

1. I am the owner of Shakey's Pizza in Pasco, Washington. Governor Inslee's lockdown has dramatically hampered my ability to keep my successful business of over 28-years afloat. His actions to forcibly close my business without listening to the people, and with no regard to my rights to earn a living. Forcing me, and my business into quarantine is against my constitutional rights.

2. I have been a successful entrepreneur for 28-years, and have worked tirelessly to make a solid, stable business. Because of Jay Inslee's stay at home order to close my restaurant, I have watched helplessly as over \$40,000.00 dollars of working capital vanish. I am a family and a group gathering place. A place for meetings, parties, teams, groups of all sizes to come, eat, play, watch sports, and have a good time. Our very popular, all you can eat "Bunch of lunch" buffet, and parties was always Shakey's marketing strategy since 1953!!

3. I have never been a delivery place, or a take-out place(less than 4% of sales normally). The Governor's order was given with no notice to us. No chance to respond; no chance to make our case that we were essential. This forced me to close my dining room, and to start marketing the opposite way as we have been doing since being open. Business does not work like that. We are failing rapidly!!

4. Since closing, my restaurant, sales have been down daily from 60 - 90%. I was not a struggling business, I was a solid, and profitable business that was forcibly closed.

5. My solid business was closed while I watched hordes of customers in Walmart, Costco, home improvement, and gas stations operating normally for the first three weeks of the shut down, and even now almost 60 days later, I see grocery carts pass from one person to another, and gas pumps used over and over without sanitizing.

6. As a business owner I was not able to collect unemployment compensation, and instead of a steady pay draw as I have worked hard for and enjoyed for years is now losing over \$15,000 dollars a month!! This is not right, and I ask for relief.

7. At the beginning of this stay home order, it was for two weeks to “flatten the curve”. Well sir, we have had no curve here in the Tri-Cities. Our hospitals have been furloughing staff and have been empty the entire time. Now 60 days later with my business holding on by a thread, we are still closed for no good reason.

8. The “second phase” of opening for the state was just set out by Inslee, to begin on the 11th of May. My restaurant will have to jump through multiple hoops to even allow 50% in my dining room!! I am now supposed to collect personal data from my customers and keep it for 30 days! No other business is being forced to

report on its customers! No buffet is allowed. No arcade is allowed. I ask you: what is the difference from passing a grocery cart from one person to another, or one person pumping gas and then another and another without sanitizing, and letting kids play a video game one after another?

9. Governor Inslee’s lockdown is an infringement of my rights of Washington State, and the United States Constitutions. It has caused irreparable harm to my business, and I am requesting the court to give us a judgment for relief of this massive injustice of our Constitutional rights.

This is my declaration signed in _____ Washington, this ____ day of May 2020.

Dean Wellsfry, Plaintiff

STATE OF WASHINGTON)
) ss
COUNTY OF _____)

On this day Dean Wellsfry personally appeared before me; and is known to me to be the individual described in and who executed the foregoing instrument and acknowledged that it was signed as a free and voluntary act and deed, for the uses and purposes herein mentioned.

DECLARATION OF DEAN WELLSFRY
CASE NO.: 3:20-cv-5408

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Given under my hand and official seal this _____ day of _____
2020.

(Signature of officer and official seal)

(printed name)

Notary Public in and for the state of Washington

Residing at _____

My commission expires: _____