

Honorable John C. Coughenour

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WASHINGTON STATE REPUBLICAN
PARTY, et al.,

Plaintiffs,

WASHINGTON DEMOCRATIC
CENTRAL COMMITTEE, et al.,

Plaintiff Intervenors,

LIBERTARIAN PARTY OF
WASHINGTON STATE, et al.,

Plaintiff Intervenors,

v.

STATE OF WASHINGTON, et al.,

Defendant Intervenors,

WASHINGTON STATE GRANGE,

Defendant Intervenors.

NO. CV05-0927-JCC

DECLARATION OF FREDI L. SIMPSON IN
OPPOSITION TO DEFENDANTS'
MOTIONS FOR SUMMARY JUDGMENT

1 Fredi L. Simpson, being over the age of eighteen years, declares under the penalty of
2 perjury under the laws of the State of Washington as follows:

3 1. I am the Republican National Committeewoman for the State of Washington, and
4 Chair of the Chelan County Republican Party. I also sit as a member of the Republican State
5 Committee of Washington and on its Executive Board. The Republican State Committee is the
6 governing body of the Washington State Republican Party. Between meetings of the State
7 Committee, the Executive Board exercises the functions of the State Committee, under the
8 Republican Party Bylaws.

9
10 2. As Chelan County Chair, I am responsible for coordinating Republican Party
11 activities throughout Chelan County. This includes fundraising for Republican candidates in
12 advance, organizing volunteers to support Republican candidates and get out Republican votes at
13 election time, coordinating the precinct caucus and convention process that occurs every two
14 years, overseeing the recruitment of precinct committee officers and Republican candidates for
15 partisan office, and speaking on behalf of the Republican Party in Chelan County. I also help
16 coordinate the Republican Party's booth at the Chelan County Fair each year, and participation
17 by Republican Party activists in parades and other community functions.

18 3. I was first elected as Chelan County Republican Chair in 2003. I serve two-year
19 terms and must run for re-election at the County Central Committee organizational meeting
20 following the general election in each even-numbered year. Precinct Committee Officers
21 ("PCOs") elected this past August make up the County Central Committee.

22
23 4. In my role as National Committeewoman, I am a liaison between the Republican
24 National Committee and the Washington State Republican Party. As a member of the
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1 Republican National Committee, I participate in the organization of the national convention,
2 support for national and federal candidates, and adoption of resolutions on matters of political
3 policy and on legislation before the Congress.

4 5. I-872 harms the Republican Party at the local level, as well as the state-wide and
5 federal level. In 2008, a candidate ran in Chelan County with the designation “prefers
6 Republican Party” on the ballot. In the five preceding years that I had been County Chair, I had
7 never seen the candidate at any Republican event. Our county is not very big, and during my
8 time as County Chair, I have gotten to know almost all, if not all of the individuals who actively
9 participate in Republican Party politics and campaigns on a regular basis. To my knowledge, the
10 candidate had never worked for a Republican candidate for office or otherwise supported the
11 Republican Party.
12

13 6. Prior to the use of the I-872 primary, at least in Chelan County, candidates who
14 sought to run as Republicans would come to the County Party and present their Republican
15 credentials. As County Chair, part of my duties is to speak to candidates seeking to run as
16 Republicans, to find out their position on issues, whether they supported the Republican
17 platform, donated to the Party or its candidates, or otherwise helped the Party accomplish its
18 goals – in short whether they should be associating with the Party to get elected.

19 7. Under the State’s implementation of I-872, some candidates with the designation
20 “prefers Republican Party” on the ballot have not come to me to seek Party support. In the most
21 recent primary, a candidate appeared on the primary ballot as “prefers Republican Party” who
22 did not have support from the Republican Party. Instead, his candidacy was backed by one of
23 the most liberal people on the planet, and who has no connection to the Republican Party, and to
24

1 my knowledge shares none of its policies, values or goals. Still, the State published the
2 candidate as “prefers Republican Party.”

3 8. Under I-872, the State permits individuals to file as PCO candidates who are not
4 Republicans. In 2008, five young Libertarian activists filed as Republican PCO candidates.
5 They filed with the intent of changing the Chelan County Republican Party. I learned this,
6 because I sat down with the gentlemen over lunch and talked openly. They told me their intent
7 was to change the Party by running for Republican PCOs. In my discussion with them, I learned
8 that they disagreed with a substantial portion of the Republican platform and wanted to change
9 the Party by becoming Party officers. Precinct committee officers are the backbone of the Party.
10 They organize their precincts and get out the Republican vote. Having non-Republicans as
11 Republican PCOs would seriously impair the ability of the Party to organize its voters and turn
12 them out. Individuals who disagree with the GOP on a wide range of issues will be unlikely to
13 work to advance its positions or candidates. If they do walk, their efforts are going to be at
14 cross-purposes with most of our organization. PCOs also have a role under the State
15 Constitution in filling vacancies in partisan offices. A block of five votes on the County Central
16 Committee could easily have an effect on which names the Chelan County Republican Party
17 would forward if a partisan office became vacant in our jurisdiction.

18
19 9. The State’s implementation of I-872 harms the Chelan County Republican Party
20 by providing certificates of election to any candidate who runs for PCO, and not just those
21 candidates who have obtained 10% of the vote received by the highest Republican vote-getter in
22 that precinct. The 10% threshold that is included in state law has also been adopted by the Party
23 as a rule. The 10% threshold is there so that we avoid having persons elected as Republican
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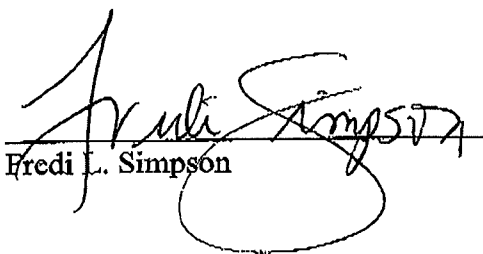
1 PCOs who have not worked to be elected, and who have not demonstrated that they have at least
2 some support among Republican voters in their precinct. In 2008, I spoke with individuals who
3 had received certificates of election as precinct committee officers who had not met the 10%
4 vote threshold. Some persons who were shown on the county election website as having been
5 elected as Republican precinct committee officers never contacted me or, to my knowledge,
6 anyone else in the Chelan County Republican Party. Those candidates who did contact me, but
7 had not received the 10% required vote threshold were not issued calls to our organizational
8 meeting. For those individuals who were really Republican, I used the authority I receive under
9 our bylaws as County Chair to appoint them to precinct committee officer positions after the
10 organizational meeting. I do not know what our County Party would have done if any of the
11 individuals had pressed the issue with certificates of election they had received from the election
12 officials. Our County Party does not have a legal budget, and had we been sued, any legal fees
13 we would have to pay would divert resources from our political programs.

15 DATED at _____, Washington this ____ day of September, 2010.

17 Signature page attached
18 Fredi L. Simpson

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2 some support among Republican voters in their precinct. In 2008, I spoke with individuals who
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13 we would have to pay would divert resources from our political programs.
14

15 DATED at WENATCHEE Washington this 13th day of September, 2010.

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19 Fredi L. Simpson
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