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7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
8 IN AND OF THURSTON COUNTY

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10 BRIAN SONNTAG, a Pierce County voter
11 and former County official; JEFF JOSEPH, a
12 Pierce County voter and Republican Precinct
13 Committeeperson; and HOLLIE ROGGE,
14 Pierce County voter and a former Pierce
15 County Charter Commissioner, Petitioners,

16 vs.

17 PIERCE COUNTY, a home rule charter
18 county government,

19 Respondent.

No.

DECLARATION OF HOLLIE ROGGE IN
SUPPORT OF PETITION TO VOID
CHARTER AMENDMENT 53 AND
PROHIBIT PIERCE COUNTY FROM
PLACING AMENDMENT 53 ON THE
BALLOT

20 I, HOLLIE ROGGE, make the following statement under oath subject to penalty of
21 perjury under the laws of the State of Washington:

22 1.1 I am over the age of eighteen and competent to testify in this matter.

23 1.2 My testimony is based on my education, training, and experience as an elected Pierce
24 County official - an immediate past Charter Review Commissioner, and a Pierce County
25 voter. I testify from personal knowledge.

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27 1.3 I am opposed to Charter Amendment 53. I voted against the measure when it came
28 before Pierce County Charter Review Commission for final passage in June of 2026.

29 Attached as **Exhibit A** is a true and correct copy of Charter Amendment 53. Attached as

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31 **Exhibit B** are true and correct copies of meeting minutes from the Charter Commission

review and consideration of Charter Amendment 53. Attached as **Exhibit C** are true and correct copies of transcribed audio recordings from the hearings on Charter Amendment 53. Attached as **Exhibit D** are true and correct copies of public comments submitted to the Commission on Charter Amendment 53. Attached as **Exhibit E** is a true and correct copy of Pierce County's Charter.

1.4 I am a petitioner in this matter and am seeking a court order voiding Pierce County Charter Amendment 53 or otherwise prohibiting placement of the proposal on the ballot.

1.5 I voted in the 2024 election for Sheriff Swank. I also voted for Pierce County Executive. So did many of my constituents. I voted for the Sheriff, and others to serve four-year terms. When I voted for Sheriff, I selected among the non-partisan candidates. When I voted for Executive and Councilmembers, I selected partisan candidates. I am opposed to my selection for Sheriff being replaced by a partisan Executive who I did not vote for and a majority of Pierce County voters did not vote for to appoint a partisan Sheriff.

1.6 I also object to taking the office away from the people and making the office subordinate to a partisan elected executive who does not hold an office historically controlled by the people like the Sheriff's Office.

1.7 The Charter Review discussions about Amendment 53 were specific to Sheriff Swank. Supporters criticized his leadership and grounded the purpose for Amendment 53, particularly the immediate effective date, on their objections to his leadership and public expression. The constituents I represent do not have the same criticisms as the Executive or his supporters.

1.8 I am concerned that Amendment 53 would set a dangerous precedent when bypassing the established recall process for removing an elected official. Recall provides due process,

1 including judicial review, and established checks and balances for both the electorate and
2 the officeholder. Amendment 53 instead proposes to remove the Sheriff automatically,
3 without cause, justification, or judicial review.
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5 1.9 Washington law requires a recall charge against an elected officer to allege malfeasance,
6 misfeasance, violation of the oath of office, or other constitutionally specified grounds,
7 supported by a detailed and verified factual statement. Amendment 53 would produce the
8 same practical result—ending the elected Sheriff’s tenure—without requiring any
9 identified misconduct or compliance with those safeguards.
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11 1.10 Washington law further requires a recall petition against a county officer in a county of
12 Pierce County’s size to obtain signatures equal to twenty-five percent of the votes cast for
13 that office at the preceding election. Amendment 53 would evade that voter-driven
14 threshold and replace it with a structural amendment directed at the office holder during
15 the incumbent’s elected term.
16

17 1.11 State law and Pierce County code separately identifies county elective offices and assigns
18 the Sheriff statutory duties, including law-enforcement and civil-process responsibilities.
19 Converting the Sheriff into an executive department would alter both the voters’ selection
20 of the officeholder and the office’s independent accountability while those statutory
21 duties remain in force.
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23 1.12 Pierce County Council may recommend charter amendments with a supermajority. If an
24 elected officer may be removed by Charter Amendment, the Council would have the
25 power to recommend Pierce County voters amend Pierce County Charter to eliminate any
26 office, and its office holder whose speech does not align with majority rule without a
27 recall process. This would include fellow councilmembers.
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1.13 My concern is justified. Pierce County's Deputy Executive gave a presentation to the Commission about how it is so hard to get anything done with the federation of positions in the county. He said many times how much easier government would be if there were not elected positions.

1.14 Pierce County Executive Ryan Mello stated that his staff speak for him, they do it all the time and he trusts them completely. Placing additional elected offices under the Executive's authority would concentrate more power in that office and shift control away from Pierce County voters. Pierce County is not politically uniform, and Amendment 53 advances the Executive's stated objective of consolidating authority. Unlike the Sheriff, the Office of Executive has no constitutional recognition. Control over who occupies the Sheriff's Office should remain with me and my constituents.

1.15 Voters cannot vote affirmatively on Amendment 53 or even consider it without infringing upon the 2024 Sheriff's election and the rights I exercised in that election.

1.16 My injury is immediate and concrete because Amendment 53 would diminish the effect of my completed 2024 vote before the elected term expires, eliminate my opportunity to hold the Sheriff directly accountable at the next election, and transfer that accountability to an Executive chosen through a separate partisan contest.

The above information is true and correct to the best of my abilities.

Dated this 21st day of August, 2026 at Enumclaw, WA.

Hollie Rogge

Petitioner Hollie Rogge