

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 CARRI
BREZONICK 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, Carri Brezonick, declare that:

1. I am over the age of 18, am competent to testify and base this declaration on
personal knowledge.

2. I am currently the supervisor of the Call Center and Customer Information Office
("Call Center") for King County Metro Transit ("Metro"). I was hired on August 1, 2008. Prior
to working with Metro, I was the Deputy Director of the Washington State Criminal Justice
Training Commission.

DECLARATION OF CARRI BREZONICK IN SUPPORT OF
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MIDEAST AWARENESS CAMPAIGN'S MOTION FOR
PRELIMINARY 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. In my current position I supervise 26 call center staff and 4 administrative staff, I
2 research and respond to customer inquiries, comments and complaints, draft replies on behalf of
3 Metro's General Manager and respond to referrals by elected officials. As a supervisor, I am
4 rarely called directly and on an average day, I might handle 2-3 customer calls directly.

5 4. The Metro Call Center provides trip planning and bus information regarding
6 transit services. We interact with customers both telephonically and by email. The Call Center
7 responds to emails sent in by the public and enters those emails, as well as phone calls, into a
8 data-base called MCS.

9 5. On a normal day, the calls center receives approximately 50 to 80 emails and
10 1500-1800 calls. These communications are entered into the MCS database in the normal course
11 of business if they are service requests, complaints or commendations.

12 6. In response to the transit advertisement submitted by the Seattle Mideast
13 Awareness Campaign (SeaMAC Ad), the Call Center and Metro received approximately 6,000
14 emails between the dates of December 20, 2010 and December 30, 2010. Also during those 10
15 days, the Call Center received numerous telephonic complaints about the SeaMAC ad.

16 7. Many of the complaints about the SeaMAC Ad were submitted via email.

17 8. During the week of December 20, 2010, Call Center staff reported to me that they
18 were spending a significant amount of work time answering public communications having to do
19 with the SeaMAC Ad. Because of the unusual volume of complaints, the call center staff was
20 unable to process the majority of emails and enter them into the MCS database.

21 9. In addition, the volume of complaints about the SeaMAC Ad considerably
22 impacted the ability of the Call Center to respond to routine customer inquiries in the normal
23 course of business.

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1 10. I, myself, received in excess of 25 calls per day from customers and many more
2 voicemail messages. On December 21, 2010, I stopped taking phone calls and let the calls go to
3 voicemail. My voicemail box was full each time I retrieved calls during the week of December
4 20, 2010, except perhaps on Christmas Eve, December 24.

5 11. Even during my vacation from December 22 through December 26, 2010, I was
6 responsible for monitoring emails and phone messages with regard to the SeaMAC Ad. I was
7 also responsible during this time for replying to internal emails from the Transit General
8 Manager and other staff working on the SeaMAC Ad issue.

9 12. One call I answered on December 20, 2010, was from a woman who called
10 Metro's Call Center several times and left a message promising if the SeaMAC Ad ran, she
11 would come to Seattle from her home in Auburn and vandalize the buses and block the tunnel to
12 prevent the buses from running. Over the course of my subsequent conversation with this caller,
13 she became irrational, hostile and irritated. She referred to the General Manager as a "Nazi"
14 before I finally had to discontinue the conversation.

15 13. The Call Center routinely receives communication from unhappy customers, but
16 the calls, emails and letters received regarding the SeaMAC Ad were overall more aggressive
17 and angrier than the usual complaints. The communication ranged from passionate to
18 belligerent, condescending and insulting. The messages and language used by some of the
19 callers was hateful, accusatory and full of expletives.

20 14. Some of the emails and calls contained messages of concern for rider and
21 personal safety if the ads were to run on the buses and concern for children riding the buses.
22 They also contained statements by riders that they would not ride the buses carrying the ads or
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1 during the month of the ad campaign. True and correct copies of some of these communications
2 are attached as Exhibit A.

3 15. Certain communications contained photographs of violent acts in what appeared
4 to be Israel or the Middle East. These photographs showed burning buses and injured or dead
5 bodies. Some of these warned of impending violence were Metro to allow the ads to run. True
6 and correct copies of some of these communications are attached as Exhibit B.

7 16. Other communications contained messages of civil disobedience were the ads to
8 run on the Metro buses. These specified not allowing the buses to run and defacing or
9 vandalizing Metro property. True and correct copy of some of these communications is attached
10 as Exhibit C.

11 17. Additional callers had significant concerns about the appropriateness of this type
12 of content in ads for the buses. True and correct copy of some of these communications is
13 attached as Exhibit D.

14 18. During my tenure as supervisor of the Call Center and Customer Information
15 Office, there has never been an advertisement that generated a similar level of controversy in
16 terms of the amount of communication and the content of the communication.

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

19 SIGNED and DATED at Seattle, WA this __ day of February, 2011.

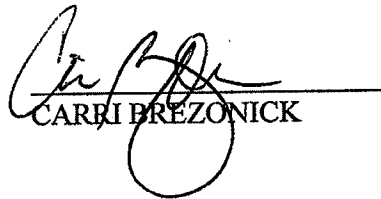
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21 _____
22 CARRI BREZONICK
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7 I hereby declare under penalty of perjury of the laws of the United States and the State of
8 Washington that the foregoing is true and correct.
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10 SIGNED and DATED at Seattle, WA this 7 day of February, 2011.
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14 CARRI BREZONICK
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