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6 SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

7 NICOLLE SHEAVES,

Case No. 23-2-00978-06

8 Plaintiff,

9 vs.

COMPLAINT FOR DAMAGES

10 CHRISTOPHER DEEGE,

11 Defendant.

12 I. PARTIES

13 A. Plaintiff Nicolle Sheaves is and was at all times material hereto a resident of Clark
14 County, Washington.

15 B. Defendant Christopher Deege is and was at all times material hereto a resident of
16 Clark County, Washington.

17 II. FACTS

18 A. At the time of the events described below, Defendant Christopher Deege was the
19 step father to Plaintiff Nicolle Sheaves.

20 B. At the time of the events described below, Plaintiff Nicolle Sheaves was ten (10)
21 years old.

22 C. In 1988, Plaintiff lived with, amongst others, Defendant Christopher Deege at 3204
23 Pennsylvania Street in Longview, Washington.

1 D. In 1988, at their home in Longview, Defendant inappropriately placed Plaintiff on
2 his lap and pinched and caressed her legs and buttocks while on the couch in the living room.

3 E. In December, 1988, at their home in Longview, Defendant Christopher Deege
4 forced Plaintiff to help him undress and then forced her into his bed where he touched Nicolle
5 Sheaves' body including her vagina, buttocks, and chest and forced her to touch his body
6 including his penis.

7 F. The plaintiff was a young girl at the time of the conduct alleged herein.

8 G. Defendant Christopher Deege took advantage of Plaintiff's innocence and
9 vulnerability and groomed and exploited her to his advantage, as evidenced by the fact that he
10 felt free to assault and harass her with seemingly no concern for her welfare, or the harm such
11 behavior would cause her.

12 **III. LIABILITY**

13 A. Common Law Assault and Battery.

14 1. Defendant Christopher Deege's actions as described herein constitute the
15 torts of assault and battery under the common law of the State of Washington.

16 B. Hate Crime Offense. RCW 9A.36.080; 083.

17 1. Defendant Christopher Deege's actions as described herein were directed
18 toward the plaintiff because of her gender.

19 2. Defendant Christopher Deege's actions as described herein caused
20 physical injury to the plaintiff.

21 3. Defendant Christopher Deege's actions as described herein constitute
22 violations of the crimes of:

23 a. Assault in the fourth degree. RCW 9A.36.041;

- b. Assault in the third degree. RCW 9A.36.140;
- c. Rape of a child in the first degree. RCW 9A.44.073;
- d. Rape of a child in the third degree. RCW 9A.44.079;
- e. Child molestation in the first degree. RCW 9A.44.083;
- f. Child molestation in the third degree. RCW 9A.44.089;
- g. Indecent liberties. RCW 9A.44.100;
- h. Voyeurism. RCW 9A.44.115;

4. Defendant Christopher Deege's conduct described above justify an award of statutory punitive damages in the amount of \$100,000 for his act.

C. Infliction of Emotional Distress.

1. Defendant Christopher Deege's conduct, as described above, constitutes the torts of negligent and/or intentional infliction of emotional distress.

IV. DAMAGES

Defendant's wrongful conduct described above has caused plaintiff to suffer actual damages for which she should be compensated in an amount to be proven at trial.

V. RELIEF SOUGHT

WHEREFORE Plaintiff Nicolle Sheaves request that the court enter judgment against defendant Christopher Deege as follows:

1. Awarding Plaintiff actual damages in an amount to be established at trial.
2. Awarding Plaintiff exemplary damages and reasonable attorneys' fees and costs to the extent provided by any applicable law, including RCW 9A.36.083.
3. Awarding Plaintiff statutory and reasonable attorney fees, litigation expenses and costs incurred in this action under RCW 49.60.030.

4. Awarding Plaintiff any additional or further relief which the court finds equitable, appropriate, or just.

DATED this 12 day of April, 2023.

5th Ed

SCOTT W. EDWARDS, WSBA 41111
of Attorneys for Plaintiff