

Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BRIAN JACOBSEN, CONNIE  
JACOBSEN, RYAN KILDEA and ARICA  
KILDEA,

Plaintiffs,

vs.

MARK DRISCOLL and JOHN SUTTON  
TURNER,

Defendants.

**No. 2:16-CV-00298 JLR**

**DECLARATION OF ARICA KILDEA  
IN SUPPORT OF PLAINTIFFS'  
OPPOSITION TO DEFENDANTS  
TURNER AND DRISCOLL  
MOTIONS TO DISMISS WITH  
PREJUDICE AND TURNER'S  
MOTION FOR SANCTIONS**

NOTED ON MOTION CALENDER:  
JULY 8, 2016

I, Arica Kildea, declare as follows:

I am over the age of eighteen years and I am competent to testify to the matters herein.

I am a Plaintiff in the above-captioned matter.

DECLARATION OF ARICA KILDEA IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDANTS MOTION  
TO DISMISS AND MOTION FOR SANCTIONS - 1 [2:16-cv-00298 JLR] - 1

LAW OFFICE OF BRIAN FAHLING  
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1           1.       My reasons for filing the lawsuit are set forth in great factual detail in the 42-  
2 page complaint filed in this matter.

3           2.       The lawsuit was filed with the expectation that the funds necessary to pay the  
4 anticipated legal expenses and costs would be raised before the expiration of the ninety day  
5 period we had to serve the Defendants.

6           3.       My expectation that the necessary funds would be raised was based upon  
7 social media marketing campaigns for the fund, funds raised to date before the suit was filed,  
8 and conversations I had with individuals who committed to donating to the litigation fund. I  
9 also knew there were thousands of people whose donations were misused by Sutton Turner  
10 and Mark Driscoll and I expected that many of them would donate to the litigation fund.

11           4.       During the approximately two years before the lawsuit was filed, Mars Hill  
12 Church, Turner and Driscoll had already been the subjects of many investigative pieces by  
13 magazines and bloggers, both locally and nationally. The articles and bloggers set out in great  
14 factual detail the wrongdoing by Turner and Driscoll, much of that documented factual  
15 information is alleged in the Complaint.

16           5.       The wrongdoing by Turner and Driscoll had been exposed in the press and  
17 online blogs before the lawsuit was filed, my only goal in the litigation was to hold Turner  
18 and Driscoll legally accountable for their wrongful actions which caused injury to my  
19 husband and me, and to the many others they defrauded.

20           I certify under penalty of perjury under the laws of the State of Washington that the  
21 foregoing is true and correct to the best of my knowledge.  
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1 DATED this 30 day of June, 2016, in Kirkland , Washington.

2  
3 By: Arica Kildea  
4 ARICA KILDEA  
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DECLARATION OF ARICA KILDEA IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO DEFENDNATS MOTION  
TO DISMISS AND MOTION FOR SANCTIONS - 1 [2:16-cv-00298 JLR] - 3

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 5th, 2016, I mailed via First Class Mail and Email, and electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

**VIA CM/ECF**

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**VIA FIRST CLASS MAIL**

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Attorneys for Defendant Mark Driscoll

DATED this 5th day of July, 2016, in Kirkland, Washington.

/s/ Brian Fahling  
Brian Fahling