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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SELAH ALLIANCE FOR
EQUALITY, COURTNEY
HERNANDEZ, REV. DONALD
DAVIS JR., LAURA PEREZ,
ANITA CALLAHAN, KALAH
JAMES, CHARLOTTE TOWN,
AMANDA WATSON, and ANNA
WHITLOCK,

Plaintiffs,

v.

CITY OF SELAH; SHERRY
RAYMOND, in her official capacity
as Mayor of the City of Selah; and
DONALD WAYMAN, in his
official capacity as City
Administrator for the City of Selah;

Defendants.

No.

**DECLARATION OF ANITA
CALLAHAN IN SUPPORT OF
PLAINTIFFS' COMPLAINT**

I, ANITA CALLAHAN, declare:

1. I am over the age of 18 and am competent to be a witness in this proceeding. I have personal knowledge of the facts set forth herein and if called to testify, I could and would testify completely thereto.

2. I am a resident of Selah, Washington and have lived here for 20 years.

3. I am an Administrator of the Selah Alliance for Equality ("S.A.F.E."). As an Administrator of S.A.F.E., I share decision-making authority with S.A.F.E.'s other five Administrators. I also lead S.A.F.E.'s City Council Outreach working group. My group is tasked with keeping S.A.F.E.'s members apprised of what happens at Selah City Council meetings and encouraging other members to

1 participate in the Council's public comment section. I often help craft public
2 comment messages for our members to use in advance of the City Council meetings.

3 4. In addition to leading the Council Outreach working group, I also help
4 set up and maintain S.A.F.E.'s signs throughout Selah. I felt that these yard signs
5 were an effective and safe way to market S.A.F.E. and its message in Selah during
6 the COVID-19 pandemic. The signs also voiced S.A.F.E.'s disapproval of City
7 Administrator Donald Wayman, who S.A.F.E. believes is unfit to serve as a City
8 official due to, among other things, his disparaging comments about the Black Lives
9 Matter movement and strong opposition to messages of racial justice and equality.

10 5. I believe in and support the messages placed on S.A.F.E.'s signs. I
11 wanted these messages to convey to members of the community that Selah can
12 become a more inclusive and equitable place for people to live. I contributed
13 financially towards the purchase of S.A.F.E.'s signs.

14 6. As soon as S.A.F.E. began putting up the signs, City officials began
15 taking them down. It is my understanding that the City contends the signs violate
16 Selah Municipal Code Chapter 10.38. I have not witnessed the City remove other
17 signs with the same vigor that they have removed S.A.F.E.'s signs.

18 7. I am concerned by the City's attempt to silence S.A.F.E. and its efforts
19 to eliminate messages in support of racial equality. I originally joined S.A.F.E. to
20 support my friends and neighbors who were creating elaborate chalk art drawings
21 supporting the Black Lives Matter movement. I understood that the City had been
22 removing their chalk art because it disagreed with these messages. When the City
23 also began removing S.A.F.E.'s signs, it showed me that the City would not tolerate
24 these messages in Selah in any form.

25 8. My hope is that S.A.F.E. will be able to continue to provide members
26 of the community with a place to feel included, heard, and cared for. However, it is

1 difficult for S.A.F.E. to accomplish this goal while it is in constant battle with the
2 City to voice its opinion. S.A.F.E.'s membership has grown substantially since it
3 began this summer. The City not only harms S.A.F.E. and its members, but the entire
4 community, by stifling S.A.F.E.'s voice. We are currently unable to reach
5 community members who may wish to join S.A.F.E. or would feel empowered by
6 its message unless they already knew we existed and found us on social media.

7 9. I feel that my voice and viewpoints are being stifled by the City and its
8 uneven and unfair enforcement of its municipal code. On behalf of myself as an
9 individual, and on behalf of S.A.F.E. as an Administrator, we bring this lawsuit to
10 protect our ability to further voice and further our mission.
11
12
13

14 s/Anita Callahan
Anita Callahan

12/7/2020
Date