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

JÉAUX RINEDAHL, an individual,

Plaintiff,

vs.

SEATTLE PACIFIC UNIVERSITY, a
Washington nonprofit corporation,

Defendant.

NO.

**COMPLAINT FOR
DAMAGES AND OTHER
RELIEF**

I. INTRODUCTION

1.1 Plaintiff Jéaux Rinedahl (“Plaintiff” or “Rinedahl”), by and through his attorneys of record, HKM Employment Attorneys LLP, requests damages, attorneys’ fees, and costs for the unlawful discriminatory conduct of his employer, Seattle Pacific University (“Defendant” or “SPU”).

1.2 Rinedahl worked as an adjunct faculty member in SPU’s Nursing Program, where he taught undergraduate nursing courses. In May 2020, Rinedahl applied for a permanent nursing faculty position for which he was clearly qualified. After Rinedahl submitted his application, SPU’s Assistant Dean of Nursing told Rinedahl that he would not be considered for the position because he is gay.

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1.3 SPU illegally discriminated against Rinedahl because of his sex and/or sexual orientation. Specifically, SPU refused to hire and/or consider Rinedahl’s application for a full-time faculty position in its Nursing Program because Rinedahl is gay and/or married to a man.

1.4 SPU’s discriminatory actions violate the Washington Law Against Discrimination (“WLAD”), RCW 49.60 *et seq.*, and the Seattle Fair Employment Practices Ordinance (“FEPO”), SMC 14.04 *et seq.*

1.5 SPU’s unlawful discrimination against Rinedahl caused Rinedahl to suffer economic and noneconomic damages in an amount to be proven at trial.

II. PARTIES

2.1 Plaintiff Jéaux Rinedahl is a married individual who resides with his husband in Pierce County, Washington. In 2019, SPU hired Rinedahl as a part-time adjunct faculty instructor in the School of Health Sciences/Lydia Green Nursing Program. At all times material to this action, Rinedahl was, or sought to be, employed by SPU to teach undergraduate level nursing courses offered at SPU’s Seattle, Washington campus.

2.2 Defendant SPU is a Washington nonprofit higher education corporation doing business in Seattle, King County, Washington under UBI Number 178 020 732. SPU is a private Christian university located in Seattle’s Queen Anne neighborhood. SPU offers undergraduate and graduate-level degree programs to its population of approximately 3,500 students.

2.3 At all times material to this action, Defendant employed eight (8) or more persons.

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III. JURISDICTION AND VENUE

3.1 The Court has jurisdiction over this action because the acts giving rise to the claims alleged herein occurred in Seattle, King County, Washington, and because the claims alleged in this case arise under Washington law and under the Seattle Municipal Code.

3.2 At all times material to this action, SPU conducted business and employed persons within the City of Seattle, County of King, State of Washington.

3.3 The acts and omissions relating to Rinedahl’s current and/or prospective employment either occurred in, or were directed by SPU representatives who work in, Seattle, King County, Washington.

3.4 SPU is an “employer” or “prospective employer” subject to the statutes and municipal codes governing employment in the State of Washington and City of Seattle.

3.5 This action has been filed within the applicable statutory time periods.

3.6 Jurisdiction and venue are properly conferred upon this Court pursuant to RCW 4.12 and SMC 14.04.185 and the claims alleged under the laws of the State of Washington and the City of Seattle, as detailed below.

IV. FACTS

4.1 Plaintiff realleges and incorporates paragraphs 1.1 through 3.6 as set forth herein.

4.2 Defendant SPU is a private Christian university located in Seattle, Washington. SPU was founded in 1891 by those who “valued a non-sectarian approach to education that welcomed all those seeking scholarly excellence rooted in the Christian faith.” SPU professes to provide its students with a “diverse learning community [that] offers students a place to grow, discover, and embrace great challenges.” *See* <https://spu.edu/about-spu/our-history>. SPU welcomes students of all faiths, and no faiths,

1 and does not discriminate in its admissions practices or policies on the basis of race, color,
2 national origin, sex, age, or disabilities. Through its Office of Inclusive Excellence, SPU
3 prides itself as a university that fosters and promotes diversity, equity, and inclusion. SPU
4 also actively promotes a wealth of undergraduate and graduate scholarship opportunities
5 for LGBTQ students. *See* [https://spu.edu/student-financial-services/grants-and-](https://spu.edu/student-financial-services/grants-and-scholarships/scholarships/LGBT-scholarships)
6 [scholarships/scholarships/LGBT-scholarships](https://spu.edu/student-financial-services/grants-and-scholarships/scholarships/LGBT-scholarships).

7 4.3 SPU seeks to recruit and hire professors who are oriented to the liberal arts
8 approach to education, who are abreast of developments in their fields, who are prepared to
9 teach non-traditional groups of students using alternate delivery systems and new
10 educational technologies, and who enjoy meeting with students to help them achieve their
11 educational goals. SPU is also committed to recruiting and hiring ethnically and culturally
12 diverse faculty to develop curriculum that emphasizes cultural competence and
13 reconciliation.

14 4.4 As a religious educational institution, SPU maintains a policy that allows for
15 a preference in hiring on the basis of religion, but otherwise prohibits discrimination in
16 hiring on the basis of race, color, national original, sex, age, disability, or genetic
17 information. SPU actively promotes its non-discrimination policies and commitment to
18 diversity on its website and in its hiring and employment applications and postings.

19 4.5 Plaintiff Jéaux Rinedahl is a highly qualified and credentialed nursing
20 professional with over 40 years of experience working in the health care industry. Rinedahl
21 graduated from a Licensed Vocational Nurse program in 1981, obtained his RN degree in
22 1991, earned a Master of Science in Nursing (MSN) in 2014, and is presently pursuing his
23 PhD in Nursing in the field of Public Health. Rinedahl has worked at nearly every level in
24 the field of nursing and brings an incredible depth of clinical and operational knowledge
25 and experience to his teaching, which he has been doing since 2019.

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1 4.6 In July 2019, Rinedahl applied for a Nursing Adjunct Instructor position in
2 SPU's School of Health Sciences/Lydia Green Nursing Program, which offers an
3 undergraduate Bachelor of Science in nursing (BSN) program and graduate programs
4 leading to either a Master of Science in nursing (MSN) or Doctor of Nursing Practice
5 (DNP). SPU's nursing program is highly regarded in the regional healthcare community,
6 with each of its nursing programs approved by the Washington State Quality Assurance
7 Commission and fully accredited by the Commission on Collegiate Nursing Education
8 (CCNE). Rinedahl was drawn to SPU both because of its strong nursing program and his
9 own Christian faith. In his application, Rinedahl affirmed his commitment to SPU's
10 mission and values and provided his own statement of faith, as required by SPU.

11 4.7 SPU hired Rinedahl for the position. Neither Rinedahl's sexual orientation
12 nor his marital status was a bar to his eligibility for the adjunct faculty position. In fact, the
13 person who hired Rinedahl congratulated him on his recent marriage and asked for a
14 wedding photograph of Rinedahl and his husband.

15 4.8 During his employment, Rinedahl taught clinical courses in Community
16 Health and was a Senior Student Practicum Instructor, which was originally a liaison for
17 graduating senior nursing students working in the field, but, due to COVID-19, was
18 changed to direct virtual classroom instruction. Rinedahl did not teach religion or
19 incorporate religion into his course curriculum. Rinedahl was not required to undergo any
20 religious training or education, nor was he asked or expected to participate in any religious
21 activities with his nursing students. Rinedahl performed well in his role and received
22 positive feedback from SPU administration and his students. Rinedahl loved teaching at
23 SPU. He had great respect for SPU, its values, its missions, and its goals and desired to
24 become a permanent faculty member in the Nursing Program.

25 4.9 In May 2020, SPU advertised a position for a full-time Assistant/Associate
26 Professor of Nursing in the undergraduate Nursing Program. Rinedahl was excited for the

1 opportunity to become a full-time permanent faculty member and immediately applied for
2 the position. The position for which Rinedahl applied is a non-ministerial teaching position
3 in the nursing program. Upon information and belief, the job duties of the position for
4 which Rinedahl applied are not religious or sectarian in nature; nursing professors are not
5 required to provide ministerial services. Upon information and belief, the position requires
6 no religious training, teaching, or instruction, nor does it require participation in any
7 religious activities with the nursing students. A copy of the job description for the position
8 that Rinedahl applied for is attached to the Complaint as Appendix A.

9 4.10 Rinedahl completed the same employment application that was used for the
10 adjunct faculty position and again affirmed his commitment to SPU's mission, values, and
11 statement of faith. SPU's statement of faith does not reference or prohibit homosexual
12 behavior. Rinedahl again provided his own faith statement, as required by SPU. In the
13 application, Rinedahl was also asked to describe how he would support SPU's commitment
14 to diversity and cultural competence through his course materials and class sessions.
15 Rinedahl answered as follows: "I firmly attest to the beauty that cultural diversity brings to
16 our communities to enhance self-governance where everyones [sic] opinion is respected
17 regardless of the color of their skin, whether they are attracted to the same or opposite sex,
18 regardless of where they were born, or what they believe in. When we all work together
19 cohesively and practice respect for diversity, our world is a better place."

20 4.11 The employment application that Rinedahl submitted states that SPU does
21 not discriminate on the basis of race, color, national origin, sex, age, disability, or genetic
22 information. Relying on these statements, as well as the fact that SPU had previously hired
23 him for the adjunct nursing faculty role, Rinedahl believed that SPU would not
24 discriminate against him on the basis of his sex or his sexual orientation.

25 4.12 On or around June 19, 2020, SPU's then-Assistant Dean of Nursing – the
26 same person who hired Rinedahl for the adjunct faculty position – told Rinedahl that SPU

1 had rejected his application for the full-time Assistant/Associate Professor position
2 “because he was not heterosexual.” Rinedahl was shocked, stunned, and deeply offended
3 by SPU’s rejection of his application. Rinedahl was qualified for the position based on his
4 training, education, experience, and Christian faith, yet SPU still refused to hire or even
5 consider him for a permanent, full-time nursing faculty position solely because of his
6 sexual orientation. Rinedahl was not selected for the position.

7 4.13 Surprisingly, SPU has repeatedly invited and encouraged Rinedahl to
8 continue teaching a variety of nursing courses in his capacity as adjunct faculty even
9 though SPU refused to consider his application for the permanent tenure-track nursing
10 faculty position. While Rinedahl appreciates SPU’s recognition of and appreciation for his
11 strong teaching credentials, he remains puzzled both by SPU’s blatant hypocrisy and its
12 discriminatory animus in its hiring practices. SPU clearly has no issues or concerns with
13 Rinedahl serving as an adjunct nursing instructor, but it refuses to recognize his hard work,
14 skill, and experience by making him a permanent faculty member simply because he is gay.
15 This is hurtful, demeaning, and demoralizing to Rinedahl.

16 4.14 As a direct and consequential result of SPU’s discriminatory hiring
17 practices, Rinedahl suffered, and continues to suffer, damages in the form of lost earnings
18 and benefits, lost opportunities for professional growth and career development, emotional
19 distress, and legal expenses in an amount to be proven at trial.

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V. CAUSES OF ACTION

**A. FIRST CAUSE OF ACTION – Sex and/or Sexual Orientation Discrimination
in Violation of Washington’s Law Against Discrimination, RCW 49.60 *et seq.***

5.1 Plaintiff realleges paragraphs 1.1 through 4.14 of the Complaint and hereby
incorporates the same by reference.

1 5.2 Plaintiff applied for a position as a full-time Assistant/Associate Professor
2 of Nursing in Defendant’s Health Services Department/Nursing Program. Plaintiff is
3 qualified for the position sought based on his training, education, and experience.

4 5.3 Defendant refused to hire Plaintiff for the position because of Plaintiff’s sex
5 and/or his sexual orientation. Plaintiff is gay and was specifically told by Defendant that his
6 application was rejected because Plaintiff “is not heterosexual.” By categorically excluding
7 Plaintiff from employment because he is “not heterosexual,” or because he is married to a
8 man, Defendant discriminated against Plaintiff on the basis of his sex and/or his sexual
9 orientation.

10 5.4 Defendant is subject to civil liability under the Washington Law Against
11 Discrimination, RCW 49.60 *et seq.*, because the position for which Defendant refused to
12 hire Plaintiff was a non-ministerial, teaching position in Defendant’s undergraduate nursing
13 program that required no religious training, teaching, or instruction.

14 5.5 As a result of Defendant’s unlawful sex and/or sexual orientation
15 discrimination against Plaintiff, Plaintiff suffered economic and non-economic damages in
16 an amount to be proven at trial, including but not limited to damages for loss of pay and
17 benefits, lost opportunities for professional growth and career development, emotional
18 pain, suffering, inconvenience, mental anguish, loss of enjoyment of life and other
19 nonpecuniary losses, and attorneys’ fees and costs.

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21 **B. SECOND CAUSE OF ACTION – Unfair Employment Practice in Violation of**
22 **Seattle Municipal Code, SMC 14.04 *et seq.***

23 5.6 Plaintiff realleges paragraphs 1.1 through 5.5 of the Complaint and hereby
24 incorporates the same by reference.

25 5.7 The facts alleged herein demonstrate that Defendant engaged in unfair
26 employment practices when it discriminated against Plaintiff on the basis of sex, sexual

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G. Whatever further and additional relief this Court shall deem just and equitable.

DATED this 11th day of January, 2021.

HKM EMPLOYMENT ATTORNEYS LLP

/s/ Erin S. Norgaard
Erin S. Norgaard, WSBA No. 32789
Daniel Kalish, WSBA No. 35815
Brian L. Dolman, WSBA No. 32365
600 Stewart Street, Suite 901
Seattle, WA 98101
Attorneys for Plaintiff

APPENDIX A



Careers > Search Jobs > Search Results > Job Details



Assistant/Associate Professor of Nursing-BSN Program

About Seattle Pacific University:

Founded in 1891, Seattle Pacific University has a long and distinguished history in Christian higher education. Located just minutes from downtown Seattle, SPU seeks to be a premier Christian University fully committed to engaging the culture and changing the world by graduating people of competence and character, becoming people of wisdom, and modeling grace-filled community. Seattle Pacific University seeks applicants committed to its Christian mission. Due to our mission of cultural engagement, SPU is committed to building an excellent and diverse staff and faculty. Diversity is an ethos that is inseparable from our Christian faith. At SPU, we recognize diversity as a basic feature of God's creation and a core theme of the gospel. At the heart of our mission-centered commitment to becoming a more diverse community is a desire to represent the breadth of God's kingdom more fully.

We strive to become a workplace of choice and to recruit, develop, and retain faculty and staff who can embrace, value, and engage differences with humility and care. We invite you to join us on our journey by starting a career at SPU! Learn more about SPU's [commitment to diversity](#) and [opportunities](#) for our employees to deepen their capacity to serve our increasingly diverse student body.

About the School of Health Sciences/Lydia Green Nursing Program:

The Lydia Green Nursing Program is a part of the School of Health Sciences and includes a vibrant

Apply Now

Category: Faculty

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Department: School of Health Sciences

Locations: Seattle, WA

Posted: Jul 15, 2020

Closes: Aug 5, 2020 - 3:34 PM EDT

Type: Full-time

Position ID: 123492



Share

The Lydia Green Nursing Program is a part of the School of Health Sciences and includes a vibrant undergraduate BSN program and graduate programs leading to a doctor of nursing practice (DNP) in advanced practice (FNP, AGNP and AGCNS/ACCN-AG). The program is highly regarded by the surrounding regional healthcare community. Each of our nursing programs is approved by the Washington State Nursing Care Quality Assurance Commission (NCQAC) and fully accredited by the Commission on Collegiate Nursing Education (CCNE).

Job Description:

We are growing! Seattle Pacific University invites applications for a full-time, nine-month tenure track eligible faculty position in the Lydia Green Nursing Program in the School of Health Sciences.

We are looking for a highly qualified faculty member for classroom and clinical teaching in our concept-based, pre-licensure BSN curriculum. We welcome applicants from all specialty backgrounds but especially those with experience and expertise in either child or adult health and illness.

While this faculty member will have teaching responsibilities primarily in the undergraduate, pre-licensure program normally offered in an on-campus format. Opportunities to teach in the nursing graduate (DNP) program may also be available.

Regular, nine (9)-month academic appointment with teaching responsibility for approximately 33 academic quarter credits in addition to advising and mentoring, curriculum and course development, individual scholarship, and department/campus-related service opportunities.

Requirements:

- Earned doctorate in Nursing or closely related discipline. At least one graduate-level degree must be in nursing. May consider candidates with Master's in Nursing who are currently enrolled in an accredited doctoral program.
- Unencumbered license as a Registered Nurse (RN) in the State of Washington by September 1, 2020 (or start date).
- Board certification in a clinical specialty or nursing education is desirable, but not required.

Successful candidates will demonstrate:

- A commitment to excellence in teaching and skill in utilizing a variety of teaching methods and collaborative active learning
- Creative classroom and clinical teaching informed by evidence-based practice
- Experience in working effectively in a multicultural academic community

- Scholarly potential to advance clinical knowledge and practice
- Commitment to high professional standards
- Excellent interpersonal, organization and communication skills
- Engaged advising /mentoring of students in coursework and professional endeavors
- Active engagement in Curriculum and Program development
- Participation in program review and accreditation reporting
- Participation in faculty governance

The School of Health Sciences is committed to an intentional and sustained school-wide effort to hire and support a diverse faculty. We welcome candidates who understand the barriers facing men and minorities who are underrepresented in nursing higher education and careers (as evidenced by life experiences and educational background), and who have experience in equity and diversity with respect to teaching, mentoring, research, life experiences, or service. At Seattle Pacific University, 40% of students are persons of color, and a significant number are first-generation college students (see [student profile](#)). Thus, applicants who can demonstrate effective mentoring of students from underrepresented backgrounds are especially welcomed.

Additional Information:

Position will remain open until filled.

Salary:

Academic rank to be determined based on qualifications. Compensation is commensurate with education and experience. Benefits include health, dental, disability and life insurance, tuition discount, as well as retirement programs. A moving allowance may be provided.

Application Instructions:

The online application includes an official SPU application form, a faith statement of approximately one page, a teaching philosophy statement of approximately one page, and other supporting documents.

[Apply Now](#)

[Frequently Asked Questions \(FAQ's\) ?](#)

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