

Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SEATTLE MIDEAST AWARENESS
CAMPAIGN, a Washington non-profit
corporation,

Plaintiff,

vs.

KING COUNTY, a municipal corporation,

Defendant.

No. 2:11-cv-00094-RAJ

DECLARATION OF SHERIFF SUE
RAHR IN SUPPORT OF KING
COUNTY'S BRIEF IN OPPOSITION
TO SEATTLE MIDEAST
AWARENESS CAMPAIGN'S
MOTION FOR PRELIMINARY
INJUNCTION

Noted for February 11, 2011

I, Sue Rahr, declare that:

1. I am the King County Sheriff, am competent to testify, and base this declaration on personal knowledge.

2. I began my career with the King County Sheriff's Office in 1979. In 2005, after rising through the ranks of the Office, I was appointed to be the King County Sheriff then elected in 2006; I was re-elected in 2009 to a second four-year term. I have spent 31 years in the field of law enforcement.

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INJUNCTION- 1 (11-00094 RAJ)

Daniel T. Satterberg, Prosecuting Attorney
CIVIL DIVISION, Litigation Section
900 King County Administration Building
500 Fourth Avenue
Seattle, Washington 98104
(206) 296-8820 Fax (206) 296-8819

1 3. As King County Sheriff, I am the chief executive officer and conservator of the
2 peace of the County.

3 4. King County is Washington State's largest metropolitan county; it spans more
4 than 2,100 square miles and has more than 1.9 million residents.

5 5. I oversee a department of nearly 1,100 employees and a \$150 million budget.
6 One of the divisions of my office is the Metro Transit Police (MTP).

7 6. On December 20, 2010, I was made aware by MTP Captain Lisa Mulligan that a
8 controversy was erupting about certain transit advertisement referring to alleged "ISRAELI
9 WAR CRIMES" ("SeaMAC Ad") that were scheduled to run the next week and that there was an
10 unusually large number of complaints coming in to Metro.

11 7. On December 21, 2010, Captain Mulligan informed me that, at the request of
12 Metro General Manager Kevin Desmond, she and her staff were developing a Bus Ads
13 Operational Response Plan.

14 8. On December 22, 2010, I was informed via my chain-of-command that public
15 demonstrations were planned both for and against the SeaMAC Ad and that certain groups were
16 planning to purchase anti-Hamas/Palestine ads from Metro.

17 9. On December 22, 2010, I called King County Executive Dow Constantine and
18 recommended to him that, in the interest of public safety, the SeaMAC Ad not be run on Metro
19 buses. I was concerned that the situation was escalating and it was becoming difficult to predict
20 the outcome. In particular, I was concerned about innocent bus riders being converted into
21 human billboards on buses carrying the SeaMAC Ad. I also told the Executive that buses, and
22 bus-passengers, were vulnerable to spontaneous, emotion driven attacks, like thrown rocks or
23 bricks.

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1
2 I hereby declare under penalty of perjury of the laws of the United States and the State of
3 Washington that, to the best of my knowledge, the foregoing is true and correct.

4 SIGNED and DATED at Seattle, WA this 3rd day of February, 2011.

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6 
7 SUE RAHR

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