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Original via U.S. First Class mail and via
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November 20, 2017

Tom McCabe
Chief Executive Officer
Evergreen Freedom Foundation
P.O. Box 552
Olympia, WA 98507

Re: Defamatory Statements on Freedom Foundation's Website
SCBIL File No. 3263-999

Dear Mr. McCabe:

This letter constitutes a formal request by SEIU 775, pursuant to Washington State's Uniform Correction or Clarification of Defamation Act, RCW 7.96, that you correct or clarify statements currently being made by the Evergreen Freedom Foundation ("Freedom Foundation") on its website, <https://www.freedomfoundation.com/labor/inside-seiu-775s-toxic-workplace-culture>, regarding SEIU 775 President David Rolf.

On that website, you assert that President Rolf influenced or participated in a decision concerning the relationship between SEIU 775 and a vendor, knowing that his spouse had a substantial ownership or financial interest in that vendor. You assert that, by doing so, President Rolf likely violated section 5(c)(2) of the SEIU Code of Ethics and Conflict of Interest Policy. And you assert that President Rolf had "direct, personal responsibility" for authorizing the payments to his spouse's employer.

You made and are continuing to make these assertions with actual knowledge that they are false. On October 30, 2017, during the deposition under oath of Mr. Rolf taken in connection with *SEIU 775 v. Elbandagji, et al.*, King County Case No. 16-213095-0, the undersigned counsel informed both the Freedom Foundation's outside counsel and the Freedom Foundation's Litigation Counsel, Dave Dewhirst, that Mr. Rolf neither knew of, nor authorized, the hiring of Sound View Strategies, the vendor you allege Mr. Rolf was involved in hiring. As I stated, on the record, on that date:

Mr. Rolf's wife was at certain points of time employed by a company called Sound View Strategies, and at certain points of time while Mr. Rolf's wife was employed by Sound View Strategies, Sound View Strategies performed work on one or more contracts for SEIU 775. Mr. Rolf's wife personally did not perform any work on any of the contracts that SEIU 775 was -- that Sound View Strategies

was performing for SEIU 775, and Mr. Rolf did not have any personal knowledge that SEIU 775 was using Sound View Strategies at that time.

In addition to not working on the contract for SEIU 775, Kylie Rolf did not receive any economic benefit specifically as a result of Sound View Strategies performing that contract.

By this letter, you are also on notice that SEIU 775 strongly supports the recommendation of the HALA task force and has supported Seattle For Everyone ("SFE"), which is a coalition of unions, community organizations, businesses, and others focused on supporting those recommendations and creating more affordable housing in Seattle. SEIU 775 made a \$5,000 contribution to SFE in 2016 to support that effort. SFE independently contracted with Sound View Strategies to provide consulting support to the campaign. SEIU 775, and per force President Rolf, did not direct, require, or request SFE to contract with Sound View Strategies as a condition of providing our funding. Your implication otherwise is therefore similarly defamatory.

By making the statements that are currently contained on your website, and not modifying or limiting those statements so that they are in conformity with the information in the Freedom Foundation's possession from Mr. Rolf's deposition—and the additional information regarding SFE noted above—you are defaming President Rolf directly, by implication and by omission, and placing him in a false light, all of which are actionable under state law. You are doing so not merely with reckless disregard for the falsity of your statements, but with actual knowledge of same. Nor is your conduct in any way privileged by law. We therefore demand, pursuant to RCW 7.96.040, that you immediately both remove and correct the offending assertions and that you do so in conformity with the requirements of RCW 7.96.070.

Pursuant to RCW 7.96.070(1), we demand that these measures be taken within thirty days of today's date, at the latest.

Respectfully,



Dmitri Iglitzin
Counsel for SEIU 775

cc: SEIU 775