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

8 GARFIELD COUNTY  
9 TRANSPORTATION AUTHORITY;  
10 KING COUNTY; CITY OF SEATTLE;  
11 WASHINGTON STATE TRANSIT  
12 ASSOCIATION; ASSOCIATION OF  
13 WASHINGTON CITIES; PORT OF  
14 SEATTLE; INTERCITY TRANSIT;  
15 AMALGAMATED TRANSIT UNION  
16 LEGISLATIVE COUNCIL OF  
17 WASHINGTON; and MICHAEL  
18 ROGERS,

19 Plaintiffs,

20 v.

21 STATE OF WASHINGTON,

22 Defendant.

No.

COMPLAINT FOR  
DECLARATORY JUDGMENT AND  
INJUNCTIVE RELIEF

23 **I. INTRODUCTION**

24 Whether passed by the Legislature or by the people, all laws in the State of Washington  
25 must comply with our Constitution. Initiative No. 976 (“I-976”) fails this test. As with prior  
26 initiatives by the same sponsor, I-976 is a poorly drafted hodge-podge that violates multiple  
27 provisions of the Constitution. I-976 violates the single subject rule of article II, section 19,

1 which prevents unscrupulous initiative sponsors from using seemingly popular provisions to gain  
2 passage of unpopular ones. I-976 violates the separate subject-in-title requirements of article II,  
3 section 19 by misleading voters on the true nature and impact of the Initiative. I-976 violates  
4 article II, section 37 through the implied repeal of numerous statutes without disclosing them to  
5 voters. I-976 violates the fundamental rule in our Constitution that matters of local concern  
6 should be decided locally and even overrides election results approving local taxes. I-976  
7 violates due process, privileges and immunities, and separation of powers principles, and is  
8 arbitrary and capricious. I-976 further impairs contractual obligations and expectations in  
9 violation of article I, section 23. The end result of this unconstitutional initiative, I-976, is to  
10 decimate revenue and funding for crucial local projects, particularly those related to  
11 transportation and transit. For these and other reasons, Plaintiffs respectfully request a  
12 judgement declaring I-976 unconstitutional and permanently enjoining I-976 from taking effect,  
13 or otherwise being enforced.  
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## 16 **II. PARTIES**

17 1. Plaintiff Garfield County Transportation Authority (“GCTA”) provides transit  
18 services in Garfield County, the smallest county in Washington State. GCTA operates with an  
19 annual budget of approximately \$350,000 and relies heavily on state grants for operations and  
20 capital improvements. GCTA provides many lifeline transportation services for individuals in  
21 Garfield County, including seniors, the disabled, and disadvantaged persons. These lifeline  
22 services include transporting individuals to and from healthcare appointments, senior services,  
23 mental health and social services, and a shopper shuttle that travels to Clarkston, Washington, so  
24 that individuals can secure groceries and prescription drugs. I-976, if allowed to take effect, is  
25 likely to result in at least a 50% reduction in services in Garfield County.  
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1           2.       Plaintiff King County is a Home Rule Charter County in the State of Washington.  
2 Through its various departments and partnerships with other municipalities, King County  
3 provides transportation, roads, parks, and licensing services that will be directly and adversely  
4 impacted if I-976 takes effect. For the King County Metro Transit Department (“Metro”) alone,  
5 the provisions of I-976 will result in the loss of funding for 175,000 annual transit service hours  
6 funded by Seattle’s Transportation Benefit District (“TBD”). Between 2020 and 2025, the Metro  
7 Transit Department will likely also experience about \$22.8 million in cuts to Regional Mobility  
8 Grant Program awards, \$29.2 million in cuts for grants to fund other transit projects (such as  
9 Rapid-Ride investments in Burien, Kent, Tukwila and Seattle), \$36.3 million in cuts to the  
10 Access paratransit program, \$7.19 million to the vanpool program and many other harms. The  
11 County Road Services division is responsible for maintaining over 1,500 miles of roads and 182  
12 bridges within unincorporated King County, which are a critical element of the regional  
13 transportation system. I-976 will exacerbate the existing dire situation faced by the County to  
14 maintain and preserve the road network. The King County Parks Department will also  
15 experience cuts and project delays due to important projects currently pending with the  
16 Washington State Department of Transportation (“WSDOT”). The King County Records and  
17 Licensing Division may lose up to \$8.5 million in annual funding due to the elimination of  
18 various licensing fees and charges. In short, King County faces substantial harm from this  
19 unconstitutional initiative, even though the voters of King County overwhelmingly rejected I-976  
20 at the polls.  
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24           3.       Plaintiff City of Seattle is a municipal corporation duly organized and existing  
25 under and by virtue of the laws of the State of Washington. In 2010, the City of Seattle created a  
26 TBD. In 2015, via ordinance and pursuant to RCW 36.74, the City assumed the authority for  
27

1 governing the TBD. Seattle’s TBD provides vital funding for critical transportation  
2 improvements, as well as important expansions to both transit services and access to those  
3 services. As a result of I-976, the City of Seattle faces a direct loss of \$32.8 million annually  
4 through local licensing fees. Additionally, another \$35 million in funds are in jeopardy, through  
5 potential loss of per capita Multimodal Account funds and Regional Mobility Grant Programs.  
6 Like King County, the City of Seattle faces substantial harm from this unconstitutional initiative.  
7 The voters of Seattle not only overwhelmingly rejected I-976 at the polls, they have, in the past,  
8 authorized significant voter-approved charges.  
9

10 4. Plaintiff Washington State Transit Association (“WSTA”) is a nonprofit  
11 corporation, representing 31 public transit systems in the state and the WSDOT Public  
12 Transportation Division. WSTA’s associate members include state and local agencies and  
13 organizations, as well as taxpayer vendors, consultants, and individuals. WSTA’s mission is to  
14 promote and enhance public transit for the citizens of the State of Washington. WSTA  
15 advocates for state legislation beneficial to public transit, fosters the professional growth and  
16 development of transit professionals, and provides outreach and education about public  
17 transportation on behalf of its members. WSTA’s public transit agency members serve rural,  
18 small urban, urban and regional areas and provide 238 million passenger trips annually,  
19 including over 6 million trips by those with special transportation needs. These transit services  
20 include fixed-route buses, paratransit (door-to-door or shared-ride service), vanpools, light rail  
21 and commuter rail. I-976, if allowed to take effect, would substantially harm WSTA and its  
22 members by eliminating essential funding necessary for WSTA’s members to provide these  
23 critical transit services.  
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1           5.       Plaintiff Association of Washington Cities (“AWC”) is a non-profit corporation  
2 that represents Washington’s cities and towns before the State Legislature, the State Executive  
3 branch and regulatory agencies. Although membership in the AWC is voluntary, the association  
4 includes 100% participation from Washington’s 281 cities and towns. Sixty of these 281 cities  
5 and towns have locally adopted license fees through their TBD. In 2018, cities raised \$58.2  
6 million in revenue through these locally adopted fees dedicated to transportation needs. I-976, if  
7 allowed to take effect, would substantially harm AWC and its members by eliminating this  
8 funding. The Office of Financial Management estimated that the impacts to TBDs would be  
9 \$349 million over the next six years.  
10

11           6.       The Port of Seattle (“Port”) was founded in 1911 by a vote of the people and is a  
12 Washington Port District duly organized and existing under and by virtue of the laws of the State  
13 of Washington. The Port’s mission is to promote economic opportunities and quality of life in  
14 the region by advancing trade, travel, commerce, and job creation in an equitable, accountable,  
15 and environmentally responsible manner. The Port has invested nearly \$500 million in  
16 transportation improvements in King County over the past 20 years and works in collaboration  
17 with partner agencies to leverage investments, develop transportation systems and maintain  
18 freight mobility, which are key to the region’s long-term vitality. I-976 will cause reductions in  
19 transit services and road improvement projects, which will significantly increase congestion  
20 throughout the region and interfere with transportation routes that that serve cargo terminals,  
21 Sea-Tac Airport, cruise terminals, Fisherman’s Terminal, industrial lands and other Port of  
22 Seattle facilities. Avoiding these impacts is critical for the Port of Seattle to continue serving as  
23 a leader in moving people, freight, and cargo in the region, across the country and around the  
24 world.  
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1           7.       Plaintiff Intercity Transit (“IT”) provides transit services in Lacey, Olympia,  
2 Tumwater, Yelm and their surrounding urban growth areas. IT operates 21 bus routes and  
3 Express service to Tacoma, along with paratransit and vanpool programs. Combined, these  
4 services provide 4.5 million passenger rides a year. IT’s mission is to provide and promote  
5 transportation choices that support an accessible, sustainable, livable, healthy, prosperous  
6 community. I-976, if allowed to take effect, would substantially harm IT’s programs and  
7 services. I-976 would reduce operating funds for Special Needs Transportation and fixed route  
8 service and significantly reduce, if not totally eliminate, intercountry bus service between  
9 Thurston and Pierce County. I-976 also would reduce capital funding for Special Needs  
10 Transportation, fixed route, vanpool and much needed capital construction projects.  
11

12           8.       Plaintiff Amalgamated Transit Union Legislative Council of Washington  
13 (“ATULC”) exists under the authorization of the Constitution of the Amalgamated Transit Union  
14 International (“ATU”), which represents employees in the public transit industry. The ATULC  
15 protects the rights of members of the ATU through the combined efforts of a council composed  
16 of the local unions in Washington and by cooperating with the Washington State Labor Council  
17 and other Labor Councils. The mission of the ATULC includes encouraging political action on  
18 matters that affect the livelihood of the ATU’s members and create a more favorable sentiment  
19 towards the Transportation Industry. The impact of I-976 on ATU will be significant. Transit  
20 agencies in the state will lose hundreds of millions of dollars, which will result in existing  
21 service being cut, and elimination of any future service increases. This will result in a loss of a  
22 substantial number of family wage jobs held by ATU’s members  
23  
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25           9.       Plaintiff Michael Rogers is an individual with cerebral palsy who resides in  
26 Lacey, Washington. Mr. Rogers, who uses a wheelchair, relies on paratransit and transit services  
27

1 to travel to his full-time and his part-time seasonal jobs, medical appointments, grocery  
2 shopping, community activities, volunteer undertakings, and to visit friends and family. On  
3 weekends during baseball season, he uses three different transit systems to commute from his  
4 residence to his dream job working for the Seattle Mariners. Mr. Rogers faces substantial harm  
5 from I-976, which will eliminate critical funding for the services on which Mr. Rogers relies for  
6 basic mobility in his daily life.

7  
8 10. Defendant State of Washington (“State”) is tasked with implementing and  
9 enforcing the provisions of I-976. Through its Department of Licensing, it collects all vehicle  
10 licensing fees, motor vehicle excise taxes (“MVET”), and other charges associated with motor  
11 vehicles, including the TBD vehicle licensing fee (“VLF”). The State also collect sales tax on  
12 sales of motor vehicles. The State and the Department of Licensing have offices and transact  
13 business in King County. Under RCW 7.24.110, the State has an interest in the declaration  
14 sought by Plaintiffs and the statutory right to defend the constitutionality of the I-976.  
15

### 16 **III. JURISDICTION AND VENUE**

17 11. This Court has jurisdiction over this matter pursuant to RCW ch. 2.08, RCW ch.  
18 7.24, and RCW 7.40.010.

19 12. Venue is proper in this Court pursuant to RCW 4.92.010 because the residence or  
20 principal place of business of one or more of the Plaintiffs is in King County, Washington.  
21

### 22 **IV. STANDING**

23 13. Plaintiffs include municipalities, individual Washington taxpayers and taxpayer  
24 organizations that represent their own and their members’ interests. Plaintiffs have standing to  
25 bring this action on multiple alternative grounds.  
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1           18.     In order to fund local transportation infrastructure and transit services,  
2 Washington allows local jurisdictions to form TBDs. Under RCW 36.73.010: “It is the intent of  
3 the legislature to encourage joint efforts by the state, local governments, and the private sector to  
4 respond to the need for those transportation improvements on state highways, county roads, and  
5 city streets.”  
6

7           19.     Nearly 110 jurisdictions have formed TBDs throughout the state to respond to  
8 local needs for transit and transportation services. More than half of these TBDs have exercised  
9 the authority, granted by law, through the local vote of the jurisdiction’s governing body, to fund  
10 the TBD with VLF revenues. These VLF revenues range from \$20 to \$40 per motor vehicle  
11 registration per year. In King County, 13 cities use the VLF to fund transit services and road  
12 services. Other TBDs similarly fund local improvements such as road repair and maintenance,  
13 transit systems, and sidewalks with VLF funds. By repealing the statutory option for VLF  
14 funding – regardless of approval through a vote of the jurisdiction’s governing body or direct  
15 approval by the voters – I-976 eliminates \$58 million in current TBD funding, which  
16 substantially harms the ability of TBDs to provide necessary local services.  
17

18           20.     To meet the transportation and transit needs of a large urban city, per motor  
19 vehicle registration, the City of Seattle TBD receives \$20 authorized by its TBD governing body.  
20 Additionally, in 2014, City of Seattle voters approved an additional \$60 Vehicle License Fee  
21 (“VLF”) by a wide margin. The combined \$80 VLF raises approximately \$32.8 million  
22 annually. In response to a letter sent by the City of Seattle, Washington Department of Licensing  
23 Director Teresa Berntsen confirmed that her agency will fully comply with I-976 and “stop  
24 collecting the City of Seattle’s Transportation Benefit District Vehicle Licensing Fee as of the  
25 effective date of the Initiative.” **See attached Exhibit B.** The loss of these vital local VLF  
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1 revenues, the majority of which were approved by voters, will result in drastic cuts in a variety of  
2 critical areas, three of which are outlined here. VLF revenues generate approximately 45% (\$24  
3 million annually) of the City of Seattle’s contract with King County Metro to provide transit  
4 service to Seattle residents. The Seattle TBD program has resulted in 8,000 new weekly trips,  
5 enhanced off-peak transit options critical to reducing congestion and increasing equitable access,  
6 and provided other benefits. Additionally, VLF revenue finances ORCA Opportunity programs,  
7 providing approximately 14,000 ORCA cards to residents of multiple Seattle Housing Authority  
8 properties, seniors, and students, with 1.77 million trips taken during the last school year alone.  
9 The City of Seattle also uses VLF revenue for approximately \$8 million in vital roadway  
10 maintenance and preservation, roadway safety enhancements, transit corridor projects, and  
11 bicycle and pedestrian improvements.  
12

13  
14 21. Many jurisdictions, including several Plaintiffs, regularly obtain grant funding  
15 from Washington’s Multimodal Account. This account is funded primarily by various vehicle  
16 license fees and a .3% sales tax on vehicle sales. The provisions of I-976, which eliminate these  
17 sources of revenue, will cause an estimated \$1.5 billion cut to the Multimodal Account over the  
18 next six years. Other dedicated state funds will lose an estimated \$421 million during the same  
19 time frame. The substantial reduction in these funds would prevent the completion of necessary  
20 local transportation and transit projects throughout the state.  
21

22 22. In light of the passage of I-976, Governor Inslee has already directed WSDOT to  
23 postpone all projects not yet underway. The Governor has further directed other state agencies  
24 that receive transportation funding, including the Washington State Patrol and Department of  
25 Licensing, to defer all non-essential spending. According to the Governor, it is “clear that this  
26 vote [in favor of I-976] means there will be adverse impacts on our state transportation system.”  
27

1           23.     The Central Puget Sound Regional Transit Authority (“RTA”), commonly known  
2 as Sound Transit, has pledged its share of the MVET to pay debt service on bonds used to  
3 finance the light rail system. I-976 either purports to eliminate or reduce the RTA MVET. In  
4 addition, I-976 purports to change how vehicles are valued for MVET purposes. If such  
5 provisions are lawful and enforceable, they would substantially impact transit services within the  
6 Sound Transit RTA district.  
7

8           24.     Although I-976 failed in King, Whatcom, Thurston, Jefferson, Island and San  
9 Juan counties, a majority of Washington voters adopted it in the November 2019 general  
10 election. The self-proclaimed title of the I-976 is “Bring Back Our \$30 Car Tabs.” I-976, §17.  
11

12           25.     The ballot title written by the Office of the Attorney General placed the following  
13 proposition before the voters:

14                 Initiative Measure No. 976 concerns motor vehicle taxes and fees.

15                 This measure would repeal, reduce, or remove authority to impose certain vehicle taxes  
16 and fees; limit annual motor-vehicle-license fees to \$30, except voter-approved charges; and  
17 base vehicle taxes on Kelley Blue Book value.

18           26.     The explicitly stated purpose of I-976 is to “limit state and local taxes, fees, and  
19 other charges relating to motor vehicles.” I-976, §1. Specifically, I-976 “limit[s] annual motor  
20 vehicle fees to \$30, except voter approved charges.” *Id.*  
21

22           27.     I-976 adds a new section to RCW ch. 46.17 that imposes a hard cap on vehicle  
23 registration and annual renewal fees: “State and local motor vehicle license fees may not exceed  
24 \$30 per year for motor vehicles, regardless of year, value, make or model.” I-976, §2(1). The  
25 term “‘state and motor vehicle license fees’ means *the general license tab fees* paid annually for  
26 licensing motor vehicles . . . and *do not (sic) include charges approved by voters after the*  
27

1 *effective date of this section.” Id. at §2(2) (emphasis added). The \$30 motor vehicle license fee*  
2 *restriction applies to “initial” registration and each annual “renewal vehicle registration.” Id.*

3 28. Sections 3 and 4 of I-976 set the vehicle license fee at \$30 for many non-  
4 commercial vehicles. Although the I-976 directly addresses some general license registration  
5 fees in RCW ch. 46.17, it is silent on others.

6 29. In addition to limiting the vehicle license fee to \$30 for many vehicles, I-976 also  
7 eliminates the electric vehicle mitigation fee established by RCW 46.17.323. Under existing  
8 law, this mitigation fee was imposed to address “the impact of vehicles on state roads and  
9 highways and for the purpose of evaluating the feasibility of transitioning from a revenue  
10 collection system based on fuel taxes to a road user assessment system.” RCW 46.17.323 (3)(a).  
11 It is “separate and distinct from other vehicle license fees.” *Id.*

12 30. Under the heading, “Repeal and Remove Authority to Impose Certain Vehicle  
13 Taxes and Charges,” section 6 of I-976 repeals a number of statutes in total. I-976 repeals RCW  
14 46.17.365, which required payment of a “weight fee in addition to all other taxes and fees  
15 required by law” and authorized WSDOT to adopt rules for determining the weight of certain  
16 vehicles. *Id.*

17 31. I-976 also repeals RCW 82.80.130, which allowed Public Transportation Benefit  
18 Areas to submit a proposed MVET of .4% to voters for passenger ferry service. I-976, § 6.

19 32. For TBDs, I-976 repeals RCW 82.80.140, which authorized a TBD to impose an  
20 “annual vehicle fee” not to exceed \$100 for each vehicle. Contrary to claims in the ballot title  
21 and the I-976 text, the complete repeal of RCW 82.80.140 leaves TBDs without the option to  
22 collect any VLF and, thus, voters have no option to choose to exceed the I-976 \$30 license fee  
23 cap through a majority vote imposing a higher VLF. Under RCW 36.73.040, a TBD is  
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1 authorized only to impose a sales tax under RCW 36.73.065, a vehicle fee under RCW  
2 82.80.140, fees or charges under RCW 36.73.120 (building fees), and vehicle tolls on roads.  
3 Because the I-976 repeals RCW 82.80.140, there is no longer any authorization for the TBD to  
4 obtain funding through vehicle fees, regardless of a public vote.

5 33. I-976, section 7 amends RCW 82.08.020. The amendment would eliminate an  
6 additional .3% sales tax on vehicle sales.

7 34. I-976, section 8 adds a new section to RCW ch. 82.44, which states that “any  
8 motor vehicle excise tax” must be calculated using the “base model Kelley Blue book value.” I-  
9 976, section 9 amends RCW 82.44.065 to implement the use of this new Kelley Blue Book  
10 valuation method.

11 35. I-976, section 10 amends RCW 81.104.140, which addresses dedicated funding  
12 sources for high capacity transportation services. The amendments purport to preclude RTA  
13 agencies from levying and collecting the special MVET authorized by RCW 81.104.160. I-976,  
14 section 11 then repeals RCW 82.44.035, which established the current method of valuing  
15 vehicles, and RCW 81.104.160, which authorized RTAs covering counties with populations  
16 exceeding 1.5 million people to collect an excise tax of up to .8% when approved by voters.

17 36. I-976, section 12 adds a new section to chapter 81.112 RCW, which states that  
18 any RTA collecting taxes under RCW 81.104.160 “must fully retire, defease or refinance any  
19 outstanding bonds” if RCW 81.104.160 revenues are pledged, and defeasement or retirement is  
20 possible under the bond terms.

21 37. Although repealed under I-976, section 11, RCW 81.104.160 is also *amended* by  
22 I-976, section 13 to purportedly reduce the authorized MVET to .2%. The question of which  
23 section prevails over the other is not clear.

1           38. I-976, section 14 requires liberal construction “to effectuate the intent, policies,  
2 and purposes of this act.”

3           39. I-976, section 15 provides for severability.

4           40. I-976, section 16 establishes an effective date for certain sections of the Initiative.  
5 Under this section, I-976 sections 10 and 11 take effect on the date that the RTA complies with  
6 section 12 of I-976. But I-976, section 13 takes effect April 1, 2020, if I-976, sections 10 and 11  
7 have not taken effect by March 31, 2020. The RTA is supposed to inform authorities on  
8 effective dates.  
9

10           41. Under article II, section 1(d) of the Constitution, initiatives adopted by the voters  
11 “shall be in operation on and after the thirtieth day after the election at which it is approved.”

12 With the exception of the sections discussed in the preceding paragraph, because I-976 was  
13 passed on November 5, 2019, it is scheduled to become effective on December 5, 2019.  
14

## 15           **VI. FIRST CAUSE OF ACTION: DECLARATORY JUDGMENT**

16           42. Plaintiffs repeat and re-allege each of the foregoing allegations as though fully set  
17 forth herein.

18           43. For reasons including but not limited to those stated herein, an actual dispute  
19 exists between Plaintiffs and Defendant, which parties have genuine and opposing interests,  
20 which interests are direct and substantial, and of which a judicial determination would be final  
21 and conclusive.  
22

23           44. I-976 violates multiple provisions of the Constitution, including but not limited to:

- 24           a. Article II, section 19, the Single Subject Rule, because I-976 includes multiple  
25 impermissible subjects;  
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- 1           b. Article II, section 19, the Subject-in-Title Rule, because the title for I-976 did not  
2           fairly apprise voters of the subjects of I-976, and in fact, affirmatively deceived voters  
3           by representing that they retained the right to approve VLFs beyond the I-976 \$30 cap  
4           for important local projects even though I-976 repealed the statutory basis for such a  
5           vote;  
6  
7           c. Article II, section 37, the Improper Amendment Rule, because I-976 is not a complete  
8           act and it improperly amends existing law without setting forth those amendments in  
9           full;  
10          d. Provisions related to home rule and local control, including article I, section 19 free  
11          elections, because I-976 subjects local issues to a statewide vote and overrides the  
12          results of a local election;  
13  
14          e. Provisions related to due process and privileges and immunities, and because I-976 is  
15          arbitrary and capricious;  
16  
17          f. Provisions related to the separation of powers, because I-976 encompasses non-  
18          legislative provisions and exceeds the scope of the initiative power; and  
19          g. Article I, section 23 Impairment of Contracts, because I-976 substantially impairs  
20          existing contracts, without lawful justification.

21           45. Plaintiffs are, therefore entitled to a declaratory judgment that I-976 is  
22          unconstitutional, as well as such other and further relief as may follow from the entry of such a  
23          declaratory judgment.

1                           **VII. SECOND CAUSE OF ACTION: INJUNCTIVE RELIEF**

2           46.     Plaintiffs repeat and re-allege each of the foregoing allegations as though fully set  
3 forth herein.

4           47.     For reasons including but not limited to those stated herein, Plaintiffs are entitled  
5 to prevent and permanently enjoin I-976 from taking effect or being enforced by any Washington  
6 official.

7           48.     Plaintiffs have clear legal rights to prevent and enjoin the effectiveness or  
8 enforcement of I-976 as described herein, which rights are and continue to be invaded by  
9 Defendant, resulting in actual and continuing injury. No adequate remedy at law exists to  
10 remedy this invasion of Plaintiffs’ rights. Further, the balance of the equities favors the issuance  
11 of an injunction.  
12

13           49.     Plaintiffs are, therefore, entitled to an injunction restraining and prohibiting further  
14 enforcement of I-976.  
15

16   **VIII. PRAYER FOR RELIEF**

17           WHEREFORE, Plaintiffs request the following relief:

18           A.     That the Court enter a declaratory judgment that I-976 violates the Constitution;

19           B.     Such other and further relief as may follow from the entry of a declaratory  
20 judgment;

21           C.     Entry of an injunction prohibiting the implementation and enforcement of I-976;

22           D.     Reasonable attorney’s fees, expenses and costs, to the fullest extent allowed by  
23 law and equity; and  
24

25           E.     Any further relief as this Court may deem necessary and proper.  
26  
27



1 DATED this 13<sup>th</sup> day of November, 2019.

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1 [ ] [ ]

2 **CERTIFICATE OF SERVICE**

3 I am and at all times hereinafter mentioned was a citizen of the United States, a resident  
4 of the State of Washington, over the age of 21 years and not a party to this action. On the 13th  
5 day of November, 2019, I caused to be served a true copy of the foregoing document upon:  
6

7  
8 Name/Address  
9 Email:

- via facsimile
- via overnight courier
- via first-class U.S. mail
- via email
- via electronic court filing
- via hand delivery

10  
11 I declare under penalty of perjury under the laws of the State of Washington that the  
12 foregoing is true and correct.

13 DATED this 13th day of November, 2019.

14  
15  
16 \_\_\_\_\_