

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CITIZENS OF EBEBY'S RESERVE FOR A
HEALTHY, SAFE & PEACEFUL
ENVIRONMENT,

Plaintiffs,

v.

U.S. DEPARTMENT OF THE NAVY;
ADMIRAL BILL GORTNEY, in his official
capacity as the Commander, Fleet Forces
Command; and COMMANDER MIKE
NORTIER, in his official capacity as
Commander Naval Air Station Whidbey
Island,

Federal Defendants.

NO. 2:13-cv-01232-TSZ

DECLARATION OF CECILIA
ASKINS

I, CECILIA ASKINS, declare as follows:

1. I am over the age of 18 and competent to testify in this matter. The information in this declaration is based on my personal belief.

2. I am 37 years old. I am married and live in Admirals Cove, just outside of Coupeville, and about one half mile from the OLF Coupeville runway. There are no APZ or no crash zone designations for the OLF. If there were, Admirals Cove would be in the APZ

THE PROHIBITED ACTS

WESTERN DISTRICT OF MISSOURI
AT ST. LOUIS

NO. 13-cv-01232-TSZ

DECLARATION OF CELIA ASKINS

CELIA ASKINS, Plaintiff,
vs.
THE UNITED STATES OF AMERICA, Defendant.

U.S. DEPARTMENT OF THE NAVY
ATTORNEY JEFFREY GORTYEN, in his official capacity as the Commanding Officer, Naval Air Station Whiting, Maryland, and COMMANDER MARK NOBLE, in his official capacity as Commanding Officer, Naval Air Station Whiting, Maryland.

Federal Defendants

I, CELIA ASKINS, declare as follows:

I am over the age of 18 and competent to testify in this matter. The information in this declaration is based on my personal belief. I am 33 years old. I am married and live in Andrews Cove just outside of Coquille and about one-half mile from the Coquille University. There are no other persons on the same property as the Andrews Cove. If there were, Andrews Cove would be on the AN.

DEPARTMENT OF JUSTICE
915 North 4th Street
Seattle, WA 98107
Phone: (206) 462-2000
Fax: (206) 462-2010

DECLARATION OF CELIA ASKINS
NO. 13-cv-01232-TSZ - 1

1 I zone and not allow residential development. Admirals Cove is a sweet community that is
2 being destroyed by jets flying at tree top height over all of our homes when they are
3 practicing their FCLPs. There are 400 other homes in Admiral's Cove, and 1,200 people,
4 including many children. Admiral's Cove has its own club house and pool, which is so
5 great for my young children, and one of the reasons we chose it.
6

7 3. We moved into our home 7 months ago. The noise disclosure we read
8 before closing said that there was an airport nearby, nothing about an OLF or Growlers or
9 the noise that these jets make. If there had been an accurate noise disclosure statement ,
10 we never would have chosen this location. Since we moved in, a lawsuit was filed against
11 the local Realtors because of this very reason, the Noise Disclosure we saw didn't tell the
12 truth.
13

14 4. We came from Texas, and moved to Whidbey Island because it's beautiful
15 and a wonderful place to raise our boys, Ian and Giacomo. We love our neighborhood
16 because it looks like an old fishing village. But after living here, and hearing the jets, and
17 seeing the toll the noise is taking on my family, we now feel that the area around the OLF is
18 not a safe place to raise our children, and have put our newly purchased home up for sale.
19

20 5. I am a housewife. I currently care for my one year old and five year old in
21 our home. The jets interfere with our daily lives as well as our ability to get a restful night
22 of sleep. On the nights they fly until late, it's so loud and frequent with the jets passing
23 over, that my entire household (including my baby) is kept awake until they are done,
24 12:30 – 1:00 a.m. Then after this, they have anxiety and have difficulty sleeping the rest of
25 the night. It even affects how they sleep the evenings prior to these late flights. Mid-day
26 flights affect my one year olds nap schedule. On the nights that they don't fly over, when it
27

28
DECLARATION OF CECILIA ASKINS
(NO. 2:13-cv-01232-TSZ) - 2

GENDLER & MANN, LLP
615 2nd Ave. Suite 580
Seattle, WA 98104
Phone: (206) 621-8868
Fax: (206) 621-0512


1 has stated that they will on the schedule, I wake up frequently in a fearful panic thinking
2 that I hear them comings. This happens many times. I just wake up at any sound and think
3 I hear them. There were weeks during the summer of 2014 when they flew every night of
4 the week, until very late, midnight or later. My children are just terrorized by the sound of
5 the jets. My five year old son Ian, has anxiety attacks when they begin to fly over,
6 especially at night. He is afraid to go to sleep. My one year old just clings to my body, and
7 if we are outside when they fly over he wails in terror. I am mostly concerned for my
8 children. We are unable to go outside when they fly, which is where we like to spend
9 much of our time. I worry about hearing damage and other long term effects.

11 6. I suffer from depression, anxiety, and insomnia which is brand new, and
12 only since moving to Whidbey Island.

14 7. We have many family members in the military. We are not anti-military.
15 We just see that the Navy is terrorizing and physically harming the citizens of the area with
16 the use of this field in the middle of a housing development, a park where children play t
17 ball, and the pool where they swim. I want to know how it's ok to terrorize children, to
18 make the people you are supposed to protect, sick. There are other alternative areas for
19 them to fly where they aren't flying right over people's homes.

21 I declare under penalty of perjury under the laws of the State of Washington that
22 the foregoing is true and correct.

23 Dated this 21 day of March, 2015, in Coupeville, Washington.

24
25
26 By: 
27 CECILIA ASKINS

I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role]. I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role].

I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role]. I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role].

I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role]. I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role].

I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role]. I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role].

I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role]. I have been a member of the [Organization] since [Year]. I have been active in the [Organization] and have served in various capacities, including [Role].

I declare under penalty of perjury under the laws of the State of Washington that

the foregoing is true and correct.

Dated this [Day] day of [Month], 2015, in [City], Washington.

 [Signature]

GENERIC & FARMER, LLC
 2100 1st Ave. S.E.
 Everett, WA 98201
 Phone: (425) 255-1111
 Fax: (425) 255-1112

BACKLASH (2013)
 (2013-01-12)