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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STEVE GONCALVES, as personal
representative of the Estate of Kaylee Jade
Goncalves, et al.,

Plaintiffs,

v.

WASHINGTON STATE UNIVERSITY, a
public university,

Defendant.

Case No. 2:26-cv-00301-KKE

**DECLARATION OF THOMAS B.
VERTETIS IN SUPPORT OF
PLAINTIFFS’ OPPOSITION TO
DEFENDANT’S MOTION TO
TRANSFER VENUE**

**NOTE ON MOTION CALENDAR:
February 27, 2026**

DECLARATION

1. I, Thomas B. Vertetis, declare that I am an attorney who has entered an appearance in this proceeding. I have personal knowledge of the matters contained in this Declaration and, if called upon as a witness, could and would testify thereto.

2. I am over the age of 18 and fully competent to give this declaration. The information stated herein is based on my personal knowledge.

3. Attached to this Declaration as Exhibit A is a true and accurate copy of a March 2022 document from Whitman County, Washington, indicating that Washington State University employs 30% of the workforce in that county.

DECLARATION OF
THOMAS B. VERTETIS IN
SUPPORT OF PLAINTIFFS’
OPPOSITION TO
DEFENDANT’S MOTION
TO TRANSFER VENUE
Page 1 of 5

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1 4. When filing this case, we could not have filed in any federal court, as all of our
2 state-law claims would have been subject to sovereign immunity. Some of our clients also
3 preferred to be as far away from the traumatic events that led to this case as possible. Based on
4 our research, we determined that possible filing locations included Skagit County Superior
5 Court, Thurston County Superior Court, and Whitman County Superior Court. We chose to file
6 in the county where Plaintiff Stacy Chapin and her family live, which is Skagit County.

7 5. Plaintiffs’ counsel, including myself, understood that by including a federal
8 claim under Title IX, we were filing a case that was undoubtedly removable. We determined
9 that we had no problem proceeding in federal court if that was the Defendant’s choice.

10 6. The interest in the underlying murders has been so substantial that various
11 government entities in that area have webpages devoted to providing information about the
12 murders. These include the Idaho State Police, the Latah County (Idaho) Sheriff’s Office, the
13 city of Moscow (Idaho), and the city of Pullman.

14 7. As required by law, Plaintiffs submitted a pre-filing notice to the State for each
15 of the four Plaintiffs. Included in those documents were lists of witnesses. Plaintiffs’ team has
16 researched the location of those witnesses, and we have tabulated their locations with relation
17 to the federal districts involved. Of the 69 witnesses named in these documents, 32 (less than
18 half) reside in the Eastern District of Washington, and 37 reside elsewhere – including 14 who
19 reside in the Western District of Washington.

20 8. Many of the witnesses listed on the aforementioned form were graduate students
21 at WSU who reported problematic interactions with Kohberger. But now, more than three years
22 after the murders, they have finished their coursework and have moved away from WSU. Seven
23 of these former graduate students now reside in the Western District, while others reside in
24 Arizona, California, Hawaii, Missouri, North Carolina, and Oregon.

1 9. Based on Plaintiffs’ investigation to date, there are at least nine additional
2 witnesses in Pennsylvania, including: Kohberger’s family (mother, father, and sister); a school
3 administrator that removed Kohberger from a trade school program due to complaints from
4 female students; Kohberger’s criminology professor at DeSales University; at least two female
5 employees of a local business that raised concerns about Kohberger’s behavior; and two
6 forensic examiners that examined Kohberger’s devices after the murders.

7 10. Plaintiffs’ team has researched available flights between Philadelphia—the
8 closest major city to where Brian Kohberger lived in Pennsylvania—and both Seattle and
9 Spokane. Three airlines have or will have non-stop flights between Seattle and Philadelphia:
10 American, Delta, and Alaska. Delta’s service is scheduled to begin in May. It appears that no
11 airline has, or plans to have, nonstop service from Philadelphia to Spokane.

12 11. Plaintiffs have already retained a team of experts in the State of Georgia, and
13 Plaintiffs intend to retain several additional expert witnesses—many or all of whom likely will
14 not live in Washington. Plaintiffs plan for all retained experts to testify live at trial.

15 12. Plaintiffs will commit to deposing in Pullman, Wash., all fact witnesses who are
16 based in Pullman.

17 13. Some of Plaintiffs’ attorneys are based in Kansas City, Mo. There are non-stop
18 flights to Seattle from Kansas City on Alaska Airlines and Delta. There are no non-stop flights
19 from Kansas City to Spokane.

20 14. Plaintiffs’ team has researched the “time to outcome” in both the Western
21 District of Washington and the Eastern District of Washington, using Westlaw Litigation
22 Analytics. At the time of that search, the results were: 174 days in the Western District, 244
23 days in the Eastern District.

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

3
4 SIGNED this 20th day of February, 2026.

5 By: /s/ Thomas B. Vertetis

6 PFAU COCHRAN VERTETIS AMALA PLLC
7 Thomas B. Vertetis, WSBA No. 29805
8 Christopher E. Love, WSBA No. 42832

9 WAGSTAFF & CARTMELL LLP
10 Jonathan P. Kieffer (*Pro Hac Vice*)
11 Jack T. Hyde (*Pro Hac Vice*)
12 Lindsey N. Scarcello (*Pro Hac Vice*)

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, **Katie Hedger**, hereby declare under penalty of perjury under the laws of the State of Washington that I am employed at Pfau Cochran Vertetis Amala PLLC and that on today’s date, I served the foregoing via ECF by directing delivery to the following individuals:

Jordyn Jones
Connor Callahan
Attorney General of Washington
Torts Division
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PO Box 40126
Olympia, WA 98504
Attorneys for Washington State University

Jonathan P. Kieffer
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4740 Grand Ave Ste. 300
Kansas City, MO 64112
Attorneys for Plaintiffs

DATED this 20th day of February, 2026.ss

/s/ Katie Hedger
Katie Hedger
Legal Assistant

EXHIBIT A

Whitman County profile



By Doug Tweedy
Regional labor economist
Updated March 2022

[Overview](#) | [Geographic facts](#) | [Outlook](#) | [Labor force and unemployment](#) | [Industry employment](#) | [Wages and income](#) | [Population](#) | [Useful links](#)

Overview

Regional context

Whitman County covers 2,159.09 square miles of land, ranking 10th in size among Washington's 39 counties. Whitman County was named after Marcus Whitman, an early pioneering missionary in the western states. The county is part of the Palouse region with wide and rolling landscapes. Located in southeastern Washington, it borders seven Washington counties and three Idaho counties. It is ranked 26th in population with a population density of 20.7 people per square mile.

The county is mostly agricultural land that's specialized in farming barley, wheat, dry peas and lentils. Pullman is the largest city mainly due to the Washington State University (WSU) student population. The county seat is at Colfax, the second largest city.

Local economy

The largest employer, WSU, conducts transformational [research](#) and provides world-class education to more than 32,000 undergraduate, graduate and professional students. Founded in 1890 in Pullman, it is Washington's original land-grant university, with a [mission](#) of improving quality of life. Thirty percent of county employment is at WSU.

Agriculture continues to play an oversized role, not in terms of total employment but in terms of economic impact. In 2021, wheat prices increased, which has a large impact on county wholesale sales, retail sales and the overall level of money flowing through the economy.

Traditionally, employment in Whitman County tends to grow at a very slow and steady rate. Much of this trend is due to education employment's dominant share of total employment. Interestingly, the relative size of education employment has shrunk as other industries have increased their total number of jobs. Manufacturing employment has grown in five of the past six years. This trend towards greater diversification is a welcome development in county employment.

Geographic facts

| | Whitman County | Rank in state |
|--------------------------------|----------------|---------------|
| Land area, 2010 (square miles) | 2,159.09 | 10 |
| People per square mile, 2010 | 20.7 | 26 |

Source: U.S. Census Bureau QuickFacts

Outlook

Agriculture employment is expected to continue its very slow growth in terms of jobs, as wheat production continues to become more mechanized. In 2021, wheat production was at record yields. Good prices for wheat and barley were a welcome financial relief from previous years of low prices. Farmers are optimistic and are buying equipment which is important to local communities. However, as farmers age, finding replacement workers will be a challenge.

Export-related manufacturing and technical educational services are a source of growth for the county's economy. The types of manufactured products and education services (WSU) in Whitman County are somewhat resistant to down cycles, which gives the county greater strength and diversity in its economy.

Employment at WSU continues to recover. Student enrollments keep increasing since the university added a new College of Medical Sciences to go along with the Colleges of Nursing and Pharmacy.

Labor force and unemployment

Current labor force and unemployment statistics are available on the [Labor area summaries](#) page on ESD's labor market information website.

The Whitman County civilian labor force for 2021 averaged 23,335, an increase from 2020. When compared to 2020, the temporary loss of jobs due to business restrictions from the COVID-19 pandemic are striking. A better comparison is to look at the labor force before the pandemic. In that analysis, the Whitman County labor force has fully recovered.

The average annual unemployment rate in Whitman County is always one of the lowest in the state. The unemployment rate fluctuates throughout the year, reflecting its seasonal changes in higher education employment and agriculture. In 2021, the unemployment rate averaged 4.3 percent.

Source: Employment Security Department/DATA Division, County Data Tables

Industry employment

Nonfarm employment in the county started recovering from pandemic business restrictions in the last half of 2021, following national and state trends.

- Goods-producing employment increased in 2021; manufacturing and construction accounted for all the growth. Manufacturing was an essential industry during the pandemic. Planned expansions in manufacturing will increase manufacturing jobs into 2022.
- Service-providing employment increased in the second half of 2021. State and local government, education, leisure and hospitality and transportation and warehousing all gained back jobs to pre-pandemic levels.

For historical industry employment data, [contact an economist](#).

Source: Employment Security Department/DATA Division, County Data Tables

Industry employment by age and gender

The Local Employment Dynamics (LED) database, a joint project of state employment departments and the U.S. Census Bureau, matches state employment data with federal administrative data. Among the products is industry employment by age and gender. All workers covered by state unemployment insurance data are included; federal workers and non-covered workers, such as the self-employed, are not. Data are presented by place of work, not place of residence.

Whitman County highlights:

Whitman County job holders in 2020 were almost equally distributed between two major age groups. The age group 25 to 34 accounted for 23.5 percent of employment, while 55 and older made-up 23.4 percent of employment.

In 2020, 51.6 percent of all industry jobs were held by men and 48.4 percent were held by women. Industry differences are discussed below:

- Male-dominated industries included agriculture, forestry, fishing and hunting (79.3 percent), construction (78.2 percent), wholesale trade (78.8 percent), transportation and warehousing (78.8 percent) and utilities (75.5 percent).
- Female-dominated industries included health care and social assistance (76.4 percent) and finance and insurance (66.6 percent).

Source: Employment Security Department/DATA Division, County Data Tables

Wages and income

In 2020, Whitman County had 17,794 jobs covered by unemployment insurance, with a total payroll of over \$977.4 million.

The county average annual wage was \$54,928 in 2020, which is well below the state's average annual wage of \$76,801.

Personal income

Personal income includes earned income, investment income and government payments such as Social Security and Veterans Benefits. Per capita personal income equals total personal income divided by the resident population.

In 2020, the per capita income in Whitman County was \$44,628, which is well below the state's per capita income of \$67,126 according to the Bureau of Economic Analysis.

Median household income over the period 2016 to 2020 was \$42,288, well below the state's \$77,006, according to the U.S. Census Bureau Quick Facts.

Over the period 2016 to 2020, 15.7 percent of the population was living below the poverty level in Whitman County. This is well above 9.5 percent for the state. This is due in large part to the college student population.

Source: Employment Security Department/DATA Division, County Data Tables; Bureau of Economic Analysis; U.S. Census Bureau QuickFacts.

Population

Whitman County's estimated population in 2021 was 47,873. Population decreased slightly in Whitman County from 2020 to 2021 (-0.2 percent), just below the state's increase of 0.4 percent.

The largest city in the county is Pullman.

Source: U.S. Census Bureau QuickFacts

Population facts

| | Whitman County | Washington state |
|------------------------------|----------------|------------------|
| Population 2021 | 47,873 | 7,738,692 |
| Population 2020 | 47,973 | 7,705,281 |
| Percent change, 2020 to 2021 | -0.2% | 0.4% |

Source: U.S. Census Bureau QuickFacts

Age, gender and ethnicity

Whitman County's population, due to the higher education industry concentration, is relatively young. The county's population age 65 and older was 10.7 percent in 2020 compared to the state's 15.9 percent. Diversity in the county is near state averages.

Source: U.S. Census Bureau QuickFacts

Demographics

| | Whitman County | Washington state |
|--|----------------|------------------|
| Population by age, 2021 | | |
| Under 5 years old | 4.1% | 6.0% |
| Under 18 years old | 15.0% | 21.8% |
| 65 years and older | 10.7% | 15.9% |
| Females, 2021 | 49.1% | 49.9% |
| Race/ethnicity, 2021 | | |
| White | 83.8% | 78.5% |
| Black | 2.4% | 4.4% |
| American Indian, Alaskan Native | 0.9% | 1.9% |
| Asian, Native Hawaiian, & other Pacific Islander | 8.7% | 10.4% |
| Hispanic or Latino, any race | 6.5% | 13.0% |

Source: U.S. Census Bureau QuickFacts

Educational attainment

According to Census estimates, for the period 2016 to 2020 in Whitman County, 95.6 percent of individuals aged 25 and older were high school graduates, which was much higher than that of Washington state (91.7 percent).

An estimated 48.2 percent of people in Whitman County 25 and older have attained a bachelor's degree or higher. This figure compares favorably with the state (36.7 percent).

Source: U.S. Census Bureau QuickFacts

Useful links

- [County data tables](#)
- [Census Bureau Profile](#)
- [Whitman County History](#)
- [Whitman County on ofm.wa.gov](#)
- [Whitman County on ChooseWashington.com](#)
- [Whitman County home page](#)
- [Pullman Chamber of Commerce](#)
- [Southeast Washington Economic Development Association](#)
- [Self Sufficiency Calculator for Washington State](#)
- [Census Bureau QuickFacts](#)
- [Washington Ports](#)
- [Workforce Development Areas and WorkSource Office Directory](#)

Employment Security Department is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. Language assistance services for limited English proficient individuals are available free of charge. Washington Relay Service: 711.