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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 ANNA
WHITLOCK IN SUPPORT OF
PLAINTIFFS' COMPLAINT**

I, ANNA WHITLOCK, 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 currently an Administrator of the Selah Alliance For Equality ("S.A.F.E.").

3. I have lived in Yakima County for my entire life and moved to the City of Selah over six years ago.

4. Although I have lived in Yakima County for nearly my entire life, I found the City of Selah itself seems unwelcoming to newcomers, particularly those like myself who have more progressive viewpoints. There is a perception in Selah

1 that everyone in the community votes the same way, goes to the same church, and
2 holds the same opinions. I was contemplating moving out of Selah because I did not
3 feel connected to the community.

4 5. I joined S.A.F.E. this summer. S.A.F.E.'s message of equity and
5 inclusion resonated with me. I realized that there is more diversity of viewpoint in
6 Selah than is apparent on the surface. Now that I am part of S.A.F.E., I feel I belong
7 here in Selah. It has prevented me from moving away.

8 6. After joining S.A.F.E., I began attending peaceful protests in Selah to
9 vocalize my support for equality and inclusivity in our community. I also took on an
10 organizing role and was asked to be an "Administrator" and leader of a working
11 group. As an Administrator, I share equal responsibility for decision making with
12 the other five S.A.F.E. Administrators. I currently co-lead the Marketing,
13 Fundraising, and Art working group, which is responsible for promoting S.A.F.E.
14 and its mission. I also manage S.A.F.E.'s finances.

15 7. In June, I suggested creating signs advancing S.A.F.E.'s mission that
16 we could place throughout Selah. I felt that signs were an effective and safe way to
17 market S.A.F.E. in Selah during the COVID-19 pandemic.

18 8. In July, I started an online fundraiser to raise money for purchasing the
19 signs.

20 9. I personally donated approximately \$60.00 to the sign fundraiser.

21 10. I worked with the rest of the S.A.F.E. Administrators to design the signs
22 and then began ordering them.

23 11. To date, S.A.F.E. has spent \$3,199.10 on purchasing signs.

24 12. Once we received the signs and began placing them in public areas in
25 Selah, the City immediately began taking the signs down pursuant to Selah
26

1 Municipal Code 10.38. I have not witnessed the City remove other signs with the
2 same vigor that they have removed S.A.F.E.’s signs.

3 13. I have also witnessed private citizens stealing S.A.F.E.’s signs. I am
4 concerned by the City’s statements that stealing our signs is akin to “picking up
5 litter” and am concerned that many of the private citizens stealing our signs may be
6 doing so because they believe the City has blessed their actions.

7 14. It is my understanding that the S.A.F.E. Administrators have also been
8 subject to constant harassment and badgering by private citizens. I believe that the
9 City’s strong public opposition to S.A.F.E., its message, and its members has
10 contributed to the harassment our Administrators have experienced. I have noticed
11 that our Administrators that identify with marginalized communities have been
12 subjected to the most vitriol.

13 15. S.A.F.E. has been forced to divert its resources from advancing its
14 mission to continue replacing signs. For example, S.A.F.E. would like to set up
15 lectures, trainings, and classes on topics related to equity and inclusion that would
16 be open to the public. S.A.F.E. would also like to donate resources for domestic
17 violence victims, the LGBTQIA+ community, and other marginalized groups in
18 Selah. Ultimately, our goal is to create a safety net for all marginalized groups in our
19 community. We have not been able to gain traction on any of these action items due
20 to constantly purchasing new signs. To date, we have had 265 signs taken. I recently
21 ordered 100 additional signs, which brings the total signs I have purchased on behalf
22 of S.A.F.E. to 500.

23 16. Although S.A.F.E. may represent a minority opinion in Selah, we hope
24 that will not always be the case. We hope through promoting our message that “hate
25 has no place in Selah” that others will join our cause. S.A.F.E.’s membership has
26 grown substantially since it began this summer. We now have nearly 700 members.

1 17. I feel that my voice and viewpoints are being stifled by the City and its
2 uneven and unfair enforcement of its municipal code. Signs are an important way
3 for S.A.F.E. to get its message out. It is our way of saying, “we’re here too, and there
4 are more of us than you think.” It is how we connect with others who may share our
5 viewpoints, and it is a way of reaching out to those who do not. My hope is that our
6 signs will make Selah residents feel included and heard, like S.A.F.E. has made me
7 feel. On behalf of myself as an individual, and on behalf of S.A.F.E. as an
8 Administrator, we bring this lawsuit to protect voice and our ability to further our
9 mission.

10
11 s/Anna Whitlock
Anna Whitlock

12/7/2020
Date