMITATIONS: RCW 4.16.340

13. According to RCW 4.16.340, (1) All claims or causes of action based on intentional conduct brought by any person for recovery of damages for injury suffered as a result of childhood sexual abuse shall be commenced within the later of the following periods: (a) Within three years of the act alleged to have caused the injury or condition; (b) Within three years of the time the victim discovered or reasonably should have discovered that the injury or condition was caused by said act; or (c) Within three years of the time the victim discovered that the act caused the injury for which the claim is brought: PROVIDED, That the time limit for commencement of an action under this section is tolled for a child until the child reaches the age of eighteen years. (2) The victim need not establish which act in a series of continuing sexual abuse or exploitation incidents caused the injury complained of, but may compute the date of discovery from the date of discovery of the last act by the same perpetrator which is part of a common scheme or plan of sexual abuse or exploitation. (3) The knowledge of a custodial parent or guardian shall not be imputed to a person under the age of eighteen years. (4) For purposes of this section, "child" means a person under the age of eighteen years. (5) As used in this section, "childhood sexual abuse" means any act committed by the defendant against a complainant who was less than eighteen years of age at the time of the act and which act would have been a violation of chapter 9A.44 RCW or RCW 9.68A.040 or prior laws of similar effect at the time the act was committed.

14. Finding—Intent—1991 c 212: "The legislature finds that: (1) Childhood sexual abuse is a pervasive problem that affects the safety and well-being of many of our

1 citizens. (2) Childhood sexual abuse is a traumatic experience for the victim causing long-
2 lasting damage. (3) The victim of childhood sexual abuse may repress the memory of the
3 abuse or be unable to connect the abuse to any injury until after the statute of limitations has
4 run. (4) The victim of childhood sexual abuse may be unable to understand or make the
5 connection between childhood sexual abuse and emotional harm or damage until many years
6 after the abuse occurs. (5) Even though victims may be aware of injuries related to the
7 childhood sexual abuse, more serious injuries may be discovered many years later. (6) The
8 legislature enacted RCW 4.16.340 to clarify the application of the discovery rule to childhood
9 sexual abuse cases. At that time the legislature intended to reverse the Washington supreme
10 court decision in *Tyson v. Tyson*, 107 Wn.2d 72, 727 P.2d 226 (1986). It is still the
11 legislature's intention that *Tyson v. Tyson*, 107 Wn.2d 72, 727 P.2d 226 (1986) be reversed, as
12 well as the line of cases that state that discovery of any injury whatsoever caused by an act of
13 childhood sexual abuse commences the statute of limitations. The legislature intends that the
14 earlier discovery of less serious injuries should not affect the statute of limitations for injuries
15 that are discovered later." D.H.'s statute of limitations is preserved under these assorted
16 provisions. By and through this civil litigation process, D.H. intends to seek answers
17 regarding the abuse, and the impact upon his life and personal well-being.

20 V. PRAYER FOR RELIEF

21 WHEREFORE, Plaintiff requests a judgment against Defendant:

- 22 (a) Awarding Plaintiff general damages including loss of consortium and special
23 damages in an amount to be proven at trial;
24 (b) Awarding him reasonable attorney's fees and costs as available under law;

- 1 (c) Awarding him any and all applicable interest on the judgment; and
2 (d) Awarding him such other and further relief as the Court deems just and proper
3 under the circumstances of this case.
4

5 Respectfully submitted this 18th day of April, 2017.
6

7 CONNELLY LAW OFFICES, PLLC

8 *Lincoln C. Beauregard*

9 By _____

10 Lincoln C. Beauregard, WSBA No. 32878
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15 By _____

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VERONICA ALICEA GALVÁN

JUDGE OF THE SUPERIOR COURT
516 THIRD AVENUE, C-0203
SEATTLE, WASHINGTON 98104-2381

JUDGE VERONICA ALICEA-GALVÁN

The Honorable Veronica Alicea- Galván is a 1994 University of Washington School of Law graduate. She has served as an Assistant City Attorney for the City of Seattle, and also served the City of Federal Way in this same capacity. Judge Alicea-Galván took the bench in 2001 as a Judge Pro Tempore, and was appointed to a full time judicial position as an Administrative Law Judge in 2002. In 2007, Judge Alicea-Galván was appointed to the Des Moines Municipal Court where she served with distinction, earning the Juez Excepcional award from the Latina/o Bar Association of Washington. Governor Jay Inslee appointed Judge Alicea-Galván to the King County Superior Court in December of 2014.

While in Des Moines, Judge Alicea-Galván implemented the only Spanish-language Court in the state of Washington granting hundreds of litigants the opportunity to address the court directly in Spanish. She was recognized by her alma mater with the Dean's Leadership Award in 2015 and in 2016 was recognized as a Woman of the Year by the Center for Women & Democracy.

In addition to her judicial duties, Judge Alicea-Galván is a faculty member for the Washington State Judicial College where she has taught several courses, most recently, *Emerging Through Bias: Towards A More Fair And Equitable Courtroom*. Judge Alicea-Galván has also been an adjunct instructor at Seattle University School of Law and has lectured extensively at legal education programs.

E

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