

FILED  
2023 JAN 24 04:01 PM  
KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE #: 23-2-01481-2 SEA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

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

**INGRID CHRISTIANSON ALM,** ) Case No.:  
 )  
**Plaintiff** ) **COMPLAINT**  
 )  
**v.** )  
 )  
**BUNGIE INC., a Washington state** )  
**corporation,** )  
**Defendant** )

PLAINTIFF, INGRID ALM, by and through her attorney, Reba Weiss and Weiss Law Firm, PLLC, alleges as follows:

**PARTIES**

1. Plaintiff Alm is a 37-year-old married woman living in Seattle, King County, Washington.
2. Plaintiff was employed with Defendant Bungie Inc. during the time periods relevant to this Complaint.
3. Defendant Bungie Inc. is a corporation whose principal place of business is in Bellevue

**COMPLAINT**

REBA WEISS  
WEISS LAW FIRM PLLC  
1833 N. 105<sup>th</sup> Street, Ste.101  
Seattle, WA 98133  
[rebalaw1@gmail.com](mailto:rebalaw1@gmail.com)

1 and is registered in Washington State.

2  
3 **JURISDICTION AND VENUE**

4 4. This Court has jurisdiction over the parties pursuant to RCW 2.08.010 and RCW  
5 49.60.030.

6 5. Venue is proper in King County because Plaintiff resides in King County and because  
7 the events occurred in King County, RCW 4.12.025(1)(3).

8 **FACTS**

9 6. Plaintiff became employed as a Human Resources manager with Defendant on or  
10 about May 16, 2022. Plaintiff has more than ten years of experience working in the  
11 Human Resources field.

12 7. In late July 2022, Plaintiff was instructed by her direct supervisor to investigate the  
13 alleged underperformance of a particular employee, “James Smith”. Plaintiff was to  
14 determine whether Mr. Smith should be counseled or terminated.

15 8. Shortly thereafter, Plaintiff met with Mr. Smith’s supervisor and another HR  
16 employee to discuss Mr. Smith’s work performance and what needed to be done  
17 about it. Plaintiff learned that Mr. Smith was the only African American person on a  
18 team of fifty people. He had expressed concern about being singled out by his  
19 supervisor for treatment that was harsher than his co-workers. He also expressed  
20 concern that he was being racially targeted by his supervisor and others for  
21 termination.  
22

23 9. Plaintiff advised her supervisor about her concerns regarding Mr. Smith being racially  
24

1 targeted and treated differently than his co-workers due to his race. Plaintiff  
2 recommended that Defendant provide diversity training to Ms. Smith's supervisor  
3 and others in the department.

4 10. Defendant's response to Plaintiff's recommendation for diversity training was met  
5 with hostility and denial. Plaintiff was told that the individuals she was  
6 recommending for diversity training "had been there for a long time" and "are highly  
7 regarded". Plaintiff was told that these individuals would not be getting diversity  
8 training, as Plaintiff had recommended.

9 11. On or about August 9, 2022, Plaintiff met with her supervisor and managers again to  
10 discuss Mr. Smith's work performance and disciplinary action. Plaintiff told the  
11 others that Mr. Smith had told her that "he felt alone as the only Black man in the  
12 department". Plaintiff's supervisor responded in a hostile manner stating that "she  
13 didn't want to touch those conversations with a ten-foot pole."

14 12. Plaintiff advised her supervisor that the Recruiting Department needed "unconscious  
15 bias training". Plaintiff's supervisor disagreed with this recommendation.

16 13. Shortly thereafter, Defendant decided to terminate Mr. Smith's employment. Plaintiff  
17 was instructed to prepare his separation agreement. Plaintiff did not believe that Mr.  
18 Smith's termination was warranted and that it was a product of racial bias by  
19 Defendant's supervisors and managers.

20 14. On or about September 16, 2022, Plaintiff reached out to Defendant's Director of  
21 Equity and Inclusion, Dr. Courtney Benjamin, to discuss Mr. Smith's termination.  
22 Dr. Benjamin advised Plaintiff that Mr. Smith's termination was "too risky  
23  
24

1 considering the evidence.”

2 15. Plaintiff told her supervisor that she had discussed Mr. Smith’s case with Dr.  
3 Benjamin and that Dr. Benjamin advised giving Mr. Smith a written warning rather  
4 than termination. Plaintiff’s supervisor became extremely angry at Plaintiff for  
5 having contacted Dr. Benjamin.

6 16. Plaintiff’s supervisor called Dr. Benjamin to apologize for Plaintiff having consulted  
7 with her. She told Dr. Benjamin that “she didn’t want her to think that she was a  
8 racist.” Dr. Benjamin explained that she was hired to consult on cases like this and  
9 that it was totally fine that Plaintiff reached out to her.

10 17. The following day, Plaintiff’s supervisor sent an email message in which she said that  
11 Plaintiff reaching out to Dr. Benjamin was unacceptable and deserved a warning.  
12 Later, Dr. Benjamin confirmed to Plaintiff that her supervisor was “very angry” at  
13 Plaintiff for reaching out to her.

14 18. Mr. Smith reached out to Plaintiff and again told her that he “was being held to a  
15 different standard than his white co-workers and treated differently than they are.”

16 19. On or about September 23, 2022, Plaintiff wrote a 12-page summary of her interview  
17 with Mr. Smith. In the summary, Plaintiff described that Defendant “was aware of  
18 unconscious bias on the part of their management team but had taken no action to  
19 correct it.”

20 20. Plaintiff’s supervisor placed her in the “Needs Improvement” category for the  
21 Professional Development cycle, although Plaintiff had received excellent  
22 performance reviews from her peers and clients.  
23  
24

1 21. On or about September 27, 2022, Plaintiff spoke with her supervisor who criticized  
2 Plaintiff's work performance for the entire conversation. Plaintiff was very upset and  
3 cried during this call because she felt betrayed by her supervisor who, previous to  
4 Plaintiff reporting racial bias in the workplace, had been very friendly with her.  
5 Plaintiff stated that maybe she should be looking for an "off-ramp".

6 22. Shortly after this phone call, Plaintiff's access to her email accounts was cut off in  
7 addition to her access to all of Defendant's platforms.

8 23. For the following few days, Plaintiff tried to contact her supervisor who did not return  
9 her calls and messages.

10 24. On or about September 30, 2022, Plaintiff's supervisor told her that she had  
11 "accepted her resignation and her termination was already in progress." Plaintiff  
12 explained that she had not intended to resign and wanted to remain in her job. Her  
13 pleas were ignored.  
14

15 25. On or about October 1, 2022, Plaintiff was advised that she had been terminated  
16 effective that date. Plaintiff refused to sign a document stating that she had  
17 "voluntarily resigned."

18 26. On or about October 7, 2022, Plaintiff sent an email to Holly Barbacovi, Chief People  
19 Officer, in which she explained that she had been terminated while investigating  
20 issues of racism in the workplace and that her termination was in retaliation for that  
21 investigation. Plaintiff further stated that her termination was based on prejudice  
22 against black employees by her supervisor. Plaintiff received no response to this  
23 message.  
24

25 **COMPLAINT**

Page 5

REBA WEISS  
WEISS LAW FIRM PLLC  
1833 N. 105<sup>th</sup> Street, Ste.101  
Seattle, WA 98133  
[rebalaw1@gmail.com](mailto:rebalaw1@gmail.com)

1  
2 **CAUSES OF ACTION**

3 Plaintiff reserves the right to amend this Complaint as necessary.

4 **COUNT I – RETALIATION**

5 Plaintiff, while investigating complaints of race discrimination in the workplace,  
6 was written up and subjected to hostile treatment by her supervisor, who eventually  
7 terminated her. This was in retaliation for Plaintiff reporting racial bias by her supervisor  
8 and others, in violation of the Washington Law Against Discrimination, RCW 49.60 *et*  
9 *seq.*

10 **COUNT II – WRONGFUL TERMINATION**

11 Defendant wrongfully terminated Plaintiff because of her reports of race  
12 discrimination in the workplace, in violation of the Washington Law Against  
13 Discrimination, RCW 49.60 *et seq.*

14 **WHEREFORE**, Plaintiff prays for the following relief from the Court:

- 15
- 16 1. Awarding Plaintiff the full amount of her lost past and future wages under RCW  
17 49.60 in amounts to be established at trial;
  - 18 2. Awarding Plaintiff damages for the unlawful infliction of emotional distress,  
19 including but not limited to severe depression, anxiety, loss of enjoyment of life, and  
20 humiliation in amounts to be established at trial;
  - 21 3. Awarding Plaintiff prejudgment interest on any awards;
  - 22 4. Awarding Plaintiff her actual and reasonable attorneys’ fees and litigation  
23 expenses under RCW 49.60.180;
- 24

25 **COMPLAINT**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

5. Awarding Plaintiff monetary relief to compensate for any adverse tax consequences of her award; and

6. Awarding Plaintiff such other and further relief as the court deems just and equitable.

DATED this 17<sup>th</sup> day of January 2023.

/s/ Reba Weiss

Reba Weiss, WSBA #12876  
Attorney for Plaintiff Alm