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THE HONORABLE MARY ROBERTS
HEARING DATE: JULY 15, 2020

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

IN RE THE MATTER OF RECALL
CHARGES AGAINST CITY OF SEATTLE
MAYOR JENNY DURKAN (HARVEY)

Case No. 20-2-10455-8 SEA

MOTION FOR RECONSIDERATION
OF ORDER ON PETITION TO
DETERMINE SUFFICIENCY OF
RECALL CHARGES AND ADEQUACY
OF BALLOT SYNOPSIS

ORAL ARGUMENT REQUESTED

I. INTRODUCTION AND RELIEF REQUESTED

Pursuant to CR 59(a)(7) and (9), Mayor Durkan respectfully requests that this Court reconsider its July 10 Order on [the] Petition to Determine Sufficiency of Recall Charges and Adequacy of Ballot Synopsis (“Order”).¹ Charge B, even as modified by the Order (“Charge”), is factually and legally insufficient. As previously noted, the Petition’s overbreadth made meaningfully responding to each allegation nearly impossible. This Motion and supporting materials are tailored to the sole remaining Charge and supplements the prior record with actions the Mayor has taken regarding crowd control policies.

Mayor Durkan has no legal or constitutional duty to prescribe policies and procedures for SPD. Instead, the City Charter places that duty upon the Chief of Police, who exercised her

¹ Mayor Durkan does not request reconsideration of the Order except as expressly provided herein.

1 authority in a reasonable manner by requiring that CS gas only be used with her approval.
2 Moreover, on July 13, DOJ stated that any unilateral change to SPD use of force or crowd control
3 policies without court approval would violate the Consent Decree.

4 To the extent Charge B implies that Mayor Durkan should have taken emergency action
5 with regard to crowd control policies, her discretionary decision not to overrule or usurp all or
6 part of the Chief’s authority cannot be a basis for recall, particularly in the midst of a dynamic
7 week of protests, public safety issues, and unrest.

8 To be sure, the insufficiency of Charge B is reflected in Judge Jones’ ruling in the *Black*
9 *Lives Matter Seattle-King County* case, which came after the events in question. Judge Jones
10 did not find a statutory, constitutional, or other legal duty to prohibit all use of chemical agents.
11 Rather, he limited their use in a manner similar to Chief Best’s existing policy and left
12 compliance to the Chief and SPD.² Recall cannot be used to settle political disagreements or
13 second guess discretionary actions, particularly where the law places that discretion in another
14 individual.

15 **II. STATEMENT OF FACTS**

16 It has been more than two decades since Seattle has seen demonstrations of the size and
17 duration of those in recent months. These events escalated significantly and quickly.

18 **A. May 30**

19 Peaceful demonstrations turned to “chaos,” including “significant property damage,
20 multiple arson events, theft, and injuries to community members and law enforcement.”³
21 Declaration of Thomas Mahaffey (“Mahaffey”), Dkt. 16, at Ex.A, ¶13. The Emergency
22

23 _____
24 ² Charge B does not even specify whether Petitioners allege that an outright ban, or some other policy short of an
outright ban, was required.

25 ³ Links to footage reflecting the dire situation are provided in the Declaration of Rebecca Roe filed herewith
26 (“Roe”) at ¶2. As the footage demonstrates, real time decision making regarding appropriate use of force is often
difficult in crowd management situations.

1 Proclamation Mayor Durkan issued described the perilous situation, including assaults on
2 officers, SPD cars set on fire, an SPD rifle stolen from a police vehicle and fired, and Molotov
3 cocktails thrown at SPD headquarters.⁴ Dkt.15, Ex.1. The National Guard was activated to
4 restore safety.

5 **B. May 31**

6 The focus of the demonstrations shifted to SPD's East Precinct. Multiple officers were
7 injured after being hit with rocks, bottles, OC spray, fireworks, and other projectiles. Mahaffey,
8 ¶15. There were 21 arrests on charges including burglary, assault, robbery, and assault/unlawful
9 possession of a firearm. Roe, Ex.B. Due to the depletion of less-lethal tools available to officers
10 "as they managed the significant violence, property damage, and injuries to police and other
11 civilians during the events," Chief Best, under her lawful Charter authority, authorized patrol to
12 use CS gas "in the necessary event of crowd disbursement otherwise consistent with SPD
13 policy."⁵ Mahaffey, ¶14.

14 **C. June 1**

15 Individuals in the crowd deployed several explosions towards officers.⁶ *Id.* ¶17. There
16 were at least three reports of officer injuries. Roe, Ex.B. After issuing several dispersal orders,
17 incident command authorized CS gas and OC spray.⁷ Mahaffey, ¶17, Roe, Ex. B.

18
19 _____
20 ⁴ The Seattle Police Operational Command's timeline (the "Timeline") contains logs reflecting radio traffic from
21 officers and commanders responding to events as they unfolded. Roe Exs. A, B. On May 30, the Timeline notes
22 55 arrests, including assault on an officer, assault, and burglary. *Id.*, Ex.B. The Timeline also describes an
23 individual being stabbed in the abdomen, multiple recovered weapons, and rampant vandalism and/or looting.

24 ⁵ As the OIG noted in its Informational Summary of Less Lethal Weapon Usage in Protests, under "normal
25 circumstances," SWAT is authorized to use CS gas in crowd management situations. Dkt.16, Ex.B.

26 ⁶ The Timeline also noted individuals "pushing hard" through a barricade, the arrest of an individual who had an
AR-15 assault rifle in the crowd, and a "violent aggressive crowd" that refused to follow orders and pushed
officers. Roe, Ex.B.

⁷ As a recent New York Times article noted, CS gas was deployed in approximately 100 U.S. cities during protests
last month. Roe, Ex.D.

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D. June 2

After viewing the events of the previous evening, Mayor Durkan verbally requested “immediate recommendations” and “systemic review” of SPD’s crowd management policy from the two oversight bodies charged with assessing individual and systemic problems at SPD: the Office of Police Accountability and the Inspector General. Roe, Ex.C. In a press conference, Mayor Durkan publicly announced the review and discussed the desire she and Chief Best shared to uphold First Amendment rights and maintain public safety, stating:

I want people to be able to peacefully gather to be able to demand change, express grief, experience community with one another, but we need them to do it peacefully.

We will do all we can to protect the cherished right to assemble and express First Amendment rights, but we will also make sure we maintain public safety, protect people, and protect the public safety of every community.

Chief Best and I have had so many conversations over the years, and we know and agree and reaffirm that every encounter of police they use and try to determine how to de-escalate as a first stop. The use of any force—whether it be the use of hands-on force or pepper spray or tear gas should only be done as circumstances require.

Roe, Ex. E. Mayor Durkan affirmed her commitment to investigating police misconduct, stating, “there could never be a more important moment that [OPA and OIG] have the resources and confidence of the public . . . we will make sure that in the budget [,] OPA and OIG have the resources they need to do the job they need to do to give the public the confidence that the oversight is there.” *Id.*

Unfortunately, violence continued from some in the protest crowds, with officers hit by various projectiles. Mahaffey, ¶18. At least four officers were injured, including one hospitalization. Roe, Ex.B. SPD incident command authorized OC spray and CS gas near midnight after prior dispersal efforts failed. *Id.*

E. June 3

To de-escalate the situation, SPD created additional barrier space between officers and

1 the crowd. Mahaffey, ¶20. Officers still incurred injuries from projectiles thrown from the
2 crowd. *Id.* Regardless, SPD did not deploy chemical irritants. *See id;* Roe, Ex.B.⁸

3 **F. June 5**

4 Mayor Durkan and Chief Best took several critical steps:

- 5 • Proactively following up on her earlier request, Mayor Durkan sought
6 professional input on SPD’s crowd management policies by sending a letter to
7 the OPA, OIG, Federal Monitor, CPC, and DOJ. *See* Roe, Ex.C. In the letter,
8 Mayor Durkan requested review of “SPD’s crowd management policy, including
9 the use of all crowd control tools and strategies, in the next 30 days.” *Id.* She
10 further requested they work with Public Health Seattle & King County to
11 “determine what innovative techniques . . . can provide a greater ability to de-
12 escalate situations that occur with mass protests, so that the use of force can be
13 greatly minimized and avoided.” *Id.*
- 14 • The OIG, CPC, and OPA released a memorandum regarding the use of CS gas,
15 noting the Mayor and Chief’s requests that they “thoroughly review the [SPD]
16 protest response.” Roe, Ex.F. They recommended that SPD “cease the use of CS
17 gas in response to First Amendment activity, until such time as any appropriate
18 use can be vetted by oversight entities and incorporated into a written SPD
19 policy.” *Id.*
- 20 • Just hours later, Chief Best announced that SPD would suspend the use of CS gas
21 for at least 30 days pending the oversight work. Any use of CS gas could only be
22 used by SWAT “in life safety circumstances and consistent with training.” The
23 directive further specified, “until further notice, any deployment must be
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25 _____
26 ⁸ Also on June 3, Mayor Durkan and Chief Best attended the CPC meeting to hear from commissioners and
community members. Roe, Ex. C.

1 approved by the Chief or the Chief’s designee.” Mahaffey, ¶21. This order was
2 well within the Chief’s authority under the Charter.

- 3 • Mayor Durkan noted that she supported Chief Best’s order, stating that “SPD
4 officers do not need to be using tear gas at protests as a crowd management tool.”
5 Roe, ¶8.

6 **G. June 6**

7 Demonstrators near the East Precinct began trying to push the line of officers back by
8 15-20 feet. Mahaffey, ¶23. When officers attempted to reestablish the line, individuals in the
9 crowd began to throw items at officers and attempt to take fencing from SPD. *Id.* Throughout
10 the night, officers were hit with glass bottles and fireworks. *Id.* Due to these dangers, OC spray
11 was deployed; CS gas was not. *See id.*; Roe, Ex.B.

12 **H. June 7**

13 During evening hours, the situation deteriorated. SPD installed new barriers, hoping to
14 minimize direct confrontations. Officers on the ground observed individuals break and
15 weaponize the protective fencing, as well as another group of approximately 20 people with
16 shields, helmets, and gas masks attempting to create a disturbance. Mahaffey, ¶24. As the crowd
17 slowly advanced towards police, officers observed a potential IED nearby and received a radio
18 report of an individual with a gun in the crowd. *Id.* Despite multiple instructions to cease
19 advancing, the situation escalated, as demonstrators threw items at officers, including a water
20 bottle filled with chemical irritants. *Id.* As individuals brought wooden shields with nails to the
21 front of the line, the crowd surrounded officers and began to block the area that was designated
22 the safe entry/exit point for SPD. *Id.*

23 Based on the life-safety circumstances, Chief Best authorized CS gas shortly after
24 midnight. *See* Mahaffey, ¶25. In a press conference, Chief Best described her decision in the
25 midst of this extremely difficult situation:
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I was keeping abreast of what was happening in the precinct. We had a shooting earlier in the day. At some point, it got unruly, [and] there was a man with a gun in the crowd. The officers felt like it was a life-safety situation based on what was occurring, and I concurred. **And I own that decision. I made that decision, and I will own any decision that I think is in the best interest of everyone’s public safety.**

Roe, ¶9. There have been no subsequent deployments of CS gas.

I. June 12

In his Order in *Black Lives Matter Seattle-King County*, Judge Jones declined plaintiffs’ request to ban the use of chemical irritants outright. Instead, his order “does not preclude individual officers from taking necessary, reasonable, proportional, and targeted action to protect against a specific threat of physical harm to themselves or identifiable others or to respond to specific acts of violence or destruction of property.” *Id.*, 5. Moreover, the order permitted use of CS gas where (a) efforts to subdue a threat by using alternative measures, including pepper spray, have been exhausted and ineffective, and (b) the Chief has determined that use of CS gas is the only reasonable alternative.

Since this order, policy discussions have continued over the use of chemical irritants. On June 15, City Council passed an ordinance banning all “crowd control weapons,” including chemical irritants, effective at the end of July.⁹ Roe, Ex.G. On June 29, Mayor Durkan returned the ordinance unsigned, noting that while she shared concerns regarding crowd management, the ordinance, among other issues, was inconsistent with Judge Jones’ order and contained no exemption for life-safety situations. Roe, Ex.H. Mayor Durkan’s response further noted that the “law directly impacts and possibly contravenes SPD policies developed and approved by [Judge Robart] in the consent decree litigation.” *Id.*

In a July 13 e-mail to the Seattle City Attorney’s Office, Assistant United States Attorney Fogg stated that pursuant to the Consent Decree, “the City must obtain approval of any

⁹ The ordinance does not purport to apply retroactively.

1 modification to Consent Decree-related policies in advance of their implementation.” The City
2 remains subject to the Consent Decree. Roe, Ex.I. Paragraph 177 of the Consent Decree states,
3 “SPD will submit the policies, procedures, training curricula, and training manuals required to
4 be written, revised, or maintained by the Settlement Agreement to the Monitor and DOJ for
5 review and comment prior to publication and implementation.” Roe, Ex.J.

6 **III. AUTHORITY AND ARGUMENT**

7 **A. Charge B is legally insufficient.**

- 8 1. Mayor Durkan has no legal duty to unilaterally implement new SPD
9 policies and procedures.

10 The City Charter places responsibility for implementation of SPD policies and
11 procedures upon the Chief, not the Mayor. Moreover, DOJ’s position is that any modification
12 to SPD use of force and crowd control policies, whether from the Mayor, City Council, or any
13 other entity, are subject to court approval prior to implementation.

14 As discussed below, Petitioners do not specify the policies they contend Mayor Durkan
15 failed to implement. If Petitioners suggest an outright ban on chemical irritants was required,
16 notably, Judge Jones declined this exact request for relief and continued to permit Chief Best to
17 authorize CS gas in life-safety situations. *Black Lives Matter Seattle-King County*, 2020 WL
18 3128299 *5. Indeed, no federal court has adopted an outright ban on chemical irritants relating
19 to the recent demonstrations. *See e.g., Don't Shoot Portland v. City of Portland*, 2020 WL
20 3078329, *4 (D. Or. June 9) (permitting CS gas where the lives or safety of the public or police
21 are at risk); *Abay v. City of Denver*, 2020 WL 3034161, *5 (D. Colo. June 5) (permitting chemical
22 agents “after an order to disperse was issued” and after adequate time is given for the intended
23 audience to comply); *Anti Police-Terror Project, et al. v. City of Oakland*, No. 20-cv-03866-
24 JCS, *2 (N.D. Cal. June 18) (permitting CS gas where necessary to protect “lives, serious bodily
25 injury, or specific property”); *Williams v. City of Dallas*, No 3:20-CV-01526-L, at *1-2 (N.D.
26 Tex. June 11) (permitting less lethal weapons in situations presenting immediate threat of serious

1 harm).

2 Legal sufficiency requires that a charge “define substantial conduct clearly amounting to
3 misfeasance, malfeasance, or violation of the oath of office.” *In re Recall of Telford*, 166 Wn.2d
4 148, 154 (2009). Malfeasance and misfeasance require “wrongful conduct that affects,
5 interrupts, or interferes with performance of an official duty.” RCW 29A.56.110(1) (emphasis
6 added). “Violation of the oath of office” likewise includes the “neglect or knowing failure by
7 an elective public officer to perform faithfully a duty imposed by law.” RCW 29A.56.110(2)
8 (emphasis added).

9 A charge cannot be legally sufficient where it does not allege violation of an official’s
10 legal duties. For example, in *In re Recall of Lindquist*, 172 Wn.2d 120, 133 (2011), petitioners
11 sought recall for a prosecutor’s alleged failure to investigate. The prosecutor argued that the
12 charge was legally insufficient, as “the prosecuting attorney does not perform investigations.”
13 *Id.* The Court agreed, holding that the charge was factually and legally insufficient because the
14 prosecutor “had no duty to investigate.” *Id.* at 134. *See also, Matter of Recall Charges Against*
15 *Seattle School District Board of Directors*, 162 Wn.2d 501, 511 (2007) (charge legally
16 insufficient where directors had no legal duty to hold the hearing petitioners claimed they failed
17 to timely hold).

18 In stating that Mayor Durkan “failed to institute new policies and safety measures for the
19 Seattle Police Department,” Charge B implies that under the various laws and constitutional
20 provisions Petitioners identified, Mayor Durkan has a legal duty to unilaterally implement
21 policies and safety measures for SPD. She does not. The Seattle City Charter states that the
22 Chief of Police shall be the “chief peace officer of the City” and shall “maintain the peace and
23 quiet of the City.” Charter, Article VI, Sec. 5. Pursuant to this authority, the Chief “shall manage
24 the Police Department, and shall prescribe rules and regulations, consistent with law, for its
25 government and control.” *Id.* at Sec. 4 (emphasis added).
26

1 interests in her stellar leadership of SPD.

2 Charge B does not allege that Mayor Durkan violated a legal duty or exercised her
3 authority in a manifestly unreasonable manner. It is accordingly legally insufficient.

4 **B. Charge B is factually insufficient.**

5 1. Charge B is impermissibly vague.

6 Charge B alleges that Mayor Durkan failed to “step in” after becoming aware of the use
7 of chemical agents. The Charge lacks the requisite specificity. To be factually sufficient, a
8 charge must “give a detailed description including the approximate date, location, and nature of
9 each act complained of.” RCW 29A.56.110. For example, in *In re Recall of Bolt*, 177 Wn.2d
10 168, 176 (2013), petitioner alleged that a city councilmember “bullied and harassed” a town
11 employee, while the mayor allowed the behavior. The Court held that the allegation was
12 factually insufficient as to both officials, as it did not “identify the conduct or behavior with any
13 specificity.” Rather, the charge simply made general allegations of “bullying” and “harassment.”

14 Here, while the Charge alleges that Mayor Durkan failed to “institute new policies and
15 safety measures for [SPD],” it does not specify the basis of an affirmative duty to do so, or any
16 particular policy or safety measure Petitioners allege Mayor Durkan failed to implement.
17 Without this specificity, Seattle voters cannot meaningfully evaluate Petitioners’ purported basis
18 for a recall election.

19 Second, while the Court held that Charge B was only sufficient to the extent it pertains
20 to Mayor Durkan’s failure to “step in” after “becoming aware of [the use of chemical agents]
21 on peaceful protestors,” Charge B does not specify the dates or uses of force to which it
22 applies.¹¹ As the above facts demonstrate, the Mayor and the Chief took specific and active
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24 _____
25 ¹¹ To the extent this distinction refers to Chief Best’s decision to authorize the deployment of CS gas due to the
26 life safety circumstances presented June 7, the Charge is insufficient, as an official cannot be recalled for an act
of a subordinate where the official did not direct or have knowledge of the act. *In re Matter of Recall of Morrisette*,
110 Wn.2d 933, 936 (1988). The Mayor is not subject to recall for any discretionary act taken by any subordinate
without her knowledge or direction.

1 steps in response to rapidly evolving events. The Mayor sought professional input, and the
2 Chief imposed a policy related to the use of chemical irritants that appropriately balanced life
3 safety concerns. Charge B accordingly lacks sufficient specificity.¹²

4 2. There is no evidence that Mayor Durkan violated the law, let alone that
5 she intended to do so.

6 Factual sufficiency requires that a petition demonstrate not only that the official
7 intended to commit an unlawful act, but that she intended to act unlawfully. *Matter of Recall*
8 *of Inslee*, 194 Wn.2d 563, 567-68 (2019). “While some inferences are permissible in a recall
9 petition, on the whole, the facts must indicate an intention to violate the law.” *Id.* at 572. For
10 example, in *In re Recall of Carkeek*, 156 Wn.2d 469 (2006), the petitioner claimed that a
11 commissioner sought an anti-harassment order against two of his neighbors to exclude them
12 from public meetings in violation of the OPMA. Even though the anti-harassment order was
13 denied, the Court nonetheless held that the petition was insufficient to show intent to violate
14 the law. *Id.* at 174. The Court noted the absence of any “concrete facts” showing an
15 “impermissible motive.” Rather, the commissioner’s “sincere, if ultimately nonprevailing”
16 fear for his safety was not indicative of the requisite intent. *Id.*

17 Likewise, in *Matter of Recall of Wade*, 115 Wn.2d 544, 799 (1990), the petitioner sought
18 to recall a school board member, noting the district affirmative action policy’s aim of increasing
19 the number of women and claiming he was not hired because he was a man. The Court held that
20 the claim was legally insufficient, stating that “[j]ust because the District’s affirmative action
21 plan had a general aim to increase the number of women in administrative positions does not
22 suggest that in this particular instance the Board refused to hire [petitioner] because he is a man.”
23 *Id.* at 550.

24 Here, in order to be factually sufficient, the Petition must set forth facts showing that
25

26 ¹² For the same reasons, the Court’s ballot synopsis does not satisfy RCW 29A.56.140’s adequacy requirement.

1 upon learning of the use of chemical irritants, Mayor Durkan had a lawful duty to “step in,” and
2 in failing to do so, intended for constitutional rights to be violated. To the contrary, Mayor
3 Durkan has:

- 4 • Consistently voiced her support for the First Amendment rights of peaceful
5 protestors;
- 6 • Actively requested OPA, CPC, DOJ, Federal Monitor, and OIG review of crowd
7 management policies just days after the onset of the protests;
- 8 • Promised budgetary support, despite the economic crisis, for review of recent
9 events; and
- 10 • Publicly stated her support of Chief Best’s decision to prohibit the use of CS gas
11 pending review of SPD crowd management policies.¹³

12 Roe, Exs. C, E, ¶8.

13 Even if this Court declines to consider Mayor Durkan’s public statements and actions,
14 the allegations contained in Charge B do not reflect any “concrete facts” evidencing intent to
15 violate the law. Petitioners have not supplied any factual basis for their allegation that after a
16 decades-long career actively pursuing police reform efforts, Mayor Durkan would intend for
17 SPD officers to violate First Amendment rights. SPD has existing court-approved policies
18 relating to use of force and crowd management.¹⁴ If individual officers’ actions violated those
19 policies, Petitioners fail to set forth any evidence that Mayor Durkan or Chief Best intended this
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21 _____
22 ¹³ It is appropriate for the trial court to consider materials beyond the petition in evaluating the factual basis of a
23 recall petition. *See Matter of Recall of Beasley*, 128 Wn.2d 419, 427 (1996) (in light of conclusory allegations, it
was proper for the trial court to consider supporting documents submitted by the public official “for the purpose of
determining whether there is any basis for the charges”).

24 ¹⁴ The OIG’s June 12 report on Less Lethal Weapons Usage in Protests provides an overview of SPD policies
25 relating to less lethal weapons. The report notes that “[i]n its preliminary research, OIG did not find credible
26 external sources advocating a blanket ban on the use of less lethal weapons either in general patrol operations or
crowd control.” Dkt.16, Ex.B. Rather, in the absence of such tools, “officers may rely on greater use of lethal
force to respond to threats of their or others’ safety.”

1 result. This allegation is both unsupported by the record and false.

2 I certify that this memorandum contains 4,194 words, in compliance with the Local
3 Civil Rules.

4 DATED this 15th day of July, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2020, I caused the foregoing opposition to be served via the Court's e-service portal on the party listed below:

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DATED this 15th day of July, 2020

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