

EXHIBIT 12

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

K.M.K., by and through her mother and
legal guardian, STEPHANIE LYNNE
BROWN; STEPHANIE LYNNE
BROWN,

Plaintiffs,

v.

WASHINGTON INTERSCHOLASTIC
ACTIVITIES ASSOCIATION, et al.,

Defendants.

CASE NO. 3:26-cv-05616-DGE

DECLARATION OF MIKE PURSEL
TO PLAINTIFFS' REPLY IN
SUPPORT OF THEIR MOTION FOR
PRELIMINARY INJUNCTION

1 1. I, Mike Pursel, a resident of Spokane, Washington, am over the age of
2 18 and competent to make this declaration.

3 2. I make the following statements based on my own personal knowledge.

4 3. I have been wrestling since I was 6 years old. Currently I am 37. I am
5 the head coach of Spokane Wrestling Club, video and strategic mentor to wrestlers
6 and an active and practicing competitor in wrestling. I have built my life around
7 wrestling.

8 4. Wrestling is a sport in which the intent of competition is to show
9 superiority through technical prowess and strength but also maintain a sense of
10 decorum and concern of safety for your opponent. It is not a no-holds-barred
11 competition: safety is paramount, and unnecessary roughness, illegal moves, and
12 unsportsmanlike conduct are strictly prohibited.

13 5. I have coached both girls and boys in wrestling. I have experience with
14 coaching all ages.

15 6. I do not know either wrestler in the videos, and I have no personal
16 connection to this case. I was retained by Alliance Defending Freedom as an expert
17 in the field of wrestling. I am being compensated for my time at a rate of \$75/hr. My
18 compensation does not depend on the outcome of this litigation, the opinions I
19 express, or the testimony I provide.

20 7. I was not present at the time of the incident; however, I have
21 extensively studied the footage on two videos, one filmed by K.M.K.'s mother, and
22 one recorded from the opposite side of the mat. I also reviewed the declaration of
23 John Morrison dated July 31, 2026.

24 8. Based on my review of the videos, I have concluded the act in question
25 more than likely occurred intentionally rather than because of fatigue or
26 inexperience. I based this conclusion on some key body indicators.

- 1 a. Indicator 1: The top wrestler in the black singlet has the
2 wrestler's right hand in a move called the "half nelson," in which
3 by lifting the right elbow, one can roll someone over to their
4 back. To create more leverage, the top wrestler would need to
5 lift at the knee and drive in a forward motion. The videos
6 instead show the top wrestler attempting to lift at the groin
7 area. What the top wrestler did is an almost impossible act to
8 accomplish suggesting either the top wrestler is uneducated in
9 the sport, or had other intentions, or some combination of both.
10 The groin is not a pivot point on the body and not close to the
11 knee.
- 12 b. Indicator 2: Top wrestler's left hand and elbow position when
13 initiating the lift is out of place. When lifting, a wrestler's palm
14 is up which turns the elbow inward slightly. According to the
15 video, top wrestler's palm is down, bowing the elbow out. This
16 would indicate an intent to dig, not a lifting motion. While the
17 action continues, the elbow does not change direction,
18 suggesting a continuous digging movement, not a lifting
19 movement.
- 20 c. Indicator 3: When the top wrestler removes the hand from the
21 groin area, the hand is still palm down. The white underside is
22 clearly present. This would suggest only a digging motion was
23 attempted, not a lifting motion.
- 24 d. Indicator 4: In my experience, the kind of contact K.M.K. alleges
25 happened between her legs does not happen in wrestling
26 because of fatigue. The top wrestler in this video also does not
27 appear to be fatigued. Throughout the videos, the wrestler's
28

1 steps are light and is in control of K.M.K. Every time K.M.K.
2 makes a move, the other wrestler can respond and regain
3 control.

4 9. I am aware of the allegations K.M.K. made against her opponent, the
5 top wrestler in the black singlet. K.M.K. says that that wrestler penetrated her
6 vagina with a finger or fingers for several seconds, and that this penetration
7 happened during the portion of the wrestling match on the videos I reviewed. The
8 videos I reviewed do not provide a sufficient angle to see whether there was digital
9 penetration because they are from the sides of the wrestlers. It also appears the
10 official referee did not have a good angle to see what the fingers of the top wrestler
11 were doing during this portion of the match. But based on my review of the videos,
12 K.M.K.'s accusation cannot be ruled out. Based on my review of the videos, her
13 allegation is within the realm of possible.

14 10. If what K.M.K. alleges is true—that the other wrestler penetrated her
15 vagina with a finger or fingers for several seconds—that would not be a valid
16 wrestling move but instead considered a flagrant foul. I agree with John Morrison
17 that wrestling is a contact sport that happens quickly. I also agree that inadvertent
18 and accidental contact occurs during wrestling. However, in my experience, when
19 improper contact is inadvertent, the contact is very brief and wrestlers immediately
20 apologize to one another. As one example, I've seen this happen when one wrestler
21 inadvertently pulls another's hair: she immediately lets go and apologizes. Also,
22 what I watched on the video and what K.M.K. described was not the same as the
23 quick or accidental contact I am used to seeing in wrestling when various invalid
24 moves inadvertently happen. In wrestling, it is not common or expected that a
25 wrestler would penetrate another wrestler's vagina with the finger for several
26 seconds.

1 11. In all my years wrestling, I have never had a wrestler alleging this
2 happened to them in a match. If what K.M.K. says is true, and digital penetration
3 occurred, the contact is not a valid wrestling move and is illegal and abnormal at all
4 levels of wrestling. Wrestlers do not wrestle expecting or consenting to that kind of
5 illegal contact.

6 12. As a coach, I know I am a mandatory reporter. If one of my wrestlers
7 finished a match and alleged another wrestler put fingers into the wrestler's vagina
8 for several seconds, I would review the video to see the context. If I saw footage like
9 the videos I have seen here, I would consider that a credible report from my
10 wrestler and alert the wrestler's parents and proper authorities to investigate it
11 further.

DECLARATION UNDER PENALTY OF PERJURY

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of August 2026 at Spokane, Washington.

Mike Pursel

Mike Pursel

Signature: 
Mike Pursel (Aug 6, 2026 13:41:54 PDT)
Email: spokanewrestling@gmail.com

KKvW Declaration of Mike Pursel 08.06.26 FINAL

Final Audit Report

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