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

LISA PIM, an individual,)	Case No.:
)	
Plaintiff,)	COMPLAINT
)	
vs.)	
)	
1ST SECURITY BANK OF WASHINGTON,)	
a Washington corporation,)	
)	
Defendant.)	

Plaintiff Lisa Pim, by and through counsel, complains and avers as follows:

I. PARTIES, JURISDICTION, AND VENUE

1.1 Status of Plaintiff. Plaintiff Lisa Pim is an individual residing in King County, Washington.

1.2 Status of Defendant. Defendant 1st Security Bank of Washington (“FSB”) is a corporation organized and doing business in King County, Washington.

1.3 Jurisdiction. This court has subject matter jurisdiction over this action pursuant to RCW 2.08.010.

1.4 Venue. Venue is proper in King County, Washington. Defendant FSB transacts business in King County and has offices in King County. RCW 4.12.025(1).

II. FACTS

2.1 FSB hired Plaintiff in 2012 as a manager.

2.2 In 2017, Plaintiff stepped down from her manager position and took an associate position. FSB hired Mr. Ron Poborsky as Plaintiff’s replacement for the manager position.

1 2.3 FSB gave Mr. Poborsky more privileges and opportunities as a manager than it
2 gave Plaintiff when she was in the same position.

3 2.4 When Plaintiff stepped down from her manager position, FSB agreed to pay her
4 five percent commission on FSB's profits for her branch.

5 2.5 While Mr. Poborsky was Plaintiff's manager, he made inappropriate comments
6 of a sexual nature. These included inappropriate, sexual comments about Plaintiff's body and
7 clothing.

8 2.6 Mr. Donn Costa, Mr. Poborsky's manager and FSB's executive vice president,
9 was aware of Mr. Poborsky's inappropriate, sexual comments.

10 2.7 Plaintiff complained to Mr. Costa about Mr. Poborsky's inappropriate, sexual
11 comments. FSB took no corrective action regarding Mr. Poborsky's behavior.

12 2.8 At a function outside of business hours, Mr. Poborsky made a comment about
13 Plaintiff's undergarments in front of her coworkers. Plaintiff, stunned, did not know how to
14 respond. Mr. Poborsky then said, "I've never seen you speechless."

15 2.9 At this same function, Mr. Poborsky simulated oral sex while he was teaching
16 women who worked for him at FSB how to smoke a cigar.

17 2.10 Later at this function, Mr. Poborsky told Plaintiff twice that she should take her
18 dress off. Shocked and offended, Plaintiff slapped Mr. Poborsky.

19 2.11 The following week, FSB placed Plaintiff on unpaid leave. A few weeks later,
20 FSB sent Plaintiff a letter terminating her employment. This letter alleged that Plaintiff's
21 reaction to Mr. Poborsky's inappropriate comments was "unprovoked" and attempted to excuse
22 his comments.

23 2.12 Before FSB informed Plaintiff that she was terminated, FSB began contacting
24 Plaintiff's clients and told them that she was no longer employed by FSB.

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IV. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

(1) Injunctive relief, including the following:

- a. Court-supervised improvements to the enforcement of Defendants' anti-discrimination policy and training of management and employees on that policy;
- b. Reports to the court about claims of discrimination for two years following the entry of judgment; and
- c. Changes to Defendants' policies regarding sexual harassment and discrimination;

(2) Compensatory damages;

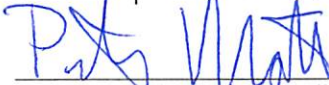
(3) Lost wages;

(4) Emotional damages;

(5) Attorney's fees and costs; and

(6) For such other and further relief as the Court may deem just and proper.

Dated this 28th day of September, 2018.

ROCKE | LAW Group, PLLC

Peter Montine, WSBA #49815
Attorney for Plaintiff