

1 **SUPERIOR COURT OF THE STATE OF WASHINGTON**
2 **FOR SAN JUAN COUNTY**

3 The LAW OFFICE OF JAMES P. GRIFO,
 LLC a Washington State Limited Liability
 Company; and THE LAW OFFICE OF
 NICHOLAS POWER, PLLC, a
 Washington State Professional Limited
 Liability Company,

 Plaintiffs,

v.

 AMERICAN FEDERATION OF STATE,
 COUNTY AND MUNICIPAL
 EMPLOYEES, A LABOR UNION;
 WALTER BLAIR, as purported
 administrator of Local 114; COLIN
 MAYCOCK as a member of Local 1849,
 President of Local 1849, and as a member
 of American Federation of State, County
 and Municipal Employees; JAEL
 KOMAC, a member of Local 114, as
 Former President Local 114, and a
 member Of American Federation of State
 And Municipal Employees; LOCAL
 1849, a labor union operating in the State
 of Washington; and LOCAL 114, a labor
 union operating in the State of
 Washington.

 Defendants.

Case No. 19-2-0517928

**DECLARATION OF
KATIE BRAY**

4
5 I, Katie Natalia Bray, hereby declare as follows:

6 I am of legal age, and I have personal knowledge of each fact stated in this
7 declaration, to which I could and would competently testify if called as a witness

8 in this matter. I am a dues-paying member in good standing of Local 114-L,
9 AFSCME, AFL-CIO.

10

11 I have been the President of Local 114-L for five years and have worked as a
12 City of Bellingham Public Services Librarian for seven years.

13

14 Local 114-L is a bargaining unit that is exclusively represented by the
15 Washington State Council of County and Municipal Employees (WSCCCE). We
16 have approximately seven members. Our bargaining unit has been independent
17 and separate from any other Local since 1976. Our certification as a bargaining
18 unit pre-dates the existence of PERC but in subsequent PERC decisions we as
19 Librarians are specifically noted as not being affiliated with the former Local 114.

20

21 We have always operated independently from Local 114 and 114-F. I was
22 unfamiliar with the existence of 114-WD until July of this year. We elect our own
23 officers, schedule our own union meetings, and elect our own delegates to
24 conventions. We maintain our own treasury. We do not operate under the
25 Constitution of Local 114 because that document pertains specifically to
26 Bellingham Local 114, not us. I do not possess a copy of Local 114's constitution.

27

28 I was not informed by WSCCCE or AFSCME International that Local 114
29 was placed under administratorship by the AFSCME International Union.

30

31 I do not consider Local 114-L to be under administratorship now nor have
32 we been at any time in the past.

33

34 Local 114-L has no desire to obtain the client file of Local 114. We were not
35 participants nor a party to the Federal lawsuit. This issue does not concern Local
36 114-L members. Consequently, we disclaim any interest in obtaining the client file
37 of the former Local 114, Local 1849, Colin Maycock or Jael Komac as individuals.

38

39 I declare under penalty of perjury under the laws of the State of Washington that
40 the foregoing is true and correct.

41

42 DATED: Friday, August 21, 2020.

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