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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

In Re the)
A.M. and Other John and Jane Does) No. 09-2 21376 3 SEA
Plaintiffs,) Amended Declaration of
V.) Philip Irvin
City of Seattle)
Defendants.)

I declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. I am the Petitioner herein.
2. I am the author of Public Disclosure Request # 1579.
3. I am a recognized civil rights leader who has fought to prevent discrimination law from being used to discriminate.

4. About eight years ago the City of Seattle (City) excluded the Boy Scouts from their Combined Charities Campaign because they would not admit homosexuals. I got on the Combined Charities Committee and noted that many of the included charities openly only stated that they provided benefits for women, racial minorities or certain racial minorities, or to gays thereby actively advertised that they discriminated against

1 the unselected categories and made them feel "unwelcome and
2 uninvited." I agitated to have all such charities either be
3 excluded from the campaign or require them to change their
4 literature. Instead a new system was developed and the Boy
5 Scouts now participate in the campaign on the same basis as
6 other charities.

7 5. About twenty two years ago the Parks Department
8 sponsored a series of dances for gay and lesbian youth. Another
9 employee and I volunteered to be chaperones. The series of
10 dances was cancelled before we could chaperone.

11 6. While I am a Caucasian and have no African-American
12 blood in me, I have exercised my right to be treated equally and
13 am a dues-paying member of the City Light Black Employees
14 Association.

15 7. About twenty years ago the City Office for Women's
16 Rights organized the Seattle Employees Association for Gays and
17 Lesbians (SEAGL.) At that time there were no other affinity
18 groups and the formation of even a Black employees group was
19 frowned upon by management. Wanting to see what benefits were
20 afforded to SEAGL, I attended the meetings, was harassed,
21 assaulted and excluded even though the meetings were sponsored
22 by the City and held on City property. By the time I won the
23 case about eight years later the Office for Women's Rights had
24 merged into the Human Rights Department to become the Office for
25 Civil Rights so the ruling showed that I had won a
26 discrimination case against the Seattle Office for Civil Rights.
27 I received a small settlement and minimal legal costs from the
28 City. At the time all Office for Civil Rights employees were
29 required to attend "antidiscrimination training" to "address
30 [my] protected class status."

1 8. About eight years ago when the Councilwoman Podlodowski
2 and the City sponsored "Come Out to Lunch" events implying that
3 they were for those who were changing their public
4 identification from straight to gay, I exercised my right to be
5 treated equally and led the sponsorship of an event in the same
6 venue for a former homosexual, Rob Taylor of Metanoia
7 Ministries, to share his experience in transitioning from gay to
8 straight. The rules governing use of facilities were changed to
9 prevent our group from having a subsequent meeting, I was warned
10 in writing by Gary Zarker, the then-superintendent of Seattle
11 City Light that I was "just on the verge" of "severe
12 consequences" for "creating a hostile work environment" although
13 Zarker refused to tell me what I had done to create a hostile
14 work environment.

15 9. Multiple times when the City has invited employees to
16 represent the City or City Light in the Gay Pride Parade I have
17 exercised my right to be treated equally and marched in the
18 parade.

19 10. I am aware of the SPU Lesbian, Gay, Bisexual,
20 Transgender, Questioning & Friends Group ("gay group") which is
21 an "affinity group" that is recognized by the Seattle Public
22 Utilities and the City of Seattle. Such recognition grants the
23 group the right to use City e-mail and telephones; to reserve
24 conference and other rooms for group activities. It is my
25 understanding that some, if not all, affinity groups, are
26 allowed to charge City paid time to their activities on the
27 basis of their support of "diversity." Such recognition affords
28 a group some rights in establishing events that "promote
29 diversity" or the interests of the groups and to receive City
30 fundgin. The gay group sponsored "Mom's Apple Pie" which I

1 attended and found that it was a movie and forum on lesbian
2 mother adoption issues. I received an invitation to attend this
3 event as part of a bulk all-employees e-mail and saw fliers
4 posted in the workplace. The movie and forum were entirely
5 sympathetic to lesbian mothers and any reference to an opposing
6 viewpoint was presented in a bad light. Although the event was
7 held partially during lunch hour a job number was provided for
8 employees to charge time beyond lunch hour.

9 11. I have announced to the Seattle Office for Civil Rights
10 the formation of an employees group for former homosexuals and
11 their allies.

12
13 I make this Declaration to the best of my knowledge and
14 belief and execute it in Seattle, Washington.

15 *

16 *

17 DATED this _____ day of June, 2009.

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21 _____
22 Philip Irvin
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