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

individually,

No. 21-2-08166-1

Plaintiff,

**DECLARATION OF**

v.

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 I, [REDACTED] declare under the penalty of perjury, that the following is true  
2 and correct:

3 1. I am over eighteen years of age and make this declaration based upon my personal  
4 knowledge.

5 2. I am an Associate Scientist at the University of Wisconsin–Madison.

6 3. I began my career with Henry Vilas Zoo on 7 June 2010, with a zero-dollar  
7 appointment as Research Associate under the direction of then-Deputy Zoo Director, Ronda  
8 Schwetz.

9 4. I began my career with the University of Wisconsin–Madison on August 21,  
10 2013, as a Visiting Scientist in the Department of Surgical Sciences at the University of  
11 Wisconsin–Madison, and was based at Henry Vilas Zoo under the direction of Zoo Director,  
12 Ronda Schwetz.

13 5. I advanced to a full-time paid appointment as an Assistant Professor in the  
14 Department of Surgical Sciences at the University of Wisconsin–Madison, based at Henry Vilas  
15 Zoo and under the direction of Zoo Director, Ronda Schwetz, on November 8, 2017.

16 6. I was an inaugural member of the AZA Orangutan SAFE Program Steering  
17 Committee in 2017, and subsequently an AZA Orangutan SAFE Program Advisor, until I was  
18 removed by AZA from this position in December 2019.

19 7. From approximately 2016 to 2018, I was a Member of the AZA Biomaterials and  
20 Banking Scientific Advisory Group (“BBAG”). I was the Co-Chair of BBAG from 2018 to 2020.

21 8. I have been a Member of the AZA Molecular Data for Population Management  
22 Scientific Advisory Group (“Molecular SAG”) since June 2018.

23 9. Upon invitation by the AZA, I gave a formal presentation to the AZA National  
24 Conference in September 2018.

Signed and DATED this September 20, 2021 at Madison, Wisconsin.



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# **EXHIBIT 1**



July 13, 2018

Dear [REDACTED],

I am organizing a presentation session at the Annual Conference for the Association of Zoos and Aquariums in Seattle, Washington on September 26, 2018. The session focuses on 'new resources and recent successes for applying molecular data to collection management.' Given your expertise in this area, I am writing to invite you to give a 15-20 minute presentation on your molecular research that is informing the population management of captive orang-utans.

The AZA Annual Conference is the largest, most comprehensive zoo and aquarium professionals' event in the country. More than 2,800 delegates are expected to attend this year's conference. I believe your work to be of particular interest to attendees and hope you can join us. Please let me know if you are able to accept this invitation.

Sincerely,

A handwritten signature in cursive script that reads "Jamie A. Ivy".

Jamie A. Ivy, Ph.D.  
Senior Population Biologist  
San Diego Zoo Global  
PO Box 120551  
San Diego, CA 9211  
email: [jivy@sandiegozoo.org](mailto:jivy@sandiegozoo.org)

**From:** [REDACTED]  
**To:** [Sharon Johnson](#)  
**Subject:** Fwd: Molecular Data for Population Advisory Group : Molecular SAG Workshop at AZA Conference  
**Date:** Monday, September 20, 2021 1:19:42 PM

! - HBSS IT Caution - The display name is similar to someone you've previously contacted.

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----- Forwarded message -----

**From:** **Jamie Ivy via Association of Zoos and Aquariums**  
<[Mail@connectedcommunity.org](mailto:Mail@connectedcommunity.org)>  
**Date:** Fri, 14 Sept 2018 at 12:17  
**Subject:** Molecular Data for Population Advisory Group : Molecular SAG Workshop at AZA Conference

[REDACTED]



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Jamie Ivy



Sep 14, 2018 1:18 PM

[Jamie Ivy](#)

Hello All –

For those of you attending the AZA Conference in Seattle, you may have noticed we have some time set aside for a Molecular SAG Workshop. The focus of the workshop will be to demo and train attendees on a new piece of software Anita Norman (postdoctoral research associate at San Diego Zoo Global) has developed to aid sample selection for molecular projects that aim to empirically estimate kinships. We'll also talk a bit about what types of SSPs could benefit from molecular-based kinship estimation and how we're starting to think about prioritizing those species. If any of you will be attending the AZA Conference, we'd love for you to join us! Although we won't be holding a formal Molecular SAG meeting, that timeslot does also provide us an opportunity to connect in person.

I know many of you won't be attending the AZA Conference, but I'm going to provide the link to

download our initial version of the PedSam software in the event anyone wants to take a look. Following any modifications we need to make after the workshop, we'll be putting out a software note and formally making the software available to both the AZA and academic communities. Any thoughts or suggestions for improvement would be much appreciated! You can download the software here:


[www.dropbox.com/sh/d8984djpfobvls3/...](http://www.dropbox.com/sh/d8984djpfobvls3/...)

Cheers,  
Jamie

**Jamie A. Ivy, Ph.D.**

Senior Population Biologist  
San Diego Zoo Global  
p. 619-557-3905 (Zoo)  
p. 760-738-5056 (Safari Park)  
p. 760-747-8702 x5709 (Institute)  
P.O. Box 120551  
San Diego, CA 92112-0551

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You are subscribed to "Molecular Data for Population Advisory Group" as [REDACTED] To change your subscriptions, go to [My Subscriptions](#). To unsubscribe from this community discussion, go to [Unsubscribe](#).

# **EXHIBIT 2**





**AZA 2018**  
ANNUAL CONFERENCE  
Seattle | September 23-27

Registration Information

Registration is now open for the 2018 AZA Annual Conference. The conference will be held at the Seattle Convention Center from September 23-27, 2018. Registration fees are \$1,200 for members and \$1,500 for non-members. Early registration is available until August 15, 2018, at a discounted rate of \$1,000 for members and \$1,300 for non-members. Registration is required for all attendees. For more information, visit [www.aza.org/conference](http://www.aza.org/conference).



ASSOCIATION  
OF ZOOS &  
AQUARIUMS



SEATTLE AQUARIUM



[Schedule](#)

[Exhibits Seattle](#)

[Registration](#)

[Exhibit](#)

Questions? Contact

## Make Plans to Attend

### Registration Now Open

Take advantage of early bird savings by registering for the Annual Conference before Friday, August 17. After this date, regular rates apply. [View](#) all the registration categories available and plan to register online, regardless of payment type.

Individual Member &  
Non-Member  
**REGISTRATION**

Commercial Member &  
Conservation Partner  
**REGISTRATION**

### Hotel Reservations

AZA's headquarters hotel is the [Sheraton Seattle](#). The Annual Conference will take place adjacent to the hotel in the Washington State Convention Center. To ensure registered attendees receive rooms in the discounted AZA hotel block, all attendees must be registered prior to receiving the hotel reservations link. Deadline to save on registration, and receive access to the discounted AZA hotel block, is Friday, August 17.

### Travel Savings

[Explore](#) savings on airfare and ground transportation while in Seattle.

## Surprising Seattle

Known as the Emerald City, Seattle is a unique mix of outdoor and urban. A thriving destination with things to do for city-dwellers and outdoor enthusiasts. Plan to visit popular attractions, museums, restaurants, shopping, wineries - all while taking in the panoramic views of the Pacific Northwest. [Learn more about the many things to do in Seattle.](#)



In addition to the [Seattle Aquarium](#) and [Woodland Park Zoo](#), discover the many AZA-accredited institutions in and around the region. There are [pre- and post-conference tours](#) available for attendees - purchase tickets when you register.

Bookmark [www.aza.org/annualconference](http://www.aza.org/annualconference) for all the details. Registration today!

## Interested in Exhibiting or Sponsoring?

AZA conferences and meetings provide unique opportunities for zoo and aquarium suppliers to promote their products and services, cultivate relationships and stay informed and engaged with this unique community. [Learn](#) about all the ways your company can participate or view the [Annual Conference Prospectus](#).

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8403 Colesville Road, Suite 710, Silver Spring, MD. 20910  
(301) 562.0777 [Send us an email!](#)

AZA Meetings Staff



# **EXHIBIT 3**




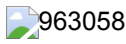



## AZA Annual Conference Registration Confirmation

AZAMeetings@aza.org <AZAMeetings@aza.org>


15 August 2018 at 10:54



 	<p style="text-align: center;"><b>Registration Information</b></p> <p>Henry Vilas Zoo          702 S Randall Avenue          Madison, WI 53715-1600          E-mail: </p>
<p>If you are having trouble viewing the above barcode image, <a href="#">click here to print your barcode.</a></p>	

Sales Date	Description	Unit Price	Qty	Gross Amount
08/15/18	Full Registration Member	\$550.00	1	\$550.00
08/15/18	Icebreaker at the Seattle Aquarium - Complimentary Ticket	\$0.00	1	\$0.00
08/15/18	Honors and Awards Lunch - Complimentary Ticket	\$0.00	1	\$0.00
08/15/18	Zoo Day at the Woodland Park Zoo - Complimentary Ticket	\$0.00	1	\$0.00
<b>Total Sales</b>				<b>\$550.00</b>
08/15/18	Payment By VISA Ronda Schwetz *9719 09/01/2020			(\$550.00)
<b>Balance Due</b>				<b>\$0.00</b>

### Attendee Service Center

Already registered and want a Conference T-shirt? Need to purchase an extra Zoo Day ticket? Visit the [Attendee Service Center](#). Your login is  and your password is **BAKE7516**.

### Hotel and Travel Information

All meetings, program sessions, General Sessions, and Exhibit Hall events will take place at the Washington State Convention Center.

#### Sheraton Seattle Hotel

[1400 6th Avenue](#)

Seattle, WA 98101

[Make Your Reservation Online](#)

The hotel has limited availability on most nights.

#### Westin Seattle Hotel

[1900 5th Avenue](#)

Seattle, WA 98101

[Make Your Reservation Online](#)

The hotel has limited availability on most nights.

### **Homewood Suites Seattle - Convention Center/Pike Street**

1011 Pike Street  
Seattle, WA 98101

[Make Your Reservation Online](#)

### **Residence Inn Seattle Downtown/Convention Center**

[1815 Terry Avenue](#)  
Seattle, WA 98101

[Make Your Reservation Online](#)

*The discounted AZA rate is for registered attendees of the 2018 Annual Conference and only available until Friday, August 17, or until the room block sells out, whichever comes first. You must register for the conference first, before booking your hotel accommodations.*

### **Registration Hours**

Registration will be located in the Exhibit Hall on the 4th Floor of the Washington State Convention Center. All attendees are required to go to the Registration Desk to get your badge and registration materials.

Sunday, September 23 - 7:00 am - 5:30 pm  
Monday, September 24 - 7:00 am - 6:00 pm  
Tuesday, September 25 - 7:00 am - 5:30 pm  
Wednesday, September 26 - 7:00 am - 5:30 pm  
Thursday, September 27 - 7:00 am - 10:30 am

### **Exhibit Hall**

The [Exhibit Hall](#) will be located in the Exhibit Hall on the 4th Floor of the Washington State Convention Center. The Exhibit Hall will be open during the following hours:

Tuesday, September 24 - 9:30 am - 6:30 pm  
Wednesday, September 25 - 1:30 pm - 7:00 pm

There will be two receptions in the Exhibit Hall. The Party On The Floor Reception will take place on Tuesday from 5:30 pm - 6:30 pm and the Poster Reception will take place on Wednesday from 5:30 pm - 7:00 pm.

### **Conference Policies**

Be sure to view the [Meetings Code of Conduct and Registration Policies](#).

**Refund Policy:** All refund requests must be received in writing by Friday, August 24, 2018. Refund requests received after this date will be reviewed on a case by case basis. No refund consideration will be given for requests received after Monday, October 11, 2018. Approved refunds will be issued within 30 business days and a \$75 processing fee will be deducted. Substitutions from the same institution or company will be accepted in writing without penalty. *Icebreaker, Honors & Awards Lunch, and Zoo Day tickets are nonrefundable.* Please send cancellation or substitution requests to: AZA, ATTN: Cheryl Wallen, [8403 Colesville Road, Suite 710, Silver Spring, MD 20910](#) (e) [cwallen@aza.org](mailto:cwallen@aza.org) (f) 301-562-0888.

### **Have Questions?**

Contact Cheryl Wallen at [cwallen@aza.org](mailto:cwallen@aza.org).

**We look forward to seeing you in Seattle!**