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**SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY**

BRUCE A. WOLF, as Personal
Representative of the ESTATE OF
KENNAN-JUSTICE KOBE FORD,
Deceased,

Plaintiff,

v.

STATE OF WASHINGTON,

Defendant.

No. 23-2-25597-6 SEA

COMPLAINT FOR PERSONAL
PHYSICAL INJURIES AND WRONGFUL
DEATH

Plaintiff Bruce A. Wolf, as Personal Representative of the Estate of Kennan-Justice Kobe Ford, avers:

I. PARTIES

1.1 Plaintiff Bruce A. Wolf is an attorney whose residence and principal place of business are in King County, Washington. On June 6, 2023, Wolf was appointed the Personal Representative of the probate estate of Kennan-Justice Kobe Ford (Keenan-Justice) by the Pacific County Superior Court under case no. 23-4-00056-25. Kennan-Justice died on December 11, 2022, at The Queensborough, an apartment complex located at 101 W Olympic Pl., Apt. 101, Seattle, Washington, 98119.

1 1.2 Defendant State of Washington (State) is a political entity with its capital in
2 Olympia, Washington. At all times relevant to this lawsuit, the State acted through employees of
3 its Department of Children, Youth, and Families (DCYF).

4 **II. NOTICE OF CLAIM, JURISDICTION, AND VENUE**

5 2.1 The Estate of Kennan-Justice Kobe Ford served a Washington State Tort Claim
6 Form on the State’s Department of Enterprise Services, Office of Risk Management, on June 14,
7 2023. More than 60 calendar days have elapsed since the Form was served. The claim presentment
8 and filing requirement of Chapter 4.92 RCW has been satisfied by The Estate of Kennan-Justice
9 Kobe Ford.

10 2.2 The Superior Court of Washington has original jurisdiction over this action,
11 pursuant to RCW 2.08.010 and 4.92.010.

12 2.3 This action may be brought in King County pursuant to RCW 4.92.010(1).

13 **III. FACTS**

14 3.1 Kennan-Justice was born on November 17, 2018, to parents Cynthia Rose Enyeart
15 and Christopher John Ford.

16 3.2 Kennan-Justice spent the entirety of his life in the care and custody of Enyeart. In
17 the months leading up to Kennan-Justice Kobe Ford’s death, he was often also dependent on
18 Enyeart’s boyfriend, Junior Prince Desta Asghedom, for care. At the time of his death, Kennan-
19 Justice, Enyeart, and Asghedom lived at The Queensborough apartment complex in Seattle,
20 Washington.

21 3.3 The State had received four or more reports of abuse or neglect regarding Kennan-
22 Justice while he was in the care of Enyeart.

1 3.4 Despite the concerns of severe physical abuse that were raised to the State,
2 Kennan-Justice remained in the care and custody of Enyeart where his abuse continued.

3 3.5 On December 11, 2022, emergency personnel responded to a call that Kennan-
4 Justice was not breathing. Kennan-Justice was declared dead upon the arrival of responders.

5 3.6 Kennan-Justice's death was ruled a homicide. Kennan-Justice's cause of death was
6 determined to be multiple blunt force injuries, including acute head trauma and brain injury that
7 led to extensive subdural hematoma, acute hemorrhaging, and subarachnoid hematoma.

8 3.7 During police interviews, Enyeart and Ashgedom blamed each other for the
9 extensive injuries to Kennan-Justice. Both were charged with murder in the second degree in
10 connection with Kennan-Justice's death.

11 **IV. CAUSES OF ACTION**

12 A. NEGLIGENCE

13 4.1 When doing an affirmative act, the State owed Kennan-Justice a duty to exercise
14 reasonable care to protect him against an unreasonable risk of harm arising out of the act.

15 4.2 The State also owed Kennan-Justice a duty to exercise reasonable care to protect
16 him from foreseeable harm.

17 4.3 The State breached these duties.

18 4.4 Kennan-Justice suffered injuries proximately caused by the State's breaches.

19 4.5 Plaintiff has standing to bring this survival claim on behalf of Kennan-Justice's
20 statutory beneficiaries, pursuant to RCW 4.20.060.

21 B. NEGLIGENT INVESTIGATION - RCW 26.44.050

22 4.6 The State gathered incomplete or biased information in investigating reports that
23 Kennan-Justice had been abused or neglected.

1 4.7 The State’s gathering of incomplete or biased information was a proximate cause
2 of a placement decision that harmed Kennan-Justice.

3 4.8 Plaintiff has standing to bring this survival claim on behalf of Kennan-Justice’s
4 statutory beneficiaries, pursuant to RCW 4.20.060.

5 C. WRONGFUL DEATH

6 4.9 Kennan-Justice’s death was proximately caused by the wrongful act, neglect, or
7 default of the State.

8 4.10 Kennan-Justice’s statutory beneficiaries sustained damages due to his death.

9 4.11 Plaintiff has standing to bring this claim on behalf of Kennan-Justice’s statutory
10 beneficiaries, pursuant to RCW 4.20.010 and .020.

11 **V. DEMAND FOR JUDGMENT**

12 Kennan-Justice requests that the Court enter a judgment against the State that includes:

13 5.1 For an award of general damages, in an amount to be determined at trial;

14 5.2 For an award of special damages, in an amount to be determined at trial;

15 5.3 For an award of statutory costs and attorneys’ fees; and

16 5.4 For such further relief as the Court deems just and proper.

17
18 Dated: December 27, 2023.

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