

FILED THE HONORABLE MELINDA YOUNG
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KING COUNTY Hearing Date: December 15, 2022, 9:00 a.m.
SUPERIOR COURT CLERK WITH ORAL ARGUMENT
E-FILED
CASE #: 21-2-08166-1 SEA

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

[REDACTED] individually,

Plaintiff,

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, et al., and RONDA SCHWETZ, a
resident of the State of Wisconsin, individually and the
marital community composed thereof,

Defendants.

No. 21-2-08166-1 SEA

**DECLARATION OF RONDA
SCHWETZ IN SUPPORT OF
DEFENDANT SCHWETZ'S
MOTION FOR SUMMARY
JUDGMENT**

I, Ronda Schwetz, declare as follows under the penalty of perjury of the laws of the State of Washington:

1. I am over the age of 18 and otherwise competent to testify to the matters set forth herein and do so based on my personal knowledge.

2. I have been a resident of the State of Wisconsin since 2010. I moved to Madison in 2010, when I took a job as Deputy Director of the Henry Vilas Zoo in Madison ("HVZ"). HVZ is a municipal zoo owned and operated by Dane County, Wisconsin, and therefore, I am

**DECLARATION OF RONDA SCHWETZ IN
SUPPORT OF DEFENDANT SCHWETZ'S
MSJ (21-2-08166-1 SEA) - 1**

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1 an employee of Dane County. HVZ is one of the few remaining admission-free community-
2 sponsored zoos in the United States. In October 2011, I was promoted to the position of
3 Executive Zoo Director for HVZ. From October 2011 to the present, I have been employed as
4 the HVZ Executive Zoo Director.

5 3. I have known the plaintiff, [REDACTED] since approximately 2010 when we
6 met at an orangutan workshop. Eventually, we became friends. From the beginning of our
7 friendship, [REDACTED] told me that he was gay, and I have personally met one of more of his male
8 partners. I am a married, heterosexual female, with two children.

9 4. [REDACTED] contends that I was his day-to-day supervisor at HVZ, which is
10 untrue. The HVZ provided him space at HVZ to perform his work, but at all times he was
11 employed by the University of Wisconsin-Madison.

12 5. As part of my role as Executive Director of HVZ, I have been an active member
13 of the Association of Zoos & Aquariums (“AZA”). In September 2018, I attended the AZA’s
14 Annual Conference in Seattle, Washington. One of the reasons I attended this conference was
15 that HVZ was up for accreditation by the AZA, and I needed to be physically present at the
16 conference in order to attend meetings related to this accreditation process (which is within the
17 scope of my employment as Executive Zoo Director for HVZ). During this 2018 AZA Annual
18 Conference in Seattle, I was also elected by the AZA as the chairperson of the AZA’s Ethics
19 Board. I did not attend the entire annual conference in Seattle; I left 1-2 days early and returned
20 home to Wisconsin to attend to work matters. I have not returned to the State of Washington
21 since the 2018 Annual AZA Conference in Seattle.

22 6. On October 13, 2021, the Seattle Municipal Court entered a “Stipulated Order of
23 Continuance and Waiver of Rights.” It is my understanding that under the terms of this

1 document, if I meet certain conditions, all criminal charges filed against me by the City of
2 Seattle (per the complaint by [REDACTED] will be dismissed after October 13, 2023, with no
3 plea or conviction.

4 DECLARED under penalty of perjury this 15 day of November 2022 at Madison,
5 Wisconsin.

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7 Ronda Schwetz

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**DECLARATION OF RONDA SCHWETZ IN
SUPPORT OF DEFENDANT SCHWETZ'S
MSJ (21-2-08166-1 SEA) - 3**

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CERTIFICATE OF SERVICE

The undersigned hereby certifies under the laws of the state of Washington that on the date written below, I caused a true and correct copy of the foregoing with the Clerk of the Court using the KCSC e-filing system, which will send notification of such filing to the following:

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*Attorneys for American Association of
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Executed November 17, 2022, at Seattle, Washington.

s/Lois Widmer
Lois Widmer, Legal Secretary