

SUPERIOR COURT OF THE STATE OF WASHINGTON
COUNTY OF PIERCE

Housing Resources Bainbridge (HRB), a
Washington non-profit organization,

No. 24-2-01082-18

Plaintiff

DECLARATION OF
LOUIS ALLOIN

vs.

Louis Alloin, Jean Alloin, any other
residents of the premises,

Defendants

I, Louis Alloin, am a defendant in the above matter, over the age of 18 years, competent to testify, and have personal knowledge regarding the following:

A. PLEASE TAKE NOTICE: Housing Resource Bainbridge has knowingly, with wanton desire, has unlawfully engaged retaliation and revenge, in this proceeding, as specified under HUD Protected Class Harassment & Retaliation Policy, also prohibits retaliation (coercion, intimidation, threats, or interference) against any person who has exercised fair housing rights or helped another person to exercise them, or participated in any fair housing investigation. Section 818 of the Fair Housing Act makes it unlawful to retaliate against anyone because a person has filed a discrimination complaint or has assisted someone with filing a discrimination complaint.

B. Housing Resource Bainbridge retaliation:

- 1). Failing to renew a lease because a person has filed a fair housing complaint
- 2). Firing an employee who has assisted a tenant with a reasonable accommodation request
- 3). Requiring that a medical provider be willing to testify in court about the nature of their client's disability.
- 4). Enforcing different terms and conditions for a tenant after they

have filed a fair housing complaint.

Ignoring maintenance requests from a tenant who previously filed a fair housing complaint

5). Reasonable Accommodations and Modifications for People with Disabilities Denial

6). Harassment & Retaliation

7). Domestic Violence & Fair Housing

1. On or around 2015-2016, my mother, Jean Alloin (Married Hoffman), and I, Louis Alloin, made inquiry for purpose applying for 2 bedroom housing with Housing Resources Bainbridge (HRB), we were instantly rejected and denied application to be placed on affordable housing waiting list. During 2018 Cross Sound Church (CSC) (Representatives: Pastor Dave O'Connell, Jim Daniels & Ben Sias, BIPB), which we are members, became involved in helping us secure 2 bedroom with Housing Resources Bainbridge (HRB), University of Washington Medical Center, Hall Health Primary Care Center, under William (Bill) Edward Neighbor, Jr. MD, Clinical Professor, Department of Family Medicine, on April 19, 2018, issued a to Bainbridge Municipal Court (Domestic Violence), during a restraint order procedure, against a white supremacist, Douglas Hoffman and his followers, who did physically and verbal threaten and violent behavior harassment, with expressed hate speech (Anti LGBTQ), for participation in New York Stone Wall Movement, advocating Washington State Decriminalization of Sodomy Laws on Bainbridge Island. Thereby Cross Sound Church members, CSC Pastor Dave O'Connell, Jim Daniels & Ben Sias BIPD Officer, began Domestic Violence Protection) negotiating for a 2 bedroom housing with Housing Resources Bainbridge (HRB) (Jean and I were not permitted in meeting) On/about June 10, 2019, a meeting was scheduled at Housing Resources Bainbridge (HRB) Office Building, with a large Cross Sound Church Cong rational Members, were present, to show solidarity. Phodra Elliott and Marta (last name unknown) The application form indicates the disabilities that Jean (and Louis) are Senior Citizen, receiving Social Security, EBT, Medical Insurance Benefits. Louis 74 year old, is member of LGBTQ Community since the 1968-1969 New York Stone Wall Movement, who was subject homophobic hate discrimination, charged for being a homosexual, raped multiple time, sexual abused, beaten multiple time, property stolen, subject to death threats, hate speech and many other acts of hate discrimination, intolerance, prejudice and bias, that never stops, just continuous indifference. On October 30, 1997 at 7pm, while walking to a Gay Night Club in Seattle, Capital Hill Community, I was surrounded by 7 (seven) White Supremacist, thereby boot kicked to near death, having lost left arm mobility (parallelized), both

hip joints were extremely damaged, along with broken ribs and loss of property (Attacker were never apprehended) (Sought Medical Treatment at San Francisco General/primary care facilities/treatment rehabilitation was establish. On/About December 10, 2010, was my last self walking mobility was restricted to a walker, was placed on [oxycontin pain medication](#) until 2017. October 2014, at University of Washington, Bone and Joint Center and Northwest Hospital, Both Hip Joint Replacement Surgery was performed. Thereby, Under University Of Washington Sport/Physical Therapy, (Musculoskeletal pain affects bones, joints, ligaments, tendons or muscles. My Hip injury caused sudden, severe pain. interferes with usual life activities). Rehabilitation is slow and painful, Sport/Physical Therapy was performed at UW Medical Center – Roosevelt and Hall Heath (Recovery after hip replacement surgery involves a [slow process of rehabilitation](#). Swelling remains a serious issue for most patients, each person will recover at a different rate,)

UW Exercise Training Center and Bainbridge Island Aquatic Center (hip rotation, flex). Physical Therapy included bike, walking/stair climbing and jogging is still painful requiring advanced physical therapy. Housing Resource Bainbridge has refused to accept my disability, thereby placing obstacles to prevent rehabilitation by refusing reasonable accommodation (Exercise Bench refused to allows use in 204w)(Witness Dave O'Connell) and denying 2 bedroom medical necessity reasonable accommodations, subjecting me hateful rejections for being disabled by depriving home therapy, educational training opportunities, career passion and other enjoyment of a fair housing home.

We have lived at the subject premises since June 19, 2019 under constant discombobulation to keep us oppressively confined and repressively deprived.

Jean Alloin (Decease Husband Robert F. Hoffman, USN 1-9-1972) is currently 99.7 years old and her diagnosed medical condition and/or disabilities include: On/about 1974, was a passenger in automobile accident, received serve injuries to left ankle, requiring skin graft and on going physical therapy. Thereby, gnarled veins, most commonly appearing in the legs and feet., as jean wounds treatment can help, but this condition are hard to cured, chronic varicose veins can last for years or be lifelong treatment to prevent serious infection, causing aching pain, mobility discomfort, circulatory problem. Treatment involves compression stockings, exercise, infection preventive treatment (washing/disinfecting procedures to close or remove the veins. Jean suffers from venous leg ulcers (VLU) (open sores on legs and ankle) occur when the veins in legs does not push blood back up to heart as well as they should. Blood backs up in the veins, building up pressure. Increased pressure and excess fluid in the affected area cause an open sore to form. Jean's

treatments include: Clean the wound regularly, apply a wound dressing, to the ulcer areas, wear compression stockings to prevent blood from pooling in the legs and to speed healing, antibacterial ointment or another topical medicine to prevent or treat infectious area. Jean's VLU shows prolonged healing time with advanced age, nutritional deficiencies, colder temperature, deep venous thrombosis, and larger wound area, contribute to Jean's suffering under Housing Resource Bainbridge denying medical necessity and reasonable accommodation, being denied by Jessica Campbell and Phedra Elliott refusal to accept Jean's medical anguishing suffering do to hate discrimination, towards home medical supplies, medical devices and mobility aid, exercise equipment, handrails with living area mobility, dietary to meet nutritional needs are being denied and subject of eviction.. Being forced to reside in a housing that in unfit of disabilities home treatment and indifference toward mobility aids and devices, affect our well being, safety and enjoyment

Do to Jessica Campbell and Phedra indifference refusing Reasonable Accommodation, demanding without allowing us opportunity to show cause for medical necessity (formal meeting denied), ordered removal of BioMedical Disinfecting Washer (BioMedical Washer was obtained at forefront of 2019-2020 Pandemic, as HRB closed/restricted access to laundry room, “ talks denied exceptional access for medical necessity/reasonable accommodation, to clean disinfect bio soiled fabrics/medical fabrics.

HRB Jessica Campbell and Phedra Elliott denying Medical Necessity and Reasonable Accommodation Requests for Devices/Equipment

Jean contracted Urinary Tract Infection/UTI is an infection of the urinary tract, specifically the urethra. are caused by bacteria from infected biomedical fabric/soiled clothing. Jean also contracted E.coli,

NOTE 1: From William E Neighbor Jr, sent March 21, 3:35 AM

Jeanne:

Your urinalysis suggests an infection. I have submitted the urine for culture and antibiotic sensitivity testing. I will write you when I receive those results. As you do not have any acute symptoms we will wait for those tests.

William E Neighbor Jr, MD

NOTE 2:From William E Neighbor Jr, sent April 30, 1:58 AM

Jeanne:

Your urine culture last week grew mixed bacteria. If you are feeling well without fever and without urinary symptoms including cloudy urine, you would not need antibiotics. However, if you do have any urinary symptoms, perhaps you should receive a second course of the antibiotic cephalexin that was prescribed in later March. I have sent in a prescription so you have it on hand.

UW Hall Health Results Special Requests Culture April 30, 2024

Dr. William E Neigbor, MD

Value 51,000 to 100,000 Col/mL Mixed flora including Gram negative rods
Abnormal

UW Hall Health Culture Lab Report June 5, 2024

Dr. Jennifer L.Melsher, MD

Value 1+ Pseudomonas aeruginosa Abnormal
Your value is 1+ Pseudomonas aeruginosa This value is Abnormal

Value 1+ Staphylococcus, coagulase negative.

CAUSE HRB DENYING MEDICAL NECESSITY AND REASONABLE ACCOMMODATION

(see attached Exhibit found in Court submitted “Show Cause Affidavit on/before May 30, 2024 to Kiitsap County Superior Court and PDF emails sent to attorney's, documented images showing details of Jean with wheeled walker and wheelchair at HRB 204w Housing Complex)(such Medical Necessity Mobility Devices are parked on Patio/near 204w entry since June 19, 2019 for immediate access for transit in community.

1. I am (Louis Alloin) 74 years old and my disabilities (Noted above) include: Discrimination hostility for being supportive of LGBTQ Community, Injuries from violent bodily injuries, HRB discrimination toward medical necessity devices for joint bone recovery.
2. When HRB approved our forced coerced application on or about June 19, 2019 and assigned us to a stated “one bedroom “ (unforeseen, expecting a 2 bedroom) for my mother and I to share, (discovering it was actually very tiny one room, resembling a studio) (I Louis Alloin stated a strong verbal declaration of opposition at that time of being shown a one room/nor 2 bedroom) (CSC Witnesses: Dave O'Connell, Jim Danials, Ben Sias and other CSC Members in attendance) (HRB Employee Marta (Last Name Unknown) was advised clearly of inadequate , unfit for disabilities, damaged: bath & shower, stove and refrigerator (requested a full private inspection to determine 204w defects, damage report was as denied). During 204w showing, and my declared refusal to accept, I Louis Alloin, was confronted with intimations coercion, treats of homeless deprivation and pleading (Hours of discussions to discombobulation/confuse) to accept 204w, against our better judgment and will. Advised to take 204w as a temporary non permanent housing, while our name was placed on waiting list for 2 bedroom (which never occurred, nor were we placed on waiting list)

Please Note: Prior to, HRB Housing Negotiations, a Safeway produce employee, provided information advising us of a HRB 2 bedroom Availability, located on High School Road, just past BHS. We advise HRB and CSC Team, we were rejected because we had no children under 18 years.

3. On or around June 19, 2024 to current date, I Louis Alloin constantly requested a reasonable accommodation hearing/meeting with HRB(Including CSC Dave O'Connell) and during Inspection/in person discussion showing cause/demonstrating the 204w need for medical necessity for both Jean and I Louis Alloin (caregiver/medical home treatment intern)(Witness: Dave O'Connell) to have a biomedical washing machine in our unit (Specifically/not limited too during Pandemic years)(Please note: HRB does not have a specific form, nor offers a reasonable accommodation, nor a medical necessity form, all communications are done/performed by in person communication contacts, phone contacts (Howeer Phone and email are never responded too. Contact is done byway of CSC Dave O'Connell, in which e,ails are forward and in person contact with HRB) HRB never includes me in any discussion and during inspections, only responds is NO.
4. I had brought in the washing machine on line (see attached Exhibit as removed from 204w (witness:/photo: Dave O'Connel)
5. https://www.amazon.com/SUPER-DEAL-Portable-Apartments-Delicates/dp/B07B94ZR74/ref=asc_df_B07B94ZR74/?tag=hyprod-20&linkCode=df0&hvadid=693770001770&hvpos=&hvnetw=g&hvrnd=9589369179041631246&hvpone=&hvptwo=&hvqmt=&hvdev=c&hvdvcmld=&hvlocint=&hvlocphy=9033314&hvtargid=pla-570087727585&psc=1&mcid=9436c91869ce37fda7f745eb02836998&gad_source=1,
6. because, as my mother's caretaker, (Member of Medical Team/home intern), I had to wash the bloodied bandages from her ulcerated legs daily and inconstant/unary tract infected medical fabrics/clothing they constituted a biohazard and need to be handled and cleaned immediately, to preent spreading infectious bacterium (has been discussed with Dave Kargan, who had dialog with HRB (Representatives?) had offered to pay for laundry services (Too Experience for just very small wash loads (pair sock's and a medical wound care towel)
7. On or around 2013 inspection (Witness Dave O'Connell), Jessica Campbell, HRB management required me to remove the washing machine or face a 10 day eviction notice because we were being denied medical necessity and reasonable accommodations. HRB would not have any discussions, nor tolerate any meeting with me (Louis), nor UW Medical Intervention on wound care home treatment necessity (Discussions with UW HHC RN Delmis.
8. Without the biomedical washing machine, I am left to hand-wash my mother's bloodied bandages/treatment medical

aids/inconstant infectious clothing/pads, unavoidably handling those biohazards. While washing those bandages in (a biobucket or the sink or the shower/ area) is not medically recommended, being under duress and having to perform medical home treatment, the loss of biomedical washer meant improvising, to perform an official medical home care necessity treatment, with consultation with UW HHC Medical Team, as needed, under pressure to perform professionally, they are treatment occasion, were patient jerks/muscle spasm causing splashed some water but never any deliberate or wanton dumping of water in a building structure, denying any deliberate "flooding" to occurred whatsoever at any time, as a professional due caution and safety procedures and OSA are followed (however accidents occur that are uncontrollable) HRB never offered rental insurance for Biomedical washer nor any offered discussion to assist in reasonable accommodations. National Occupational Health Act/OSHA Healthcare workers (HCWs) are occupationally exposed to a variety of infectious diseases during the performance of their duties. The delivery of healthcare services requires a broad range of workers, such as physicians, nurses, technicians, clinical laboratory workers, first responders, building maintenance, security and administrative personnel, social workers, food service, housekeeping, caregivers and mortuary personnel, including hospitals, nursing care facilities, outpatient clinics (e.g., medical and dental offices, and occupational health clinics), ambulatory care centers, and emergency response settings. . The primary routes of infectious disease transmission (Jen and Louis Urinary Bladder infection, eColi contact, bacterium infections experience from HRB denied biomedical washer) in U.S. healthcare settings are contact, droplet, and airborne. Contact transmission can be sub-divided into direct and indirect contact. Work Place and Home Medical Treatment Accidents and Injuries are due in large part to "overexertion" "denied proper equipment "related to repeated manual patient handling activities, often involving heavy manual lifting associated with transferring, and repositioning patients and working in extremely awkward postures, as tiny one room. The General Duty Clause of the OSH Act (the law that created OSHA) requires employers (HRB) to provide workers with a safe workplace that does not have any known hazards that cause or are likely to cause death or serious injury. OSHA's recordkeeping regulation at section 1904.7(b)(5)(ii)(D) defines first aid in part as "Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, stitches, etc. are considered medical treatment)." OSHA's Bloodborne Pathogens Standard (29 CFR 1910.1030) as amended pursuant to the 2000 Needlestick Safety and Prevention Act, is a regulation that prescribes safeguards to protect workers against health hazards related to bloodborne pathogens.

1910.1030(a)

Scope and Application. This section applies to all occupational exposure to blood or other potentially infectious materials as defined by paragraph (b) of this section.

Contaminated means the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface. *Contaminated Laundry* means laundry which has been soiled with blood or other potentially infectious materials or may contain sharps.

Decontamination means the use of physical or chemical means to remove, inactivate, or destroy bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use, or disposal.

Exposure Incident means a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Handwashing facilities means a facility providing an adequate supply of running potable water, soap, and single-use towels or air-drying machines.

Other Potentially Infectious Materials means:

(1) The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids;

Sterilize means the use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospores.

Universal Precautions is an approach to infection control. According to the concept of Universal Precautions, all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

Work Practice Controls means controls that reduce the likelihood of exposure by altering the manner in which a task is performed

HRB is denying OSHA Reasonable Accommodation for home treatment, medical safety and basic principles enjoyment of home.

Basic principles: A fundamental part of giving care is being a good communicator with the person getting care. Care is given with respect for the dignity of the person receiving care. The carer remains in contact with the primary health care provider, often a doctor or nurse, and helps the person receiving care make decisions about their health and matters affecting their daily life. HRB is denying functional aspects of home integrity, by removing wheelchair mobility.

Keeping the person mentally alert: There is a link between [mental health](#) and physical health and [mind–body interventions](#) may increase physical health by improving mental health. These practices seek to improve a person's [quality of life](#) by helping them [socialize](#) with others, keep [friendships](#), do [hobbies](#), and enjoy whatever [physical exercise](#) is appropriate. HRB is denying mental alertness depriving a functional home environment.

Living arrangements: A common example of this is when a parent gets older and has previously lived alone. If the parent's children are to be caregivers, then they may move in with the parent or have the parent move in with them

Safety in the home: Persons who need care are also frequently people who need homes that are [accessible](#) in a way that matches their needs. If the caregiving plan calls for a check on the home, then typically this includes checking that the floor is free from hazards which could cause a [falling](#), has [temperature control](#) which suits the person getting care, and has faucets and knobs which suit the users. To reduce risk of any major problem, [smoke detectors](#) should be put in place and appropriate [physical security](#) measures taken for home safety

On a day-to-day basis, caregivers may be responsible for the majority of [comfort care](#) and personal care. Personal [caregiving](#) activities include helping with various things the patient is no longer able to do unassisted.

Basic caregiver duties could include:(Not Limited Too)

- Bathing and grooming
- Laundry and helping with dressing
- Food shopping and prep
- Light housekeeping
- Managing medications
- Transportation
- Mobility assistance
- Companionship and emotional support
- Communicating with doctors and monitoring medications
- [And much more](#)

Caregiving involves intertwined activities: **Direct caring for a person**, including physical care, emotional care (for example listening, talking, giving reassurance), and service to help meet physical and emotional needs such as shopping for food or transportation to doctors' appointments.

- **Maintaining the immediate physical environment in which the person lives**—washing sheets, cleaning, yard work, paying bills and taxes.
- **Nurturing the person's connections and relationships**—communicating with family and friends, inviting people over, and facilitating phone calls.
- **Administrative caregiving**—all the hours spent (on hold and otherwise) dealing with insurance companies, healthcare systems, and doctors' offices.
- **Selfcare**, not usually included on lists of caregiving activities, but in many ways enabling the others.

HRB Policy: Thrive in Place: The Independent Living program works with older adults, people with disabilities, and those coming home to rehab to maintain their independence at home. We assess the home environment and perform modifications and repairs to make it more functional and safe.

We want to see clients continue to live in the homes they love and remain engaged in the communities they've built. We call this "thrive in place."

HRB Home Modifications :As we age, we all experience natural changes in the way we get around our homes and our communities. Home modifications can support a person's changing needs by making daily activities easier, reducing safety hazards that can lead to accidents, and helping people live independently.

Independent Living staff work with residents and local contractors to provide these health and safety modifications. Services are available free of charge for income-eligible households. HRB also offers this program to households which are not income-eligible on a fee-for-service basis.

Modifications include:

- Installing grab bars and railings,
- Providing non-slip bathmats,
- Installing ADA toilets
- Changing out faucets,
- Weatherization repairs
- Exterior ramps,
- Flooring replacement,
- Lighting improvements
- Smoke detector updates

HRB Policy How It Works: A successful home modification involves far more than a repair or two, but a careful inventory of the living space and an honest look at personal health and habits. We are at your side through the entire process—from first inquiry to project completion.

HRB employees have refused, reasonable accommodations of any kind.

9. In addition, on or around June 19, 2019 to current date HRB management continuously/any time in person contact is made, told me I had to get rid of the following items from our unit (and give their stated reason for each item):

- 10 Patio Table & Chairs and Follower Pot (Commercial Condo)
- 11 Wheelchair, Walker and Wagon [property obstruction/er gees)
- 12 Remove Computer printer (36in Hallway Obstruction)
- 13 Remove Food (Not Necessary/nor needed at 204w)
- 14 Medical Exercise Bench (Force To Store)/rm Obstruction)
- 15 Removal of Food Processing Appliances from 204w
- 16 Removal of Medical BioWasher (no discuss/just a demand)

On or around next business day, I provided a letter from the doctor at UWMC dated September 16, 2020, and a doctor's letter from 2018 that together indicated my mother needed my caregiving support and that we needed a two-bedroom unit. (See attached Exhibit ____, doctors' letters.). The response I received was NOT RESPONSE.

Our Lease Agreement Rules and Regulations (see attached Exhibit see show case and PDF Emails) indicates on page 1 that HRB would make reasonable accommodations for residents with disabilities. That has not been our experience at all, true and correct.

On or around June 19, 2019 and at every inspection, provide demonstration of non function or broken parts, over head light starter burned out (Witness: Dave O'Connell), I informed management of our need for a working stove, they never provided one and never fixed the existing one. Instead, their response was Between June 19, 2019 to January 1, 2023 was NO RESPONSE, on /about after negotiations with CSC Dave O'Connell and my communication with Home Depot Sales and notify HRB Jessica Campbell, that Home Depot had a stove set in Spokane, Wa and would delivery in 5 day/with installation. Jessica Campbell became extremely hateful toward me, with threats on eviction, if Home Depot installed a new stove. I was then contacted by Dave O'Connell, that HRB would start working on a replacement. I then received notice to clear our 15x15 feet for Raven Feather Construction to install a stove. Raven Feather Conditions I had to secure a used stove for the unit through the generosity of a local construction company's donated stove and labor

TO BE CONTINUED

_____. (LOUIS: forward to me any email for such repair requests – the lease says such requests were to be emailed to “Jeannette@housingresourcesbi.org”)

10. (repeat #12 for any other repairs/requests that have gone unfixed – BUT NOTE that none of the complaints about the place or its people can be a defense in this unlawful detainer/eviction lawsuit about the claim of flooding damage/waste.)

LOUIS: What is your response if the Court says you have too much stuff packed into

that small space for the landlord to come to inspect for the source of the water damage? HRB is not required to move you to a 2BR unit if they don't have one (or even if they do have one, they could just say you're right, 2 people should not be living in that space and terminate your residency if you've never gone month-to-month but had successive leases for 6-12 months without a break).

I declare under penalty of perjury under the laws of the state of Washington that the facts I have provided on this form (and any attachments) are true.

Signed at (city and state): Date:

Sign here Print name

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CERTIFICATION OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on the _____, of June, 202, I e-served and emailed a copy of the foregoing document to the attorney of record for Plaintiff.

Mary Sarigumba, WSBA No. 45653

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