

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

**A.B., by and through her next friend Cassie Cordell Trueblood; D.D., by and through his next friend Andrea Crumpler; K.R. by and through his next friend Marilyn Roberts; Q.M. by and through his next friend Kathryn McCormick; all others similarly situated; and Disability Rights Washington;**

**Plaintiffs,**

**vs.**

**Washington State Department of Social and Health Services; Kevin Quigley, in his official capacity as Secretary of the Department of Social and Health Services; Western State Hospital; Ron Adler in his official capacity as Chief Executive Officer of Western State Hospital; Eastern State Hospital; and Dorothy Sawyer in her official capacity as Chief Executive Officer of Eastern State Hospital,**

**Defendants.**

**No. 14-cv-01178-MJP**

**DECLARATION OF  
GORDON KARLSSON**

**CLASS ACTION**

I, Gordon Karlsson, declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters stated herein, and am competent to testify thereto.

2. I have been in corrections at the King County Correctional Facility (KCCF) for thirty-four years. I have been the KCCF Facility Commander since June 2006. Prior to my

1 current position, I was a Corrections Officer from 1980 to 1991, a Corrections Sergeant from  
2 1991 to 1996, a Corrections Captain from 1996 to 2004, and a Corrections Major from 2004 to  
3 2006.

4 3. As a corrections officer, I have had contact with offenders with mental illness  
5 since the first day on the job. Regrettably, we've always had acutely mental ill inmates in  
6 custody that lack competency to stand trial.

7 4. In past years, it appears that the wait time for Washington State Hospital (WSH)  
8 evaluations or restoration was significant, yet in the past year, the wait time has doubled.

9 5. Disability Rights Washington came to the King County jail in the fall of 2012 as  
10 part of an investigation related to a report called Lost and Forgotten.

11 6. Since 2004, and more so after DRW's Lost and Forgotten report, I became more  
12 and more aware of the acutely mentally ill in our custody and the negative effect that evaluation  
13 and restoration wait times have on their average length of stay, which has dramatically increased.


14 7. Generally speaking, those inmates that are mentally ill or facing competency  
15 issues can have a longer length of stay in jail than those without these issues.

16 8. Police officers on the street have limited viable resources to take these individuals  
17 as an alternative to jail. These programs may be better suited to serve the acutely mentally ill  
18 because they provide treatment for healthcare reasons rather than for forensic reasons which is  
19 what happens in the criminal justice system.

20 9. At the King County Correctional Facility, we provide for the health and safety of  
21 the inmates in our custody. This includes mental healthcare and special housing for the acutely  
22 mentally ill. However, the increasing length of stay of the acutely mentally ill in our facility  
23 significantly taxes the resources available to us.

1 I declare under penalty of perjury under 28 U.S.C. § 1746, that the forgoing is true and  
2 accurate.

3 DATED this 30<sup>th</sup> day of September, 2014, at Seattle, Washington.

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6 Gordon Karlsson

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

- John K McIlhenny ([JohnM5@atg.wa.gov](mailto:JohnM5@atg.wa.gov))
- Nicholas A Williamson ([NicholasW1@atg.wa.gov](mailto:NicholasW1@atg.wa.gov))
- Sarah Jane Coats ([sarahc@atg.wa.gov](mailto:sarahc@atg.wa.gov))
- Amber Lea Leaders ([amberl1@atg.wa.gov](mailto:amberl1@atg.wa.gov))

DATED: October 3, 2014, at Seattle, Washington.

*/s/Mona Rennie*  
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 Legal Assistant  
 Disability Rights Washington