

The Honorable Jim Rogers

SUPERIOR COURT OF THE STATE OF WASHINGTON
KING COUNTY

IN RE THE MATTER OF RECALL CHARGES
AGAINST CITY OF SEATTLE
COUNCILMEMBER KSHAMA SAWANT

No. 20-2-13314-1 SEA

DECLARATION OF
ERNEST H. LOU IN SUPPORT
OF STATEMENT OF CHARGES
SUPPORTING THE RECALL
ELECTION OF SEATTLE CITY
COUNCILMEMBER KSHAMA
SAWANT

I, Ernest H. Lou, declares as follows:

1. I am over the age of 18 and competent to testify to the matters in this declaration.
2. I am a registered voter in the State of Washington, King County and the City of Seattle in City Council District 3.
3. I am a Seattle native who grew up on Beacon Hill and previously lived in the Ravenna area after I graduated from the University of Washington. I have lived in Seattle's Capitol Hill neighborhood since 1997.
4. It is important to me that I responsibly exercise my right to vote, and therefore I strive to stay informed of local and national politics.

1 5. I am a liberal-minded voter, as I believe a majority of the citizens in Seattle's
2 District 3 are. I personally support the \$15 per hour minimum wage, Medicare for All and the
3 Green New Deal. I am a Democrat and have always voted for Democrats at the city, county,
4 state and national levels.

5 6. I therefore support some of Councilmember Sawant's policy goals.
6 Unfortunately, Councilmember Sawant is very divisive and tries to achieve her goals via
7 intimidation and bullying. She refuses to meet with fellow council members unless they agree
8 100% with her policy and political agenda. She does not collaborate with her fellow council
9 members and never responds to requests from her constituents in Seattle's District 3.

10 7. In the past several months, I have become aware, along with many others, that
11 Councilmember Sawant has committed acts of misfeasance, malfeasance, and violations of her
12 oath of office. These revelations precipitated my decision to participate in an effort to recall
13 Councilmember Sawant.

14 8. On August 18, 2020, I filed a Statement of Charges Supporting the Recall
15 Election of City of Seattle City Councilmember Kshama Sawant ("Statement of Charges") with
16 the King County Elections Department.

17 9. I have knowledge of Councilmember Sawant's misconduct described in my
18 Statement of Charges and the brief in support of the same from various news media, social
19 media, government reports, and other primary and secondary sources. Some of those sources are
20 listed in this declaration.

21 10. Attached as **Exhibit A** is a true and correct copy of an image capturing a retweet
22 entitled "Councilmember Sawant has a key to City Hall, allowing protesters to enter and chant
23 for the mayor's removal."

24 11. Attached as **Exhibit B** is a true and correct copy of an image capturing a retweet
25 entitled "Councilmember Sawant used her key to let protesters in to Seattle City Hall tonight."
26
27

1 12. Attached as **Exhibit C** is a true and correct copy of an image capturing a retweet
2 stating “Seattle City Councilmember Kshama Sawant led protesters to occupy City Hall for
3 about an hour this evening.”

4 13. Attached as **Exhibit D** is a true and correct copy of Governor’s Proclamation 20-
5 25.2 &.4, as extended and amended.

6 14. Attached as **Exhibit E** is a true and correct copy of a June 30, 2020, CHS Capitol
7 Hill Seattle article titled “After #defundSPD speech in front of her home, Durkan calls for City
8 Council to investigate, expel Sawant.”

9 15. Attached as **Exhibit F** is a true and correct copy of a June 30, 2020, Seattle Times
10 article titled “Durkan says Sawant should be investigated for ‘contemptuous’ behavior during
11 protests as City Council closes in on big-business tax.”

12 16. Attached as **Exhibit G** is a true and correct copy of an October 28, 2017 letter
13 from Kshama Sawant to the Seattle Executive Committee of the Socialist Alternative Party
14 found at [https://sccinsight.com/wp-content/uploads/2019/01/US-Doc-4-letter-from-KS-to-](https://sccinsight.com/wp-content/uploads/2019/01/US-Doc-4-letter-from-KS-to-EC.pdf)
15 [EC.pdf](https://sccinsight.com/wp-content/uploads/2019/01/US-Doc-4-letter-from-KS-to-EC.pdf).

16 17. Attached as **Exhibit H** is a true and correct copy of a December 2017 Socialist
17 Alternative Party resolution found at [https://sccinsight.com/wp-content/uploads/2019/01/Doc-04-](https://sccinsight.com/wp-content/uploads/2019/01/Doc-04-IEC-NC-resolution.pdf)
18 [IEC-NC-resolution.pdf](https://sccinsight.com/wp-content/uploads/2019/01/Doc-04-IEC-NC-resolution.pdf) .

19 18. Attached as **Exhibit I** is a true and correct copy of a letter from the Seattle
20 Executive Committee of the Socialist Alternative Party to “NC” found at
21 <https://sccinsight.com/wp-content/uploads/2019/01/Doc-17-Letter-from-EC-to-NC.pdf>.

22 19. Attached as **Exhibit J** is a true and correct copy of January 24, 2018 letter from
23 the Seattle Executive Committee of the Socialist Alternative Party in response to letters sent to
24 “NC” on 1/21/18 found at [https://sccinsight.com/wp-content/uploads/ 2019/01/Doc-23-PL-SK-](https://sccinsight.com/wp-content/uploads/2019/01/Doc-23-PL-SK-Response-to-the-Letters-sent-to-the-NC-on-1-21-18.pdf)
25 [Response-to-the-Letters-sent-to-the-NC-on-1-21-18.pdf](https://sccinsight.com/wp-content/uploads/2019/01/Doc-23-PL-SK-Response-to-the-Letters-sent-to-the-NC-on-1-21-18.pdf).

CERTIFICATE OF SERVICE

I hereby certify that on the date noted below I caused the foregoing DECLARATION OF ERNEST H. LOU to be filed with the Clerk of the King County Superior Court via the King County eFiling Application, and true and correct copies of the same to be delivered to the individuals noted below as follows:

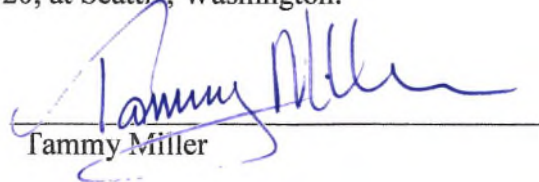
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- Hand delivery
- Facsimile transmission
- Overnight delivery
- First class mail
- Electronic mail

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- Hand delivery
- Facsimile transmission
- Overnight delivery
- First class mail
- Electronic mail

Executed this 11th day of September, 2020, at Seattle, Washington.



Tammy Miller