



7  
8

**IN THE SUPERIOR COURT OF WASHINGTON  
COUNTY OF YAKIMA**

9  
10

**IN THE MATTER OF:**

No. 20-2-01135-39

11  
12  
13

**THE RECALL OF JASON WHITE,  
CITY OF YAKIMA DISTRICT 2  
COUNCILMAN.**

**DECLARATION OF DAVID  
BRIGGS**

14  
15

I, DAVID BRIGGS, declare under penalty of perjury in the State of Washington that the following statements are true, based on my personal knowledge.

- 16  
17  
18  
19  
20  
21  
22  
23  
24  
25
1. I am over the age of 18, I am competent to provide testimony in this matter, and I do so based on my personal knowledge.
  2. I am a resident of Yakima, WA, and I reside in the city voting district designated as District 2. Respondent White is the official currently representing my district.
  3. I am a member of local civic groups, along with attorney Liz Hallock.
  4. I am a regular reader of the *Yakima Herald* newspaper for 16 years.
  5. I have personal knowledge of the alleged facts upon which the stated grounds for recall are based.
  6. As detailed in the Petition for Recall, Mr. White's statements on Facebook were re-printed in the *Yakima Herald*.
  7. As detailed in the Petition for Recall, Mr. White's conduct in detracting from the City's

1 efforts to voluntarily impose disease control measures was recounted in the *Yakima*  
2 *Herald* and the *Seattle Times*. I have read all of these articles; these papers have no pay-  
3 wall for COVID-19 coverage.

4 8. I also have seen Mr. White's Facebook posts.

5 9. I am actively involved in the community. I am aware of Mr. White's conduct and his  
6 attempt to interfere with the local and state stay-at-home orders.

7 10. On or about April 13<sup>th</sup>, I joined this effort to recall Mr. White, along with Ms. Hallock.

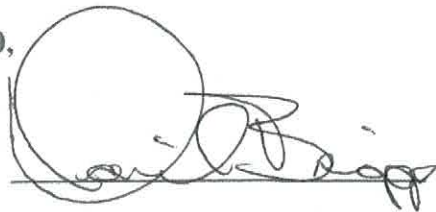
8 11. Ms. Hallock had some concerns about members in the community being harassed on  
9 social media by Mr. White.

10 12. After consulting with the auditor's office, we resubmitted the Petition for Recall, along  
11 with my affidavit of personal knowledge on April 17<sup>th</sup>.

12 13. Ms. Hallock's concerns about Mr. White proved correct when Mr. White posted a copy  
13 of the recall petition on social media, disparaged Ms. Hallock, and disparaged a voter's  
14 genitalia.

15 14. Ms. Hallock submitted a Notice of Appearance on May 6<sup>th</sup> and is currently representing  
16 me in this matter.

17  
18 Executed at Yakima, WA, this 25th of May, 2020,

19  
20  
21 

22 Petitioner David Briggs

23 607 1/2 South 3<sup>RD</sup> STREET  
24 Yakima, WA 98901  
25