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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

WASHINGTON ELECTION INTEGRITY
COALITION UNITED, a Washington State
Nonprofit Corporation; BRETT SIMPSON;
BONNIE GRIECO; JONETTE MOLYNEUX;
ROSS MERRITT; TAMARA SHAW;
HARLYN THOMPSON; KIMBERLEE
ELBON; ROBERT WARD; CONSTANCE
COOKE; DOREEN ROSE; SHIRLEY
MOZENA; JAMES MOZENA; MICHELLE
DAWSON; LINDSEY NICHOLS; JOSEPH
KENT; ROXANNE PEARCE; DAVID
MACHADO; JOSHUA BRADLEY; BENNETT
ESRAEL; JAKE PARMER; RICH AUDETTE;
MARIA BRUEMMER; JOSEPH GIBSON;
ERIC HARGRAVE; WENDY KEELINE;
PHILLIP HOGAN; MARILI HAAS; IKE
HAAS; FRANK GMELIN; TRICIA SHOUP;
JEN HOLBROOK; STEPHEN CLEMENTS;
KIMBERLY ANDERSON; SUSAN AUDETTE,

Plaintiffs,

v.

GREG KIMSEY, Clark County Auditor;
CLARK COUNTY; and DOES 1-30, inclusive,

Defendants.

Case No.

COUNTY DEFENDANTS' NOTICE OF
REMOVAL OF ACTION PURSUANT TO
42 U.S.C. § 1983 and 28 U.S.C. §§ 1331,
1441, AND 1446

(REMOVED FROM CLARK COUNTY
SUPERIOR COURT, CAUSE NO. 21-2-
01775-06)

1 TO: CLERK, U.S. DISTRICT COURT, WESTERN DISTRICT OF WASHINGTON
2 AT TACOMA

3 AND TO: PLAINTIFFS, Pro Se

4 AND TO: INTERVENOR WASHINGTON STATE DEMOCRATIC CENTRAL
5 COMMITTEE AND IT'S COUNSEL OF RECORD

6 Defendants Greg Kimsey, Clark County Auditor, and Clark County ("County Defendants")
7 hereby remove to this court the state court action described below on the grounds stated herein,
8 and as supported by the Declaration of Amanda M. Migchelbrink and the exhibits attached thereto.

9 I. STATEMENT OF FACTS

10 On September 16, 2021, Plaintiffs filed a Complaint for Equal Protection alleging a
11 violation of their civil rights under RCW 29A.68.013(1) and (2) stemming from the County
12 Auditor allegedly "allowing or facilitating vote flipping, additions and/or deletions, and allowing
13 or facilitating party preference tracking and/or ballot identification." Declaration of Amanda M.
14 Migchelbrink, Exhibit 3 - Complaint, p. 2.

15 Plaintiffs further demand the release of all County ballots for "a full forensic audit
16 conducted by Jovan Hutton Pulitzer, inventor of kinematic artifact detection," to confirm or deny
17 the conduct. *Id.*, Complaint, pp. 2-3. Plaintiffs seek preliminary and permanent injunctions, writs
18 of mandamus, declaratory relief and damages. *Id.*, Complaint, p. 14.

19 County Defendants were served with a copy of the Summons and Complaint in the above-
20 entitled state court action on September 17, 2015. Migchelbrink Decl., Exhibits 4 and 5.

21 II. BASIS FOR REMOVAL

22 Plaintiffs allege a 42 U.S.C. § 1983 Claim. Any civil action brought in a State court of
23 which the district courts of the United States have original jurisdiction may be removed. 28 U.S.C.
24 § 1441(a). Federal courts have subject matter jurisdiction over § 1983 claims under the general
25 federal question jurisdiction statute, 28 U.S.C. § 1331.

26 This Notice of Removal is timely under 28 U.S.C. §1446(b) because it is filed "within 30
27 days after the receipt by the defendant, through service or otherwise, of a copy of the initial

DEFENDANTS' NOTICE OF REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. §§ 1332, 1441, AND 1446 - 2 of 6

CLARK COUNTY PROSECUTING ATTORNEY
CIVIL DIVISION
1300 FRANKLIN ST, SUITE 380 • PO BOX 5000
VANCOUVER, WASHINGTON 98666-5000
(564) 397-2478 (OFFICE) / (564) 397-2184 (FAX)

1 pleading setting forth the claim for relief upon which such action or proceeding is based." 28
2 U.S.C. § 1446(b).

3 The Court would also have jurisdiction over any related state law claims, such as those
4 under the Washington State Constitution. 28 U.S.C Section 1367 grants "supplemental
5 jurisdiction" to the federal court over state claims which are related or form a part of the same case
6 or controversy. The state claims are "pendent" to the federal claims; hence, "pendent jurisdiction."
7 *United Mine Workers of America v. Gibbs*, 383 U.S. 715, 86 S.Ct. 1130, (1966).

8 III. CONCLUSION

9 Plaintiffs' civil action, originally filed in Clark County Superior Court for the State of
10 Washington, may be removed pursuant to 28 U.S.C. §1331, 1441(a) and 1446(b) to the United
11 States District Court for the Western District of Washington at Tacoma.

12 Respectfully submitted this 7th day of October 2021.

13
14 s/ Amanda M. Migchelbrink
15 Amanda M. Migchelbrink, WSBA #34223
16 Deputy Prosecuting Attorney
17 Clark County Prosecuting Attorney's Office – Civil
18 Division
19 1300 Franklin Street, Suite 380
20 P.O. Box 5000
21 Vancouver, WA 98666-5000
22 Ph: (564) 397-2478
23 Amanda.Migchelbrink@clark.wa.gov
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October 2021, I electronically filed with the Clerk of the Court using the CM/ECF system the forgoing COUNTY DEFENDANTS' NOTICE OF REMOVAL OF ACTION PURSUANT TO 42 U.S.C. § 1983 and 28 U.S.C. §§ 1331, 1441, AND 1446 and the Clerk of the Court, by this filing with the CM/ECF system, will send notification of such filing to all Pro Se Plaintiffs and counsel of record as follows:

Washington Election Integrity Coalition United, a WA State Nonprofit Corporation ATTN: Tamborine Borelli, Director 13402 – 125 th Ave NW Gig Harbor, WA 98329-4215 Ph: (253) 375-1255 And via email to: weicu@protonmail.com	Brett Simpson 19018 NE 127 th Circle Brush Prairie, WA 98606 Ph: (425) 444-9933
Bonnie Grieco 222 S. 32 nd Place Ridgefield, WA 98642 Ph: (971) 219-8939	Jonette Molyneux 12905 NE Salmon Creek Ave. Vancouver, WA 98686 Ph: (360) 600-5777
Ross Merritt 270 Stonegate Washougal, WA 98671 Ph: (503) 676-7370	Tamara Shaw 13705 NE 36 th St Vancouver, WA 98682 Ph: (360) 977-8090
Harlyn Thompson 1511 SW 13 th Ave, Apt 346 Battle Ground, WA 98604 Ph: (360) 567-7676	Kimberlee Elbon 613 E. 6 th Street La Center, WA 98629 Ph: (360) 593-6878
Robert Ward 504 NE 134 th St Vancouver, WA 98685 Ph: (360) 952-1601	Constance Cooke 33817 SE 27 th St Washougal, WA 98671 Ph: (360) 606-6830
Doreen Rose 5606 NW 280 th St Ridgefield, WA 9898642 Ph: (425) 923-0832	Shirley Mozena 3816 SE 153 rd Ct Vancouver, WA 98683 Ph: (360) 292-3155
James Mozena 3816 SE 153 rd Ct Vancouver, WA 98683 Ph: (503) 804-8349	Michelle Dawson 304 W. Cushman St. Yacolt, WA 98675 Ph: (435) 503-7742

DEFENDANTS' NOTICE OF REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. §§ 1332, 1441, AND 1446 - 4 of 6

CLARK COUNTY PROSECUTING ATTORNEY
CIVIL DIVISION
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1 2 3 4	Lindsey Nichols 11405 NW 21 st Ave Vancouver, WA 98685 Ph: (714) 376-5577	Joseph Kent 37607 NE Eagle View Dr Yacolt, WA 98675 Ph: (931-933-0232
5 6 7	Roxanne Pearce 1051 – 4 th St Washougal, WA 98671 Ph: (360) 901-0647	David Machado 2406 NE 139 th St #27 Vancouver, WA 98686 Ph: (360) 607-8699
8 9 10	Joshua Bradley 62 – 34 th St Washougal, WA 98671 Ph: (360) 601-2078	Bennett Esrael 25217 NE 142 nd Ave Battle Ground, WA 98604-2400 Ph: (360) 702-7944
11 12 13	Jake Parmer 725 E Vine Maple Ave La Center, WA 98629 Ph: (503) 839-6633	Rich Audette 603 NW 24 th Ave Battle Ground, WA 98604 Ph: (360) 831-4527
14 15 16	Maria Bruemmer 5105 NE 72 nd Ave, Apt 49F Vancouver, WA 98661 Ph: (360) 977-0074	Joseph Gibson 13023 NE Hwy 99, Suite 7-712 Vancouver, WA 98686 Ph: (360) 635-3081
17 18 19	Eric Hargrave 505 – 26 th St Washougal, WA 98671 Ph: (360) 553-2377	Wendy Keeline 23103 NE 134 th Circle Brush Prairie, WA 98606 Ph: (360) 896-2874
20 21 22	Phillip Hogan 8314 NE 239 th St Battle Ground, WA 98604 Ph: (360) 521-3621	Marili Haas 27408 NE 69 th Ave Battle Ground, WA 98604 Ph: (360) 721-9521
23 24 25	Ike Haas 27408 NE 69 th Ave Battle Ground, WA 98604 Ph: (360) 952-0307	Frank Gmelin 4001 NE Everett Ct Camas, WA 98607 Ph: (503) 467-6580
26	Tricia Shoup 17417 NE 200 th Circle Battle Ground, WA 98604 Ph: (360) 910-2497	Jen Holbrook 27000 NE Bjur Rd Ridgefield, WA 98642 Ph: (360) 601-5690

DEFENDANTS' NOTICE OF REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. §§ 1332, 1441, AND 1446 - 5 of 6

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<p>Stephen Clements 812 Z St Vancouver, WA 98661 Ph: (901) 592-7902</p>	<p>Kimberly Anderson 9509 NE 135th Court Vancouver, WA 98682 Ph: (251) 259-2254</p>
<p>Susan Audette 603 NW 24th Ave Battle Ground, WA 98604-4566 Ph: (360) 903-3540</p>	<p>Kevin J. Hamilton Amanda J. Beane Reina A. Almon-Griffin Nitika Arora PERKINS COIE LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Ph: (206) 359-8000 Emails: KHamilton@perkinscoie.com, ABeane@perkinscoie.com, RAlmon-Griffin@perkinscoie.com, NArora@perkinscoie.com <i>Of Attorneys for Intervenor Washington State Democratic Central Committee</i></p>

Hard copies of the foregoing DEFENDANTS' NOTICE OF REMOVAL OF ACTION will also be mailed to each of the above pro se plaintiffs and counsel of record at their last-known mailing addresses listed above on this same date.

s/ Pamela Hamilton
Pamela Hamilton, Paralegal

COPY
Original Filed

SEP 16 2021

Scott G. Weber, Clerk, Clark Co.

CLARK CO. ELECTIONS
SEP 17 2021 PM4:32

SUPERIOR COURT OF THE STATE OF WASHINGTON

FOR THE COUNTY OF CLARK

WASHINGTON ELECTION INTEGRITY)
COALITION UNITED, a Washington)
State Nonprofit Corporation; BRETT)
SIMPSON; BONNIE GRIECO; JONETTE)
MOLYNEUX; ROSS MERRITT;)
TAMARA SHAW; HARLYN THOMPSON;)
KIMBERLEE ELBON; ROBERT WARD;)
CONSTANCE COOKE; DOREEN ROSE;)
SHIRLEY MOZENA; JAMES MOZENA;)
MICHELLE DAWSON; LINDSEY)
NICHOLS; JOSEPH KENT; ROXANNE)
PEARCE; DAVID MACHADO; JOSHUA)
BRADLEY; BENNETT ESRAEL; JAKE)
PARMER; RICH AUDETTE; MARIA)
BRUEMMER; JOSEPH GIBSON;)
ERIC HARGRAVE; WENDY)
KEELINE; PHILLIP HOGAN;)
MARILI HAAS; IKE HAAS; FRANK)
GMELIN; TRICIA SHOUP; JEN)
HOLBROOK; STEPHEN CLEMENTS;)
KIMBERLY ANDERSON; SUSAN)
AUDETTE,)

Plaintiffs,)

v.)

GREG KIMSEY, Clark County)
Auditor; CLARK COUNTY, and DOES)
1-30, inclusive,)

Defendants.)

Case No.

VERIFIED COMPLAINT FOR
EQUAL PROTECTION; VIOLATION OF
CIVIL RIGHTS; EQUITABLE RELIEF;
INJUNCTIVE RELIEF; DECLARATORY
RELIEF; PUBLIC RECORDS ACTION TO
COMPEL BALLOT PRODUCTION

JURY DEMAND

Plaintiffs allege:

I. PARTIES

1. Plaintiffs Brett Simpson, Bonnie Grieco, Jonette Molyneux, Ross Merritt, Tamara Shaw, Harlyn Thompson, Kimberlee Elbon, Robert Ward, Constance Cooke, Doreen Rose, Shirley Mozena, James Mozena, Michelle Dawson, Lindsey Nichols, Joseph Kent, Roxanne Pearce, David Machado, Joshua Bradley, Bennett Esrael, Jake Parmer, Rich Audette, Maria Bruemmer, Joseph Gibson, Eric Hargrave, Wendy Keeline, Phillip Hogan, Marili Haas, Ike Haas, Frank Gmelin, Tricia Shoup, Jen Holbrook, Stephen Clements, Kimberly Anderson and Susan Audette (“Citizen Plaintiffs”) are Clark County residents and lawful electors of Washington State who voted in the November 2020 General Election (“Election”). (Article VI, §1, Washington State Constitution).

2. Plaintiff Washington Election Integrity Coalition United (“WEiCU”) is a Washington State nonprofit corporation with its principal office in Pierce County, Washington.

3. At all relevant times, Defendant Greg Kimsey is serving as the elected Auditor for the State of Washington, Clark County (“Auditor” and “County”), responsible for all Election procedures, elections staff, election workers, election observers, the accuracy of the County’s Election vote tabulations, and certification of the County Election’s tabulation results.

4. Defendant Clark County is a municipal corporation.

II. OVERVIEW

5. The Auditor is responsible for conducting the County’s Election in violation of, *inter alia*, Plaintiffs’ equal protection, due process and free speech rights under the Washington State and United States Constitutions. Plaintiffs demand a jury trial and seek a judgment for damages for violations of their civil rights stemming from the Auditor allowing or facilitating vote flipping, additions and/or deletions, and allowing or facilitating party preference tracking and/or ballot identification. Plaintiff WEiCU issued a records request for ballots to confirm or deny the

conduct and seeks a Court order compelling release of the public records, including a Court order unsealing ballots under RCW 29A.60.110, for a full forensic audit conducted by Jovan Hutton Pulitzer, inventor of kinematic artifact detection and Maricopa County Arizona ballot auditor of approximately 2.1 million ballots.

III. JURISDICTION, VENUE, LIMITATIONS

6. Any justice of the supreme court, judge of the court of appeals, or judge of the superior court in the proper county shall, by order, require any person charged with error, wrongful act, or neglect to forthwith correct the error, desist from the wrongful act, or perform the duty and to do as the court orders or to show cause forthwith why the error should not be corrected, the wrongful act desisted from, or the duty or order not performed, whenever it is made to appear to such justice or judge by affidavit of an elector that: (1) A wrongful act has been performed or is about to be performed by any election officer; or (2) Any neglect of duty on the part of an election officer has occurred or is about to occur. (RCW 29A.68.013(1), (2).)

7. Venue is proper in the County's Superior Court for Constitutional violations, wrongful acts and/or neglect of duty by Auditor during the County's Election. (RCW 29A.68.013(1), (2).) Given a troublesome recent trend of judges recusing themselves thereby forcing actions to more favorable venues, Plaintiffs request that the Court immediately disclose to the parties any direct or indirect communications with any third parties aimed at disrupting the Court's ability to administer this action in a fair and equitable manner.

8. The narrow 10 day limitations period of RCW 29A.68.013 subsection (3) does not apply to Plaintiffs' claims, as Plaintiffs are not seeking de-certification of the Election.

9. Plaintiffs do not know the true names of defendants Does 1 through 30, inclusive, who are therefore sued by such fictitious names. Plaintiffs will amend this complaint to show their true names and capacities when they are ascertained.

IV. WRONGFUL ACTS: VOTE FLIPPING, ADDITIONS, AND/OR DELETIONS

RCW 29A.68.013(1) and/or (2)

(Citizen Plaintiffs v. Auditor)

10. Plaintiffs incorporate the allegations of paragraphs 1 through 9 above, as though fully set forth herein.

11. Prior to assuming the duties of overseeing elections for the County, Auditor entered into a solemn contract with the citizens of the County in the form of a publicly sworn oath to, *inter alia*, ‘faithfully and impartially discharge the duties of his or her office to the best of his or her ability.’ (RCW 36.16.040; “Oath”)

12. Contrary to Auditor’s Oath, Plaintiffs are informed and believe and thereon allege, that Auditor engaged in wrongful acts, errors and/or neglect of duty by allowing and/or facilitating electronic manipulation of the voting results from the Election.

13. Plaintiffs are informed and believe and thereon allege, based on official electronic tallies recorded and electronically reported and captured in real time, that approximately 6,000 votes were flipped, over 400,000 votes were added, and/or thousands of votes were removed in one or more state-wide races before, during, and/or after the Election. Plaintiffs are informed and believe and thereon allege, that a portion of the state-wide vote flipping, additions and/or deletions occurred in the County’s Election overseen by Auditor.

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V. DECLARATORY RELIEF: VOTE FLIPPING, ADDITIONS AND/OR DELETIONS

(Citizen Plaintiffs v. Auditor)

14. Plaintiffs incorporate the allegations of paragraphs 1 through 13 above, as though fully set forth herein.

15. A controversy has arisen relating to the legal rights of Plaintiffs and the legal duties of Auditor, in that Plaintiffs contend that Auditor engaged in a wrongful act, error and/or neglect of duty by allowing and/or facilitating electronic manipulation of the voting results from the Election.

16. It is necessary and proper for the Court at this time to ascertain, determine and declare Plaintiffs' rights and the duties of Auditor with regard to the alleged vote flipping, additions and/or deletions before, during and/or after the Election.

VI. EQUITABLE RELIEF: VOTE FLIPPING, ADDITIONS, AND/OR DELETIONS

(Citizen Plaintiffs v. Auditor)

17. Plaintiffs incorporate the allegations of paragraphs 1 through 16 above, as though fully set forth herein.

18. By reason of the matters alleged above, Plaintiffs' remedies at law are inadequate. Auditor must be preliminarily and permanently restrained from allowing and/or facilitating electronic manipulation of the voting results for any election held in the County. In addition, Plaintiffs will suffer irreparable injury in that their fundamental rights under the Washington State Constitution and/or United States Constitution, and amendments, will be further violated.

19. Accordingly, Plaintiffs are entitled to a preliminary and permanent injunction (or, alternatively, in the Court's discretion, the issuance of a writ of mandamus under RCW 7.16.160)

barring Auditor from allowing and/or facilitating electronic manipulation of the voting results for any election held in the County.

VII. WRONGFUL ACTS: PARTY PREFERENCE

RCW 29A.68.013(1) and/or (2)

(Citizen Plaintiffs v. Auditor)

20. Plaintiffs incorporate the allegations of paragraphs 1 through 19 above, as though fully set forth herein.

21. Contrary to Auditor's Oath of impartiality, Plaintiffs are informed and believe and thereon allege, that Auditor engaged in wrongful acts, errors and/or neglect of duty by allowing and/or facilitating: 1) maintaining a record of County elector party preference in violation of RCW 29A.08.166; and/or 2) identifying ballots cast by County electors in the Election by party preference. (RCW 29A.08.166)

VIII. DECLARATORY RELIEF: PARTY PREFERENCE

(Citizen Plaintiffs v. Auditor)

22. Plaintiffs incorporate the allegations of paragraphs 1 through 21 above, as though fully set forth herein.

23. A controversy has arisen relating to the legal rights of Plaintiffs and the legal duties of Auditor, in that Plaintiffs contend that Auditor engaged in wrongful acts, errors and/or neglect of duty by: 1) maintaining a record of County elector party preference in violation of RCW 29A.08.166; and/or 2) identifying ballots cast by County electors in the Election by party preference. (RCW 29A.08.166)

24. It is necessary and proper for the Court at this time to ascertain, determine and declare Plaintiffs' rights and the duties of Auditor with regard to the alleged party preference conduct.

IX. EQUITABLE RELIEF: PARTY PREFERENCE

(Citizen Plaintiffs v. Auditor)

25. Plaintiffs incorporate the allegations of paragraphs 1 through 24 above, as though fully set forth herein.

26. By reason of the matters alleged above, Plaintiffs' remedies at law are inadequate. Auditor must be preliminarily and permanently restrained from allowing and/or facilitating party preference tracking and/or ballot identification. In addition, Plaintiffs will suffer irreparable injury in that their fundamental rights under the Washington State Constitution and/or United States Constitution, and amendments, will be further violated.

27. Accordingly, Plaintiffs are entitled to a preliminary and permanent injunction (or, alternatively, in the Court's discretion, the issuance of a writ of mandamus under RCW 7.16.160) barring Auditor from: 1) maintaining a record of County elector party preference in violation of RCW 29A.08.166; and/or 2) identifying ballots cast by County electors in the Election by party preference. (RCW 29A.08.166)

X. PUBLIC RECORDS ACTION

RCW 29A.68.013(1) and/or (2); RCW 42.56.030; RCW 42.56.550; RCW 29A.60.110

(Plaintiff WEiCU v. Auditor and County)

28. Plaintiffs incorporate the allegations of paragraphs 1 through 27 above, as though fully set forth herein.

29. In order to prove (or disprove) Plaintiffs' allegations herein, WEiCU brings this Public Records Act action to compel Defendants to provide access to public records from the Election for a full forensic audit. (RCW 42.56.030, 42.56.550, 29A.60.110).

30. In August 2021, Plaintiff WEiCU submitted a records request to Auditor requesting original ballots, ballot images, spoiled ballots, adjudication records, ballot envelopes, and returned ballots for the Election. (RCW 42.56, "PRR"). The County denied one or more of the requested documents in WEiCU's PRR as exempt under RCW 42.56 citing RCW 29A.60.110 and/or *White v. Clark County*, 199 Wn.App. 929 (2017) ("PRR Denial"; "White Case").

31. Contrary to the PRR Denial, RCW 29A.60.110 does not prohibit ballot review and expressly permits court ordered review of ballots. In addition, the White Case relies on WA State Constitution Article 6, Section 6 as grounds for refusing access to ballots, but that provision actually guarantees secrecy only in the preparation and deposit of ballots, and says nothing about secrecy following an election: "The legislature shall provide for such method of voting as will secure to every elector absolute secrecy in **preparing and depositing** his ballot." [WA State Const. Art. 6, § 6 [emphasis added].)

32. Article 6, Section 6 does not prohibit public access to unidentifiable ballots after an election. Such interpretation of the State Constitution would prevent any ballot reviews relating to wrongful acts in an election and would be contrary to Article 1, Section 19 of the Washington State Constitution which ensures fair and free elections in our state: "All Elections shall be free and equal, and no power, civil or military, shall at any time interfere to prevent the free exercise of the right of suffrage."

33. Moreover, the State Constitution is consistent with Washington State law and administrative code, which provide that access to ballots or ballot images via court order is entirely

appropriate to prove or disprove election irregularities, and that such review “shall be de novo.” (RCW 42.56.030 [the people do not yield their sovereignty to the agencies and insist on remaining informed so that they may maintain control over the instruments they have created to assure public interest is fully protected]; RCW 42.56.550(3) [judicial review of all agency actions taken or challenged under the [PRA] “shall be de novo”]; RCW 29A.60.110 [allows unsealing of ballots “...by order of the superior court in a contest or election dispute.”]; WAC 434-261-045 [“Voted ballots and voted ballot images may . . . be accessed in accordance with RCW 29A.60.110 [unsealing of ballots allowed by court order]).

34. Numerous courts outside of Washington State have ruled that ballots are public records and subject to inspection: “Nothing could be more obvious than that a ballot becomes a public record once it is voted.” (*Rogers v. Hood*, 906 So. 2d 1220, 1223 (Fla. Dist. Ct. App. 2005); *Marks v. Koch*, 284 P.3d 118, 122 (Colo. App. 2011) [ballot secrecy is not violated if “the identity of the voter cannot be discerned from the face of that ballot”]).

35. Defendants must be compelled to comply with the PRR not only because the documents requested are public records, but also to prove (or disprove) the allegations herein. WEiCU further requests that the Court unseal the ballots under RCW 29A.60.110, as Plaintiff WEiCU stands ready, willing and able to conduct a full forensic audit of the requested public records in coordination with Jovan Hutton Pulitzer, inventor of kinematic artifact detection and Maricopa county Arizona ballot auditor of 2020 General Election 2.1 million ballots.

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XI. DECLARATORY RELIEF: VIOLATIONS OF CONSTITUTIONAL RIGHTS

WA STATE CONSTITUTION ART. I, § 1, § 2, § 3, § 12, §19, §29; ART. VI, §6,

US CONSTITUTION AMENDMENTS I, XIV

(Citizen Plaintiffs v. Auditor)

36. Plaintiffs incorporate the allegations of paragraphs 1 through 35 above, as though fully set forth herein.

37. The right to freely elect one's representatives and to influence the political direction of one's government is the democratic republic's indispensable political foundation. Without free elections, there is neither the possibility for citizens to express their will nor the opportunity for citizens to change their leaders, approve policies for the country, address wrongs, or protest the limitation of their rights afforded to them by the Constitution. (Article 1, §19 Washington State Constitution).

38. Moreover, Constitutional requirements and mandates may not be ignored by Auditor or this Court. (Article 1, §2, §29, Washington State Constitution.) Elections establish the citizenry's and the individual's right to FREE SPEECH as depicted by the First Amendment of the Constitution of the United States of America. Accordingly, Plaintiffs hereby demand of the Superior Court that the state and federal Constitutions be followed so that free and fair elections may be held in the County consistent with the free speech will of the People.

39. Article 1 § 3 of the Washington State Constitution states: "No person shall be deprived of life, liberty, or property without due process of law." The right to vote is a fundamental right to which all lawful citizens of Washington State who meet the requirements are entitled, and as such this right is a "liberty" protected under Article 1 Section 3 of the Washington State Constitution.

40. A controversy has arisen relating to the legal rights of Plaintiffs and the legal duties of Auditor, in that Plaintiffs contend as follows:

a. Auditor's wrongful acts as alleged herein infringed upon Plaintiffs' fundamental rights of equal protection, due process, and/or free speech under the Washington State Constitution and/or United States Constitution and amendments;

b. Because Auditor failed to follow state and federal law, qualified electors were denied their fundamental right of suffrage without due process of law. Qualified electors who voted similarly had the value of their votes diluted, and the will of said voters denied, without due process of law;

c. That the principles of equal protection require that Auditor abide by the process created by the Legislature to ensure uniform treatment of ballots regardless of who cast them, the manner in which they are cast, and/or who or what was voted for upon those ballots;

d. That Auditor's conduct alleged herein abridged Plaintiffs' rights under the fourteenth amendment to the United States Constitution, which reads in relevant part: "No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state ... deny to any person within its jurisdiction the equal protection of the laws." The requirements of the special "privileges or immunities" prohibition of WA State Const. Art. 1, § 12 are in most cases at least as stringent as those of the federal equal protection clause. *Hunter v. North Mason High Sch.*, 85 Wn.2d 810, 819 n. 9, 539 P.2d 845 (1975);

e. That ballots from County electors, including Plaintiffs herein, were not treated equally nor given equal levels of protection under the law; and,

f. That Plaintiffs' state and/or federal Constitutional rights have been abridged as a proximate result of Auditor's conduct as alleged herein.

41. Plaintiffs are informed and believe, and thereon allege, that Auditor disputes and denies the contentions set forth in subparagraphs (a) through (f) above.

42. It is necessary and proper for the Court at this time to ascertain, determine and declare Plaintiffs' rights and the duties of Auditor, as they pertain to the Election and future elections in the County.

XII. INJUNCTIVE RELIEF: VIOLATIONS OF CONSTITUTIONAL RIGHTS

(Citizen Plaintiffs v. Auditor)

43. Plaintiffs incorporate the allegations of paragraphs 1 through 42 above, as though fully set forth herein.

44. By reason of the matters alleged above, Plaintiffs' remedies at law are inadequate. Unless Auditor is immediately and permanently restrained from taking any further actions in violation of Plaintiff's Constitutional rights, Plaintiffs will suffer irreparable injury in that, among other things, their fundamental rights under the Washington State Constitution and/or United States Constitution, and amendments, will be further violated.

45. Accordingly, Plaintiffs are entitled to a preliminary and permanent injunction (or, alternatively, in the Court's discretion, the issuance of a writ of mandamus under RCW 7.16.160) barring Auditor from:

- a) Allowing or facilitating vote flipping, additions and/or deletions; and/or
- b) Allowing or facilitating party preference tracking and/or ballot identification.

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XIII. DAMAGES FOR CIVIL RIGHTS VIOLATIONS

42 USC §1983, §1988

(Citizen Plaintiffs v. Auditor)

46. Plaintiffs incorporate the allegations of paragraphs 1 through 45 above, as though fully set forth herein.

47. Every person who, under color of any statute, ordinance, regulation, custom, or usage of any State . . . subjects, or causes to be subjected, any citizen of the United States . . . to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress. (42 U.S.C. §1983).

48. Auditor's actions as alleged herein were done under color of state law.

49. While acting under color of state law, and as a proximate result of Auditor's conduct, Auditor deprived Plaintiffs of their federal rights under, *inter alia*, the First and/or Fourteenth Amendments to the United States Constitution.

50. Plaintiffs have incurred and will incur expenses of suit as a result of this proceeding, in an amount that cannot yet be ascertained, and reserve all rights to recovery under 42 U.S.C. Sections 1983 and 1988.

XIV. DEMAND FOR JURY TRIAL

51. Auditor's conduct alleged herein raises serious questions of fact. (RCW 4.44.090 [all questions of fact shall be decided by the jury].) Plaintiffs' right of trial by jury "shall remain inviolate". (Washington State Constitution, Art. 1, §21; US Constitution Amendment VII.) Plaintiffs hereby demand a jury trial.

///

XV. RELIEF SOUGHT

WHEREFORE, PLAINTIFFS pray for judgment as follows:

1. That Auditor be found in error and/or neglect for allowing and/or facilitating vote flipping, additions and/or deletions before, during and/or after the Election;
2. That Auditor be found in error and/or neglect for allowing or facilitating party preference tracking and/or ballot identification for the Election;
3. That Auditor be ordered to desist from the following errors and wrongful acts and facilitation thereof:
 - a) Allowing or facilitating vote flipping, additions and/or deletions; and/or,
 - b) Allowing or facilitating party preference tracking and/or ballot identification;
4. That Auditor and/or Defendant County be compelled and ordered to comply with WEiCU's PRR, including a Court order unsealing ballots under RCW 29A.60.110, for the purpose, *inter alia*, of a full forensic audit conducted by Jovan Hutton Pulitzer, inventor of kinematic artifact detection and Maricopa county Arizona ballot auditor of 2020 General Election 2.1 million ballots;
5. For a declaration that Auditor's actions violated Plaintiffs' Constitutional Rights to Equal Protection, Due Process, and/or Free Speech Under the Law (WA State Const., Art I, § 1, § 2, § 3, § 12, §19, §29 ; Art. VI, §6, US Const. Amendments I and/or XIV.)
6. For preliminary and permanent injunctive relief injunction (or, alternatively, in the Court's discretion, the issuance of a writ of mandamus under RCW 7.16.160) enjoining Auditor, Auditor's agents, employees, and all persons acting in concert with Auditor, from any and all of the following actions, as Plaintiffs' remedies at law are inadequate,

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and Auditor's conduct will cause Plaintiffs to suffer irreparable injury through continued violations of their Constitutional rights:

- a) Allowing or facilitating vote flipping, additions and/or deletions; and/or,
- b) Allowing or facilitating party preference tracking and/or ballot identification;

7. For damages for violation of Plaintiffs' constitutional rights under color of law (42 U.S.C. Sections 1983); and/or,

8. For attorney's fees if counsel is retained, for costs of suit, and for such other and further relief as the Court deems just and proper.

WASHINGTON ELECTION INTEGRITY
COALITION UNITED,
a WA State Nonprofit Corporation

Dated: 9/14/2021

DocuSigned by:
Tamborine Borrelli
F850E67D1604E3...
By: Tamborine Borrelli
Its: Director
Address: 13402 125th Ave NW
Gig Harbor, WA 98329-4215
Phone: 253-375-1255

Dated: 9/14/2021

DocuSigned by:
Brett Simpson
71F8C36FD38648F...
Brett Simpson
Plaintiff, *Pro Se*
Address: 19018 NE 127th Cir
Brush Prairie, WA 98606
Phone: (425) 444-9933

Dated: 9/14/2021

DocuSigned by:
Bonnie Grieco
0EF5005A56D48E...
Bonnie Grieco
Plaintiff, *Pro Se*
Address: 222 S 32nd Place
Ridgefield, WA 98642
Phone: (971) 219-8939

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Dated: 9/15/2021

DocuSigned by:
Jonette Molyneux
0612E0AE29B6448...
Jonette Molyneux
Plaintiff, *Pro Se*
Address: 12905 NE Salmon Creek Ave.
Vancouver, WA 98686
Phone: (360) 600-5777

Dated: 9/14/2021

DocuSigned by:
Ross Merritt
0E94EE2FE0340B...
Ross Merritt
Plaintiff, *Pro Se*
Address: 270 Stonegate
Washougal, WA 98671
Phone: (503) 676-7370

Dated: 9/15/2021

DocuSigned by:
Tamara Shaw
4AFC1129A765A...
Tamara Shaw
Plaintiff, *Pro Se*
Address: 13705 NE 36th St
Vancouver, WA 98682
Phone: (360) 977-8090

Dated: 9/15/2021

DocuSigned by:
Harlyn Thompson
028E06DB703416...
Harlyn Thompson
Plaintiff, *Pro Se*
Address: 1511 SW13th Ave Apt 346
Battle Ground, WA 98604
Phone: (360) 567-7676

Dated: 9/15/2021

DocuSigned by:
Kimberlee Elbon
0A0339DF83C41F...
Kimberlee Elbon
Plaintiff, *Pro Se*
Address: 613 East 6th Street
LA Center, WA 98629
Phone: (360) 593-6878

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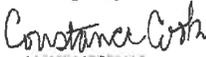
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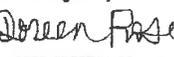
Robert Ward
Plaintiff, *Pro Se*
Address: 504 NE 134th St
Vancouver, WA 98685
Phone: (360) 952-1601

Dated: 9/14/2021

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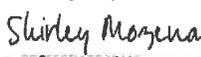
Constance Cooke
Plaintiff, *Pro Se*
Address: 33817 SE 27th Street
Washougal, WA 98671
Phone: (360) 606-6830

Dated: 9/14/2021

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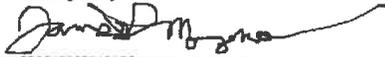
Doreen Rose
Plaintiff, *Pro Se*
Address: 5606 NW 280th St
Ridgefield, WA 98642
Phone: (425) 923-0832

Dated: 9/14/2021

DocuSigned by:

8FC655D4C36413...

Shirley Mozena
Plaintiff, *Pro Se*
Address: 3816 SE 153rd Court
Vancouver, WA 98683
Phone: (360) 292-3155

Dated: 9/14/2021

DocuSigned by:

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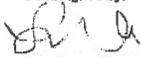
James Mozena
Plaintiff, *Pro Se*
Address: 3816 SE 153rd Court
Vancouver, WA 98683
Phone: (503) 804-8349

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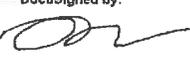
Dated: 9/14/2021

DocuSigned by:
MICHELLE DAWSON
07003EC38655D492...
Michelle Dawson
Plaintiff, *Pro Se*
Address: 304 West Cushman St.
Yacolt, WA 98675
Phone: (435) 503-7742

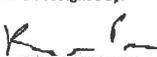
Dated: 9/15/2021

DocuSigned by:

6090C42CA1D841F...
Lindsey Nichols
Plaintiff, *Pro Se*
Address: 11405 NW 22st Ave.
Vancouver, WA 98685
Phone: (714) 376-5577

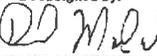
Dated: 9/15/2021

DocuSigned by:

E4F5148E0E744E7...
Joseph Kent
Plaintiff, *Pro Se*
Address: 37607 NE Eagle View Drive
Yacolt, WA 98675
Phone: (931) 933-0232

Dated: 9/15/2021

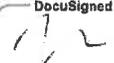
DocuSigned by:

D5E170E70C661483...
Roxanne Pearce
Plaintiff, *Pro Se*
Address: 1051 4th St.
Washougal, WA 98671
Phone: (360) 901-0647

Dated: 9/16/2021

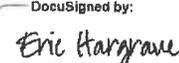
DocuSigned by:

C3F78E931ABB16C...
David Machado
Plaintiff, *Pro Se*
Address: 2406 NE 139th St. #27
Vancouver, WA 98686
Phone: (360) 607-8699

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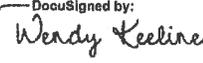
Dated: 9/14/2021

DocuSigned by:

065D1346812447...
Joseph Gibson
Plaintiff, *Pro Se*
Address: 13023 NE Hwy 99 Suite 7-712
Vancouver, WA 98686
Phone: (360) 635-3081

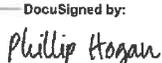
Dated: 9/14/2021

DocuSigned by:

5157105050406...
Eric Hargrave
Plaintiff, *Pro Se*
Address: 505 26th St.
Washougal, WA 98671
Phone: 360-553-2377

Dated: 9/15/2021

DocuSigned by:

125D364506E1306...
Wendy Keeline
Plaintiff, *Pro Se*
Address: 23103 NE 134th Circle
Brush Prairie, WA 98606
Phone: (360) 896-2874

Dated: 9/14/2021

DocuSigned by:

0247612123C840E...
Phillip Hogan
Plaintiff, *Pro Se*
Address: 8314 NE 239th St.
Battle Ground, WA 98604
Phone: (360) 521-3621

Dated: 9/14/2021

DocuSigned by:

0121508E22134F...
Marili Haas
Plaintiff, *Pro Se*
Address: 27408 NE 69th Ave
Battle Ground, WA 98604
Phone: (360) 721-9521

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Dated: 9/14/2021

DocuSigned by:
Ike Haas
8A4E543032D4E4

Ike Haas
Plaintiff, *Pro Se*
Address: 27408 NE 69th Ave
Battle Ground, WA 98604
Phone: (360) 952-0307

Dated: 9/15/2021

DocuSigned by:
Frank Gmelin
E04722426230411

Frank Gmelin
Plaintiff, *Pro Se*
Address: 4001 NE Everett Ct
Camas, WA 98607
Phone: (503) 467-6580

Dated: 9/15/2021

DocuSigned by:
Tricia Shoup
1DD918D08BE6471

Tricia Shoup
Plaintiff, *Pro Se*
Address: 17417 Ne 200th Cir
Battle Ground, WA 98604
Phone: (360) 910-2497

Dated: 9/15/2021

DocuSigned by:
Jen Holbrook
1288CF6ED444D3

Jen Holbrook
Plaintiff, *Pro Se*
Address: 27000 NE Bjur Rd.
Ridgefield, WA 98642
Phone: (360) 601-5690

Dated: 9/14/2021

DocuSigned by:
Stephen Clements
0B4B1F8C6E47D...

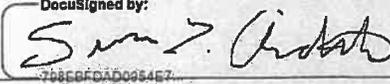
Stephen Clements
Plaintiff, *Pro Se*
Address: 812 Z St
Vancouver, WA 98661
Phone: (901) 592-7902

Dated: 9/15/2021

DocuSigned by:

41DFC912B06443F
Kimberly Anderson
Plaintiff, *Pro Se*
Address: 9509 NE 135th Ct.
Vancouver, WA 98682
Phone: (251) 259-2254

Dated: 9/15/2021

DocuSigned by:

7B8CFDAD0954E7
Susan Audette
Plaintiff, *Pro Se*
Address: 603 NW 24th Ave
Battle Ground, WA 98604-4566
Phone: (360) 903-3540

DocuSigned by: 553AUF9A-210E-490E-A1AC-4C4E95959A0D

VERIFICATIONS

I, Tamborine Borrelli, declare:

I am the Director of Washington Election Integrity Coalition United, a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Thurston, State of Washington, on this 9/14/2021 day of _____, 2021.

WASHINGTON ELECTION INTEGRITY
COALITION UNITED, a WA State Nonprofit

DocuSigned by:
Tamborine Borrelli

By: Tamborine Borrelli
Its: Director

I, Brett Simpson, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this 9/14/2021 day of _____, 2021.

DocuSigned by:
Brett Simpson

Brett Simpson

DocuSign: Envelope ID: 053AD73A710E480E7A1AC404E9090A0D

I, Bonnie Grieco, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/14/2021 day of _____, 2021.

DocuSigned by:
Bonnie Grieco
0FFE5005A56D468

Bonnie Grieco

I, Jonette Molyneux, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of JM, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:
Jonette Molyneux
B812E2AE28B6448

Jonette Molyneux

DocuSign Envelope ID: 653AD79A-210E-480E-A1AC-404E09090A0D

I, Ross Merritt, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/14/2021 day of _____, 2021.

DocuSigned by:
Ross Merritt
6E8A9EE73E07A0D

Ross Merritt

I, Tamara Shaw, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:
Tamara Shaw
4AEC11283178ACA

Tamara Shaw

DocuSign Envelope ID: 653AD79A-210E-490E-A1AC-404E09090A0D

I, Harlyn Thomson, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark county, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:
Harlyn Thomson
6288060670119
Harlyn Thompson

I, Kimberlee Elbon, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark county, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:
Kimberlee Elbon
64250786011
Kimberlee Elbon

DocuSigned by: [illegible]

I, Robert Ward, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/14/2021 day of , 2021.

DocuSigned by:
Robert Ward
Robert Ward

I, Constance Cooke, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/14/2021 day of , 2021.

DocuSigned by:
Constance Cooke
Constance Cooke

DocuSign Envelope ID: 055AD79A-210E-480E-A1A0-4649E9090A00

I, Doreen Rose, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of 9/14/2021, 2021.

DocuSigned by:
Doreen Rose
8056993D48C46443
Doreen Rose

I, Shirley Mozena, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of 9/14/2021, 2021.

DocuSigned by:
Shirley Mozena
8056993D48C46443
Shirley Mozena

DocuSigned by: Lindsey Nichols

I, Lindsey Nichols, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Lindsey nichols, State of Washington, on this _____ day of 9/15/2021, 2021.

DocuSigned by:

C829C13CA7D841F...
Lindsey Nichols

I, Joseph Kent, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of 15, State of Washington, on this _____ day of 9/15/2021, 2021.

DocuSigned by:

C1C1348ECC4C1D0
Joseph Kent

DocuSigned by: 655AD79A-210E-490E-A1A0-404E9090A0U

I, Roxanne Pearce, declare:

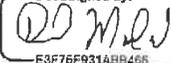
I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark county, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:

Roxanne Pearce

I, David Machado, declare:

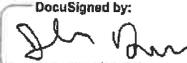
I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/16/2021 day of _____, 2021.

DocuSigned by:

David Machado

DocuSign Envelope ID: 033A0F9A-210E-490E-A1A0-404E09090A0D

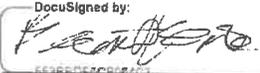
I, Joshua Bradley, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this _____ day of 9/15/2021, 2021.

DocuSigned by:

Joshua Bradley

I, Bennett Esrael, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark county, State of Washington, on this _____ day of 9/15/2021, 2021.

DocuSigned by:

Bennett Esrael

DocuSign Envelope ID: 053AD79A-210E-430E-A1A0-4C4E90906A0D

I, Jake Parmer, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of _____, 2021.

DocuSigned by:
JAKE PARMER
1676C1740CA345A

Jake Parmer

I, Rich Audette, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of _____, 2021.

DocuSigned by:
Rich Audette
A19078E1180F4E1

Rich Audette

DocuSign Envelope ID: 853AD78A-210E-480E-A1A6-4C4E09898A0D

I, Maria Bruemmer, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of 9/14/2021, 2021.

DocuSigned by:
Maria Bruemmer
T09F32B800E34E7

Maria Bruemmer

I, Joseph Gibson, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark county _____, State of Washington, on this _____ day of 9/14/2021, 2021.

DocuSigned by:
Joseph Gibson
4FDD1322681044374

Joseph Gibson

DocuSigned by: Eric Hargrave ID: 8534DF8A-210E-480E-A1A0-404E95959A0D

I, Eric Hargrave, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of CLARK, State of Washington, on this 9/14/2021 day of _____, 2021.

DocuSigned by:
Eric Hargrave
Eric Hargrave

I, Wendy Keeline, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:
Wendy Keeline
Wendy Keeline

DocuSign Envelope ID: 033A0F8A-210E-490E-A1AC-4C4E09090A0D

I, Phillip Hogan, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of 9/14/2021, 2021.

DocuSigned by:
Phillip Hogan
Phillip Hogan

I, Marili Haas, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of 9/14/2021, 2021.

DocuSigned by:
Marili Haas
Marili Haas

DocuSign Envelope ID: 633A0F3A-210E-430E-A1A0-404E0509DA0D

I, Ike Haas, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/14/2021 day of _____, 2021.

DocuSigned by:
Ike Haas
Ike Haas

I, Frank Gmelin, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark, State of Washington, on this 9/15/2021 day of _____, 2021.

DocuSigned by:
Frank Gmelin
Frank Gmelin

UNLAWFUL DISCLOSURE TO: 855ADP5A-210E-480E-7A1A0-404E08080A00

I, Stephen Clements, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of _____, 2021.

DocuSigned by:
Stephen Clements

Stephen Clements

I, Kimberly Anderson, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of _____, 2021.

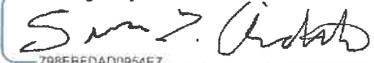
DocuSigned by:
Kimberly Anderson

Kimberly Anderson

DocuSign Envelope ID: 40078732-6003-4210-0B28-24404D10D0A2

I, Susan Audette, declare:

I am a named Plaintiff in the above-captioned action. I have read the foregoing VERIFIED COMPLAINT FOR EQUAL PROTECTION, VIOLATION OF CIVIL RIGHTS, EQUITABLE RELIEF, INJUNCTIVE RELIEF, DECLARATORY RELIEF, PUBLIC RECORDS ACTION TO COMPEL BALLOT PRODUCTION and know the contents thereof. I am informed and believe that the matters stated therein are true and correct and on that ground I allege that the matters stated therein are true. I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct and that this document was executed in the County of Clark _____, State of Washington, on this _____ day of _____, 2021.

DocuSigned by:

798EBEDAD0954E7
Susan Audette