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KING COUNTY
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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
CASE # 21-2-08166-1 SEA
IN AND FOR THE COUNTY OF KING

[REDACTED] individually,
Plaintiff,

No. 21-2-08166-1

DECLARATION OF [REDACTED]
[REDACTED]

AMERICAN ASSOCIATION OF
ZOOLOGICAL PARKS AND AQUARIUMS
INC. d/b/a ASSOCIATION OF ZOOS &
AQUARIUMS, a Maryland corporation doing
business in King County, Washington; JAMES
J. BREHENY, Chair, a resident of the State of
New York; PEGGY SLOAN, Vice Chair, a
resident of the State of Illinois; DENNIS
KELLY, Past Chair, a resident of the State of
Georgia; ALEJANDRO GRAJAL, Director, a
resident of the State of Washington;
CHRISTOPHER KUHAR, Director, a resident
of the State of Ohio; JOHN LEWIS, Director, a
resident of the State of California; NORBERTO
CASTRO, Director, a resident of the State of
Arizona; CHRIS GENTILE, Director, a resident
of the State of North Carolina; ADRIENNE
ROWLAND, Director, a resident of the State of
Nevada; BRIAN L. DAVIS, Director, a resident
of the State of Georgia; ELIZABETH A.
WHEALY, Director, a resident of the State of
South Dakota; DANIEL M. ASHE, President
and Chief Executive Officer, a resident of the
State of Maryland; KRISTEN VEHRs,
Executive Director, a resident of the State of
Maryland; and RONDA SCHWETZ, a resident
of the State of Wisconsin, individually and the
marital community composed thereof,

Defendants.

1 [REDACTED] declare and testify under penalty of perjury, under the laws of the State
2 of Washington, as follows:

3 1. I am over the age of eighteen and competent to testify to my personal knowledge
4 of the facts below.

5 2. I am currently a Mammal Curator. I was the Conservation Education Curator at
6 Henry Vilas Zoo from May 2011 to August 2017.

7 3. During my career in AZA accredited zoos, I have worked directly with both [REDACTED]
8 [REDACTED] and Ronda Schwetz.

9 4. I have known [REDACTED] for approximately ten years. [REDACTED] and I were
10 colleagues at Henry Vilas Zoo as well as members of AZA.

11 5. I found [REDACTED] to be a very kind, gentle and respectful man. He was respectful
12 in his interactions with me at all times.

13 6. By contrast, Ronda Schwetz was extremely aggressive and verbally abusive to
14 others and me. I observed that she ran hot and cold when it came to [REDACTED]. She was super
15 supportive of his work and showed him off to colleagues or in the professional community. She
16 often took credit for [REDACTED] work. She treated him as a subordinate, and as long as she
17 controlled him, she treated him favorably. When [REDACTED] stood up for himself, her support
18 waned.

19 7. Our work environment was toxic and hostile. Ronda bullied [REDACTED] me and
20 other people who were subordinate to her.

21 8. At work-related functions, Ronda drank to the point of excess on numerous
22 occasions. She would go around the room kissing us.

23 9. Ronda does not have a filter. Ronda openly discussed her sexual hookups with
24 various men and at AZA conferences in explicit detail with me.

25 10. I was once forced to share a hotel room with Ronda at an AZA class where she
26 was one of my instructors. I was so uncomfortable with how she spoke to and treated me that I
27 felt I had no choice but to incur the personal expense to get my own room going forward, after
28 that experience.

1 11. AZA conferences have a long and historical reputation of alcohol and sexual
2 hookups. Attendance at AZA conferences is a critical part of maintaining and developing
3 professional relationships needed to succeed [REDACTED] [REDACTED] or my fields. AZA acknowledges this
4 in its materials saying it provides “unique networking opportunities” which help “cultivate
5 relationships” and “stay informed and engaged with the zoo and aquarium community.”¹

6 12. Alcohol is often freely available at various AZA events—paid for either by the
7 host or cash bar. For example, at one AZA sanctioned event I attended to develop my
8 professional prospects, they handed out margaritas and conference attendees rode around on felt
9 covered motorized animals. I was surprised at the combination of handing out margaritas and
10 providing motorized animals for conference attendees to ride on. I was also surprised that the zoo
11 was still open to guests as conference attendees were riding the motorized animals on the main
12 path around the zoo.

13 13. The true value of AZA conferences and professional classes happens outside of
14 the presentations, often at the bar. Its where a lot of the networking takes place.

15 14. AZA is like high school in that it is a relatively small organization that oversees a
16 small field, and is full of ‘cliques’ of professionals. Because it is such a small field, a mistake,
17 misstep or negative reference can have career-wide or career-ending ramifications.

18 15. When I left Henry Vilas Zoo, I was too scared to give an exit interview for fear of
19 professional retaliation. Ronda creates a toxic culture and AZA allows and nurtures it. I am even
20 concerned about how giving this testimony will affect my career prospects. However, I am
21 concerned that if no one steps forward to provide an accurate factual account of the culture that
22 Ronda and AZA perpetuate, then people like [REDACTED] [REDACTED] will continue to be harmed. I do not want
23 to be part of that.

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

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27
28 ¹ https://annual.aza.org/2021/documents/2021_Virtual_Prospectus_.pdf

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Signed and DATED this August 17, 2021 at Albuquerque, New Mexico.

