

CLAIM FOR DAMAGES
CITY OF SPOKANE, WASHINGTON

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PLEASE PRINT
IN BLUE OR BLACK INK

1. Claimant's Name: Matthew Shea
Residence: 19402 E 4th Ave, Spokane Valley, WA 99016

CITY CLERK'S OFFICE

(List full address: Street, City, State, Zip Code)

Phone #: Home 509-239-5200 Work N/A Birthdate: 04-18-1974

2. Residence of claimant for six months prior to the time the claim of damages accrued (if different): N/A

3. Name, address and telephone of owner of any damaged property if not given above: N/A TOTAL CLAIM: \$ 24,000,000.00

4. CLAIM INCIDENT DATE: 09/25/2023 TIME: N/A PLACE: Spokane City Hall

DESCRIPTION OF INCIDENT: (Give full account; describe how the City was at fault. List defects causing loss and City acts or omissions) See attachment.

Attachments (Attach additional sheets if necessary.)

5. Give an itemization of your claim, listing specific losses actually sustained or expected: See attachment.

Attachments (Attach bills, statements, estimates or other proof of your specific items of loss.)

6. Were any other persons involved in the incident? Give details with name, address and telephone: Spokane City Council Members Zack Zappone, Lori Kinnear, Betsy Wilkerson, and Karen Stratton - addresses and telephone numbers unknown to claimant, but known by the City of Spokane.

7. Name, address and telephone of witnesses or persons with further information: N/A

8. Is claimant willing to settle or compromise? If so, state amount acceptable as full settlement: \$ 24,000,000.00

NOTE: Please see Spokane Municipal Code 4.02.030 for further information on claim requirements.

MEDICAL INFORMATION DISCLAIMER: Per chapter 42.56 RCW (Public Records Act), a filed Claim for Damages and its attachments are subject to public disclosure. If you have any attachments to this claim containing medical information, please enclose those attachments in a sealed envelope marked with your name and the phrase "Medical Contents."

STATE OF WASHINGTON)
County of Spokane)

I, MATTHEW T. SHEA (print name), being first duly sworn, on oath, depose and say: That I have read the foregoing claim, know the matter therein contained, and the same is true to the best of my knowledge.

[Signature]
Claimant

SUBSCRIBED AND SWORN to before me this 25TH day of OCTOBER, 2024

FILE COMPLETED FORM WITH:
Spokane City Clerk's Office
Fifth Floor, Municipal Bldg.
808 W. Spokane Falls Blvd.
Spokane WA 99201-3342
509-625-6350

Cori Gillen
Notary Public in and for the State of Washington,
Residing at Liberty Lake
My commission expires 02/24/2027



Claim for Damages – Attachment

On August 20, 2023, Pastor Matthew Shea helped organize the Let Us Worship event in Spokane, Washington. There, Pastor Shea prayed with thousands of people in attendance. The mayor of Spokane at the time, Nadine Woodward, joined Pastor Shea on stage, where he prayed for Mayor Woodward and her team's leadership of Spokane.

Shortly thereafter, on September 25, 2023, the City of Spokane passed Resolution No. 2023-0081 (the "Resolution"). Council Members Lori Kinnear, Zack Zappone, Betsy Wilkerson, and Karen Stratton voted in favor of passing the Resolution. This Description of Incident incorporates the totality of the Resolution.

The Resolution condemns Pastor Shea's worship, prayer, preaching, and religious beliefs. It also disparages Pastor Shea's Christian beliefs and behavior as "hateful" and "dangerous" and labels them as an ideology that "promote[s] fear, hatred, violence, and bigotry." The Resolution is retaliation against Pastor Shea for his exercising of his constitutionally protected rights of free speech, expression, religious worship, assembly, and association. The Resolution also violates the Establishment Clause through its treatment of Christianity.

The Resolution attaints Pastor Shea as a domestic terrorist to establish his criminal guilt and blameworthiness without a judicial trial. The Resolution assigns and/or attributes guilt to Pastor Shea for domestic terrorism, or associated criminal activity, without any due process of law. Pastor Shea has never been charged with, much less convicted of, any crime associated with domestic terrorism, political violence, or taking up arms against the United States.

Other acts that are relevant to and/or constitute a part of this incident include, but are not limited to, the August 25, 2023, statement/release of Council Members Wilkerson, Stratton, and Zappone, and the contents thereof, including the statement that Pastor Shea is "a domestic terrorist"; the August 30, 2023, statement/release of Council President Lori Kinnear, and the contents thereof; the September 25, 2023, City Council meeting; the legislative record; and the correspondence of Council Members, legislative assistants, staff, advisors, and attorneys concerning the worship event, the Resolution, and/or Pastor Shea, which are too numerous to detail.

The City of Spokane and its Council Members' acts or omissions violate our laws, including but not limited to:

- Violation of Article I, Section 3 of Washington's Constitution – Personal Rights;
- Violation of Article I, Section 4 of Washington's Constitution – Right of Petition and Assemblage;
- Violation of Article I, Section 5 of Washington's Constitution – Freedom of Speech;
- Article I, Section 10 of Washington's Constitution – Administration of Justice – action/remedy for state constitutional violations
- Violation of Article I, Section 11 of Washington's Constitution – Freedom of Religion;
- Violation of Article I, Section 23 of Washington's Constitution – Bill of Attainder, Ex Post Facto Law, Etc.;
- Declaratory Judgment, RCW 7.24, *et seq.*; and
- 42 U.S.C. § 1983 and violations of the rights, privileges, and/or immunities of the U.S. Constitution's First Amendment; Fourteenth Amendment; Article I, Section 9, Clause 3; and Article I, Section 10, Clause 1.

Pastor Shea's claim includes, but is not limited to, noneconomic damages of emotional distress, injury to reputation, mental anguish, inconvenience, loss of society, and humiliation; punitive damages; nominal/presumed damages; declaratory relief; and injunctive relief. The amount of noneconomic and punitive damages is an ultimate fact to be determined by the jury in its constitutional damage-determining role. The Resolution remains in effect and constitutes continuing harm and damage to Pastor Shea.