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**BEFORE THE HEARING EXAMINER
CITY OF SEATTLE**

In the Matter of the Citation Issued to
SEATTLE EVENTS/HEMPFEST CENTRAL

by the Director, Department of Finance
and Administrative Services, for violation of the
Marijuana Businesses Code

NO. MJ-17-04-002

DISCOVERY DEMAND

Pursuant to Hearing Examiner Practice Rule 3.11, Seattle Events demands the following
items of discovery:

- A. A complete copy of the entire file re: Citation MJ17-04-002, including
 - o the citation, and
 - o any and all underlying and related reports, and
 - o any and all notices purportedly sent, and
 - o proof of service.

- B. If any representative of the City paid for a Hempfest membership, please provide all vouchers, reports, reimbursement requests, checks, receipts and other documents related to the membership fee.

- C. Any and all photographs that were taken by any City of Seattle FAS employee or representative at any Hempfest event since January 1, 2017.

- 1 D. Any and all documents, literature, flyers, posters, and other items that any
2 representative of the City obtained from Seattle Events and/or from Seattle
3 Events, and/or from any representative, member or other person while in
4 attendance at any Hempfest event, including the 420 event that was held on April
5 20, 2017.
- 6 E. All communications and all notes of communications between David Mendoza of
7 the Mayor's Office and Department of Financial and Administrative Services
8 (FAS) with respect to its intentions or plans to issue a citation to Hempfest for the
9 420-fest.
- 10 F. All communications between David Mendoza of the Mayor's office and each and
11 every FAS employee relative to Seattle Events and/or Seattle Hempfest.
- 12 G. All communications, notes, and documents relative to David Mendoza's stated
13 representation to Vivian McPeak, Executive Director of Seattle Events that "we
14 were not going to be this same type of enforcement at Hempfest itself where that
15 is still primarily a First Amendment protected, you know, free speech event."
- 16 H. All communications, notes, and documents relative to David Mendoza's stated
17 representation to Vivian McPeak, Executive Director of Seattle Events that
18 Seattle City officials and employees "did not think that 420-fest met that criteria
19 and that it was more looking like just another event and that kind of activity of a
20 business sponsoring or a non-profit sponsoring an event where people are
21 smoking isn't allowed. So, we're going to be issuing a citation for a thousand
22 dollars, um, to that effect."
- 23 I. A list of all witnesses who the City intends to call, together with
- 24 ○ The witness' name, job title, work address and work telephone number
25 and email address
 - 26 ○ The witness' emails relative to Seattle Events, dba Seattle Hempfest, at
any time or date since October 1, 2016, whether or not related to the 420
Event
 - The witness' reports, notes, and any photographs and videos either taken
by the witness or depicting the witness or depicting any Seattle Events
event, including but not limited to the 420-fest, at which the witness was
present
 - The witness' social media pages and posts that depict or refer to Seattle
events and/or Hempfest.
- J. Any and all social media pages or posts that the City has collected on Seattle
Events and/or Seattle Hempfest since January 1, 2016.

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K. All other citations issued by FAS for any violation of SMC Chapter 6.500, at any time or date.

L. Any and all exculpatory evidence in the possession of the City of Seattle, including any and all of its enforcement agencies and including the Mayor's Office and the Department of Financial and Administrative Services (FAS).

DATED this 21st day of July, 2017.

**LAW OFFICES OF
FRED DIAMONDSTONE**



Fred Diamondstone
WSBA No. 7138
Attorney for Seattle Events

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DECLARATION OF SERVICE

I hereby certify that I have served a true and correct copy of the foregoing *Discovery Demand* upon the individual(s) listed herein by the following means:

Stephen Manning, WSBA 36965
Assistant City Attorney
701 Fifth Ave, Suite 2050
Seattle WA 98104-7097

Via

email to
Stephen.manning@seattle.gov

Legal Messenger for delivery by 5:00
p.m. on:

Department

Tim Guice
Debra Hernandez
Ianne Santos
Cheri MacLeod
FAS Marijuana

Via

email to
Tim.Guice@seattle.gov
Debra.Hernandez@seattle.gov
Ianne.Santos@seattle.gov
Cheri.MacLeod@seattle.gov
marijuana@seattle.gov

I declare under the penalties of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Signed at Seattle, Washington, on July 21, 2017.



Fred Diamondstone