

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  
MELISSA PARKER**

**CLASS ACTION**

I, Melissa Parker, 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 am the sister of Amanda Cook. Besides Amanda, I only have one other sister.

1           3.     Amanda committed suicide on December 6, 2013, while waiting in Spokane  
2 County Jail for competency evaluation from Eastern State Hospital (“ESH”). She was only  
3 twenty-five years old and a mother.

4           4.     Amanda and I became very close after we had both left home. When she got  
5 pregnant, we lived in the same town and would see each other often.

6           5.     She was a really sweet kid. She was emotional and deeply caring. I remember  
7 one incident where our loved family dog evacuated his bowels when he died. She bathed him so  
8 he could be clean before we buried him. This was the sort of thing my sister would do for  
9 someone or something she loved.

10          6.     As she got older, my sister got lost for a while in the drug scene. I feel like her  
11 drug use stunted her development and contributed a lot to her mental instability.

12          7.     She went to Spokane County Jail because she was charged with assaulting my  
13 mother and her husband. I think she was delusional during this assault. The reason I think this is  
14 because right before this happened, Amanda had convinced herself that our mom had hurt  
15 Amanda’s daughter, Vanessa, or was keeping Vanessa from her. She later told me that God told  
16 her to do it. I would see her get angry and delusional about stuff that didn’t happen. Later she  
17 would express remorse and say she was sorry. During this time, I would see her go in and out of  
18 being the sister I knew to someone I didn’t know.

19          8.     Amanda lived with me for a month before being arrested for assault. I noticed her  
20 acting strangely. For example, she would say weird things like, “I can see hearts in the sky.”  
21 But to my knowledge, she wasn’t using drugs at this time. The reason she was staying with me  
22 was so she could get away from the people she would do drugs with and get the drugs out of her  
23 system.

1           9.       It wasn't all weird though. I remember that she would do things like climb in bed  
2 with me and watch TV. She was really sweet and thoughtful. Being the youngest, she always  
3 wanted to be front and center and not be left behind. As her older sister, I would try to give her  
4 the attention and support she needed.

5           10.       When she got booked into jail for the assault, she called and wrote to me to let me  
6 know where she was and how she was doing. There was a period of time when she wasn't  
7 getting my letters and I wasn't hearing them from her either. I started calling the jail to see if she  
8 was still there and okay.

9           11.       Before she went to Spokane County Jail, my sister was held at Pend Oreille  
10 County Jail. She told me that they had given her medication and pamphlets with information  
11 about her anxiety. She told me that the breathing techniques described in the pamphlet and the  
12 medication seemed to really be helping. She also told me that they had her on suicide watch. I  
13 felt relieved that that they were watching her closely because she had attempted suicide before. I  
14 remember thinking that she was safer in jail than when she was out on the streets because there  
15 were people continuously watching out for her and keeping her safe.

16           12.       Yet, when they transferred her down to Spokane County Jail, my sister wasn't  
17 provided with medication. She also wasn't put on suicide watch. I don't understand why the two  
18 jails in counties right next to one another weren't talking to each other. I know that there are  
19 licensed mental health providers at Spokane County Jail, but no one I talked to at the Spokane  
20 County Jail was able to tell me why Amanda was not receiving the medication, monitoring, or  
21 support that seemed to help so much when she was in the Pend Oreille County Jail. It made me  
22 very worried about my sister.

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1 13. I got even more worried when I would talk to my sister. I think she might have  
2 been hallucinating about people trying to hurt her. She was highly paranoid. She would call me  
3 and tell me that jail staff was trying to poison her food and was convinced that the jail staff  
4 would kill her. She said these bad people knew where I lived and wanted to hurt me too.

5 14. She also talked about her daughter and cried a lot. She asked about how the rest  
6 of the family was doing and worried about people being mad at her. She expressed a lot of  
7 confusion about what's wrong with her and wanted to know what she should do to feel better.

8 15. After being in jail for several weeks, Amanda told me that she was going to get a  
9 mental health evaluation from ESH. She was relieved it was going to happen soon. *See Exhibit*  
10 *A.* In one of her last letters to me, my sister told me, "I talked to my attorney today. She says  
11 Eastern is gonna come and give me an evaluation here in the next week or so. I'll let you know.  
12 Please pray for me....I need to pull myself together. Moe, I am losing my mind." *Id.*

13 16. In this same letter she also told me, "You guys want your sister back and I want to  
14 be a part of my family again. I've got a lot of shameful guilt I just need to let go of, but it's hard.  
15 Honestly, I feel like a freak show. I'm really hoping to still have a chance to get my mind right  
16 and be able to be with you where I belong." *Id.*

17 17. After I got this letter, Amanda called me to tell me that the evaluation was  
18 delayed several times. She was confused about why the evaluation was delayed and seemed to  
19 think it was her fault.

20 18. I called the jail several times and asked them about why my sister wasn't getting  
21 evaluated. The jail staff wasn't able to tell me much except that she was waiting and that she was  
22 going to be held in jail until she was evaluated. The impression I got was that the purpose of the  
23 evaluation was to see if she was competent to stand trial for the stuff she allegedly did. It

1 seemed like they weren't also concerned with my sisters deteriorating mental stability so they  
2 could get her the help she needed to keep her safe.

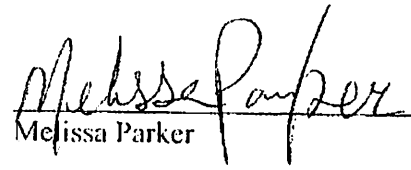
3 19. Towards the end, I saw my sister getting even worse. I think it had a lot to do  
4 with her feeling severely depressed about the time of year. It was December or right around her  
5 daughter's birthday and Christmas. The call I remember the most is she called a few days before  
6 she died crying so hysterically I couldn't understand her. The only thing I could really tell her  
7 was no one wanted to hurt her and to focus on bettering herself and making her life better when  
8 she gets out. I would try to get her to focus on the future. But, she would hang up still really sad.

9 20. Even with all the bad decisions my sister made throughout her short life, she  
10 always felt remorse about it and wanted to know how she could make it better. Even when she  
11 was the most lost, I knew all along my real sister was in there somewhere and trying to get out. I  
12 only wish that she had gotten the help so she could still be here; the happy, funny, caring sister  
13 that I love and miss so very much.

14 21. I am telling her story in this declaration just like I did with the reporter from *The*  
15 *Inlander* because I don't want my sister and the struggles she went through to get help to be  
16 forgotten. See Exhibit B. Now that I know that there are so many other people like her waiting  
17 in jail, I want to be part of the effort to stop this from happening again.

18 I declare under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and  
19 accurate.

20 DATED this 30 day of September, 2014, at Rock Springs, Wyoming.

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23 Melissa Parker

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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*  
 \_\_\_\_\_  
 Legal Assistant  
 Disability Rights Washington