

# EXHIBIT A

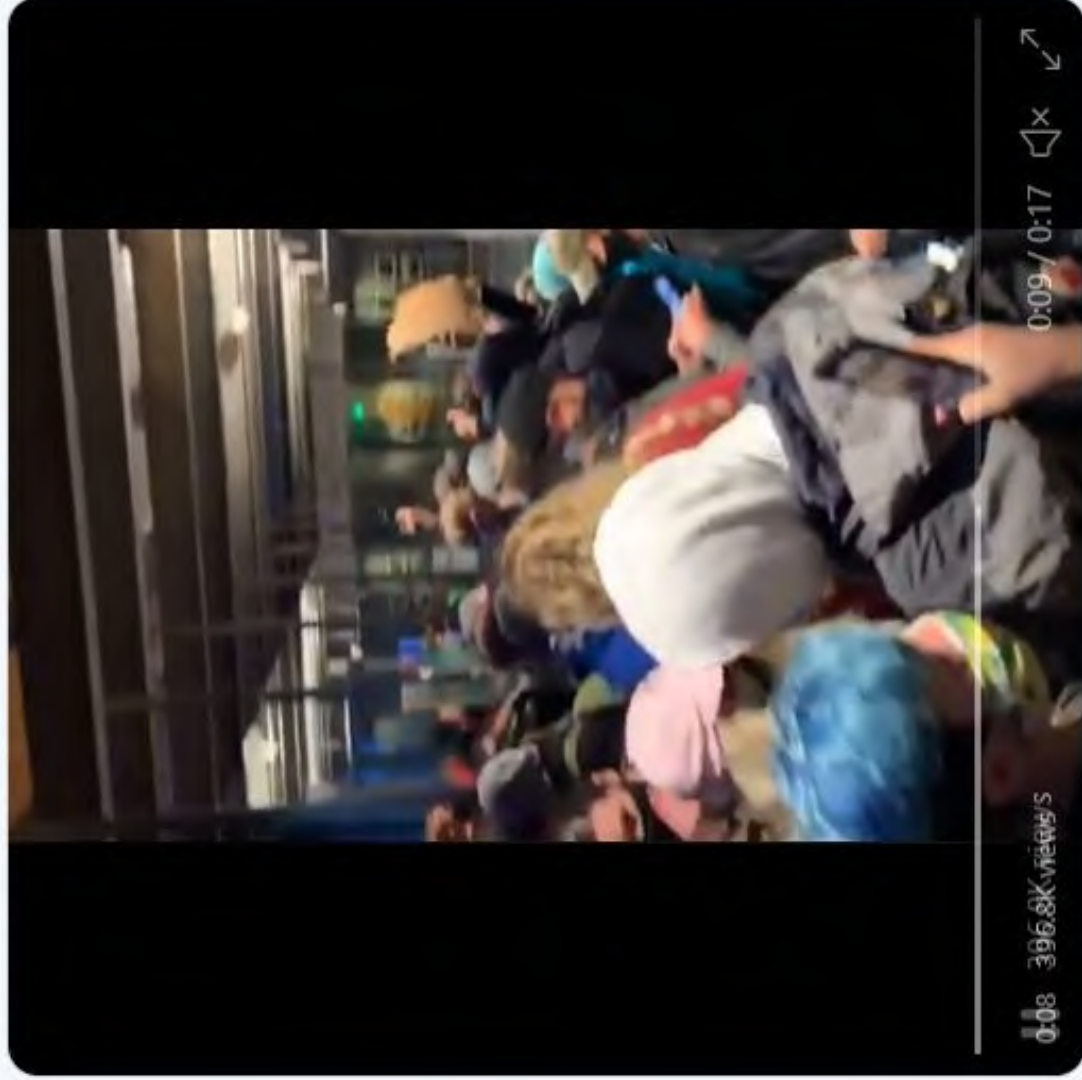


Kshama Sawant Retweeted



**Jake Goldstein-Street** @GoldsteinStreet · Jun 9

Councilmember Sawant has a key to City Hall, allowing protesters to enter and chant for the mayor's removal. #seattleprotest



0:08

396.8K views

0:09 / 0:17



375



3.5K



8.9K



# EXHIBIT B



Kshama Sawant Retweeted



**Remy** 🌟 @reemofficially · Jun 9

We voted for Kshama Sawant, and we are beyond delighted at all the work she has been putting in



**KING 5 News** @KING5Seattle · Jun 9

Councilmember Sawant used her key to let protesters in to Seattle City Hall tonight. [king5.com/article/news/...](http://king5.com/article/news/)

39

73

623



# EXHIBIT C

Retweeted by Kshama Sawant



**amandamsnyder** @amandamsnyder · Jun 9

When @evanbush asked why Sawant brought the group into City Hall, Sawant said it was essential that the power and uprising evident in the streets be seen in the halls of power in Seattle



4



39



223



[Show this thread](#)

Retweeted by Kshama Sawant



**amandamsnyder** @amandamsnyder · Jun 9

Photos: Seattle City Councilmember Kshama Sawant led protesters to occupy City Hall for about an hour this evening. Inside, people took turns speaking, sharing songs and repeatedly chanting about the removal of Mayor Jenny Durkan.



163



1.4K



3.4K



[Show this thread](#)

# EXHIBIT D

JAY INSLEE  
Governor



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**PROCLAMATION BY THE GOVERNOR  
AMENDING PROCLAMATION 20-05**

**20-25**

**STAY HOME – STAY HEALTHY**

**WHEREAS**, on February 29, 2020, I issued Proclamation 20-05, proclaiming a State of Emergency for all counties throughout the state of Washington as a result of the coronavirus disease 2019 (COVID-19) outbreak in the United States and confirmed person-to-person spread of COVID-19 in Washington State; and

**WHEREAS**, as a result of the continued worldwide spread of COVID-19, its significant progression in Washington State, and the high risk it poses to our most vulnerable populations, I have subsequently issued amendatory Proclamations 20-06, 20-07, 20-08, 20-09, 20-10, 20-11, 20-12, 20-13, 20-14, 20-15, 20-16, 20-17, 20-18, 20-19, 20-20, 20-21, 20-22, 20-23, and 20-24, exercising my emergency powers under RCW 43.06.220 by prohibiting certain activities and waiving and suspending specified laws and regulations; and

**WHEREAS**, the COVID-19 disease, caused by a virus that spreads easily from person to person which may result in serious illness or death and has been classified by the World Health Organization as a worldwide pandemic, has broadly spread throughout Washington State, significantly increasing the threat of serious associated health risks statewide; and

**WHEREAS**, there are currently at least 2,221 cases of COVID-19 in Washington State and, tragically, 110 deaths of Washingtonians associated with COVID-19; and

**WHEREAS**, models predict that many hospitals in Washington State will reach capacity or become overwhelmed with COVID-19 patients within the next several weeks unless we substantially slow down the spread of COVID-19 throughout the state; and

**WHEREAS**, hospitalizations for COVID-19 like illnesses are significantly elevated in all adults, and a sharply increasing trend in COVID-19 like illness hospitalizations has been observed for the past three (3) weeks; and

**WHEREAS**, the worldwide COVID-19 pandemic and its progression in Washington State continues to threaten the life and health of our people as well as the economy of Washington State, and remains a public disaster affecting life, health, property or the public peace; and



**WHEREAS**, the Washington State Department of Health continues to maintain a Public Health Incident Management Team in coordination with the State Emergency Operations Center and other supporting state agencies to manage the public health aspects of the incident; and

**WHEREAS**, the Washington State Military Department Emergency Management Division, through the State Emergency Operations Center, continues coordinating resources across state government to support the Department of Health and local health officials in alleviating the impacts to people, property, and infrastructure, and continues coordinating with the Department of Health in assessing the impacts and long-term effects of the incident on Washington State and its people.

**NOW, THEREFORE**, I, Jay Inslee, Governor of the state of Washington, as a result of the above-noted situation, and under Chapters 38.08, 38.52 and 43.06 RCW, do hereby proclaim: that a State of Emergency continues to exist in all counties of Washington State; that Proclamation 20-05 and all amendments thereto remain in effect as otherwise amended; and that Proclamations 20-05, 20-07, 20-11, 20-13, and 20-14 are amended and superseded by this Proclamation to impose a Stay Home – Stay Healthy Order throughout Washington State by prohibiting all people in Washington State from leaving their homes or participating in social, spiritual and recreational gatherings of any kind regardless of the number of participants, and all non-essential businesses in Washington State from conducting business, within the limitations provided herein.

I again direct that the plans and procedures of the Washington State Comprehensive Emergency Management Plan be implemented throughout state government. State agencies and departments are directed to continue utilizing state resources and doing everything reasonably possible to support implementation of the Washington State Comprehensive Emergency Management Plan and to assist affected political subdivisions in an effort to respond to and recover from the COVID-19 pandemic.

I continue to order into active state service the organized militia of Washington State to include the National Guard and the State Guard, or such part thereof as may be necessary in the opinion of The Adjutant General to address the circumstances described above, to perform such duties as directed by competent authority of the Washington State Military Department in addressing the outbreak. Additionally, I continue to direct the Department of Health, the Washington State Military Department Emergency Management Division, and other agencies to identify and provide appropriate personnel for conducting necessary and ongoing incident related assessments.

**FURTHERMORE**, based on the above situation and under the provisions of RCW 43.06.220(1)(h), to help preserve and maintain life, health, property or the public peace, and to implement the Stay Home—Stay Healthy Order described above, I hereby impose the following necessary restrictions on participation by all people in Washington State by prohibiting each of the following activities by all people and businesses throughout

Washington State, which prohibitions shall remain in effect until midnight on April 6, 2020, unless extended beyond that date:

1. **All people in Washington State shall immediately cease leaving their home or place of residence except: (1) to conduct or participate in essential activities, and/or (2) for employment in essential business services.** This prohibition shall remain in effect until midnight on April 6, 2020, unless extended beyond that date.

**To implement this mandate, I hereby order** that all people in Washington State are immediately prohibited from leaving their home or place of residence except to conduct or participate in (1) essential activities, and/or (2) employment in providing essential business services:

- a. **Essential activities** permitted under this Proclamation are limited to the following:
  - 1) **Obtaining necessary supplies and services** for family or household members and pets, such as groceries, food and supplies for household consumption and use, supplies and equipment needed to work from home, and products necessary to maintain safety, sanitation and essential maintenance of the home or residence.
  - 2) **Engaging in activities essential for the health and safety** of family, household members and pets, including things such as seeking medical or behavioral health or emergency services and obtaining medical supplies or medication.
  - 3) **Caring for** a family member, friend, or pet in another household or residence, and to transport a family member, friend or their pet for essential health and safety activities, and to obtain necessary supplies and services.
  - 4) **Engaging in outdoor exercise activities**, such as walking, hiking, running or biking, but only if appropriate social distancing practices are used.
- b. **Employment in essential business services** means an essential employee performing work for an essential business as identified in the "[Essential Critical Infrastructure Workers](#)" list, or carrying out minimum basic operations (as defined in Section 3(d) of this Order) for a non-essential business.
- c. **This prohibition shall not apply to** individuals whose homes or residences are unsafe or become unsafe, such as victims of domestic violence. These individuals are permitted and urged to leave their homes or residences and stay at a safe alternate location.
- d. **This prohibition also shall not apply to** individuals experiencing homelessness, but they are urged to obtain shelter, and governmental and other entities are strongly encouraged to make such shelter available as soon as possible and to the maximum extent practicable.

- e. For purposes of this Proclamation, homes or residences include hotels, motels, shared rental units, shelters, and similar facilities.
2. **All people in Washington State shall immediately cease participating in all public and private gatherings and multi-person activities for social, spiritual and recreational purposes, regardless of the number of people involved, except as specifically identified herein.** Such activity includes, but is not limited to, community, civic, public, leisure, faith-based, or sporting events; parades; concerts; festivals; conventions; fundraisers; and similar activities. This prohibition also applies to planned wedding and funeral events. This prohibition shall remain in effect until midnight on April 6, 2020, unless extended beyond that date.

**To implement this mandate, I hereby order** that all people in Washington State are immediately prohibited from participating in public and private gatherings of any number of people for social, spiritual and recreational purposes. **This prohibition shall not apply to** activities and gatherings solely including those people who are part of a single household or residential living unit.

3. **Effective midnight on March 25, 2020, all non-essential businesses in Washington State shall cease operations except for performing basic minimum operations. All essential businesses are encouraged to remain open and maintain operations, but must establish and implement social distancing and sanitation measures established by the United States Department of Labor or the Washington State Department of Health Guidelines.** This prohibition shall remain in effect until midnight on April 8, 2020, unless extended beyond that date.

**To implement this mandate, I hereby order** that, effective midnight on March 25, 2020, all non-essential businesses in Washington State are prohibited from conducting all activities and operations except minimum basic operations.

- a. **Non-essential businesses** are strongly encouraged to immediately cease operations other than performance of basic minimum operations, but must do so no later than midnight on March 25, 2020.
- b. **Essential businesses** are prohibited from operating under this Proclamation unless they establish and implement social distancing and sanitation measures established by the United States Department of Labor's Guidance on Preparing Workplaces for COVID-19 at <https://www.osha.gov/Publications/OSHA3990.pdf> and the Washington State Department of Health Workplace and Employer Resources & Recommendations at <https://www.doh.wa.gov/Coronavirus/workplace>.
- c. **This prohibition does not apply to** businesses consisting exclusively of employees or contractors performing business activities at their home or residence, and who do not engage in in-person contact with clients.





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**PROCLAMATION BY THE GOVERNOR  
AMENDING PROCLAMATIONS 20-05, 20-25 AND 20-25.1**

**20-25.2**

**ADJUSTING  
STAY HOME – STAY HEALTHY  
TO MAY 4, 2020**

**WHEREAS**, on February 29, 2020, I issued Proclamation 20-05, proclaiming a State of Emergency for all counties throughout the state of Washington as a result of the coronavirus disease 2019 (COVID-19) outbreak in the United States and confirmed person-to-person spread of COVID-19 in Washington State; and

**WHEREAS**, as a result of the continued worldwide spread of COVID-19, its significant progression in Washington State, and the high risk it poses to our most vulnerable populations, I have subsequently issued amendatory Proclamations 20-06 through 20-52, exercising my emergency powers under RCW 43.06.220 by prohibiting certain activities and waiving and suspending specified laws and regulations, including issuance of Proclamation 20-25, and 20-25.1 (Stay Home – Stay Healthy), prohibiting all people in Washington State from leaving their homes or participating in gatherings of any kind regardless of the number of participants, and all non-essential businesses in Washington State from conducting business, within the limitations therein; and

**WHEREAS**, the COVID-19 disease, caused by a virus that spreads easily from person to person which may result in serious illness or death and has been classified by the World Health Organization as a worldwide pandemic, has broadly spread throughout Washington State and is a significant health risk to all of our people, especially members of our most vulnerable populations; and

**WHEREAS**, while there are currently at least 13,521 cases of COVID-19 in Washington State with 749 associated deaths, current models predict that we have started to slow its spread throughout the State; and

**WHEREAS**, Washington State is known for a high level of outdoor recreation on its many trails, parks, lakes, beaches and other outdoor recreational areas, and outdoor recreation is a fundamental part of maintaining physical, emotional and mental health, particularly in a time of great stress;

**WHEREAS**, these conditions now permit adjustment of some of the prohibitions in Proclamation 20-25 and 20-25.1 to allow for some recreational activities and related employment, while continuing to protect the health and safety of all Washingtonians by retaining the remainder of the prohibitions imposed in Proclamations 20-25 and 20-25.1; and

**WHEREAS**, the worldwide COVID-19 pandemic and its progression in Washington State continues to threaten the life and health of our people as well as the economy of Washington State, and remains a public disaster affecting life, health, property or the public peace; and

**WHEREAS**, the Washington State Department of Health continues to maintain a Public Health Incident Management Team in coordination with the State Emergency Operations Center and other supporting state agencies to manage the public health aspects of the incident; and

**WHEREAS**, the Washington State Military Department Emergency Management Division, through the State Emergency Operations Center, continues coordinating resources across state government to support the Department of Health and local health officials in alleviating the impacts to people, property, and infrastructure, and continues coordinating with the Department of Health in assessing the impacts and long-term effects of the incident on Washington State and its people.

**NOW, THEREFORE**, I, Jay Inslee, Governor of the state of Washington, as a result of the above-noted situation, and under RCW 38.08, 38.52 and 43.06, do hereby proclaim and order that a State of Emergency continues to exist in all counties of the state, that Proclamation 20-05 and all amendments thereto remain in effect as otherwise amended, and that, to help preserve and maintain life, health, property or the public peace pursuant to RCW 43.06.220(1)(h), Proclamations 20-25 and 20-25.1 (Stay Home – Stay Healthy) are amended to extend all of their provisions, except those specifically listed below and as specifically allowed in the requirements available [here](#), and each expiration date therein, to May 4, 2020:

As of April 27, 2020, in order to prepare for re-opening on May 5, 2020, all employees necessary to operate and maintain day-use activity and trails, including those in state parks and state public lands, state hunting and fishing operations, golf operations, and day-use activities and trails in other public parks and public lands are authorized to return to work; and

As of May 5, 2020, the following outdoor recreational activities, when and where permitted, are authorized to commence so long as participants fully comply with the social distancing and coronavirus related hygiene requirements found [here](#), such as:

- Recreational hunting, fishing, and boating
- Outdoor exercise, including hiking, running, walking and biking
- Golfing
- Day-use activities at public parks and public lands

All other provisions of Proclamation 20-25 and 20-25.1 shall remain in full force and effect.

**ADDITIONALLY**, except as exempted above, I continue to prohibit all other public and private gatherings and multi-person activities for social, spiritual and recreational purposes, regardless of the number of people involved. Such activity includes, but is not limited to, community, civic, public, leisure, faith-based, or sporting events; parades; concerts; festivals; conventions; fundraisers; team sports activities, and similar activities that involve a gathering of people other than a household unit. This prohibition continues to apply to planned wedding and funeral events.



JAY INSLEE  
Governor



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**PROCLAMATION BY THE GOVERNOR  
AMENDING PROCLAMATIONS 20-05, 20-25, 20-25.1, 20-25.2 and 20-25.3**

**20-25.4**

**TRANSITION FROM “STAY HOME – STAY HEALTHY” TO  
“SAFE START - STAY HEALTHY” COUNTY-BY-COUNTY PHASED  
REOPENING**

**WHEREAS**, on February 29, 2020, I issued Proclamation 20-05, proclaiming a State of Emergency for all counties throughout the state of Washington as a result of the coronavirus disease 2019 (COVID-19) outbreak in the United States and confirmed person-to-person spread of COVID-19 in Washington State; and

**WHEREAS**, as a result of the continued worldwide spread of COVID-19, its significant progression in Washington State, and the high risk it poses to our most vulnerable populations, I have subsequently issued amendatory Proclamations 20-06 through 20-53 and 20-55 through 20-57, exercising my emergency powers under RCW 43.06.220 by prohibiting certain activities and waiving and suspending specified laws and regulations, including issuance of Proclamations 20-25, 20-25.1, 20-25.2 and 20-25.3 (*Stay Home - Stay Healthy*), prohibiting all people in Washington State from leaving their homes except to participate in essential services or essential work and preventing all non-essential businesses in Washington State from conducting business, within the limitations therein; and

**WHEREAS**, the COVID-19 disease, caused by a virus that spreads easily from person to person which may result in serious illness or death and has been classified by the World Health Organization as a worldwide pandemic, has broadly spread throughout Washington State and remains a significant health risk to all of our people, especially members of our most vulnerable populations; and

**WHEREAS**, when I last amended the *Stay Home - Stay Healthy* order (Proclamation 20-25.3) on May 4, 2020, there were approximately 15,462 cases of COVID-19 in Washington State with 841 deaths; and, now, as of May 31 2020, the Department of Health indicated that there have been 21,349 cases and 1,118 deaths, demonstrating the ongoing, present threat of this lethal disease; and



**WHEREAS**, the health professionals and epidemiological modeling experts predict that although we have passed the peak of the first wave of COVID-19 in the State and we have made adequate progress as a state to modify some of the initial community mitigation efforts, the nature of COVID-19 viral transmission, including both asymptomatic and symptomatic spread as well as the relatively high infectious nature, suggests it is appropriate to slowly re-open Washington State only through a careful, phased, and science-based approach. Modelers continue to agree that fully relaxing social distancing measures will result in a sharp increase in the number of cases; and

**WHEREAS**, although the judicial system, an essential service, has undergone significant disruption and modification to operate safely during this crisis, and by order of the Supreme Court has delayed most jury trials in criminal and civil matters, in-person proceedings are necessary in many circumstances, and the judicial system is currently working with health officials to innovate and plan for the safe resumption of jury trials and other court services including at offsite facilities; and the efforts undertaken to innovate and plan are equally essential to the resumption of our judicial system, and should be conducted remotely if possible but otherwise may be conducted in person if appropriate physical distancing and protective measures are in place; and

**WHEREAS**, this unprecedented health crisis has caused extraordinary anxiety and a significant disruption of routine and important activities for every Washingtonian; and I recognize the extraordinary resiliency, strength, adaptability, and courage of every Washingtonian during this difficult time; and

**WHEREAS**, many people in Washington State attend religious services on a regular basis, making such services a vital part of the spiritual and mental health of our community, and previous guidance issued related to remote services, drive-in services, counseling, outdoor services, and Phase 2 indoor services, all subject to restrictions outlined in those guidance documents, remain in place and may be further expanded or modified as the science and data support; and

**WHEREAS**, the science also suggests that by ensuring safe social distancing and hygiene practices, many business activities can be conducted with limited exposure to customers, which is important to revitalizing Washington State's economy, restoring jobs, and providing necessary goods and services; and

**WHEREAS**, in Proclamation 20-25.3 I established an initial four-phased approach to reopening Washington State; and, while all counties started in Phase I on May 4, 2020, a total of 28 counties are now either in or eligible to apply for Phase 2; and

**WHEREAS**, the Washington State Department of Health's data and modeling demonstrate that many counties have significantly reduced or eliminated the number of new COVID-19 cases sufficiently to enable those counties to control and respond to virus outbreaks within the capacity of existing local and regional health care systems without significant increased risk of being overwhelmed, and this data supports

providing all counties with an opportunity to lift some restrictions, subject to certain conditions and requirements; and

**WHEREAS**, the worldwide COVID-19 pandemic and its progression in Washington State continue to threaten the life and health of our people as well as the economy of Washington State, and remain a public disaster affecting life, health, property or the public peace; and

**WHEREAS**, the Washington State Department of Health continues to maintain a Public Health Incident Management Team in coordination with the State Emergency Operations Center and other supporting state agencies to manage the public health aspects of the incident; and

**WHEREAS**, the Washington State Military Department Emergency Management Division, through the State Emergency Operations Center, continues coordinating resources across state government to support the Department of Health and local health officials in alleviating the impacts to people, property, and infrastructure, and continues coordinating with the Department of Health in assessing the impacts and long-term effects of the incident on Washington State and its people; and

**NOW, THEREFORE**, I, Jay Inslee, Governor of the state of Washington, as a result of the above-noted situation, and under Chapters 38.08, 38.52 and 43.06 RCW, do hereby proclaim and order that a State of Emergency continues to exist in all counties of Washington State, that Proclamation 20-05 and all amendments thereto remain in effect as otherwise amended, and that, to help preserve and maintain life, health, property or the public peace pursuant to RCW 43.06.220(1)(h), Proclamations 20-25, 20-25.1, 20-25.2, and 20-25.3 (*Stay Home – Stay Healthy*) are amended to extend all of the prohibitions and each expiration date therein to 11:59 p.m. on July 1, 2020, and are renamed (*Safe Start – Stay Healthy*), and that except as otherwise provided in this order or the *Safe Start Washington Phased Reopening County-by-County Plan* found [here](#), all other provisions of Proclamations 20-25, 20-25.1, 20-25.2, and 20-25.3 shall remain in full force and effect.

**FURTHERMORE**, in collaboration with the Washington State Department of Health, and based on analysis of the data and epidemiological modeling, I hereby order that, beginning on June 1, 2020, the *Safe Start Washington Phased Reopening Plan* will be applied on a county-by-county basis, and will allow any county that has been in Phase 1 or 2 for three weeks to apply to the Secretary of Health to move in whole or in part to the next phase; and further, the application process will include target metrics (intended to be applied as “targets” and not hard-line measures) set by the Secretary of Health, and the application must be submitted by the County Executive, or, in the absence of a County Executive, with the approval of the County Council or Commission, in accordance with the instructions provided by the Secretary of Health; and

**FURTHERMORE**, in evaluating any application to move forward, the Secretary of Health may approve a county moving in whole to the next phase, or may only approve certain activities moving to the next phase; and

**FURTHERMORE**, until there is an effective vaccine, effective treatment or herd immunity, it is crucial to maintain some level of community interventions to suppress the spread of COVID-19 throughout all phases of recovery; and, therefore, throughout all phases, individuals should continue to engage in personal protective behaviors including: practice physical distancing, staying at least six feet away from other people; wear cloth face coverings in public places when not eating or drinking; stay home if sick; avoid others who are sick; wash hands frequently; cover coughs and sneezes; avoid touching eyes, nose and mouth with unwashed hands; and disinfect surfaces and objects regularly; and

**FURTHERMORE**, I hereby order, in addition to other requirements detailed in the *Safe Start Washington* Phased Reopening Plan, that, beginning on June 8, 2020, when on the job, all employees must wear a facial covering except when working alone or when the job has no in-person interaction as detailed in the *Safe Start Washington* Phased Reopening Plan; and, further, that employers must provide cloth facial coverings to employees, unless their exposure dictates a higher level of protection; and

**FURTHERMORE**, I continue to permit the low-risk activities previously permitted as reflected or clarified in formal guidance documents [here](#), and which may be updated or modified as the science and data supports; and

**FURTHERMORE**, in collaboration with the Washington State Department of Health, in furtherance of the physical, mental, and economic well-being of all Washingtonians, I will continue to analyze the data and epidemiological modeling and adjust the *Safe Start Washington* Phased Reopening Plan accordingly.

I again direct that the plans and procedures of the *Washington State Comprehensive Emergency Management Plan* be implemented throughout state government. State agencies and departments are directed to continue utilizing state resources and doing everything reasonably possible to support implementation of the *Washington State Comprehensive Emergency Management Plan* and to assist affected political subdivisions in an effort to respond to and recover from the COVID-19 pandemic.

I continue to order into active state service the organized militia of Washington State to include the National Guard and the State Guard, or such part thereof as may be necessary in the opinion of The Adjutant General to address the circumstances described above, to perform such duties as directed by competent authority of the Washington State Military Department in addressing the outbreak. Additionally, I continue to direct the Department of Health, the Washington State Military Department Emergency Management Division, and other agencies to identify and provide appropriate personnel for conducting necessary and ongoing incident related assessments.

All persons are again reminded that no credentialing program or requirement applies to any activities or operations under this Proclamation.



# EXHIBIT E



Prev: [City of Seattle begins removal of Capitol Hill...](#) (06/30/20) | Next: [16-year-old killed in Capitol Hill protest zone...](#) (06/30/20)

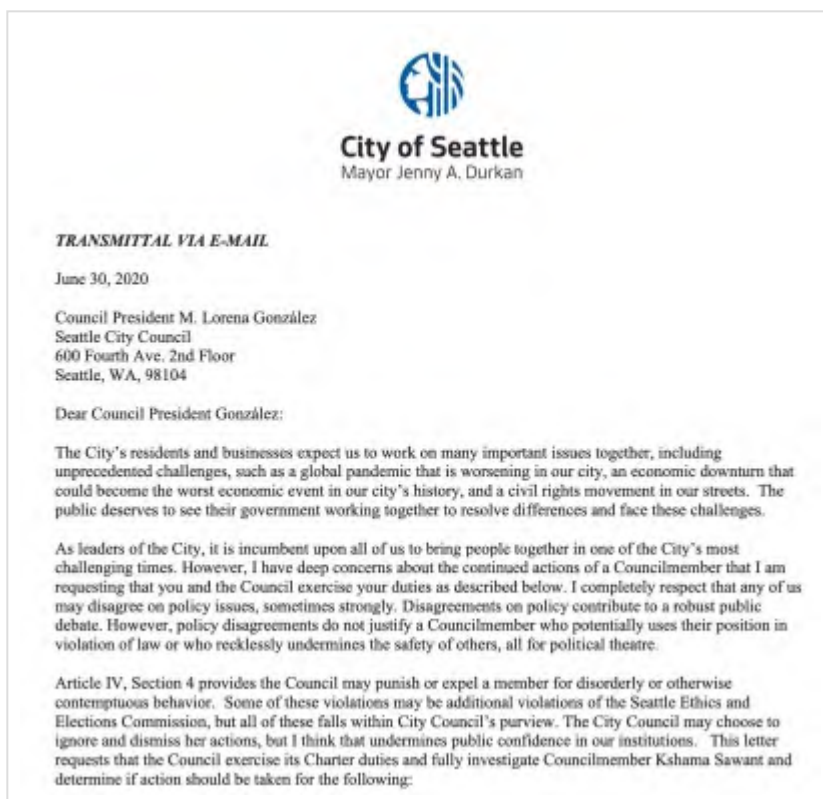
# After #defundSPD speech in front of her home, Durkan calls for City Council to investigate, expel Sawant

Posted on [Tuesday, June 30, 2020 - 12:39 pm](#) by [jseattle](#)



— Sawant during Sunday's protest organized by the Seattle Democratic Socialists of America





Speaking to a massive protest march in front of her Northeast Seattle home was apparently the final straw.

**Mayor Jenny Durkan** has escalated her ongoing political war with **Kshama Sawant** to a new level with a call for the **Seattle City Council** and council **President Lorena Gonzalez** to investigate and expel its longest-serving member.

"The City Council may choose to ignore and dismiss her actions, but I think that undermines public confidence in our institutions," Durkan writes. "This letter requests that the Council exercise its Charter duties and fully investigate Councilmember Kshama Sawant and determine if action should be taken..."

The letter from Durkan's office levels five allegations against Sawant including "using her official position to lead a march" to the mayor's home Sunday night, Durkan says, "despite the fact that it was publicly known I was not there, and she and organizers knew that my address was protected under the state confidentiality program because of threats against me due largely to my work as U.S. Attorney."

"All of us have joined hundreds of demonstrations across the City, but Councilmember Sawant and her followers chose to do so with reckless disregard of the safety of my family and children," Durkan writes.

**UPDATE 3:05 PM:** In a blistering response, Sawant says she is proud of her activism.

"Socialist Alternative and my Council office are proud to have marched, rallied, and organized with thousands of community members and activists in recent weeks to demand #JusticeForGeorgeFloyd, #BlackLivesMatter," she writes. "Our movement is demanding racial and economic justice, long withheld by a pro-corporate political establishment, whose leader currently is Mayor Durkan."

Sawant concludes her letter saying she does not take the attack "personally."

“While her words are directed at me and my elected office, I don’t take it personally,” she writes. “In reality, this is an attack on working people’s movements, and everything we are fighting for, by a corporate politician desperately looking to distract from her failures of leadership and politically bankrupt administration.”

“Our movement will respond accordingly: we will fight with even greater unity and determination,” she concludes.

The full response from Sawant’s office is at the end of this post.



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“In addition, during or after Councilmember Sawant’s speech at that rally, her followers vandalized my home by spray-painting obscenities,” the mayor alleges.

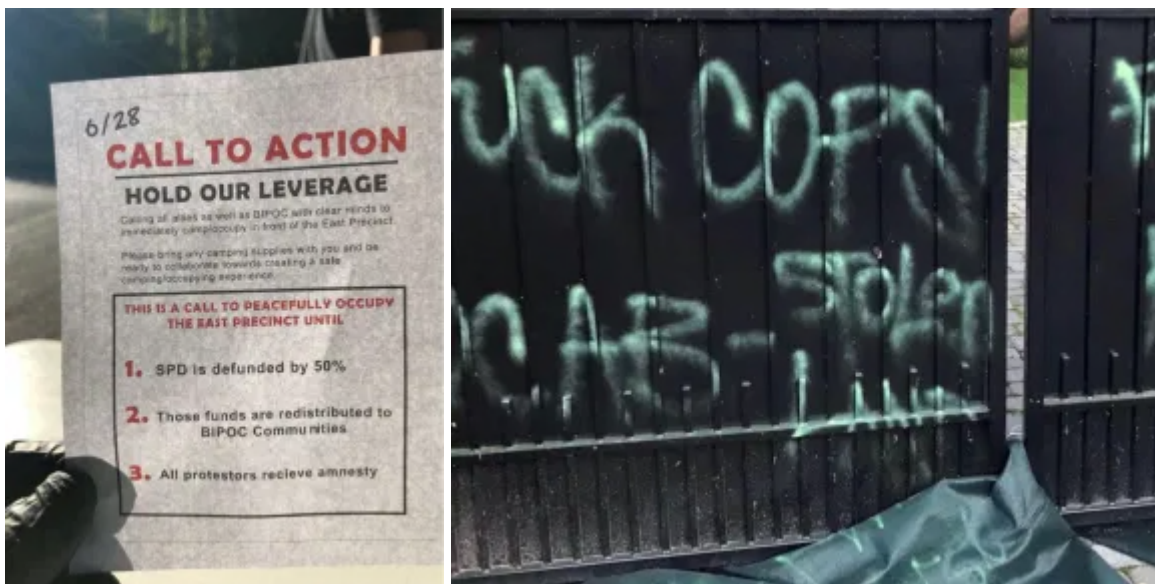
CHS reported on [the Sunday march for Black Lives Matter goals including a 50% cut to the Seattle Police budget](#) organized by the **Seattle Democratic Socialists of America** and including **Socialist Alternative**, the Sawant-led political group that has helped the veteran politician build a deep and active support base in the city and beyond.

Durkan’s roster of allegations stretch back beyond the weekend. They begin with issues first reported in early 2019 of documents showing [the power of the Socialist Alternative organization](#) in Sawant’s City Hall dealings. “According to the documents, the National Executive Committee and the Seattle Executive Committee of the Socialist Alternative party had authority over staffing decisions for the City Council office,” the Durkan letter reads.

The mayor also attacks another Sawant action during the BLM protests when she provided access to Seattle City Hall [for a massive demonstration to briefly occupy the building](#). “Our fight is not just against the police, our fight is for systemic change,” Sawant said that night during the rally inside the building. Sawant used “her official position” to give “access to City facilities to admit hundreds of individuals at night into City Hall when it was closed to the public because of COVID-19 and failing to follow the City’s COVID-19 precautions for the visitors,” Durkan, a former federal prosecutor, alleges. “Her actions put the safety of individuals and City workers at risk, and it led to janitorial staff making complaints about the incident because of safety concerns.”

The mayor alleges Sawant has used her “official office and equipment to promote and raise money” for [the Tax Amazon ballot initiative](#) and to encourage people to “to illegally ‘occupy’ City property” at the East Precinct. The letter comes as city workers [began removing some barriers](#) Tuesday morning around the camp.





The letter dated June 30th now sits with Gonzalez office. We've asked for details on any response or next steps and will update when we hear back.

Sawant's office has also yet to respond to the letter. Her office has overcome past complaints including [a complaint dismissed last year](#) by the **Seattle Ethics and Elections Committee** over the Socialist Alternative influence allegations. She also faced a similar complaint earlier this year [over the Tax Amazon initiative](#).

Sawant is in the midst of her third term leading **District 3** serving Capitol Hill and the Central District on the council. The Socialist Alternative incumbent posted another victory for the movement last fall [as Sawant overcame historic spending](#) by the business community and large companies like **Amazon** and **Expedia** to unseat progressive candidates in Seattle. "Our movement has won our socialist office for working people," she said. "The election results are a repudiation of the billionaire class...and the relentless attacks and lies...and working people have stood up and said Seattle is not for sale!," Sawant said in her victory speech.

A copy of the Durkan letter is below.



**City of Seattle**  
Mayor Jenny A. Durkan

***TRANSMITTAL VIA E-MAIL***

June 30, 2020

Council President M. Lorena González  
Seattle City Council  
600 Fourth Ave. 2nd Floor  
Seattle, WA, 98104

Dear Council President González:

The City's residents and businesses expect us to work on many important issues together, including unprecedented challenges, such as a global pandemic that is worsening in our city, an economic downturn that could become the worst economic event in our city's history, and a civil rights movement in our streets. The public deserves to see their government working together to resolve differences and face these challenges.

As leaders of the City, it is incumbent upon all of us to bring people together in one of the City's most challenging times. However, I have deep concerns about the continued actions of a Councilmember that I am requesting that you and I completely respect that any of us may disagree on policy is attribute to a robust public debate. However, policy should not be used to essentially use their position in

**UPDATE 3:05 PM:** Here is the full response from Sawant's office:

**Response by Councilmember Sawant to Durkan Attack on Our Office – June 30, 2020**

Mayor Jenny Durkan's establishment has utterly failed working people and communities of color in this city. She bears responsibility for a torrent of violence by Seattle police, including the use of brutal weapons like tear gas and rubber bullets against the Black Lives Matter protest movement. Under her watch, eight community members have been killed at the hands of Seattle police, with zero officers prosecuted.

Bankrolled by corporate cash in her election campaign, Durkan has used her position to doggedly protect Amazon's corporate tax haven while working people shoulder the overwhelming burden of society. She has just declared budget cuts of nearly \$300 million, which will only exacerbate human suffering, especially in communities of color, dishonestly claiming that the cuts are "unavoidable."

This Mayor has no standing whatsoever to now disingenuously call for "the urgent need for government to work together."

Socialist Alternative and my Council office are proud to have marched, rallied, and organized with thousands of community members and activists in recent weeks to demand #JusticeForGeorgeFloyd, #BlackLivesMatter. Our movement is demanding racial and economic justice, long withl leader currently is Mayor Durkan.



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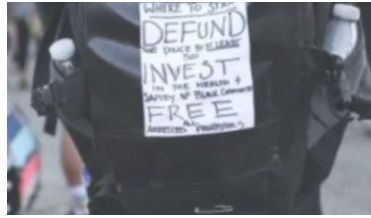
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#defundSPD: Going it alone, Sawant to unveil her proposal for immediate 50% cut to Seattle Police budget -- UPDATE

Thursday, July 30, 2020 - 8:19 am  
In "News, etc."



Demonstrators take their message to Chief Best's home as Seattle City Council looks at smaller 2020 cuts to start process of #defundSPD

Monday, August 3, 2020 - 12:59 pm  
In "News, etc."



Protest march, Sawant take #defundSPD budget fight to Durkan's doorstep

Monday, June 29, 2020 - 3:18 pm  
In "News, etc."

This entry was posted in [News, etc.](#) and tagged [city hall](#), [district 3](#), [politics](#) by [jseattle](#). Bookmark the [permalink \[https://www.capitolhillseattle.com/2020/06/after-defundspd-speech-in-front-of-her-home-durkan-calls-for-city-council-to-investigate-expel-sawant/\]](https://www.capitolhillseattle.com/2020/06/after-defundspd-speech-in-front-of-her-home-durkan-calls-for-city-council-to-investigate-expel-sawant/) .



About jseattle

Justin is publisher of CHS. You can reach him at [chs@capitolhillseattle.com](mailto:chs@capitolhillseattle.com) or call/txt (206) 399-5959. Follow [@jseattle](#) on Twitter or be [best pals](#) on Facebook.

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9 THOUGHTS ON "AFTER #DEFUNDSPD SPEECH IN FRONT OF HER HOME, DURKAN CALLS FOR CITY COUNCIL TO INVESTIGATE, EXPEL SAWANT"



CiaoJenny

on [Tuesday, June 30, 2020 - 12:48 pm](#) said:

This reminds me of Trump's letters to media to avoid dealing with reality. Not everyone who was at the march for Charleena Lyles was there because of Sawant. So, does the Mayor have proof it was a Sawant acolyte who "violated" the sanctity of her fence? Or is the mayor – who was perfectly fine gassing an entire neighborhood for a week and lying about it – going to start lying about this as well?



Nora

on [Tuesday, June 30, 2020 - 1:06 pm](#) said:

Mayor Durkan took office on November 28, 2017. Charleena Lyles was not killed on her watch.



Paul

on [Tuesday, June 30, 2020 - 1:11 pm](#) said:

It would benefit so many people and different communities within D3 for the council to expel her.



C Doom

on [Tuesday, June 30, 2020 - 1:12 pm](#) said:

Sawant won D3 with 51% of the vote, after Amazon's idiotic funding to Orion got publicized 2 weekends before the election, and DON'T LET AMAZON BUY CITY HALL posters blanketed Broadway Ave, 12th, Pike and Pine. Up until then, Orion had been leading by as much as 58% in early voting.

Without the "October Surprise" Amazon mistake (or tbh, Orion's non-strong response to it) Sawant may well have been defeated.

Her followers love to believe they have a solid mandate. They do not. 51% on a late-breaking fluke/mistake by Orion and Amazon does not equal unbeatable or resounding support for Sawant.



democracy is dying

on [Tuesday, June 30, 2020 - 1:17 pm](#) said:

CM Sawant won, Orion lost. IT doesn't matter if the margin was 1 vote or 1 million. That's how democracy works. DEAL WITH IT.



democracy is dying

on [Tuesday, June 30, 2020 - 1:14 pm](#) said:

Attempting to eliminate a democratically elected CM because they disagree with your ideology is a fascist move plain and simple.



**Adam**

on [Tuesday, June 30, 2020 - 1:20 pm](#) said:

Sawant's irresponsible behavior (for many years) goes beyond just ideology.

Sadly, this move will just further her persecution complex and endear her even more to her followers.

She's literally the left version of Donald Trump. She was rocking his playbook years before he even got into politics. Maybe he studied her.



**Nora**

on [Tuesday, June 30, 2020 - 1:26 pm](#) said:

Yet Sawant is trying to unseat the mayor, which will mean Gonzalez becomes mayor. Convenient, eh?



**Nora**

on [Tuesday, June 30, 2020 - 1:24 pm](#) said:

So the neighborhood was about to finally get its streets back and Sawant puts out a call to action to occupy the precinct. Then the people camping in front of the precinct doubles overnight. Thank your CM for the fact that this bullshit wont be over any time soon. And thank CM Sawant for co-opting a movement and calling it her own (once again), for political purposes, and regardless of the loss of life.

# EXHIBIT F

Local Politics  
**The Seattle Times**

# Durkan says Sawant should be investigated for 'contemptuous' behavior during protests as City Council closes in on big-business tax

June 30, 2020 at 12:14 pm | Updated July 1, 2020 at 7:52 am



**1 of 4** | Seattle Councilmember Kshama Sawant talks Tuesday about the "Tax Amazon" campaign that has collected enough signatures to qualify for the November ballot. Seattle Mayor Jenny Durkan is asking... (Steve Ringman / The Seattle Times) **More** ▾





By [Daniel Beekman](#) 

*Seattle Times staff reporter*

Seattle Mayor Jenny Durkan is asking the Seattle City Council to investigate Councilmember Kshama Sawant for taking part in a Black Lives Matter protest march to Durkan's home and for other actions, noting the council may expel a member "for disorderly or otherwise contemptuous behavior."

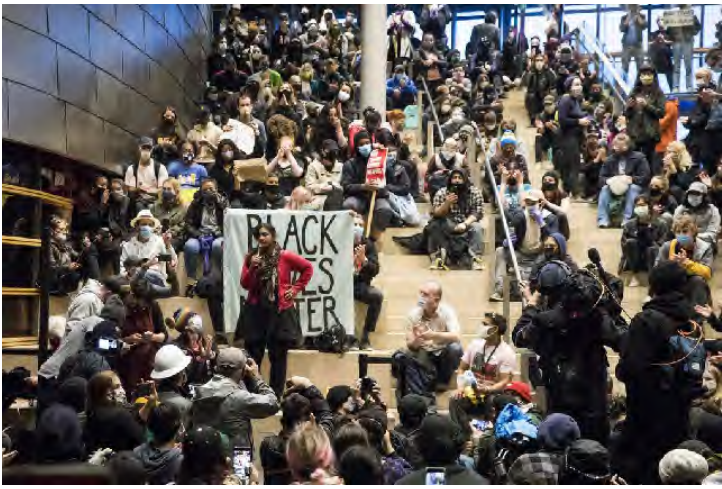
Durkan made her request public [in a letter](#) to Council President M. Lorena González on Tuesday, shortly before Sawant joined "Tax Amazon" campaign supporters for a news conference outside City Hall to announce the campaign has collected about 27,000 petition signatures — enough to qualify their proposal for the November ballot if the council doesn't pass a similar tax on Seattle's largest corporations.

The council's budget committee is poised to vote as early as Wednesday to establish a tax on big businesses, [championed by Councilmember Teresa Mosqueda](#), that could underwrite \$86 million in coronavirus relief this year and that could raise as much as \$200 million per year in the long term for affordable housing, business assistance and community development.

Asked about Durkan's letter at the news conference about the potential ballot measure, Sawant criticized the mayor for allowing the Police Department to tear-gas people protesting police killings of Black men and described the mayor's letter as "an attack on the Black Lives Matter movement."

In her letter, Durkan wrote that Sawant should be investigated for several actions, such as opening City Hall to protesters on the evening of June 9 and taking part in [the march to Durkan's home](#) on Sunday.

Durkan's letter said City Hall was closed to the public because of the coronavirus pandemic and by opening the building, Sawant "put the safety of individuals and city workers at risk." City Hall hosts an overnight homeless shelter that was open during the pandemic until May 30, when it was closed due to damage sustained during protests; it reopened on June 22.



Councilmember Kshama Sawant speaks to demonstrators inside Seattle City Hall June 9. (Amanda Snyder / The Seattle Times)

The mayor's letter said Sawant led the Sunday demonstration. Sawant took part but did not organize the march, which began near the apartment where Charleena Lyles was fatally shot by police in 2017 and which partly focused on demands outlined by Lyles' relatives, the council member said Tuesday.

"She and organizers knew that my address was protected [under the state confidentiality program](#) because of threats against me due largely to my work as U.S. Attorney," wrote the mayor, who previously served as Seattle's top federal prosecutor. "All of us have joined hundreds of demonstrations across the city, but Councilmember Sawant and her followers chose to do so with reckless disregard of the safety of my family and children."

The mayor cited Article IV, Section 4 of the [City Charter](#), which says the council has the authority "to punish its members and others for disorderly or otherwise contemptuous behavior in its presence, and to expel for such behavior in its presence any member by the affirmative vote of not less than two-thirds of its members."

Sawant also should be investigated for [involving her political organization](#), Socialist Alternative, in staffing decisions for her council office; for using her office [to promote](#) the Tax Amazon ballot measure; and for urging protesters to occupy the Police Department's East Precinct where they've been camped out for weeks, Durkan wrote Tuesday.

"I completely respect that any of us may disagree on policy issues, sometimes strongly," the mayor wrote. "However, policy disagreements do not justify a council member who potentially uses their position in violation of law or who recklessly undermines the safety of others, all for political theatre."

González didn't comment Tuesday.

The Seattle Ethics and Elections Commission last year dismissed complaints against Sawant related to Socialist Alternative. It and the Washington State Public Disclosure Commission [have open enforcement cases](#) related to Sawant and the Tax Amazon campaign.

Durkan's letter said Sawant encouraged people at Sunday's march to occupy the East Precinct "at a time the city has been trying to de-escalate the situation and ask individuals to depart because of violence in the area" [known as the Capitol Hill Organized Protest](#).

There have been [four separate shootings](#) in the vicinity in the past two weeks, killing a 19-year-old and a 16-year-old and injuring four people, including a 14-year-old. Sawant and González said Monday they didn't think the protest area should be blamed for the violence. In 2019, the police investigated three homicides on Capitol Hill, spread months apart.

The mayor attached to her letter a photo of a flyer, apparently from Sunday's march, calling for people to "camp/occupy in front of the East Precinct." Sawant's name is not on the flyer.

Durkan and Sawant have long been at odds, and the council member earlier this month [called on the mayor to resign](#) over the Police Department's militaristic response [to the recent protests](#). "The City Council may choose to ignore and dismiss [Sawant's] actions, but I think that undermines public confidence in our institutions," Durkan wrote Tuesday.

At the Tax Amazon news conference, Sawant said she had just learned about the mayor's letter but slammed Durkan for allowing police to use "barbaric weapons" against protesters. The council this month passed a law, sponsored by Sawant, banning Seattle from using crowd-control weapons like tear gas.

The Rev. Robert Jeffrey, a pastor from New Hope Missionary Baptist Church in the Central District who participated in the Tax Amazon news conference, said he was "shocked and appalled" at the mayor's move, arguing Durkan is trying to curb the racial and social justice movement by painting Sawant as a criminal, like opponents did to civil rights leaders during the 1960s.

In a written statement later Tuesday, Sawant again criticized Durkan's response to the protests. "Our movement is demanding racial and economic justice, long withheld by a pro-corporate political establishment, whose leader currently is Mayor Durkan," she wrote.

She added, "While her words are directed at me ... I don't take it personally. In reality, this is an attack on working people's movements, and everything we are fighting for, by a corporate politician desperately looking to distract from her failures of leadership and politically bankrupt administration."

In a statement about Durkan and Sawant going after each other, Councilmember Lisa Herbold said, "Can we call it a draw and get back to focusing on passing progressive revenue, redesigning community safety and investing in lifelines to help Seattle households recover from lost jobs?"

While Durkan's letter stirred the political pot Tuesday, the council's budget committee meeting Wednesday could prove equally or more consequential.

Five of nine council members — Mosqueda, González, Herbold, Andrew Lewis and Dan Strauss — have declared support for the plan that Mosqueda is calling "JumpStart Seattle." It would tax pay of employees making at least \$150,000 per year, excluding companies with annual payrolls under \$7 million, to address the multiple crises Seattle is facing: a long-running housing and homelessness emergency, COVID-19 economic pain, a massive budget gap and widespread inequality.

Two of their colleagues — Debora Juarez and Alex Pedersen — have expressed reservations, suggesting voters should decide whether to establish a new tax.

But Sawant and Councilmember Tammy Morales can also be counted as votes for Mosqueda's plan. They teamed up earlier this year to propose a tax on pay of all employees at large companies, saying it could raise \$500 million a year, and now are pushing to increase the amount JumpStart Seattle would raise.

The Tax Amazon campaign is prepared to put a \$300 million-per-year tax on the November ballot unless the council does what Sawant and Morales are calling for, organizer Eva Metz said Tuesday. That the campaign has been able to collect 27,000 signatures in the midst of the COVID-19 pandemic shows how committed many supporters and voters are to the concept, Metz said.



There are still opponents: Some business leaders in recent weeks have repeatedly warned the council against enacting a new tax as businesses try to pull through the pandemic. Durkan opposed the Sawant-Morales plan and has been noncommittal on Mosqueda's plan.

"The local economy is cratering at a level we haven't seen since the Great Depression," the Downtown Seattle Association said Tuesday. "We need our local leaders to plan for recovery, not more plywood."

But seven of nine council members — enough to override a mayoral veto — appear ready to pass a big-business tax. It was only two years ago that Durkan and the council, under intense pressure from corporate critics like Amazon and many voters, [repealed](#) a \$47 million per-employee head tax they had approved less than a month before.

"This is exciting," said Katie Wilson, an activist with the Seattle Transit Riders Union who lobbied for the head tax in 2018 and who has been pushing the council to try again. "I think we're in a really strong position."

City Hall politics may have changed. In last year's [council elections](#), Herbold, Lewis, Strauss, Sawant and Morales all defeated candidates backed by Amazon. Mosqueda held talks with many business leaders while working on her proposal and Wilson said she thinks the COVID-19 economic recession and the Black Lives Matter protests also have altered the picture by "making it obvious to people how deep the need is" for housing and social services.

In 2018, concerns about City Hall spending loomed large. "This time, I think the momentum of popular opinion is on our side," Wilson said.

**Daniel Beekman:** 206-464-2164 or [dbeekman@seattletimes.com](mailto:dbeekman@seattletimes.com); on Twitter: [@dbeekman](https://twitter.com/dbeekman). *Seattle Times* staff reporter Daniel Beekman covers Seattle city government and local politics.

 [View 930 Comments](#)

# EXHIBIT G

# Concerns Regarding Worsening Situation in the Seattle Leadership

Hi EC,

For the last months, Calvin, Adam, and I have made a sincere effort to try to move towards a healthy collective leadership in the Seattle Executive Committee (SEC) and in Seattle generally, and to try to rebuild from the polarizing effects of the conflicts earlier this year. While we did not expect an easy path, we had hoped that all SEC comrades would approach this with the seriousness and urgency that it deserves.

I am writing this letter to register that in my view the situation is getting worse, rather than better, due to highly irresponsible behavior by SEC comrades. There have been several recent events which I will report, which unfortunately appear to speak to ongoing problematic methods that need to be addressed.

## **New Rumors about a Lack of Accountability by the Council Office**

It has come to my attention, reported to me by several different Seattle branch members in recent weeks, that new rumors are being spread maligning the Council Office and questioning its accountability to the democratic structures of the organization. It is clear from the details of the rumors that the ultimate source would have to be SEC members. Since that time, there has been confirmation of some of the sources, as I will explain below.

There are multiple specific rumors. I have now heard from a number of Branch Committee (BC) members that there is an insinuation that the Affordable Housing Alliance (AHA) coalition, and its inaugural meeting, were undemocratically created by the Council Office without oversight of the SEC. A second accusation is that our recent vote on the appointment to the vacant City Council position was done undemocratically without oversight of the structures of the organization. A third is that decisions around this year's People's Budget have also been made unaccountably by the Council Office without SEC oversight.

Philip has admitted in the SEC that he registered concerns about our AHA coalition to non-SEC comrades, though he did not explain to whom. After we heard through other members, Ty admitted to us that he raised his concern to a branch organizer, Colin, about our vote on the appointment to the vacant City Council position, which then rapidly spread to the rest of Colin's BC and beyond. The source of the People's Budget rumor is unclear, but it's hard to imagine the details reported could come from a non-SEC member.

All of this represents a highly irresponsible doubling down on the earlier accusations, from this Spring, against the Council Office and me of a lack of accountability, only now no longer restricted to NC members, but being raised with a wide layer of BC members and fulltimers in the Seattle organization. James and Rebekah, who work parttime and fulltime, respectively, in the Council Office have both reported these rumors. There is a real danger of these irresponsible actions seriously damaging morale or even creating a factionalized situation in our City Council office.

Rebekah informed Adam recently that these rumors are quickly becoming widespread among branch members.

I will further explain the rumors and facts of the situation below.

### **Affordable Housing Alliance (AHA) and People's Budget**

The most common example being cited in the new rumors is the recently launched 2017 People's Budget. Seattle members have been told that the Council Office did not have proper discussions within the SEC about whether the branches should orient towards the People's Budget, and that the Council Office essentially steamrolled its way on this issue, and did not give branches the opportunity to participate in the decisions.

In reality, the reason there was a delay in going to the City Committee and the branches with the People's Budget ideas was that Philip and Ty on the SEC pushed back hard against the idea of doing a People's Budget this year (we have held one every year since winning the City Council seat), or if we did do it, to do it in a small way with the Council Office and without involving the branches.

The perspectives put forward were that there wasn't much room for SA to play a leadership role during this year's budget season, that we were crowded out by the Katie Wilson-dominated liberal activist layer. Philip even suggested that we should dissolve our AHA coalition and effectively leave the current organizing around housing and homelessness issues in the hands of Katie Wilson and other Housing for All Coalition leaders (the liberal reformist activist layer). It was only because of Calvin, Adam, and my insistence that the People's Budget went ahead.

These are tactical questions and of course need to be debated, and in general, we should not engage in internal point-scoring. But what stands out to me is that branch members are being told (likely by Philip and/or Ty) that the Council Office is not communicating and didn't involve the larger membership on AHA and the People's Budget, even though SEC decisions were in fact stalled by Philip and Ty, as part of their larger pattern of resistance to proposals made by the Council Office. For what it's worth, the Council Office's proposals to prominently fight for the People's Budget, and lead the way on 'Stop the Sweeps' of homeless people and 'Progressive Business Tax' to fund housing and services have been proven completely correct so far. Council comrades skillfully pushed back against the liberal activist leaders by winning over rank-and-file activists, forcing two Councilmembers (Mike O'Brien and the new appointee we voted for, Kirsten Harris-Talley) to support the demands. We are clearly succeeding in using our People's Budget and Stop the Sweeps proposal to energize and mobilize, and are getting a huge echo as well as media coverage. Whether we can win the demands outright will depend on the strength of the campaign in the next few weeks, but the main goal is clearly already confirmed as a decisive success.

This recent attempt to oppose broader branch involvement in the Council Office work is only the latest in a series. There has unfortunately been a longstanding practice by the Party-Building Team (PBT) (before Ty arrived) of pushing back against branch involvement. SEC members on the PBT have asserted that branches are not excited about the Council work, have other more politically important things to do, that engaging in opportunities opened up by our Council



position is not politically educational enough, and that it's hard to motivate members to take an interest in the Council work.

The reality is quite the opposite, and we have heard from many BC members in this regard, who have wondered why branches are not asked to be more involved. Interestingly, one of the reasons cited at a recent SEC meeting unwittingly by Ty, as to why City Committee (CC) members should not see a document listing possible roles for branches in the People's Budget movement, was that he worried "they will be excited" about the People's Budget, and presumably it would be hard to hold them back.

### **Vote on Appointment to Vacant Council Position**

Another new example of accusations against the Council Office is something that Ty himself has admitted: he recently talked to Colin, a very new branch organizer and unconsolidated member, and complained that he (Ty) found out about the Kirsten Harris-Talley vote in the media, and that he (Ty) was frustrated that the Council Office has had a record of not communicating properly, and that that has been a problem for the SEC on an ongoing basis. Colin later raised this with his fellow-BC members, and since my last conversation with Ty, I have heard the same rumor being repeated by several CC members and CC invitees.

I had in fact requested at the two SEC meetings prior to the vote that the topic be included in the SEC agenda. Unfortunately, those two meetings were each five and six hours long (!), and the topic was never addressed. Further, as was reported to SEC comrades, the vote on the appointment to the vacant City Council position was a politically very tricky, fast-changing issue with consequences if we made the wrong decision. It required us to be agile, and did not offer us any avenue for live consultation with the SEC - we had to make a final decision in the space of the last half hour right before the vote. Events since then have fully vindicated the decision. Not only was the vote proven correct in retrospect, our Council Office worked extremely well throughout the appointment process, building links with the best activists of the People's Party, totally upending backroom plans to appoint establishment candidate John Okamoto, and on top of that requiring all candidates to answer to a public community forum (for the first time in Seattle City Council history of temporary appointments), because of a resolution we forced the Council to pass.

After I found out about the rumors, I asked Ty, do you have disagreements with the decision to vote for Harris-Talley's appointment, or with how we politically presented our vote? Ty said he had no disagreements. Danny B. informed me that when Philip complained to him about the same thing, Danny asked Philip if he had any disagreements with the decision to vote for Harris-Talley. Philip also said he didn't have disagreements.

My question is, if SEC comrades do not have any political disagreements, why are they making such accusations about the Council Office? None of these specific concerns were in fact registered with me, or even questions asked about the process, before the rumors began to spread. Lastly, even if the comrades did have disagreements, it would still be extremely concerning to go immediately to the broader membership with such loaded accusations without fully airing them first on the SEC.

### **Consequences of Accusations about the Council Office**

It is all the more astounding that these accusations are happening at the same time we are tasked with trying to repair the broken Seattle leadership, in the heat of the number one national priority of the Minneapolis election campaign, and with two lawsuits hanging over us.

When I confronted Ty recently about this in a meeting between Calvin, Ty, and myself on Oct 17, he expressed regret about his individual comments to Colin, but he also tried to portray it as somehow not a big deal. Worse, he continued with his (ongoing) accusation that the Council Office is systematically lax in communicating to the SEC, and that it does not consistently incorporate the SEC in important decisions, in spite of a mountain of evidence to the contrary.

This is a real problem, as I have quite clearly explained to Ty and Philip multiple times. I completely reject the idea that the Council Office is failing - in any way - to communicate to the SEC, or to be accountable to the SEC and the organization. As SEC comrades should be able to admit, Council comrades take great pains to include and consult the full SEC. We err on the side of taking political questions to the SEC. There have been many instances when I have personally insisted that Council comrades send advance notice to the SEC to make all leading members aware of a given political situation. But realistically, we cannot always inform the SEC of every detail or involve comrades on every question.

The comrades' idea of "accountability" for the Council Office appears to be only explainable as an idea of micromanaging rooted in distrust, particularly striking given the exceptionally high degree of ongoing communication and oversight, given that I am an elected member of the national EC tasked with leading the Council work, and not least given the success and political consistency of that work since we were elected. If there are political disagreements, then no doubt these should be discussed. But for over two years now, I have been at a loss to explain why there has been this continual attack on the Council Office.

As I have said to the EC before, if a CWI elected representative was in fact unaccountable, that would be an extremely serious matter, and would need to be dealt with through our elected structures. Do the comrades realize how damaging their actions can be to our organization as a whole? And how do they hope to consolidate members into SA while at the same time sowing doubts in their minds about the accountability of currently the most prominent public position of SA?

Needless to say, this risks a potentially quite difficult Council Office atmosphere on top of the huge pressures our office already faces. If this situation is not corrected, it will create worse problems for the Council Office work. Failure to correct this would indicate an inability to put the interests of our organization above the comrades' factional interests.

When Calvin and I recently met with Ty, he said that he agreed the political differences in our organization do not justify the damage to our organization posed by an ongoing faction in the US section. Yet, that is precisely what the comrades appear to be developing.

To take another recent example, SEC members who are not on the PBT were not made aware of a fulltimer study group, and only select non-PBT fulltimers (like Rebekah) were invited. Calvin, Adam, and I were completely unaware of this study group, and know about it only because of social media posts by comrades. To my knowledge, there have been no SEC

discussions about fulltimer study groups, what should be discussed, and who should attend them.

When Danny B was just in Seattle, Stephan told Kailyn that she shouldn't trust the IS's motives in their discussions with her. The question here is what do the comrades think they are doing when they convey the impression that the IS, the majority of the EC, and the Council Office are not to be trusted? That even a discussion with an IS member is somehow suspect?

## **Conclusion**

Aside from everything else, my most urgent appeal to the comrades is that they refrain from bringing their factionalizing further in Minneapolis during the last days of the Ginger campaign. Already, it has been reported to me that criticisms of the election campaign similar to the ones the comrades have made in the EC phone meetings are being raised by other Seattle fulltimers who are currently in Minneapolis. We need all hands on deck right now and we need to maintain a high morale. I hope that can be respected for the remainder of the Ginger campaign.

Kshama

Sent October 28, 2017

# EXHIBIT H

## **IEC RESOLUTION - Also adopted by the National Committee**

Vote by the CWI's International Executive Committee, Dec 2017

Full IEC Members: 41 in favor / 0 against / 1 abstention

Consultative IEC Members: 12 in favor / 0 against / 0 abstentions

Visitors: 16 in favor / 0 against / 1 abstention

*Vote by the US National Committee, Dec 2017*

Full NC Members: 23 in favor, 0 against, 2 abstentions.

Candidate NC Members: 7 in favor, 0 against, 0 abstentions

## **RESOLUTION Adopted by the CWI's International Executive Committee on the US**

This meeting of the IEC recognises the tremendous steps forward taken by the US organisation. This is reflected in the outstanding victories we have conquered in Seattle and more recently the marvellous election campaign in Minneapolis. We also recognise the rapid growth of the organisation which brings with it new challenges to consolidate the new members on a solidly Marxist basis.

The opportunities which exist in the US to build a strong Marxist party are of international importance for the CWI and the working class.

The organisation in the US now has the opportunity to make even further advances and steps forward in the coming period. The development of the US organisation is crucial for the whole International. We appeal to all comrades in the organisation not to conduct themselves in any way that will damage our work or weaken our ability to build the section.

The IEC has had a full day's discussion on the situation which has arisen in the organisation and the differences which exist. We do not think a delegation from the IEC is necessary. The IS will be fully involved in the discussions in the US organisation and will fully report to the IEC on the situation. Having considered all of the issues raised by all comrades the IEC concludes that:

1. **1.** The discussion on differences on political, organisational and methods of party building must be conducted in a structured manner through the established structures of the organisation. It is the IEC's view that current political differences in the organisation don't justify the present factional divisions.
2. **2.** The production of documents as part of this discussion should only be done in the framework of a strictly agreed procedure with a word limit established for each document.
3. **3.** We reject the allegation that comrade KS is in anyway unaccountable or has conducted her work in an unaccountable manner.
4. **4.** The IEC agrees that the running and staffing of

KS's office in Seattle be agreed by the national EC of the organisation in consultation with KS.

5. **5.** We do not accept that the IS or majority of the EC has acted in a manner to be responsible for the divisions which have opened up within the leading bodies of the US organisation. The IEC is concerned about PL and SK's approach to the break-down of relations in the Seattle and national leadership, and hopes they will be open to a reviewing of roles to find a healthy way forward in the organisation.

6. **6.** The IEC urges all comrades to conduct discussions and debates over any differences which exist in a comradely and responsible manner taking into account the need to defend the interests of the US organisation and strengthen it and not to do anything that will damage it.

The IEC is confident that the EC, NC and membership of the organisation will overcome the problems which have arisen and will take the necessary steps to seize hold of the opportunities which exist to build a stronger organisation.

# EXHIBIT I

# Letter from EC to the NC

The next phone NC will take place on Sunday, Feb 18th at 6pm Eastern. It will be a closed meeting, and one of the points on the agenda will be the situation in the leadership. Please try to set aside other meetings for this important discussion.

At the December NC meeting, PL offered to step down as National Secretary. PL reiterated this at a meeting after the NC, and the EC agreed to accept PL's resignation from this position. We are still in the process of discussing PL's role going forward, and we will report fully on this at the NC.

The EC decided to take on Seraphina in the Bay Area and Elan in Boston as full-timers. Elan is needed in Boston because Andy has moved to Minneapolis. This puts a strain on our finances, but we feel these are steps forward that were needed.

With the pressures of our national finances and the proposal to keep the SA staff focused on Seattle limited to five comrades, the EC had to unfortunately decide that Freeman should no longer continue work as a full-timer. The five FTers in Seattle focused on local branch building work are Ty, Kailyn, Jordan, Emily and Sasha. Freeman has continued to be very active in the organization after this decision.

As was agreed by the IEC resolution endorsed overwhelmingly by the NC, the national EC is responsible for making decisions about council staff in consultation with Kshama. Adam Z who manages the office proposed to the EC that Whitney (James K) not continue as a council staff part-timer. The EC and comrades leading the work in Seattle felt Whitney should not be one of the five staff focused on the local work of the branches in Seattle.

Whitney and others have objected to this decision, and written material on this question will be submitted to the NC. This issue can be discussed further at the February 18th NC meeting.

The Seattle City Committee is meeting over the coming weekend of January 27th. This meeting will discuss an NC report and also Seattle structures. EC members from outside of Seattle will be participating as well.

Over the past period, SK has been responsible from the EC for the Bay Area. The Bay Area NC members have asked the EC that SK be taken off of this role. The EC will need further discussion about this, including who can potentially take on this role from the EC.

We have agreed to plans and composition for re-convening the national Party-Building Team. We can discuss this further at upcoming NC meetings.

Comradely,  
Bryan K, for the EC



# EXHIBIT J

## Response to the Letters sent to the NC on 1/21/18

By Philip L and Stephan K, EC members

January 24, 2018

1. Following the discussions at the December meetings of the CWI International Executive Committee and the SA National Committee about the debates in the SA leadership, we hoped that, regardless of whatever disagreements existed, we could move forward in a new and positive fashion in collaboration to build SA and work to begin to overcome the divisions that had regrettably developed in our leadership. We registered the concerns raised about us and take them very seriously. We will continue to reflect on how things unfolded over the last year, on owning our mistakes, not to get defensive about them and work to help the organization to move forward. At the same time, we understood that the organization sees no basis for ongoing faction divisions and also the majority would be asked not to act in a factional way. Unfortunately, we think the majority of the Executive Committee has not acted in this way.
2. We believe we need to write to the National Committee and the Seattle City Committee to register our views in response to the three documents Bryan K sent to the NC on January 21. These documents were sent out without the democratic agreement of the EC. They contain one-sided, incomplete information, and inaccuracies. All three documents were then forwarded by Ty M to the Seattle City Committee members and observers.
3. The first document "Letter from EC + Next Phone NC," signed "Bryan K, for the EC," was not voted on or formally agreed by the EC. We proposed to the EC before it was sent out an amendment to this letter. The amendment was to inform the NC of a minority viewpoint on the EC regarding the recent decisions to lay off Freeman and Whitney. This amendment was to add one sentence "*A minority of the EC thinks that, before laying off full-timers, we should have had a full discussion about other areas of work that we need and can finance full-timers for, such as the the defense campaign against lawsuits.*" (We proposed adding this sentence to the end of the fourth paragraph which starts with "With the pressures of our national finances.")
4. Bryan K responded to this by writing to the EC "I don't think this proposed change accurately reflects the balance of the discussion surrounding Whitney's changed role. I will send out the EC letter without the proposed change and also the material from Whitney and Adam to the NC." Following that Bryan K immediately sent the letter to the NC "for the EC."
5. We agree that the balance of opinion of the EC, i.e. the majority of the EC, does not agree with the our view that, before laying off full-timers, the EC "*should have had a full discussion about other areas of work that we need and can finance full-timers for, such as the the defense campaign against lawsuits.*" Our amendment did not claim that. Our amendment was to inform the NC that a *minority of the EC* has this view.
6. The EC, through majority votes, has every right to take decisions. This includes deciding to lay off Freeman and Whitney. A minority of the EC also has the right to disagree with those decisions and have their minority viewpoint reported to the NC. A majority has the obligation to allow a minority to have its viewpoints heard within the organization.

## **Inaccuracy**

7. The EC took its decision to lay off Whitney on December 15, 2017. This was only eight days after it had received Adam's first letter - not five weeks later as Bryan's introduction and the dating of Adam's letter in the document sent out gives the impression of.
8. The date given for Adam's first letter is incorrectly dated November 7, 2017 in the document sent to the NC and Seattle City Committee. Bryan K's introduction to Adam's letters inaccurately repeats this, saying "the decision not to renew Whitney Kahn's part-time position in the council office in 2018 ... was agreed on by the EC in December 2017. The first letter [from Adam] was emailed to the EC on November 7, explaining in brief the need to make a change to city council staffing and to not renew Whitney's position."
9. In fact Adam's first letter was sent out one month later on December 7, 2017, in the heat of the internal debates that were taking place a few days after the IEC and two days before the start of the December NC meeting.

## **Termination of Whitney's Employment**

10. Adam sent his second letter to the EC on January 21, further explaining the reasoning for terminating Whitney's employment. Bryan K sent it to the NC (and then Ty sent it on to the Seattle City Committee and observers). Does the majority of the EC agree with Adam's letter? Is it only Adam's personal opinion? Unfortunately, the statement sent out by Bryan gives no indication.
11. But it was the EC, not Adam, who took the decision to terminate Whitney's work in the Council office, and the decision to end his employment with SA as well. (Whitney worked as a SA Seattle full-timer starting in December 2014, and since May 2016 part-time for SA and part-time for the Council office).
12. For our part, we have questions about some of the claims Adam makes in his second letter. Furthermore we believe parts of Adam's second letter will unfortunately raise even further doubts and concerns that Whitney was fired because he raised questions and criticisms about aspects of Kshama's work.
13. For example, Adam in his January 21 letter explaining the reasoning for the Whitney's termination says "Most disturbingly, the idea that Kshama or the council office is unaccountable and abuses authority, and the use of AHA and the Harris-Talley vote as supposed examples of that, have been spreading in the Seattle organization. This seems to me a particularly damaging and dangerous outcome of the present internal crisis in Seattle SA." Adam also criticizes Whitney for having the view that "the council office formed AHA, organized the People's Budget, or focused on the stop the sweeps demand in an undemocratic way."
14. Whitney can explain his views about the accuracy (or lack thereof) of these claims. But Adam cites Whitney's supposed views (which echo the "most disturbing" criticisms of Kshama that "have been spreading in the Seattle organization") as one of the reasons Whitney should not continue working in the Council office. This adds further weight to Whitney's contention that he was fired for raising questions and criticisms of the council work - exactly what the EC Majority has so vigorously denied.

15. Whitney as a SA member and an elected member of the Seattle City Committee has every right to hold such views and, if so, would have an obligation to raise his criticisms through the structures of the organization. His political rights and obligations were not eliminated when he started working in the Council office or for SA. It is essential for the democratic integrity of SA that all members and full-timers feel completely free to raise questions or disagreements through the structures of the organization.
16. A full-timer must carry out the decisions of the organization and carry out the work that is assigned to them, regardless of which views they hold. At the same time, they also have a duty to raise their political views through the structures of the organization in a constructive fashion. It is incumbent on the EC, in our view, to go out of its way to remove any suspicion that full-timers face retaliation if they raise criticisms of our public representative or the majority positions of the SA leadership.

### **Discussions with NC Observers**

17. Bryan K states in his introduction to the letters by Adam: “The second, more detailed letter was sent by Adam to the EC on January 21 in response to Whitney’s request for further information on the decision and to a very serious charge made by EC member Stephan Kimmerle in conversations with Seattle NC observers that the decision represents a ‘firing’ of Whitney as ‘political retaliation.’”
18. Bryan’s introduction to Adam’s letters was never circulated to the EC or agreed by the EC. Nor did Bryan inform the EC he would be writing an introduction. EC members did not have any opportunity to raise questions, clarifications, concerns, or amendments before it was sent to the NC and Seattle City Committee.
19. The EC agreed at its December 15, 2017 meeting that NC members could discuss the closed “EC Report” session of the NC with the invited NC observers. This was communicated to the NC by Bryan K in a message on December 15. This was almost nine months after the crisis in the SA leadership had broken out. During those nine months the EC would not allow us to discuss the crisis with the NC observers or other members who are not on the NC, a decision we criticized but respected. In contrast, the EC Majority has not respected this decision to not speak with members outside of the NC about the crisis.
20. Following the EC decision to allow comrades to discuss the “EC Report” session of the NC with NC observers, Stephan had discussions with NC observers in Seattle. Stephan told the comrades who he discussed with that he was in a minority at the IEC and NC, and urged the comrades to speak with EC members from the majority to hear both viewpoints. The full NC material was made available to NC observers to read and judge for themselves. Most of the material was later on also made available to the Seattle City Committee members and observers by the EC (though the majority of the EC refused Philip and Stephan’s request for all the documents to be circulated to the Seattle City Committee).
21. Stephan had every right to speak about all aspects of the crisis, including the fear of political retaliation, and state his views about it. Patrick, Ty and Kailyn already mentioned their fear of this in their letter to the IEC which was circulated to the NC. They wrote, “at this moment it seems the EC majority, the stronger side in this escalating crisis, appears prepared to force through a resolution on its own terms, driving minority comrades out of leadership, out of full-time positions, and other measures to marginalise their influence. Majority comrades have said that they believe things are heading toward a split and this seems to be informing their uncompromising approach.” (We were

informed that Ty and Kailyn recently withdrew that document.)

22. This concern was also alluded to in Patrick's resolution to the NC (which he subsequently withdrew) when it said the EC should "reach mutually acceptable agreement on the immediate organizational issues posed, including at least ... hiring, firing, and roles of full-timers." At the December NC discussion, EC Majority comrades criticized this part of Patrick's resolution. This demonstrates further that concerns about firings of full-timers was an issue that the NC was aware of, and relevant to include in discussions with NC observers. This was even more relevant after the NC meeting when the EC terminated Whitney's employment, a move that Stephan believed confirmed the fears of such measures that had been part of the NC discussion.
23. These concerns were also openly raised on the EC before the EC made its decision to terminate Whitney's employment. The EC first discussed the proposal to terminate Whitney's employment on December 8, 2017, the day after Adam's first letter was sent to the EC.
24. Philip raised in that EC discussion that he hoped that Kshama had properly discussed the criticisms of Whitney's work with him in order to hear what Whitney had to say, and to give him feedback, with the opportunity to overcome problems. Philip also stated that he agreed that Kshama needs a team in her office that worked for her, but it is essential that any staffing changes be done in a way that does not in any way give an impression that Whitney was facing retaliation for raising questions or disagreements with aspects of the council work. Philip proposed clearly to the EC that this could be achieved by keeping Whitney as a SA full-timer even if he did not continue working part-time for the Council office. Philip argued that transferring Whitney from part-time council work (and part-time SA work) to full-time SA work would avoid any possible perception that raising questions or disagreements is not welcome.
25. Finally, Philip raised at the December 8th EC meeting that, before we lay off any full-timers, we should decide if we are going to hire full-timers for the defense campaign against the lawsuits (which would be able to finance itself). At that EC meeting Ty also raised that, before we decide on the composition of the 5 full-timers focused on the Seattle work, we should know who was being considered to replace Whitney in the Council office. (For example, would it be one of the current Seattle full-timers?) These ideas were never properly explored or discussed before Whitney and Freeman's employment were terminated.
26. If the majority of the EC does not agree with a minority, the majority has the right to implement its decisions -- after collective discussions and votes. But that does not eliminate the right of a minority to raise its views internally in the organization, particularly after raising the concerns openly with the EC. The Minority has every right to discuss these issues with the NC members and observers who the EC agreed we could discuss the EC Report session from the NC meeting with.

### **"Request for Further Information"?**

27. Bryan's introduction to Adam's letters says "the second, more detailed letter was sent by Adam to the EC on January 21 in response to Whitney's request for further information on the decision and to a very serious charge made by EC member Stephan Kimmerle in conversations with Seattle NC observers that the decision represents a "firing" of Whitney as "political retaliation."

28. This account gives the impression that Whitney was only asking for “further information on the decision,” while it was the “EC member Stephan Kimmerle” who had raised that “the decision represents a ‘firing’ of Whitney as ‘political retaliation.’”
29. In fact Whitney says in his letter “I believe I was fired by the EC as part of the factional debate, and for raising political questions.” Whitney also writes “This is a dangerous precedent which can have a chilling effect on our internal democracy, especially on other full-timers who might fear if they raise questions or criticisms they will also be fired ... This chilling effect can be damaging even if there is merely the perception that full-timers are fired for having political disagreements ... Any impression that the organization is using such methods of retaliation for raising political concerns ... has a profound chilling effect on our internal democracy.”
30. As comrades can see, it is not only Stephan who criticized the EC’s decision to “fire” Whitney or raised it was done out of “retaliation” for Whitney “raising political concerns.” Nor is it just Whitney, Stephan and Philip who have these criticisms.
31. It is also not accurate to give the impression that Whitney was only asking for “further information on the decision.” His letter is quite clear: “If my lay-off is to be discussed with the National Committee, or if the NC Closed Session or my lay-off is to be reported to the City Committee, it’s at that time that I ask that this document be circulated to the relevant body so that comrades can read it, hear both sides, and make their own independent assessment.”
32. In conclusion, we believe a number of aspects of how this affair was handled continues the undemocratic policy of “locking out” Philip and Stephan from meaningful participation on the EC as Bryan K described it at the December 2017 CWI International Executive Committee meeting. This is not a policy to build a collective leadership, to respect minority views, or to work to overcome the unnecessary divisions in our leadership. It is also a concerning continuation of the pattern of removing comrades from leadership bodies or from areas of work if they express disagreements with our public representative. When our public representative developed political disagreements with Jess, Patrick, Stephan, Philip, and now Whitney, she and another EC member, Calvin, either cut off working relationships with them or developed an uncooperative approach toward them.
33. As our organization grows and increasingly engages in mass work, we will inevitably have more internal debates and disagreements about our analysis of the political situation and the best tactics. We need a democratic atmosphere inside our organization where comrades can raise questions and disagreements with each other, which will help us hash out the best analyses and tactics together. We urge comrades to restart work in a spirit of solidarity and democracy. We are committed to build this organization and will do everything we can to help overcome the internal challenges facing SA.

# EXHIBIT K

Greetings NC members and observers,

Unfortunately, I feel the need to inform the NC of recent actions taken by Stephan and Philip that I believe violate the intent of the resolution passed by the NC and the IEC regarding the internal crisis in the leadership of the US section.

The resolution states **“The discussion on differences on political, organizational and methods of party building must be conducted in a structured manner through the established structures of the organisation.”** It also explicitly “reject[s] the allegation that comrade KS is in anyway unaccountable” and expresses “concern about PL and SK’s approach to the break-down of relations in the Seattle and national leadership”. Finally, it appeals to **“all comrades to conduct discussions and debates over any differences which exist in a comradely and responsible manner taking into account the need to defend the interests of the US organization and strengthen it and not to do anything that will damage it.”**

### **Raising Allegations of Political Retaliation in Violation of Structures**

As comrades are aware, in December two Seattle full-timers (Sasha and Freeman) returned from extended visits to other cities, requiring the Seattle party building team to decide which 5 of the 7 full-timers we would keep on for Seattle party building work. One of the last things I was asked to do by EC comrades before leaving work for the holidays in December was offer my views on who should be on that team of 5, which I did, based on my general assessment of the political strengths and weaknesses of each comrade and their dynamics in relation to the rest of the team. At this time I was also informed that Whitney would not be kept on in his part-time position in the council office in the new year (hopefully comrades have read the documents from Whitney and Adam regarding the reasoning for this decision, which I won’t get into here). I had no concerns about that decision, as it was my understanding that it is the purview of the EC and NC comrades leading the Council work (Kshama and Adam) to make decisions about staffing for that office, and that they need to be free to create a team they have the utmost confidence in to work within the extremely high-pressure, fast-paced, politically complicated environment of City Hall.

Upon returning back to work after the winter holidays, I met with Emily and Ty to discuss our immediate priorities for January. In that meeting, Emily related a conversation she had recently had with Stephan, at his request, in which he raised allegations that Whitney had been “fired” from the council office as “political retaliation” by the EC majority for raising questions and sympathizing with the minority. Emily was surprised that this was being raised in the discussion, and did not share Stephan’s view that Whitney being let go was a factional move. I also learned that Stephan had raised the same allegations with Sasha, who’s reaction was much the same as Emily’s.

Ty and I quickly agreed that it was imperative to talk with Stephan and Philip immediately to register opposition to this allegation being raised with comrades outside of the EC. Ty spoke with Stephan within 24 hours of us learning of the allegation, and other EC members were also informed of what was going on. All EC members except Stephan and Philip agreed that raising such extremely serious allegations with non-EC members like Emily and Sasha without the



knowledge of the EC was a clear violation of the right of the elected structures to organize the discussion around the internal crisis, and also a clear violation of the intent of the IEC/NC resolution, which was to cease the stoking of factional suspicions based on a lack of adequate political disagreement to justify factional behavior.

Stephan and Philip acknowledged holding the belief that Whitney being let go from the council office was political retaliation by the EC majority. They have explained that in their view, since the NC had granted comrades the right to discuss the issues raised in the NC's internal session with NC observers, they had a right to raise new concerns regarding what they perceived to be factional behavior by the EC majority. I do not believe that the NC resolution intended to allow EC members to raise such serious new allegations of factionalism by the EC majority with NC observers without bringing those allegations to the EC and allowing the EC to organize the discussion, as is it's right.

In a discussion with Stephan where I raised these concerns, he raised with me that in his view, the EC majority had undemocratically rushed through the decision to let Whitney go. I learned from discussions with other EC members that, while Philip did raise concerns about procedure and perception, neither he nor Stephan made a case against letting Whitney go, nor did they raise questions to find out more about the City Council comrades' reasons for the decision before beginning to discuss their concerns with non-EC comrades. Adam's letter was sent to the EC on Nov 7, and the decision to let Whitney go was made on December 15th. Philip had raised concerns on the EC, and then with comrades in Seattle, that the decision could be interpreted as factional retaliation by other full-timers who would feel uncomfortable raising questions or disagreements with the majority due to a perceived threat of losing their jobs. Neither Emily nor Sasha had concerns about retaliation or internal democracy relating to Whitney being let go when Philip and Stephan raised these concerns with them. In my view, Stephan and Philip are stoking concerns about retaliation by raising these concerns in the minds of NC observers without notifying the EC, depriving it of the chance to respond or organize the discussion in a responsible way.

The one full-time comrade I know of who does share their concerns is Rebekah, who also works in the council office. Rather than trying to help deescalate Rebekah's concerns by explaining the reasons given by Adam and Kshama for Whitney being let go, Philip and Stephan both added to her concerns, telling her that the decision was indeed factional retaliation without notifying the SEC or EC that they were doing so.

I believe it was inappropriate of Stephan and Philip to raise their concerns about political retaliation by the EC majority against Whitney with members outside of the EC. I believe this violates not only the general democratic rights of our elected bodies to organize discussions on contentious issues, but also the resolution passed by the IEC and NC just weeks before which emphasizes the need to carefully observe the right of our elected structures to organize this discussion and to carefully consider the potential damage to the organization when making decisions about how to conduct discussions on the NC internal session. Spreading serious allegations of "political retaliation" without first discussing with the EC is the opposite of that.

### **Raising Demands Relating to Kshama's Defense Campaign in Violation of Structures**

Another issue I encountered upon returning to work after the holidays was a high degree of concern from Whitney (expressed in a proposal to the SEC and in one-on-one discussions) that the organization was doing nothing to organize a campaign to defend Kshama against the police lawsuit. I explained to him more than once that this lawsuit was absolutely a high priority for the EC, which was energetically discussing with legal experts to start drafting the outlines of a defense campaign, but that the process was taking time due to complicated legal questions and developments, and that to rush to begin a public defense campaign without being clear on the legal risks of such a campaign would only further jeopardize Kshama and our ability to fight the lawsuit. I was unclear as to why he continued to bring this up over and over, apparently not accepting my explanation of the need to wait for direction from the EC.

Then, at our first City Committee meeting of the year on January 13th, during an agenda item where we were supposed to be discussing the political character of our upcoming interventions at MLK Day and J20, Philip made a long contribution chastising the EC for moving too slowly in organizing the lawsuit defense campaign and urged the Seattle CC to move forward in planning for a local, boots-on-the-ground public defense campaign. Ramy and Whitney came in to the discussion to back-up Philip's proposal. This required SEC members to respond and clarify that it was not only incorrect to allege that the EC (which CC comrades are well-aware Philip is a member of) was failing to take the defense campaign seriously, but that pre-empting the EC with a local defense campaign would in fact be dangerously irresponsible. This topic ended up dominating the entire discussion, preventing the City Committee from weighing in on the political character of our citywide interventions on MLK Day and J20.

More than one member spoke with me after the meeting to express confusion and frustration at receiving two different characterizations of the EC's activity from EC members themselves, in addition to frustration that an EC member had raised a controversial point under an unrelated agenda item which violated the right of the CC to organize its own discussions.

I raise all of this out of concern for the organization in the face of what appears to be a doubling down on factional behavior by Philip and Stephan and because I feel the NC has a right to know that the expectations we set at the December meeting are, in my view, being violated. I hope we can find a way to move forward that will minimize the damage to the organization both locally and nationally and allow us to intervene successfully in the huge events and opportunities facing us this year.

Comradely,  
Kailyn (NC elected alternate, Seattle EC member)

# EXHIBIT L

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4 **BEFORE THE SEATTLE ETHICS AND ELECTIONS COMMISSION**

5  
6 In the Matter Of

7 **Councilmember Kshama Sawant**

)  
) Case No. 20-0116-1

)  
) **NOTICE OF CHARGES**  
)  
)

9  
10 To: Councilmember Kshama Sawant and  
11 The Seattle Ethics and Elections Commission

12  
13 Pursuant to Seattle Municipal Code (SMC) §§ 2.04.060.I, 2.04.075, 3.70.100.D, and SMC  
14 4.16.090.F and Seattle Ethics and Elections Commission Administrative Rule 3H, NOTICE IS  
15 HEREBY GIVEN that the Executive Director of the Seattle Ethics and Elections Commission has  
16 reasonable cause to believe that Councilmember Kshama Sawant has committed material violations  
17 of the Seattle Ethics and Elections Codes. The Executive Director sets a hearing in this matter for  
18 March 4, 2020 at 4:00 in Seattle Municipal Tower Room 4080, and hereby charges as follows:

19  
20 Councilmember Kshama Sawant, acting by and through employees of her City Council  
21 office, violated SMC 2.04.300, which bars the use of City facilities to promote or oppose  
22 candidates and ballot measures, and SMC 4.16.070.B.2, which bars the use of City resources for  
23 other than a City purpose, when she posted hyperlinks to materials on her City Council web site  
24 promoting a ballot initiative.

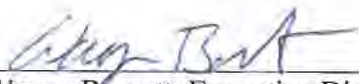
25  
26 In support of these charges, the Executive Director further states that as of this date, the  
27 Councilmember's web site includes the following:

- 28  
29 1. A hyperlink to a Facebook page promoting a January 25, 2020 Tax Amazon Action  
30 Conference which states: "Our immediate task is to file a grassroots ballot initiative

1 this February so that we can begin collecting signatures....” Councilmember Sawant  
2 is listed first among the hosts of the conference. Exhibit A.

- 3 2. A hyperlink to a “Resolution to Tax Amazon and Big Business” which includes the same  
4 language. It also states: “We will need to collect 22,000 valid signatures (likely  
5 30,000+) of registered Seattle voters by late May in order to guarantee a spot on the  
6 November ballot.” Councilmember Sawant is listed as an original member of the  
7 Coordinating Committee. Exhibit B.
- 8 3. A hyperlink to a poster for a February 9, 2020 Tax Amazon Action Conference which  
9 states: “Join us at our second grassroots conference: vote on a ballot initiative to put  
10 forward in 2020, and get organized to win!” The poster includes the City of Seattle  
11 seal and the first organization listed is the Office of Councilmember Kshama Sawant.  
12 Exhibit C.

13  
14 This notice is hereby given this 10<sup>th</sup> day of February, 2020.

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19 Wayne Barnett, Executive Director  
20 Seattle Ethics and Elections Commission  
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**APPENDIX A**

**RELEVANT LAW**

**SMC 2.04.300 provides in relevant part:**

No elected official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition. Facilities of public office or agency include but are not limited to use of stationery, postage, machines, and equipment, use of employees of the office or agency during working hours, vehicles, office space, publications of the office or agency, and clientele lists of persons served by the officer or agency....

**SMC 4.16.070.B.2 provides in relevant part that no Covered Individual may:**

Use or attempt to use, or permit the use of any City funds, property, or personnel, for a purpose which is, or to a reasonable person would appear to be, for other than a City purpose....



Exhibit A

Sign Up



**JAN 25** Tax Amazon Action Conference  
Public Hosted by Councilmember Kshama Sawant and 7 others

Interested

Saturday, January 25, 2020 at 10:00 AM – 2:00 PM PST  
about 2 weeks ago

Washington Hall  
153 14th Ave, Seattle, Washington 98122

Show Map

148 Went · 463 Interested

Share this event with your friends

Details

Our movement is picking up steam! On January 13, we held a powerful launch rally of our Tax Amazon 2020 campaign, with 500 people rocking Washington Hall to Tax Amazon and big business to build social housing!

Now join my council office and a coalition of progressive, labor, and renters' rights organizations — alongside hundreds of working people in Seattle — at the first of our grassroots democratic Tax Amazon conferences. Let's come together as a movement to discuss different proposals for an Amazon Tax, including how much it should raise annually, what it should fund and what tax mechanism we should use, as well as to organize the grassroots strategy needed to win.

During last year's elections, Seattle's working people rejected Amazon's attempts to buy City Hall. We now have a historic mandate for taxing Seattle's biggest corporations to build social housing — a major expansion of social housing — publicly-owned, high quality, affordable, green and energy-efficient homes for working people, built by union labor and an important part of a Green New Deal.

But we know that big business will fight tooth and nail to maintain their corporate tax haven in Seattle. To win our Tax Amazon struggle, we will need to build a powerful movement.

Our immediate task is to file a grassroots ballot initiative this February so that we can begin collecting signatures to get our Amazon Tax on the November ballot.

I hope you can join us.

In solidarity,  
Councilmember Kshama Sawant

See Less

Related Events

Join or Log Into Facebook



Pack City Hall - End Cruel Win...  
1:00 PM PST at Seattle City Hall  
Email or Phone  
157 guests



Password  
Tell City Council: No tax shel...  
1:00 PM PST at Seattle City Hall  
75 guests  
Forgot account?

Log In



South Seattle Debate Watch P...  
Tue, Feb 25 PST at Clock-Out L...  
60 guests  
Do you want to join Facebook?

Sign Up



Tenant Rights Bootcamp - Ca...  
Tue, Feb 18 PST at Ada's Tech...  
50 guests



TRU Potluck Social & Annual ...  
Thu, Feb 20 PST at Seattle Lab...  
72 guests



Share The Cities CARPOOL D...  
Sun, Feb 23 PST at Northwest ...  
18 guests

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

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Exhibit B

# Resolution to Tax Amazon and Big Business - Fund Social Housing and a Green New Deal

**Proposal to Jan 25, 2020 Tax Amazon Action Conference**

*We, the attendees of this first Action Conference of the Tax Amazon movement affirm the following:*

Our city is in the midst of the worst affordability crisis in its history. At the same time, our entire planet is in the midst of a climate crisis that threatens the very stability of human societies around the world. Amazon and other big corporations in Seattle make billions in profits annually, yet pay little to nothing in taxes. Ordinary people - disproportionately people of color - are bearing the brunt of both our housing and climate crises, while continuing to shoulder the overwhelming burden of taxation for the services we desperately need.

In last year's City Council elections, working people roundly rejected Amazon's attempts to buy City Hall while a post-election poll showed 75% support for taxing big business. In the context of deep inequality, Trump's corporate tax cuts, and a highly regressive Washington State tax system, there is growing recognition the billionaires need to pay their fair share!

This is why our Tax Amazon 2020 movement is fighting for a tax on our city's biggest corporations to fund a major expansion of social housing — publicly-owned, high quality, permanently affordable, green and energy-efficient homes for working people, built by union labor — as part of a broader Green New Deal.

We recognize that our struggle is one part of a much larger fight for social justice, housing justice, workers' rights, racial justice, LGBTQ equality, gender justice, and for an alternative to the bankrupt system of capitalism and its threat of climate catastrophe.

Our immediate task is to file a grassroots ballot initiative to Tax Amazon and big business so that we can begin collecting signatures.

We know that big business will fight tooth and nail to maintain their corporate tax haven in Seattle. Winning will require a bold, fighting strategy and message that can mobilize working and middle-class people, tech workers, students, retirees, small businesses, Amazon workers, people of color, the faith community, the LGBTQ community, and all everyday people. It requires we be unafraid to honestly call out Jeff Bezos and Amazon for their tax-dodging and bullying methods. It would be a serious mistake to base ourselves on the idea of collaboration or negotiation with Amazon and big business executives, who will fiercely oppose us as they did in 2018 and again last year. Instead we need to build a strong, united movement. Our message: Tax Amazon and big business, NOT working people!

All major decisions on this campaign will be based on grassroots democracy and made in mass Action Conferences like this one on January 25, 2020, where all members of our movement can debate and vote. At this Conference, we are also electing a Coordinating Committee to carry out the decisions of this Conference and to organize future Action Conferences. The Coordinating Committee will strive for consensus or broad agreement. Coordinating Committee members can send a designated representative in their place as needed.

The initial committee is made up of the following individuals and organizations, fully *accountable to our movement and subject to recall and re-election by future Action Conferences*:



- Kshama Sawant, socialist Seattle City Councilmember (Committee Co-Chair)
- Nikkita Oliver, Seattle People's Party\* (Committee Co-Chair)
- Alec Connon, 350 Seattle
- David Parsons, UAW 4121
- Calvin Priest, Socialist Alternative
- Harris, Democratic Socialists of America
- Violet Lavatai, Tenants Union
- Katie Wilson, Transit Riders Union\*
- Paula Lukaszek, WFSE 1488
- Kathy Yasi, SEIU 925\*
- Scott Morrow, Nickelsville
- Reverend Angela Ying, Bethany UCC
- Logan Swan, Ironworkers 86\*
- Barbara Phinney, 32nd LD Democrats\*
- Margaret Cary, Working Families Party

*\* Personal capacity only, pending decision by the organization*

The Coordinating Committee cannot be accountable in name only — members and their organizations must play an active and committed role in building our movement. The basis of the composition of the Committee is not “shareholder democracy,” where membership is determined by cash commitments, but rather a balance reflective of our movement and representative of our fighting strategy for a strong Amazon Tax.

The Committee will establish an umbrella 501(c)4 or other structure, where funding for joint activities can be directed and managed, accountable and reported to the movement. Individual organizations will continue to fundraise and make separate expenditures to build the movement.

The following features of our grassroots ballot initiative are agreed to by this Action Conference:

- The Amazon Tax will fund social housing — all housing will be union-built, Priority Hire, energy-efficient, and green. On-site child care services will be incorporated where possible.
- The Amazon Tax will fund additional Green New Deal programs — including making existing homes green and helping to eliminate fossil fuels, with work carried out by union labor and Priority Hire. We will explore other GND program options, including transit.
- All cooperatives, nonprofits and small businesses will be excluded from the tax.

The Tax Amazon Action Conference will meet again in February. The Coordinating Committee will seek to file one or more versions of the ballot language in advance of the conference, subject to a final vote of approval by the Conference. We will need to collect 22,000 valid signatures (likely 30,000+) of registered Seattle voters by late May in order to guarantee a spot on the November ballot. If the Seattle City Council passes a strong Amazon Tax, our movement may choose not to turn in these signatures. But with this major outreach effort in front of us, and no guarantee that City Council will act, we cannot afford to wait before filing the initiative and beginning to gather signatures.

We recognize that our movement to Tax Amazon and big business can set a powerful example, and inspire working people around the country looking to fight back.

# ACTION CONFERENCE!

# TAX

# AMAZON

Our movement is growing to Tax Amazon and big business to fund Social Housing and a Green New Deal! Join us at our second grassroots conference: vote on a ballot initiative to put forward in 2020, and get organized to win!

TO FUND  
SOCIAL  
HOUSING &  
A GREEN NEW  
DEAL

SUN  
FEB. 9  
12-4PM  
WASHINGTON  
HALL  
153 14<sup>TH</sup> AVE



SOCIALIST  
ALTERNATIVE



WF



Nickelville

SHARE/WHEEL

TAX  
AMAZON

Exhibit C

# EXHIBIT M





File with: Seattle City Clerk  
 PO BOX 94728  
 Seattle, WA 98124-4728  
 Questions: (206) 684-8500  
 (206) 615-1248  
 polly.grow@seattle.gov

**SEEC FORM**  
**F-1**  
 (7/18)

SEEC DOLLAR CODE	AMOUNT	
(1)	\$0	-- \$999
(2)	\$1,000	-- \$4,999
(3)	\$5,000	-- \$9,999
(4)	\$10,000	-- \$24,999
(5)	\$25,000	-- \$99,999
(6)	\$100,000	-- \$199,999
(7)	\$200,000	-- \$999,999
(8)	\$1,000,000	-- \$4,999,999
(9)	\$5,000,000 or more	

**PERSONAL FINANCIAL AFFAIRS STATEMENT**

**Deadlines:** Incumbent elected and appointed officials -- by April 15.  
 Candidates and others -- within two weeks of becoming a candidate or being newly appointed to a position.

**SEND REPORT TO Seattle City Clerk**

"immediate family" means: (a) a spouse or domestic partner, or (b) a parent, parent of a spouse or domestic partner, child, child of spouse or domestic partner, sibling, uncle, aunt, cousin, niece or nephew, if that person either resides with or is a dependent on the Covered Individual's most recently filed federal income tax return. SMC 4.16.080

Last Name: **Sawant** First: **Kshama** Middle Initial: **V**

Names of immediate family members. If there is no reportable information to disclose for dependent children, or other dependents living in your household, do not identify them. Do identify your spouse or domestic partner.  
 Calvin Priest

Mailing Address (Use PO Box or Work Address) \*  
**112 28th Ave S**

City: **Seattle** County: **King** Zip + 4: **98122**

Filing Status (Check only one box.)  
 An elected or appointed official filing annual report  
 Final report as an elected official. Term expired: \_\_\_\_\_ year \_\_\_\_\_  
 Candidate running in an election: month \_\_\_\_\_ year \_\_\_\_\_  
 Newly appointed to an elective office

Office Held or Sought  
 Office title: **City Councilmember**  
 Position number: **Dist. 3**  
 Term begins: **Jan 2019** ends: **Dec 2023**

**1 INCOME** List each employer, or other source of income (pension, social security, legal judgment, etc.) from which you or an immediate family member, received compensation, in any form, of \$2,400 or more during the period. Include stock options received during the reporting period that had a value of more than **\$2,400**.  
 (Report interest and dividends in Item 3.)

Show Self (S) Spouse (SP/DP) Dependent (D)	Name and Address of Employer or Source of Compensation	Occupation or How Compensation Was Earned	Amount: (Use Code)
S	City of Seattle	City Councilmember	( 6 )
SP	Vote Sawant	Political Director	( 5 )
SP	Socialist Alternative	Political Organizer	( 2 )
			( )

Check Here  if continued on attached sheet

**2 REAL ESTATE** List street address, assessor's parcel number, or legal description AND county for each parcel of Washington real estate with value of over \$12,000 in which you or an immediate family member held a personal financial interest during the reporting period. (Show partnership, company, etc. real estate on F-1 supplement.)

Property Sold or Interest Divested	Assessed Value (Use 1-9 Code)	Name and Address of Purchaser	Nature and Amount (Use Code) of Payment or Consideration Received		
	( )		( )		
	( )		( )		
Property Purchased or Interest Acquired		Creditor's Name/Address	Payment Terms (eg. 20 yrs at 4.3%)	Security Given	Mortgage Amount - (Use Code) Original Current
	( )				( ) ( )
	( )				( ) ( )
All Other Property Entirely or Partially Owned 112 28th Ave S	( 7 ) ( )	Caliber Home, PO Box 24610, Oklahoma City,	30 yrs at	Down Pa	( 7 ) ( 6 ) ( ) ( )

Check here  if continued on attached sheet

**3 ASSETS / INVESTMENTS - INTEREST / DIVIDENDS**

List bank and savings accounts, insurance policies, stock, bonds and other intangible property (including but not limited to stock options) held during the reporting period.

	Type of Account or Description of Asset	Asset Value (Use 1-9 Code)	Income Amount (Use 1-9 Code)
A. Name and address of each bank or financial institution in which you or an immediate family member had an account over \$24,000 at any time during the report period.	Checking Account, Salal Credit Union, PO box 19340, Seattle, WA	( 5 )	( 5 )
B. Name and address of each insurance company where you or an immediate family member had a policy with a cash or loan value over \$24,000 during the period.	Life Insurance, Standard Insurance Company, 10900 NE 8th St, Seattle, WA 98004	( 7 )	( 0 )
C. Name and address of each company, association, government agency, etc. in which you or an immediate family member, owned or had a financial interest worth over \$2,400. Include stocks, bonds, ownership, retirement plan, IRA, notes, stock options, and other intangible property. If you or your immediate family member had decision making authority regarding individual assets/investments list each asset or investment, the value and any income amount. EXAMPLE: If you self-directed an investment account identify each stock or other asset in that account. <b>Stock shall be reported by market value at the time of reporting.</b>		( )	( )
		( )	( )
		( )	( )
		( )	( )

Check here  if continued on attached sheet.

**4 CREDITORS** List each creditor you or an immediate family member owed \$2,400 or more any time during the period. Don't include retail charge accounts, credit cards, or mortgages or real estate reported in Item 2. **AMOUNT (USE 1-9 CODE)**

Creditor's Name and Address	Terms of Payment (eg. 6 years at 5.25%)	Security Given	original	current
Salal Credit Union, PO box 19340, Seattle Wa	4.25%		( )	( 5 )
			( )	( )

Check here  if continued on attached sheet.

**5 NET WORTH** Enter your estimated net worth. Enter Dollar Amount \$ 470,000

**6 All filers answer questions A thru D below. If the answer is YES to any of these questions, the F-1 Supplement must also be completed as part of this report. If all answers are NO and you are a candidate or an appointee to a vacant elective office filing your initial report, no F-1 Supplement is required.**

Incumbent elected officials filing an annual financial affairs report also must answer question E. An F-1 Supplement is required of these officeholders unless all answers to questions A thru E are NO.

- A. At any time during the reporting period were you and/or an immediate family member (1) an officer, director, general partner or trustee of any corporation, company, union, association, joint venture or other entity or (2) a partner or member of any limited partnership, limited liability partnership, limited liability company or similar entity including but not limited to a professional limited liability company? Y If yes, complete Supplement, Part A.
- B. Did you and/or an immediate family member have an ownership of 10% or more in any company, corporation, partnership, joint venture or other business at any time during the reporting period? N If yes, complete Supplement, Part A.
- C. Did you and/or an immediate family member own a business at any time during the reporting period? N If yes, complete Supplement, Part A.
- D. Did you and/or an immediate family member prepare, promote or oppose state legislation, rules, rates or standards for compensation or deferred compensation (other than pay for a currently-held public office) at any time during the reporting period? N If yes, complete Supplement, Part B.
- E. **Only for Persons Filing Annual Report.** Regarding the receipt of items not provided or paid for by your governmental agency during the previous calendar year: 1) Did you, and/or an immediate family member accept a gift of food or beverages costing over \$50 per occasion? N or 2) Did any source other than your governmental agency provide or pay in whole or in part for you and/or an immediate family member to travel or to attend a seminar or other training? Y If yes to either or both questions, complete Supplement, Part C.

**ALL FILERS EXCEPT CANDIDATES.** Check the appropriate box.  
 I hold a local elected office. I have read and am familiar with SMC 2.04.300 regarding the use of public facilities in campaigns.

Contact Telephone: (206) 714 6163 \*  
 Email: kshama.sawant@seattle.gov (work)\*  
 Email: \_\_\_\_\_ (Home) Optional

**CERTIFICATION:** I certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.  
4/15/2020 Kshama Sawant  
 Date Signature

\*CANDIDATES: Do not use public agency addresses or telephone numbers for contact information. Report Not Acceptable Without Filer's Signature



File with: Seattle City Clerk  
 PO BOX 94728  
 Seattle, WA 98124-4728  
 Questions: (206) 684-8500  
 (206) 615-1248  
 Polly.Grow@Seattle.gov

SEEC FORM

**F-1**

SUPPLEMENT  
(7/18)

**SUPPLEMENT PAGE**  
**PERSONAL FINANCIAL AFFAIRS STATEMENT**

**PROVIDE INFORMATION FOR YOU AND ANY IMMEDIATE FAMILY MEMBERS**

Last Name Sawant	First Kshama	Middle Initial V	DATE 04/14/2020
---------------------	-----------------	---------------------	--------------------

**A OFFICE HELD, BUSINESS INTERESTS:** Provide the following information if, during the reporting period, you or any immediate family member

- (1) were an officer, director, general partner, trustee, or 10 percent or more owner of a corporation, non-profit organization, union, partnership, joint venture or other entity; and/or
- (2) were a partner or member of a limited partnership, limited liability partnership, limited liability company or similar entity, including but not limited to a professional limited liability company.

- Legal Name: Report name used on legal documents establishing the entity.
- Trade or Operating Name: Report name used for business purposes if different from the legal name.
- Position or Percent of Ownership: The office, title and/or percent of ownership held.
- Brief Description of the Business/Organization: Report the purpose, product(s), and/or the service(s) rendered.
- Payments from Governmental Unit: If the governmental unit in which you hold or seek office made payments to the business entity concerning which you're reporting, show the purpose of each payment and the actual amount received.
- Payments from Business Customers and Other Government Agencies: List each corporation, partnership, joint venture, sole proprietorship, union, association, business or other commercial entity and each government agency (other than the one you seek/hold office) which paid compensation of \$12,000 or more during the period to the entity. Briefly say what property, goods, services or other consideration was given or performed for the compensation.
- Washington Real Estate: Identify real estate owned by the business entity if the qualifications referenced below are met.

ENTITY NO. 1

Reporting For: Self  Spouse   
 Registered Domestic Partner  Dependent   
 POSITION OR PERCENT OF OWNERSHIP

LEGAL NAME: 15 Now

TRADE OR OPERATING NAME: 15 Now

Officer

ADDRESS:

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION: Activist Organization to raise the minimum wage to \$15/hr

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:  
 Purpose of payments Amount (actual dollars)  
 \$

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:  
 Agency name: Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE  
 Customer name: Purpose of payment (amount not required)

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

Check here  if continued on attached sheet

**CONTINUE PARTS B AND C ON NEXT PAGE**

Name

---

**ENTITY NO. 2** Reporting For: Self  Spouse   
 Registered Domestic Partner  Dependent

LEGAL NAME: POSITION OR PERCENT OF OWNERSHIP

TRADE OR OPERATING NAME:

ADDRESS:

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:  
 Purpose of payments Amount (actual dollars)  
 \$

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:  
 Agency name: Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE  
 Customer name: Purpose of payment (amount not required)

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

Check here  if continued on attached sheet

**B LOBBYING:** List persons for whom you, or any immediate family member, lobbied or prepared state legislation or state rules, rates, or standards for compensation or deferred compensation. Do not list pay from government body in which you are an elected official or professional staff member.

Person to Whom Services Rendered	Description of Legislation, Rules, Etc.	Compensation (Use Code 1- 9)
		( )
		( )
		( )

Check here  if continued on attached sheet

**C FOOD TRAVEL SEMINARS** Complete this section if a source other than your own governmental agency paid for or otherwise provided all or a portion of the following items to you, your spouse, registered domestic partner or dependents, or a combination thereof: 1) Food and beverages costing over \$50 per occasion; 2) Travel occasions; or 3) Seminars, educational programs or other training.

Date Received	Donor's Name, City and State	Brief Description	Actual Dollar Amount	Value (Use Code1-9)
02/14/2	Socialist Alternative, NYC,	Flight to MPLS for KS and CP for SA National Committee	\$ 699.2	( 1 )
3/1/201	Socialist Alternative, NYC,	Flight to London for Socialist Conference	1,137.92	( 2 )
				( )

Check here  if continued on attached sheet

**Information Continued**

**F-1 Supplement**

Name

**ENTITY NO.** Reporting For: Self  Spouse   
 Registered Domestic Partner  Dependent

LEGAL NAME: POSITION OR PERCENT OF OWNERSHIP

TRADE OR OPERATING NAME:

ADDRESS:

BRIEF DESCRIPTION OF THE BUSINESS/ORGANIZATION:

PAYMENTS ENTITY RECEIVED FROM GOVERNMENTAL UNIT IN WHICH YOU SEEK/HOLD OFFICE:  
 Purpose of payments Amount (actual dollars)  
 \$

PAYMENTS ENTITY RECEIVED FROM OTHER GOVERNMENT AGENCIES OF \$12,000 OR MORE:  
 Agency name: Purpose of payment (amount not required)

PAYMENTS ENTITY RECEIVED FROM BUSINESS CUSTOMERS OF \$12,000 OR MORE  
 Customer name: Purpose of payment (amount not required)

WASHINGTON REAL ESTATE IN WHICH ENTITY HELD A DIRECT FINANCIAL INTEREST (Complete only if ownership in the ENTITY is 10% or more and assessed value of property is over \$24,000. List street address, assessor parcel number, or legal description and county for each parcel):

**B LOBBYING:** (Continued)

Person to Whom Services Rendered	Description of Legislation, Rules, Etc.	Compensation (Use Code 1-9)
		( )
		( )
		( )

**C FOOD TRAVEL SEMINARS** (continued)

Date Received	Donor's Name, City and State	Brief Description	Actual Dollar Amount	Value (Use Code 1-9)
			\$	( )
				( )
				( )



# EXHIBIT N

# Seattle City Council Insight

Independent news and analysis of the Seattle City Council. Wordy and nerdy.

---

## Catching up on Sawant's alleged misdeeds

On 05/05/2020 | In [election, ethics](#)

There are several pending allegations of law-breaking against Seattle City Council member Kshama Sawant. Let's get caught up on where they currently stand.

This Wednesday's scheduled meeting of the [Seattle Ethics and Elections Commission](#) (SEEC) has been postponed to May 20, pushing out further a hearing on charges that Council member Kshama Sawant violated the law by using public facilities to promote the "Tax Amazon" ballot initiative.

As SCC Insight [reported](#) in February, SEEC Executive Director Wayne Barnett filed charges based upon Sawant using her office to host events and publish information to organize an effort to get the so-called "Amazon Tax" on the ballot later this year.

[Seattle Municipal Code 2.04.300](#) reads:

*No elected official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition. Facilities of public office or agency include but are not limited to use of stationery, postage, machines, and equipment, use of employees of the office or agency during working hours, vehicles, office space, publications of the office or agency, and clientele lists of*

persons served by the officer or agency; provided, that the foregoing provisions of this Section 2.04.300 shall not apply to the following activities:

A. Action taken at an open public meeting by the City Council to express a collective decision or to actually vote upon a motion, proposal, resolution, order or ordinance, or to support or oppose a ballot proposition so long as (1) any required notice of the meeting includes the title and number of the ballot proposition, and (2) members of the City Council or members of the public are afforded an approximate equal opportunity for the expression of an opposing view;

B. A statement by an elected official in support of or in opposition to any ballot proposition at an open press conference or in response to a specific inquiry; and

C. Activities that are part of the normal and regular conduct of the office or agency.

Sawant knows this well; in fact, every year on her financial disclosure form she is required to re-certify that she has read and understands this ordinance.

<p><b>ALL FILERS EXCEPT CANDIDATES.</b> Check the appropriate box.</p> <p><input checked="" type="checkbox"/> I hold a local elected office. I have read and am familiar with SMC 2.04.300 regarding the use of public facilities in campaigns.</p>	<p>Contact Telephone: ( <u>206</u> ) <u>684 8016</u> *</p> <p>Email: <u>kshama.sawant@seattle.gov</u> (work)*</p> <p>Email: _____ (Home) Optional</p>
<p><b>CERTIFICATION:</b> I certify under penalty of perjury that the information contained in this report is true and correct to the best of my knowledge.</p> <p><u>04/15/2019</u> _____</p> <p>Date Signature</p>	
<p>*CANDIDATES: Do not use public agency addresses or telephone numbers for contact information. <b>Report Not Acceptable Without Filer's Signature</b></p>	

Since the charges were filed, a Public Document Request submitted by SCC Insight has revealed additional documentation of Sawant's use of public facilities — including money — to organize and promote the "Tax Amazon" ballot initiative.

Receipts provided by the Council's financial office document over \$2000 spent by Sawant's office to advertise meetings on January 25 and February 9 to organize a "ballot initiative"; provide food for the meetings; and purchase posters and wood pickets for signs.

To print the document, click the "Original Document" link to open the original PDF.  
At this time it is not possible to print the document with annotations.

*(note: the receipt on page 8 includes several additional unrelated charges, stemming from Sawant's inauguration event on January 13.)*

In addition, emails document Sawant's Council staff — on the clock — [initiating](#), [negotiating](#) and [purchasing](#) ad space, working on the posters, [adding information](#) (including the posters and flyers) to Sawant's official City Council web site, and [organizing the meetings](#).

Sawant responded in a [statement](#) after the SEEC filed its charges in February, in which she says that her understanding was that she was allowed to “*encourage community discussions about a potential ballot initiative, even one that hadn't been drafted or filed*” — understating their role in organizing the Tax Amazon ballot initiative. After charges were filed by the SEEC, SCC Insight sent the same information to the state Public Disclosure Commission for their analysis since Sawant's actions also appear to violate [state law](#) (which are nearly identical to Seattle's laws). In response to the PDC's ongoing investigation, a representative for Sawant [told the PDC](#) that they believe Sawant's actions do not violate either state or city laws. Their main justification for their position is a [1994 ruling](#) by the SEEC. In that ruling, an unrelated third-party was beginning to organize a ballot initiative and inquired with all the Seattle City Council members as to whether they would endorse it. The SEEC found that because the third party had not filed their initiative yet, it was not officially a “ballot issue” and thus Council members were free to comment on it.

Sawant's is a bizarre interpretation of the SEEC's 1994 ruling. There is a clear distinction to be made between commenting on a ballot issue that a third party is organizing, and being the organizer of a ballot initiative oneself. Along those lines, if Sawant's interpretation is to be followed, then it leads to the nonsensical conclusion that a Council member may use city resources to recruit, assemble, and organize a team of people whose mission is to put a specific initiative on the ballot, and as long as they stop using city resources when the first piece of paperwork is filed with the city it's all perfectly legal. They are arguing that organizing to write a ballot initiative, and fundraising and forming a group to gather signatures to get it on the ballot, do not count as “promoting” it and thus are unregulated activities and completely up to the discretion of an elected official.



Poster advertising for an organizing event for the "Tax Amazon" campaign. The first event sponsor in the list is "Office of Councilmember Kshama Sawant," printed with the seal of the City of Seattle ([larger version](#)).

According to SEEC Executive Director Wayne Barnett, the hearing on Sawant's alleged violation won't be on the agenda for May 20. "We anticipate scheduling that matter to take place within 45 days of the lifting of the stay-home order," Barnett said.

However, there is another complaint against Sawant that is likely to be scheduled for adjudication on May 20: late last month, Roger Valdez of Seattle for Growth [filed a complaint](#) with the SEEC alleging that Sawant was violating her oath of office by organizing both a rent strike (encouraging people not to pay their rent) and a "car caravan" protest (in violation of the Governor's "stay home, stay healthy" order).

To print the document, click the "Original Document" link to open the original PDF.  
At this time it is not possible to print the document with annotations.

Barnett quickly dismissed the complaint administratively, saying "I do not think that CM Sawant is in violation of the Ethics Code when she, to quote your letter, 'urg[es] people not keep their legally binding financial obligations and violat[e] the Governor's stay at home order using City of Seattle resources and the logo of the City.'" But Valdez [filed an appeal](#) of Barnett's dismissal, so now all the commissioners will be required to hear and rule on the complaint.

To print the document, click the "Original Document" link to open the original PDF.  
At this time it is not possible to print the document with annotations.



In a separate matter, a [defamation suit](#) against Sawant continues to work its way through the court system. The case was filed by SPD Officers Scott Miller and Michael Spaulding, who shot and killed Che Taylor in February 2016. The facts of the incident are still in dispute and ~~an inquest is still pending~~ (correction: the inquest [concluded](#), largely backing the officers; my bad, I incorrectly recalled that it was one of several that are on hold while King County inquest procedures are being modified), but shortly after the incident Sawant made public remarks about the shooting, saying:

*"This is dramatic racial injustice, in this city and everywhere in this nation. The brutal murder of Che Taylor, just a blatant murder at the hands of the police, show how urgently we need to keep building our movement for basic human rights for black people and brown people. I want to let you know that I stand here both as an elected official, as a brown person, as an immigrant woman of color, and as someone who has been in solidarity with the Black Lives Matter movement, and our movement for racial, economic and social justice. . . . And I am here as an elected official because I am completely committed, unambiguously committed, to holding the Seattle Police Department accountable for their reprehensible actions, individual actions. We need justice on the individual actions and we need to turn the tide on the systematic police brutality and racial profiling."*

In June 2017, after different SPD officers shot and killed Charleena Lyles, Sawant spoke again, reiterating some of her accusations about the Che Taylor shooting:

*"I join the NAACP in demanding such a transparent public hearing. When Che Taylor was murdered by the police, the community and I demanded such a hearing from the Mayor and from Council member Gonzalez whose committee oversees the SPD, but neither the Mayor nor Council member Gonzalez responded. In . . . in light of the horrific killing of Charleena now I again urge . . . I publicly urge the City Council to hold such a hearing. I have also earlier today sent a number of important questions to the SPD.*

*. . . We demand that the City of Seattle appoint an independent committee to review this case . . . with . . . with full public accountability. We cannot rely on the existing process to determine why Charleena was killed because that process has failed Che Taylor . . . that process has failed every person who was killed at the hands of the Police. Sisters and brothers, I will add one more thing for our movement that is standing with Charleena to think about, a deeply unequal society such as ours also implies that the lives of poor and low-income people, black and brown people, homeless people, those who have mental health issues and challenges . . . the system treats our lives as expendable."*

The heart of the lawsuit is the assertion that these comments defamed Miller and Spaulding by painting them as murderers. In her [defense](#), Sawant notes that she never refers to the officers by name, thus casting doubt on whether her remarks were "of and concerning" the plaintiffs — as the law requires the plaintiffs to prove in defamation suits. However, the law does not require the allegedly defamed persons to be named explicitly, [under certain circumstances](#):

*"One who publishes defamatory matter concerning a group or class of persons is subject to liability to an individual member of it if, but only if, (a) the group or class is so small that the matter can reasonably be understood to refer to the member, or (b) the circumstances of [the statement] reasonably give rise to the conclusion that there is particular reference to the member."*

So then the question becomes whether Sawant's statements were so obviously referring to the two officers who shot Taylor that they satisfy the requirements of a defamation suit. The case history for this type of situation takes into consideration the media coverage at the time of the statements and allows plaintiffs to argue that

common knowledge made the reference clear. However, in this case the district court judge found that the plaintiffs had not sufficiently provided evidence that the media coverage and common knowledge would have led people to believe that Sawant was referring to Miller and Spaulding, and dismissed the case. The plaintiffs asked to amend their complaint to add more evidence to make that case, and the judge denied that request.

The plaintiffs appealed their case to the Ninth Circuit Court of Appeals, arguing that the judge erred in ruling that Sawant's statements were convincingly "of and concerning" them, and in denying them the opportunity to amend their complaint. They also argued that the judge has shown his bias toward the defendant and requested that the case be reassigned to a different judge. Sawant, in turn, argued that the Ninth Circuit did not have jurisdiction to hear the appeal, on a technicality.

Last week the Ninth Circuit ruled on the case, and handed down a mixed decision. First, they rejected Sawant's argument that they didn't have jurisdiction over the appeal. Second, they agreed with the trial court that the evidence asserted by the plaintiffs in their complaint did not meet the "of and concerning" standard — but they found that the judge had abused his discretion by not allowing the plaintiffs to amend their complaint. Finally, they rejected the request to reassign the case to a different judge. They sent the case back down to the district court, with instructions to allow the plaintiffs to submit an amended complaint.

To print the document, click the "Original Document" link to open the original PDF.  
At this time it is not possible to print the document with annotations.

So the case lives on, and Officers Miller and Spaulding will get one more chance to make the case that Sawant defamed them.


*I hope you found this article valuable. If you did, please take a moment to [make a contribution](#) to support my ongoing work. Thanks!*

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# EXHIBIT O

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## Tax Amazon Movement: Alleged violations of RCW 42.17A.205, .235, and .240 for failure to register and report as a political committee, or RCW 42.17A.640 for failure to report grassroots lobbying (EY 20; Feb 20)

### Case #65022

**Respondent name:** Tax Amazon Movement

**Complainant name:** Kevin Schofield and Glen Morgan

On February 11, 2020, the Public Disclosure Commission (PDC) received a complaint alleging that the Tax Amazon 2020 may have violated RCW 42.17A.205 for failure to timely file a Committee Registration (C-1pc) and RCW 42.17A.235 for failure to file timely C-3 and C-4 reports.

Staff reviewed the applicable statute(s), rule(s), and the reporting requirements, including the response submitted by the Committee.

Staff found that the Committee failed to timely register and report contributions and expenditures report in a timely manner, as required by law.

Based on these findings, the staff formally warned the Committee for failure to register and file statutory contributions and expenditure reports timely.

Based on the above findings, PDC staff dismissed this matter in accordance with RCW 42.17A.755(1)

**Disposition:** Case Closed with Written Warning (Resolved 08/21/2020)

**Date opened:** 02/13/2020

**Area of Law:** RCW 42.17A.205, RCW 42.17A.235, RCW 42.17A.240, RCW 42.17A.640

#### Case Documents

[65022 Tax Amazon Response.pdf](#)

[65022 Tax Amazon 2020 Complaint Return Letter..pdf](#)

[65022 Tax Amazon Complaint - Kevin Schoefield.pdf](#)

[65022 Tax Amazon Complaint - Glen Morgan.pdf](#)

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