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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 JILL
KRECKLOW 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, Jill Krecklow, declare that:

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

2. I am the Finance Manager in the Transit Section of the King County Department of Transportation ("Metro"). I began my career with King County in 1994 and have spent all of those 17 years involved in finance and budget activities for transit operations.

DECLARATION OF JILL KRECKLOW IN SUPPORT OF
KING COUNTY'S BRIEF IN OPPOSITION TO SEATTLE
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 position as Finance Manager, I am responsible for all aspects of the
2 financial and budget operations of the Transit Division and the fund manager for the Public
3 Transportation Enterprise Fund.

4 4. I am responsible for creating, reviewing and approving financial information on a
5 daily basis and am frequently called upon to present information on Metro's revenues and
6 expenses to various internal and external audiences.

7 5. As the Finance Manager, I was asked to calculate the value of time spent by
8 Metro staff addressing the various aspects of the SeaMAC advertisement controversy between
9 the dates of December 17, 2010 and December 27, 2010.

10 6. In order to calculate these numbers, I collected a list of the employees who
11 worked on the SeaMAC ad issues, used the wage rate for each Metro staff person involved and
12 added an estimate of payroll-related taxes (FICA and PERS).

13 7. For staff of the King County Sheriff's Office (Metro Transit Police), I did not
14 have a wage rate available because these services are purchased through a rate developed by the
15 Sheriff's Office. To calculate the value of the hours, I used an estimate of the burdened costs for
16 the KCSO positions.

17 8. For salaried staff that worked on holiday or weekend hours, I collected the hours
18 and created a cost that included the hours worked as well as the hours paid.

19 9. The results of this analysis are: 358.75 hours reported with a cost of \$25,988,
20 based on reported hours worked; and 341.25 hours with a cost of \$24,703, based on reported
21 hours paid.

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

DECLARATION OF JILL KRECKLOW IN SUPPORT OF
KING COUNTY'S BRIEF IN OPPOSITION TO SEATTLE
MIDEAST AWARENESS CAMPAIGN'S MOTION FOR
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SIGNED and DATED at Seattle, WA this 4th day of February, 2011.


JILL KRECKLOW

DECLARATION OF JILL KRECKLOW IN SUPPORT OF
KING COUNTY'S BRIEF IN OPPOSITION TO SEATTLE
MIDEAST AWARENESS CAMPAIGN'S MOTION FOR
PRELIMINARY INJUNCTION - 3 (11-00094 RAJ)

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