

1 Joseph P. Cutler, WSBA No. 37234  
2 *E.D. WA Admission pending*  
3 Carolyn Gilbert, WSBA No. 51285  
4 Reina Almon-Griffin, WSBA No. 54651  
5 Jane E. Carmody, WSBA No. 55409  
6 Jacob Stillwell, WSBA No. 48407  
7 PERKINS COIE LLP  
8 1201 Third Avenue, Suite 4900  
9 Seattle, WA 98101-3099  
10 Telephone: 206.359.8000  
11 Facsimile: 206.359.9000  
12 JCutler@perkinscoie.com  
13 CarolynGilbert@perkinscoie.com  
14 RAlmon-Griffin@perkinscoie.com  
15 JCarmody@perkinscoie.com  
16 JStillwell@perkinscoie.com

17 *Attorneys for Plaintiffs,*  
18 *Selah Alliance for Equality, et al.*

19 Antoinette M. Davis, WSBA No. 29821  
20 Nancy Talner, WSBA No. 11196  
21 Crystal Pardue, WSBA No. 54371  
22 American Civil Liberties Union of  
23 Washington Foundation  
24 P.O. Box 2728  
25 Seattle, WA 98111  
26 Telephone: 206.624.2184  
Talner@aclu-wa.org  
tdavis@aclu-wa.org  
cpardue@aclu-wa.org

*Co-Counsel and Attorneys for Plaintiff Selah*  
*Alliance for Equality, et al.*

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 AMANDA  
WATSON IN SUPPORT OF  
PLAINTIFFS' COMPLAINT**

I, AMANDA WATSON, 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 grew up in Selah, Washington but am a current resident of Sherwood, Oregon.

3. I am an Administrator for the Selah Alliance For Equality ("S.A.F.E."). As an Administrator for S.A.F.E., I share decision-making authority with S.A.F.E.'s other five Administrators.

4. Even though I currently do not reside in Selah, I am deeply connected to the community. I was raised in Selah along with my brother and several cousins.

1 I still have many family members who live in Selah and the surrounding community,  
2 including my grandmother, my aunts, and my uncles. Additionally, my grandfather  
3 was a school teacher in Selah for many years.

4 5. I moved away from Selah primarily because I felt like an outsider due  
5 to my progressive viewpoints. I felt like my views were not heard by many people  
6 in the community, including Selah public officials.

7 6. Since the events of this summer surrounding the Black Lives Matter  
8 movement, I was saddened to see Selah public officials, including City  
9 Administrator Donald Wayman and Mayor Sherry Raymond, speak out against the  
10 goals of racial equity.

11 7. Those comments fueled my desire to organize in the community where  
12 I grew up. I wanted to help people in Selah who felt similarly to me—those who  
13 didn't feel like their opinions were being heard. I want Selah to become a more  
14 inclusive community so that people like me do not feel like their only choice is to  
15 move away.

16 8. I began my organizing efforts by creating an online Change.org petition  
17 calling for the removal of Mr. Wayman as Selah City Administrator. I made this  
18 online petition primarily because of Mr. Wayman's disrespectful public statements  
19 against the Black Lives Matter movement.

20 9. S.A.F.E. is a way for me to help make a small difference in the  
21 community where I grew up.

22 10. S.A.F.E. maintains five active working groups: (1) Activism and  
23 Action; (2) Education; (3) Marketing, Fundraising, and Financials; (4) Media  
24 Outreach and Communications; and (5) City Council Outreach. A S.A.F.E.  
25 Administrator leads each of the five working groups. Any member of S.A.F.E. has  
26

1 the opportunity to participate in these working groups. Additionally, each working  
2 group has subcommittees.

3 11. I co-lead the Marketing working group. This working group is  
4 responsible for S.A.F.E. branding, which includes merchandise, art, logos, and so  
5 forth. In my group, for example, there are several artists and individuals who work  
6 in web development and use their skills to help S.A.F.E. The Marketing working  
7 group also chooses Selah community events in which S.A.F.E. should participate.

8 12. I devote between two to six hours each day to my responsibilities for  
9 S.A.F.E. My major tasks thus far have included working with a local artist who grew  
10 up in Selah, but recently moved to Yelm, Washington, to design S.A.F.E.'s logo;  
11 designing all the apparel that S.A.F.E. sells; and coordinating three different  
12 fundraisers for S.A.F.E., the funds from which were primarily used to purchase  
13 S.A.F.E.'s signs.

14 13. I also designed S.A.F.E.'s signs with the help of the local artist, which  
15 promote S.A.F.E. as an organization and advance our message of equality and  
16 inclusion. Some of the signs call for Mr. Wayman to be terminated as City  
17 Administrator because S.A.F.E. believes that his opposition to equality and racial  
18 justice in Selah makes him unfit to lead the diverse community he serves. We need  
19 leadership that is willing to listen to S.A.F.E. and all members of the Selah  
20 community. These signs were designed to be placed throughout Selah in public  
21 areas. Based on my experience in marketing, I believed signs would be an effective  
22 and safe way to promote S.A.F.E during the COVID-19 pandemic.

23 14. S.A.F.E.'s primary fundraising has been to fund S.A.F.E.'s signs. I  
24 personally contributed \$200.00 to S.A.F.E.'s signs fundraisers. I also pay for  
25 S.A.F.E.'s Zoom membership for our meetings, which is \$15.00 a month, and for  
26 our website that is currently being developed, which is \$12.00 a month.

**DECLARATION OF AMANDA WATSON – 4**

1           15. As soon as S.A.F.E. began putting up signs throughout Selah, the City  
2 immediately took them down. It is my understanding that the City contends the signs  
3 violate Selah Municipal Code Chapter 10.38. I have not witnessed the City remove  
4 other signs with the same consistency and vigor that it has have removed S.A.F.E.'s  
5 signs.

6           16. S.A.F.E. is currently spending most of its money replacing stolen signs,  
7 which diverts S.A.F.E.'s resources from its mission of serving marginalized groups  
8 in Selah. For example, one of our primary goals has been to help provide shelter and  
9 a safe space for LGBTQIA+ teens, people of color, and domestic violence survivors.

10           17. I am extremely frustrated that the City is determined to silence S.A.F.E.  
11 and messages promoting racial justice and equality. It is detracting from the real  
12 work that S.A.F.E. would like to accomplish and makes it difficult for S.A.F.E. to  
13 market itself in the community.

14           18. I feel that my voice and viewpoints are being stifled by the City and its  
15 uneven and unfair enforcement of its municipal code. On behalf of myself as an  
16 individual, and on behalf of S.A.F.E. as an Administrator, we bring this lawsuit to  
17 protect our voice and our ability to further our mission.

18  
19 s/Amanda Watson  
Amanda Watson

12/7/2020  
Date