

Washington State Board of Health
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COMPLAINT

This Complaint is hereby filed with the Washington State Board of Health (“WSBH”) via e-mail to “wsboh@sboh.wa.gov.”

This Complaint is filed in accordance with RCW 70.05.120(1) which provides that “Any person may complain to the state board of health concerning the failure of the local health officer or administrative officer to carry out the laws or the rules and regulations concerning public health.”

This Complaint alleges that the following Snohomish County Health Department (“SCHD”) officials have violated provisions of Chapter 70.05 RCW and refused and/or neglected to obey and/or enforce the rules and regulations of the State Board of Health for the prevention, suppression or control of dangerous contagious or infectious disease or for the protection of the health of the People of the State of Washington (WAC 246-100-036 and -040):

Dennis Worsham – Director;

James Lewis, MD, MPH – Health Officer.

“We now know that COVID-19 is here for the foreseeable future. It's important to understand how to live our lives while keeping ourselves, loved ones and community as safe as possible. How can we do that? By using all the tools we've learned so far: staying up to date with COVID-19 vaccines, getting tested and staying home if sick or exposed, wearing a mask in crowds, and keeping distance.”¹

SCHD has failed to use any of the available tools to control and prevent the spread of dangerous, contagious and/or highly infectious pathogens circulating within Snohomish County. (RCW 70.05.070(3))

¹ <https://doh.wa.gov/emergencies/covid-19>

The Director and the Health Officer are ultimately responsible for ensuring that the public health laws, rules, and regulations of the State of Washington are strictly enforced within all of Snohomish County. (RCW 70.05.070(1) and (2))

It is a gross dereliction of duty to allow such individuals to continue jeopardizing the health and safety of the Citizens of Snohomish County. (RCW 70.05.120(1))

I, John G Gehman, hereby respectfully request that WSBH conduct a preliminary investigation as mandated under RCW 70.05.120(1), and if so warranted, call a hearing to determine whether the aforementioned individuals are guilty of refusing and/or neglecting to control and prevent the spread of dangerous, contagious or infectious diseases occurring within Snohomish County.

Remedies Sought:

1. Immediate implementation and enforcement of the State of Washington's current COVID-19 masking guidance throughout all of Snohomish County
2. Immediate implementation and enforcement of the State's "Procedures for isolation or quarantine" under WAC 246-100-040.
3. Any other action necessary to control and prevent the spread of dangerous, contagious, or infectious diseases within Snohomish County.

Respectfully signed, electronically, and submitted this 28th Day of November 2023, by:

/s/ John G Gehman

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