

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
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BY SUSAN L. CARLSON  
CLERK

No. 98633-9

SUPREME COURT OF THE STATE OF WASHINGTON

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UNEMPLOYMENT LAW PROJECT, et al.

Petitioners,

v.

SUZAN LEVINE, COMMISSIONER FOR THE WASHINGTON STATE EMPLOYMENT  
SECURITY DEPARTMENT,

Respondent.

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DECLARATION OF CHYNNA GLENN

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THE SHERIDAN LAW FIRM, P.S.

John P. Sheridan, WSBA #21473  
Mark W. Rose, WSBA #41916  
Andra Kranzler, WSBA # 44098  
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Hoge Building, Suite 1200  
705 Second Avenue Seattle, WA 98104 (206) 381-5949

Attorneys for Petitioners

I, CHYNNA GLENN, declare that the following statement is true and correct:

1. My name is Chynna Glenn.
2. I am over the age of eighteen (18) and competent to make this declaration.
3. I am a resident of Enumclaw in King County, WA.
4. I worked at Naches Tavern since November of 2019 as a line cook.
5. I became unemployed when the tavern shut down on March 14<sup>th</sup>, 2020.
6. I applied for regular unemployment benefits on March 19<sup>th</sup>, 2020.
7. On April 20<sup>th</sup>, 2020, I received a single payment of \$235, for the week of March 21<sup>st</sup>, 2020.
8. On April 21<sup>st</sup>, 2020, I received a monetary determination approving me for the PUA.
9. On that same day, April 21<sup>st</sup>, 2020, I received a single payment of \$235 for the week of March 28<sup>th</sup>, 2020. After that, my weekly filing claim started appearing under an old UI claim from 2018 and said that it was pending from 4/25--5/2. At this point I called and asked ESD to move the claim to the PUA claim. I received payment for these weeks.
10. On May 15<sup>th</sup>, 2020, I received notifications saying that I had to verify my identity, that I had a timely filing issue, and had received an overpayment. They requested that I explain why I might have been

overpaid. I sent in my driver's license and social security information, as well as explain why I might have been overpaid, stating I haven't been overpaid.

11. They did not verify my identity or resolve the "timely filing" issue, but my account is currently being adjudicated, and the dates on this keeps changing. I have screenshots of all this.

12. A couple days later, on May 17<sup>th</sup>, 2020, y bank froze my account and requested that I verify my identity. It took two days to get it fixed, and meanwhile I could not access any of my checking account.

13. For the next several weeks, the phone lines went down, from 5/9—6/13, and my claim has been pending under the same expired UI claim. I have not been able to reach a representative and move the claim over to my PUA claim.

14. I have taken the following actions to address this issue with ESD: I have called numerous times. I probably spend twelve hours a week on the phone trying to get a hold of ESD. Once the lines went down, I gave up on calling but continued to send messages over my account and sent my identification when prompted. When nothing came of it, I contacted Rep. Kim Schrier. She sent back an impersonal form email, justifying ESD's response and repeating the same lip service ESD was giving to other Washington residents. I contacted the Deputy Commissioner, but he responded by telling me that I shouldn't contact ESD again or it could bump me down "escalation cue." This felt like a veiled threat, so I stopped contacting ESD.

15. I have been significantly and adversely affected in the following ways due to my not receiving my unemployment benefits: Basically, my mother and I are living in a one-room cabin that doesn't have a kitchen. We used to be able to use the kitchen at work, but since the stay-at-home order, we have not been able to cook anything that doesn't fit in a toaster oven. We were trying to move into a duplex my mom's cousin, who is a COVID-19 response worker, but Williams Investments said that they couldn't approve us because our unemployment is not considered income, plus it's not consistent enough anyways. We've tried to apply to several other places, but they've all rejected us based on our economic situation. I also don't have any savings, since I am a food service worker. I live week to week, so I don't have any financial cushion to rely on.

16. My level of fear and stress levels are fairly high because of my financial situation. I've been taking mood and stress medicine to cope with everything.

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

DATED this 16<sup>th</sup> day of June, 2020 in Seattle, Washington.

/s/ Chynna Glenn  
CHYNNA GLENN

**CERTIFICATE OF SERVICE**

I, Tony Dondero, certify under penalty of perjury under the laws of the State of Washington and the United States that, on June 23, 2020, I served the document to which this Certificate is attached to the party listed below in the manner shown.

ROBERT FERGUSON  
Attorney General

Eric D. Peterson, WSBA #35555  
Senior Assistant Attorney General

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Assistant Attorney General

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- By United States Mail
- By Legal Messenger
- By Facsimile
- By Overnight Fed Ex Delivery
- By Electronic Mail

Dated this 23rd day of June 2020.

*s/Tony Dondero* \_\_\_\_\_  
Tony Dondero,  
Legal Assistant

**THE SHERIDAN LAW FIRM, P.S.**

**June 23, 2020 - 2:19 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 98633-9  
**Appellate Court Case Title:** Unemployment Law Project et al. v. Suzan Levine

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