

Andrea Hanson

From: Shauna Magee <shauna@ajalawyers.com>
Sent: Thursday, April 2, 2026 12:23 PM
To: Elections
Subject: Submission of Tort Claim on Behalf of Client
Attachments: Soreano_ChelanTortPacket.pdf

RECEIVED

APR 03 2026

CHELAN COUNTY
PROSECUTING ATTY.

Claim No. 2026-5

WARNING! This email is from an EXTERNAL SOURCE.

Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Chelan County Auditor's Office,

Enclosed please find a completed tort claim form submitted on behalf of our client, Cole Soreano, in accordance with the requirements of Washington State. We respectfully request that the claim be duly filed and processed upon receipt. For your records, a hard copy of the form has also been sent via certified mail.

Kindly confirm receipt of this submission at your earliest convenience. Should you require any additional information or documentation, please do not hesitate to contact me.

Thank you for your prompt attention to this matter.

Respectfully,

Shauna Magee | Paralegal & Mitigation Specialist
ARNOLD JACOBOWITZ & ALVARADO PLLC
Shauna@AJLawyers.com
720 Seneca St., Ste. 107, No. 393
Seattle, WA 98121



Arnold Jacobowitz & Alvarado PLLC

NATHAN J. ARNOLD
720 Seneca St., Ste. 107, No. 393
Seattle WA 98101
113 Woodin Avenue, Suite 200
Chelan, WA 98816 (non-service address)
(206) 799-4221
Nathan@AJAlawyers.com

BY MAIL & EMAIL

March 30, 2026

Chelan County Auditor
Elections Division
350 Orondo Avenue, Level 3, Suite 306
Wenatchee, WA 98801

**Chelan County
Elections**

APR 02 2026

Received
Wenatchee, WA

Re: Claim for Damages – RCW 4.96
Claimant: Cole Soreano

Dear Chelan County Auditor:

Please find enclosed a Claim for Damages submitted pursuant to RCW 4.96 on behalf of the above-referenced claimant. The enclosed materials include:

1. Chelan County Claim for Damages Form; and
2. Attachment A – Claim Narrative, incorporated by reference.

This claim arises from acts and omissions of Chelan County employees acting within the scope of employment. The narrative describes a continuing course of conduct resulting in ongoing and cumulative damages.

Please confirm receipt of this claim. All future correspondence regarding this matter should be directed to the undersigned or counsel of record.

Thank you for your attention.

Sincerely,

ARNOLD JACOBOWITZ & ALVARADO PLLC

Nathan J. Arnold, WSBA No. 45356

CC: Mr. Cole Soreano

CHELAN COUNTY CLAIM FOR DAMAGES FORM

CLAIM NO. 2026-05

DATE RECEIVED: 04.02.2026

Pursuant to Chapter 4.96 RCW, this Claim for Damages form is provided solely as an accommodation to the claimant, and the County makes no representations as to its legal sufficiency. Responsibility for complying with all requirements of State law regarding claims rests with the claimant. No County employee is authorized to advise a claimant in completing this form or reviewing its sufficiency. The County expressly disclaims responsibility for any such advice or review.

Chelan County
Claim for Damages
Received Date 04.02.2026
Received By AAJ

Send Original Claim for Damages Form by Regular Mail, Registered Mail, or Certified Mail, Return Receipt Requested, or Deliver in Person to:

Chelan County
Elections

CHELAN COUNTY AUDITOR
ELECTIONS DIVISION
350 ORONDO AVENUE, LEVEL 3, SUITE 306
WENATCHEE, WA 98801
Business Hours: Monday-Friday 9:00 a.m.-5:00 p.m.

APR 02 2026

Received
Wenatchee, WA

PLEASE TYPE OR PRINT IN INK. If more space is needed to answer any items, attach additional sheets and specify the item number.

CLAIMANT INFORMATION

- 1) Name: ROBERT COLE SOREANO Jan 1991
(Print Full Name) (DOB: mm/dd/yyyy)
- 2) Current Residential Address: 321 E Franklin St. Chelan, Washington 98816
(street, city, state, zip code)
- 3) Mailing Address (if different): _____
(street/post office box, city, state, zip code)
- 4) Residential address *on the date this incident occurred* (if different from current address):

(street, city, state, zip code)
- 5) Daytime phone numbers: _____
(Home) 509-630-7567 (Work) _____ (Cell)
- 6) E-Mail Address: robert.soreano@gmail.com

INCIDENT INFORMATION

- 7) The incident for which I make claim against Chelan County occurred as a series of related retaliatory acts occurring between: October 15, 2022 through December 2025.
See Attachment A.
- 8) The incident occurred at the following location(s): Multiple locations associated with the Chelan County Sheriff's Office. **See Attachment A.**

9) Chelan County departments or employee(s) allegedly responsible for damage/injury:

Chelan County Sheriff's Office; Sheriff Mike Morrison; Undersheriff Ozment; Chief Ryan Moody; Chief Buhler; Sgt. Mathews; Deputy Alex Bushy; Additional CCSO command staff and administrators acting in the scope of employment

10) Names, addresses, and telephone numbers of all persons involved in, or witness to, this incident:

Multiple deputies, supervisors, union representatives, school officials, HR staff, and county employees as reflected in emails, public records, witness statements, and arbitration findings. See Attachment A.

11) My injury or damages were caused or happened as follows:

See Attachment A.

12) Please describe the nature and extent of your injury or damages.

See Attachment A.

13) I claim damages from Chelan County in the sum of \$ \$10 million

14) The itemized amount of damages I claim are attached to this form. **Two estimates of the cost of repairs or a billing invoice must be attached to this claim, together with the name of your insurance agency. Please also include photos of the damages claimed. If your claim relates to a personal injury, please attach copies of all medical reports and billings.**

15) If you are claiming injury, are you a Medicare beneficiary? Yes No (Check One).
If Yes, please provide your Medicare number:

This claim form must be signed by the Claimant, a person holding a written power of attorney from the Claimant, by the attorney in fact for the Claimant, by an attorney admitted to practice in Washington State on the Claimant's behalf, or by a court-approved guardian or guardian ad litem on behalf of the Claimant.

I declare, under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.

DATED this 30 day of March 2026

s/Nathan J. Arnold
Signature of Claimant

Arnold Jacobowitz & Alvarado PLLC, Edmonds, Snohomish County, Washington
Place of Signing (residential address, city, and county)

ATTACHMENT A – NARRATIVE STATEMENT OF CLAIM

Claimant: Deputy Cole Soreano

Agency: Chelan County Sheriff's Office

Claim Period: October 2022 – January 2026

I. Overview

This claim arises from a continuous pattern of retaliation, harassment, hostile work environment, and administrative misconduct directed at me, Deputy Cole Soreano, following (1) my lawful political support of former Sheriff Brian Burnett as a private citizen beginning October 15, 2022, and (2) my filing of a criminal report against CCSO employee Deputy Alex Bushy in October 2023 after he assaulted my daughter in May 2023.

These retaliatory acts were carried out by CCSO administration including Sheriff Mike Morrison, Undersheriff Ozment, Chief Buhler, Chief Moody, and others acting under their direction, and have caused significant emotional, professional, and economic harm, culminating in a diagnosis of PTSD, anxiety, and depression.

II. State Agency or Employees Involved

- Chelan County Sheriff's Office (CCSO)
- Sheriff Mike Morrison
- Former Sheriff Brian Burnett (political context; not responsible for retaliation)
- Undersheriff Ozment
- Chief Ryan Moody
- Chief Buhler
- Sgt. Mathews
- Deputy Alex Bushy
- Additional CCSO administrators, staff, and agents acting under color of law

III. Description of the Incident

Beginning on October 15, 2022, while acting as a private citizen on my own time, I publicly expressed political support for incumbent Sheriff Brian Burnett during a public election. My support included attending campaign events, social media posts, and having my name publicly listed as endorsing the incumbent. This was protected political speech on a matter of public concern.

After the election of challenger Mike Morrison, retaliatory behavior by CCSO administration began and continued through December 2025, including harassment, ostracism, unfounded complaints, increased scrutiny, disparate discipline, interference with career advancement, and questions regarding my mental wellbeing based on rumor, anonymous complaints, and fabricated information.

In May 2023, my daughter was assaulted off-duty by CCSO employee Deputy Alex Bushy. When I reported this incident to CCSO administration and requested an administrative investigation, CCSO omitted and fabricated information, refused to conduct an investigation, and minimized the conduct. In October 2023, I filed a criminal report against Deputy Bushy as a private citizen. Following this, retaliation escalated.

Over the course of 2023–2025, CCSO administration engaged in a pattern of retaliatory conduct, including:

A. Employment Retaliation & Harassment

- Being passed over for specialty assignments (SRO position in April 2023) despite being qualified; Deputy Bushy given waiver to apply, despite not meeting requirements.
- Filing criminal report in October 2023 followed by increased scrutiny, anonymous complaints, mental health insinuations, and hostile treatment.
- Supervisors warning me to “watch your back” and that I had a “target on my back” (August 2023).
- Ostracism at community events, including being ignored by administration while serving on Honor Guard (September 2023, December 2024).
- Compelled to resign from Field Training Officer and Honor Guard positions due to retaliatory atmosphere (Sept–Oct 2023).
- Repeated mental health–related inquiries initiated by administration based solely on anonymous complaints, despite supervisors stating such inquiries were inappropriate (April–May 2025).
- Undersheriff directing supervisors to check on my mental wellbeing despite lack of any performance concerns (May 2025).

B. Unequal Treatment & Due Process Violations

- Multiple administrative inquiries initiated based on unconfirmed or anonymous complaints.
- No opportunity to respond to accusations brought forth by administration.
- Disparate treatment compared to similarly situated deputies, including inconsistent handling of complaints and administrative investigations.
- Denial of access to administrative investigation records (March 2025) and later admission this was improper (April 2025).
- Favoritism and preferential treatment demonstrated toward employees who supported Sheriff Morrison, as documented in union correspondence and culture surveys.

C. Public Records Irregularities & Mishandled Evidence

- Missing, altered, or replaced documents discovered via public disclosure requests (Sept 2025).
- Metadata revealed statements from Deputy Bushy admitting to physically restraining my daughter on 11/14/2023 that were not previously disclosed.
- Former Civil Deputy reported documents she prepared had been replaced after her departure.

D. Officer Safety Concerns

- Jan 2025 - Sept 2025 - multiple deputies alerted supervisors of concerns over Deputy Bushy's lack of response, requested assistance for remedy, no response from CCSO administration
- June 6, 2025: Deputy Bushy failed to provide backup during a call involving a violent subject, despite driving by; multiple deputies reported behavior, CCSO failed to investigate

E. Defamation & Damage to Reputation

- Administration described me as “unhinged” to my supervisor following a meeting with school staff; school staff confirmed this was false (November 2023).
- Citizens relayed that Sheriff Morrison and Chief Moody criticized my handling of case, motivated by political association.

F. Mental and Emotional Harm

As a result of prolonged retaliation and harassment, I developed PTSD, depression, and anxiety, confirmed by a licensed counselor in November 2025. I experienced severe nightmares and required three months of sick leave for treatment. My family also experienced distress due to ongoing harassment and workplace hostility.

The retaliation has caused damage to my professional standing, financial loss from missed opportunities, emotional suffering, diminished workplace safety, and reputational harm within my community.

IV. Incident Chronology

A. Protected Speech and Onset of Retaliation (Oct. 2022 – Jan. 2023)

- **Oct 15, 2022:** I attended a campaign event and publicly supported incumbent Sheriff Brian Burnett
- After candidate Mike Morrison was elected, retaliation began.
- **Jan 2023:**
 - Four employees who supported Burnett were removed from a promotion list
 - Sheriff Morrison stated during a labor meeting that promotions would reflect election support
 - Burnett-supporting deputies were passed over for detective and Forest Service positions despite qualifications

B. Retaliation Connected to My Daughter’s Assault (Apr. 2023 – Nov. 2023)

- **May 2023:** My daughter was assaulted off duty by Deputy Bushy. CCSO refused to conduct an administrative investigation, omitted key facts, and fabricated portions of their documentation
- **June 2023:** I was denied the SRO position; Deputy Bushy was given a waiver to apply despite lacking qualifications
- **Aug 2023:** Direct supervisors warned me of retaliation: “watch your back” and that I had a “target on my back.”

- **Sept 2023:** Administration publicly ignored Honor Guard members at a community event; this contributed to me and four others stepping down
- **Oct 2023:** I filed a criminal report against Bushy as a private citizen
 - Retaliation escalated immediately afterward.
- **Nov 2023:** CCSO administration sends me three copies of the same letter directing me not to speak about my filing of report. CCSO proceeded to send it to my county email, personal email, and the Undersheriff hand delivered a physical copy to me. Undersheriff states during the delivery of the physical copy that he understands my report was personal in nature but was directing me not to speak about it.
- **Nov 2023:** Admin falsely reported I was “unhinged” during a school meeting. School staff confirmed this was false

C. Hostile Environment, Due Process Violations & Retaliatory Acts (2024–2025)

2024

- **Feb 2024:** CCSO Union Rep sent an open letter citing deteriorated labor relationship, CBA violations, and concerns of harassment and favoritism.

2025

- **Feb 2025:** Arbitration confirmed Sheriff knowingly violated the CBA.
- **Feb 2025:** Admin launched an unfounded investigation into me based on a principal complaint that the principal later confirmed was not about me. Misleading statements by another coworker were ignored.
- **Mar 2025:** I was denied access to internal investigation records; Undersheriff later admitted this was wrong.
- **Apr–May 2025:**
 - Multiple anonymous complaints regarding non-work-related “behavior” at youth baseball events led to administrators directing supervisors to question my mental wellbeing.
 - Supervisors repeatedly stated these inquiries were inappropriate, rumor-based, and retaliatory.
 - Undersheriff acknowledged he “understood why I felt targeted.”
- **June 2025:**
 - Personnel file review confirmed 8 years of positive evaluations and no mental-health-related issues.
 - Deputy Bushy failed to back me up on a call involving a violent subject.
- **June–Sept 2025:**
 - Public disclosure requests revealed altered, missing, or withheld documents.
 - Metadata confirmed Deputy Bushy authored a partial statement on 11/14/23 admitting to physically restraining my daughter.
 - Former Civil Deputy confirmed documents she prepared were replaced after her departure.
- **Aug 2025:** Citizen stated Sheriff Morrison and Chief Moody told him I should be ashamed of how I handled his case, attributes treatment to political affiliation.
- **Sept 2025:**

- Administration engaged in misrepresentation of complaints.
- Witnesses were discouraged from speaking with me.
- **Oct 2025:** Admin restricted Bushy from assisting my squad after my safety complaint.
- **Nov 2025:** Due to cumulative stress, nightmares, and anxiety, I was diagnosed with **PTSD, depression, and anxiety**, and required three months of leave.
- **Dec 2025:** Records showed Bushy received assistance obtaining a prosecutorial declination letter, while I was forced through full PDR processes for my own records.
- **Jan 2026:** HR Investigation finds multiple substantiated complaints on my behalf.
- **Jan 2026:** Subject of HR investigation, claims of retaliation and hostile work environment by Deputy Bushy after placing my daughter in a "headlock"
- **Feb 2026:** Subject of citizen complaint received by CCSO administration in October 2025. Irregular handling of complaint by CCSO administration despite HR findings alerting them of improper handling

V. Damages: To be determined.

- **Emotional/psychological harm:** PTSD, anxiety, depression; long-term treatment required.
- **Economic harm:** Loss of specialty positions, lost career progress, reduced earnings.
- **Reputational harm:** Damage within CCSO and community.
- **Family impact:** Daughter bullied by Bushy's child; wife involved in PDR issues; household stress.
- **Organizational harm:** Unsafe working conditions; lack of backup; ostracization.

An exact amount will be provided following further documentation and evaluation.

VI. Supporting Documents

The following evidence exists and will be provided upon request:

- Emails, county email correspondence
- Police reports and case files
- Facebook posts
- Witness statements
- Arbitration findings
- Union representative letters
- Culture survey results
- HR complaints
- Body-worn and in-car camera video
- Metadata reports
- Public disclosure request results
- Counselor diagnosis and treatment records

VII. Conclusion

CCSO administration, under the authority of Sheriff Mike Morrison and Undersheriff Ozment, engaged in a prolonged pattern of retaliation, harassment, hostile work environment creation, document manipulation, and targeted conduct designed to impair my career, credibility, and emotional wellbeing.

I respectfully submit this Tort Claim and reserve the right to amend and supplement as necessary.