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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 REVEREND  
DONALD DAVIS JR. IN SUPPORT  
OF PLAINTIFFS' COMPLAINT**

I, REVEREND DONALD DAVIS JR., 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 Yakima County, Washington and have lived here for six years. My granddaughter lives in the City of Selah, which is in Yakima County, with her family.

3. I moved to Yakima County because in October of 2014, the Bishop of the Fifth Episcopal District of the African Methodist Episcopal Church appointed me as the Senior Pastor to the Bethel African Methodist Episcopal Church in Yakima, Washington.

1           4. I am a member of the Selah Alliance For Equality (“S.A.F.E.”). The  
2 S.A.F.E. administrators reached out to me for my input regarding the design and  
3 wording of S.A.F.E.’s signs and I gave my approval. I assisted with placing  
4 S.A.F.E.’s signs throughout Selah. I also placed two outside of my home.  
5 Unfortunately, as soon as S.A.F.E. began putting up the signs, City officials began  
6 taking them down. It is my understanding that the City contends the signs violate  
7 Selah Municipal Code Chapter 10.38. I have not witnessed the City remove other  
8 signs with the same vigor that they have removed S.A.F.E.’s signs.

9           5. I grew up in New Orleans, Louisiana during the civil rights movement.  
10 My great uncle was one of the founding members of the Southern Christian  
11 Leadership Conference and I accompanied them to meetings, demonstrations,  
12 protests, marches, and other events. My childhood memories include playing behind  
13 the Lincoln Memorial whilst Reverend Martin Luther King Jr. gave his “I have a  
14 dream” speech. At age 13, I attended a march with Reverend King right before he  
15 was assassinated.

16           6. Courtney Hernandez, one of the S.A.F.E. Administrators, invited me to  
17 take part in the Black Lives Matter march that she coordinated in Selah this past  
18 June. I decided to participate because I believe that Black lives, including my own  
19 life and the lives of my family members, matter. I support the Black Lives Matter  
20 mission of eradicating racism and creating a more equal world. As Reverend, I teach  
21 my parishioners to love their neighbors regardless of color. My faith calls me to  
22 stand up publicly for this belief. As a young child, I looked up to other spiritual  
23 leaders of the civil rights movement like Reverend King and Representative John  
24 Lewis. I feel that it is *my* time to pick up where they left off. It is for these same  
25 reasons that I joined S.A.F.E. and will continue to strive for equality.  
26

1           7.     Witnessing the City of Selah's response to the Black Lives Matter  
2 movement has brought back dark memories from the civil rights era. During the  
3 Black Lives Matter march in June, I saw City Administrator Donald Wayman  
4 standing near the Selah Civic Center with his hand at his waist, making what I and  
5 others interpreted as a signal that he was carrying a firearm. During the civil rights  
6 marches, City officials were often unwelcoming to our cause. I was chased by police  
7 officers and German Shepherds and witnessed police beat my friends and family.

8           8.     In some ways, the City of Selah's strong opposition to messages of  
9 equality and inclusion makes me more fearful than when I was while growing up in  
10 the South. It makes me concerned that we have not made the progress that Reverend  
11 King died fighting for years ago. It pains me that there are some people who are still  
12 blind to the hatred certain groups of people face daily. Racism is far from gone. Just  
13 five years ago, I lost my friend Reverend Clementa C. Pinckney, pastor of the  
14 Emanuel African Methodist Episcopal Church in Charleston, South Carolina when  
15 a white supremacist opened fire on a bible study group.

16          9.     Despite my fear for my own safety, I will never be silent about injustice.  
17 Silence is dangerous.

18          10.    During the civil rights marches, like S.A.F.E., we had signs too. Our  
19 signs read, "We Demand Equal Rights Now" and "I Am A Man." Unfortunately, I  
20 did not see these signs except for in marches and protests. On a daily basis, the signs  
21 I saw were quite different. They read "Whites Only" and "Coloreds Only." Signs are  
22 not simply words on a paper. Signs are important.

23          11.    Had I seen S.A.F.E.'s signs that read "Hate Has No Place Here" and  
24 "Black Lives Matter" as a child growing up in New Orleans instead of the prejudiced  
25 signs I was more often subjected to, my life would have felt very different.  
26 S.A.F.E.'s messages give me hope. S.A.F.E. has given a voice to people in Selah

1 who feel unsafe or unwanted in their own community. The S.A.F.E. signs signal a  
2 unified and solidary commitment to fixing the deeply rooted racism and brokenness  
3 that still plagues this country. It greatly encourages me to see Selah residents of *all*  
4 races picking up where Reverend King and John Lewis left off to speak out against  
5 the injustice in the community, causing “good trouble” to bring equity and justice to  
6 all people.

7 12. 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 a member, we bring this lawsuit to protect  
10 our ability to further voice and further our mission.

11  
12  
13 *s/Rev. Donald Davis Jr.*  
14 Rev. Donald Davis Jr.

12/7/2020  
Date