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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 CHARLOTTE
TOWN IN SUPPORT OF
PLAINTIFFS' COMPLAINT**

I, CHARLOTTE TOWN, 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 have lived in Selah, Washington for the past five years. I am temporarily living in Tri-Cities Washington, but intend to return home to Selah.

3. I have been involved with supporting the Black Lives Matter movement in Eastern Washington, including attending several demonstrations in Tri-Cities, Washington.

4. I decided to become more involved in Selah after I heard City Administrator Donald Wayman state that the Black Lives Matter group was a “neo-

1 Marxist organization,” and compared Selah’s first Black Lives Matter march to
2 “communist indoctrination.”

3 5. I am a current member of the Selah Alliance for Equality (“S.A.F.E.”).
4 I was asked to join S.A.F.E. because of my previous activism and organizing
5 experiences. I am an Administrator for S.A.F.E. and the Public Outreach Manager
6 and leader of S.A.F.E.’s Media Outreach and Communications working group. As
7 an Administrator, I share decision-making authority with S.A.F.E.’s other
8 Administrators.

9 6. I also joined the members of S.A.F.E. in putting up its signs around
10 Selah. The signs convey S.A.F.E.’s mission of equality and inclusion. The signs also
11 voice S.A.F.E.’s disapproval of City Administrator Wayman, who S.A.F.E.
12 members believe to be unfit to serve as a City official due to, among other things,
13 his disparaging comments about the Black Lives Matter movement and strong
14 opposition to messages of racial justice and equality.

15 7. Unfortunately, as soon as S.A.F.E. began putting up the signs, City
16 officials took them down. It is my understanding that the City justified its behavior
17 by claiming that placement of the signs violates Selah Municipal Code Chapter
18 10.38. I have not witnessed the City remove other signs with the same consistency
19 or vigor that they have removed S.A.F.E.’s signs.

20 8. In my role as S.A.F.E.’s Public Outreach manager and leader of the
21 City Council Outreach group, I communicate with the local media and I also manage
22 the group’s outreach to City officials, such as the Mayor and City Council members.

23 9. As the Public Outreach Manager, I met with Mayor Sherry Raymond
24 on October 30, 2020. The purpose of this meeting was to explain S.A.F.E.’s goals
25 of creating a more inclusive and equitable Selah. I also emphasized to Mayor
26 Raymond that S.A.F.E. has the right to express its messages of equality.

1 10. I have also met with two City Council members—Councilmember Russ
2 Carlson and Councilmember Jacquie Matson—on about three separate occasions to
3 share S.A.F.E.’s goals. Like my meeting with Mayor Raymond, my purpose was to
4 explain S.A.F.E.’s message and to push back on the negative press about S.A.F.E.
5 My goal in these meetings was to come to a reasonable understanding of one another.
6 I wanted them to see S.A.F.E.’s perspective and to understand that we are only trying
7 to make Selah a more equitable and inclusive community.

8 11. In my meetings with City officials, they were quick to tell me that
9 S.A.F.E.’s message is not popular.

10 12. I am concerned that the City is overtly trying to silence S.A.F.E.
11 through its efforts to eliminate messages in support of racial equality. I believe that
12 racism is a problem in Selah. For me, S.A.F.E.’s signs represent our commitment to
13 publicly creating a safer community for people of color in Selah who do not feel
14 seen, heard, or cared about. We want people in Selah to know that there is a safe
15 space in our community. It is extremely important to me that regardless of how
16 unpopular S.A.F.E.’s message may be to some residents, that S.A.F.E. must be
17 allowed to voice its beliefs.

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

22
23 s/Charlotte Town
24 Charlotte Town

12/7/2020
Date