

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

THE DOWNTOWN SOUP KITCHEN d/b/a  
DOWNTOWN HOPE CENTER,

Plaintiff,

v.

MUNICIPALITY OF ANCHORAGE,  
ANCHORAGE EQUAL RIGHTS  
COMMISSION, and PAMELA BASLER,  
Individually and in her Official Capacity as  
the Executive Director of the Anchorage  
Equal Rights Commission,

Defendants.

Case No. 3:18-cv-00190-SLG

**DECLARATION OF  
SONJA REDMOND**

I, Sonja Redmond, declare as follows:

1. I am a citizen of the United States and a resident of the State of Alaska. I am competent to make this declaration and the facts stated herein are within my personal knowledge.

2. I am an attorney of record for The Downtown Soup Kitchen d/b/a The Hope Center (the “Hope Center”) in Case No. 3:18-cv-00190-SLG; *The Downtown Soup Kitchen v. Municipality of Anchorage, et al*, pending in the United States District Court for the District of Alaska and AERC Case No. 18-041, *Complainant v. Downtown Hope Center*, pending before the Anchorage Equal Rights Commission (AERC Case No. 18-041).<sup>1</sup> Before its dismissal, I was also an attorney of record for the Hope Center in AERC Case No. 18-167;

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<sup>1</sup> The name of the complainant is not included in the style of the complaint or exhibits attached to this declaration for privacy reasons.

*Pamela Basler v. Downtown Hope Center, et al*, pending before the Anchorage Equal Rights Commission (“AERC Case No. 18-167”).

3. On June 21, 2018, I filed the notices of appearance for attorneys at Alliance Defending Freedom, counsel representing the Hope Center in AERC Case No. 18-167. The Notice of Appearance of Counsel for Ryan J. Tucker states he is designated as the “contact person” for the Hope Center.

4. On multiple occasions I informed the Anchorage Equal Rights Commission (“Commission”) that Ryan J. Tucker at Alliance Defending Freedom was the “contact person” in AERC Case No. 18-167, but the Commission continued to contact me directly instead.

5. On July 5, 2018, Ryan J. Tucker sent an e-mail to the Commission in AERC Case No. 18-167 with two attachments (“July 5 E-mail”). The first attachment was a cover letter that in part reiterated Mr. Tucker’s role as the “contact person.” The second attachment to the July 5 E-mail was the Hope Center’s Motion for Lack of Jurisdiction.

6. In response to Mr. Tucker’s July 5 E-mail, Pamela Basler, Executive Director of the Commission, responded solely to me via e-mail on July 6, 2018, and advised that all submissions to the Commission were to go through me as the “contact person.”

7. On July 9, 2018, I attended the Fact Finding Conference in AERC Case No. 18-167 (“Conference”).

8. Before the Conference began, John Thorsness, counsel for Respondent Brena, Bell & Clarkson, requested that the proceeding be recorded by a court reporter. In response, Andrew Sundbloom, Investigator for the Commission, denied the request and stated that the Commission controlled the process and made the rules and regulations.

9. During the Conference, Pamela Basler accused the Hope Center of not truthfully answering interrogatories in AERC Case No. 18-041 and alluded to “evidence” she had in her possession that allegedly supported the Commission’s position. When pressed for production of those materials, Ms. Basler informed counsel that she would do so via e-mail sometime during the week.

10. On July 13, 2018, I asked Ms. Basler to e-mail me copies of the written materials she alluded to during the Conference.

11. In response to my e-mail sent on July 13, 2018, to Ms. Basler, Mr. Sundbloom e-mailed me later that day informing me that no supplemental information was required of the Hope Center, nor was the Commission going to produce any information. Instead, Mr. Sundbloom suggested that the parties focus on settlement discussions.

12. Exhibit R is a true and correct copy of an e-mail dated June 21, 2018, from me to the Commission, along with the notices of appearance that accompanied that e-mail.

13. Exhibit S is a true and correct copy of an e-mail dated July 5, 2018, from Ryan J. Tucker to the Commission, along with the letter that accompanied his e-mail.

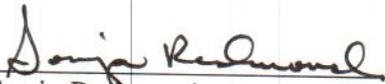
14. Exhibit T is a true and correct copy of an e-mail dated July 6, 2018, from Pamela Basler to me.

15. Exhibit U is a true and correct copy of an e-mail dated July 13, 2018, from me to Pamela Basler.

16. Exhibit V is a true and correct copy of an e-mail exchange between me and Andrew Sundboom beginning on July 13, 2018.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing facts are true and correct to the best of my knowledge.

Executed on the 30<sup>th</sup> day of October, 2018, in Soldotna, Alaska.

  
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Sonja Redmond