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OCT 04 2021

PEGGY A. SEMPRIMOZNIK LINCOLN COUNTY CLERK

SUPERIOR COURT OF THE STATE OF WASHINGTON

FOR THE COUNTY OF LINCOLN

WASHINGTON ELECTION INTEGRITY )
COALITION UNITED, a Washington )
State Nonprofit Corporation; JERRY )
SCHULZ, )

Plaintiffs,

v.

CHANDRA SCHUMACHER, Lincoln )
County Auditor; LINCOLN 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. Plaintiff Jerry Schulz ("Citizen Plaintiff") is a Lincoln County resident and lawful elector 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. Defendant Chandra Schumacher is serving as the newly appointed Auditor for the State of Washington, Lincoln 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. Auditor’s predecessor, Shelly Johnston, served as the County auditor for the Election and resigned in 2021.

4. Defendant Lincoln County is a municipal corporation.

## II. OVERVIEW

5. The Auditor’s predecessor was responsible for conducting the County’s Election in violation of, *inter alia*, Plaintiff’s 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’s predecessor allowing or facilitating vote flipping, additions and/or deletions, ballot box stuffing through lax signature verification, party preference tracking, and personally certifying electronically generated tabulation results for an Election subject to not only a substantial loss of access to signature verification data, but also a ransomware attack.

6. 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.

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### III. JURISDICTION, VENUE, LIMITATIONS

7. 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).)

8. 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).) Plaintiffs have standing as a result of, *inter alia*, the cognizable injury they have suffered as a proximate result of the blatant violations of constitutional rights as alleged herein. 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.

9. 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.

10. 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.

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

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

##### **(Plaintiffs v. Auditor)**

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

12. Prior to assuming the duties of overseeing elections for the County, Auditor's predecessor 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")

13. Contrary to this Oath, Plaintiffs are informed and believe and thereon allege, that Auditor's predecessor engaged in wrongful acts, errors and/or neglect of duty by allowing and/or facilitating electronic manipulation of the voting results from the Election with corresponding ballot box stuffing to match one or more predetermined Election race outcomes, said ballot box stuffing achieved at least in part through lax signature verification operating procedures.

14. 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's predecessor.

15. Plaintiffs are further informed and believe and thereon allege, that on or about November 11, 2020, the Auditor's office experienced a ransomware attack that, among other things, blocked access to County computers and election systems which continued to be shut down

through certification of the Election. Auditor's predecessor erred in proceeding with personally certifying electronically generated tabulation results for an Election subject to a ransomware attack and potential related cyber intrusion.

16. In addition, Plaintiffs are informed and believe and thereon allege, that for several weeks during the Election, Auditor's predecessor experienced problems with the signature verification system used to verify ballot envelope signatures, including without limitation, lost access to the state-supplied signature database. Auditor's predecessor erred in proceeding with personally certifying electronically generated tabulation results for an Election subject to substantial loss of access to signature verification data.

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

##### **(Plaintiffs v. Auditor)**

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

18. A controversy has arisen relating to the legal rights of Plaintiffs and the legal duties of Auditor, in that Plaintiffs contend that Auditor's predecessor 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; allowing and/or facilitating ballot box stuffing through lax signature verification; certifying electronically generated tabulation results for an Election subject to a ransomware attack and potential related cyber intrusion; and/or certifying electronically generated tabulation results for an Election subject to substantial loss of access to signature verification data.

19. 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 above alleged conduct before, during and/or after the Election.

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

### **(Plaintiffs v. Auditor)**

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

21. 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, ballot box stuffing through lax signature verification, and/or certifying electronically generated tabulation results subject to a ransomware attack and/or substantial loss of signature verification data for any election held in the County. In addition, Citizen Plaintiff will suffer irreparable injury in that his fundamental rights under the Washington State Constitution and/or United States Constitution, and amendments, will be further violated.

22. 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, ballot box stuffing through lax signature verification, and/or certifying electronically generated tabulation results for an Election subject to a ransomware attack and/or substantial loss of signature verification data, for any election held in the County.

## **VII. WRONGFUL ACTS: PARTY PREFERENCE**

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

### **(Plaintiffs v. Auditor)**

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

24. Contrary to Auditor's Oath of impartiality, Plaintiffs are informed and believe and thereon allege, that Auditor's predecessor 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**

#### **(Plaintiffs v. Auditor)**

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

26. A controversy has arisen relating to the legal rights of Plaintiffs and the legal duties of Auditor, in that Plaintiffs contend that Auditor's predecessor 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)

27. 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**

#### **(Plaintiffs v. Auditor)**

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

29. 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.

30. 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)**

31. Plaintiffs incorporate the allegations of paragraphs 1 through 30 above, as though fully set forth herein.

32. 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).

33. In August 2021, Plaintiff WEiCU submitted a records request to Auditor's predecessor 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").



34. 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].)

35. 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."

36. 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]).

37. 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"]).

38. 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.

39. Consistent with the Public Records Action, Plaintiff WEiCU further seeks a Preservation Order to preserve all data, surveillance video, electronic components and paper-based evidence from the Election in Defendants' possession, custody or control ("Election Evidence") pending discovery and trial in this action, to prevent spoliation. The Election Evidence should be remanded to the Lincoln County Sheriff for sequestration under lock and key.

## **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 Plaintiff v. Auditor)**

40. Plaintiffs incorporate the allegations of paragraphs 1 through 39 above, as though fully set forth herein.

41. 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).

42. 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, Citizen Plaintiff hereby demands 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.

43. 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.

44. A controversy has arisen relating to the legal rights of Citizen Plaintiff and the legal duties of Auditor, in that Citizen Plaintiff contends as follows:

a. Auditor's predecessor's wrongful acts as alleged herein infringed upon Citizen Plaintiff's 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's predecessor 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 predecessor's conduct alleged herein abridged Citizen Plaintiff's 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 Citizen Plaintiff's herein, were not treated equally nor given equal levels of protection under the law; and,

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

45. Citizen Plaintiff is informed and believe, and thereon alleges, that Auditor disputes and denies the contentions set forth in subparagraphs (a) through (f) above.

46. It is necessary and proper for the Court at this time to ascertain, determine and declare Citizen Plaintiff's 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 Plaintiff v. Auditor)**

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

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

49. Accordingly, Citizen Plaintiff is 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;
- b) allowing or facilitating ballot box stuffing through lax signature verification;
- c) certifying electronically generated tabulation results for an Election subject to a ransomware attack and/or substantial loss of access to signature verification data;
- d) tracking party preference;

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### **XIII. DAMAGES FOR CIVIL RIGHTS VIOLATIONS**

#### **42 USC §1983, §1988**

##### **(Citizen Plaintiff v. Auditor)**

50. Plaintiffs incorporate the allegations of paragraphs 1 through 49 above, as though fully set forth herein.

51. 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).

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

53. While acting under color of state law, and as a proximate result of her conduct, Auditor's predecessor deprived Citizen Plaintiff of his federal rights under, *inter alia*, the First and/or Fourteenth Amendments to the United States Constitution.

54. Citizen Plaintiff has 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**

55. The 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's predecessor 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's predecessor be found in error and/or neglect for allowing and/or facilitating ballot box stuffing through lax signature verification;
3. That Auditor's predecessor be found in error and/or neglect for certifying electronically generated tabulation results for an Election subject to substantial loss of access to signature verification data;
4. That Auditor's predecessor be found in error and/or neglect for certifying electronically generated tabulation results for an Election subject to a ransomware attack and potential related cyber intrusion;
5. That Auditor's predecessor be found in error and/or neglect for allowing or facilitating party preference tracking and/or ballot identification for the Election;
6. 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;
  - b) Allowing or facilitating ballot box stuffing through lax signature verification;
  - c) Allowing or facilitating certification of electronically generated tabulation results for an Election subject to substantial loss of access to signature verification data;
  - d) Allowing or facilitating party preference tracking and/or ballot identification;

and/or,

- e) Allowing or facilitating certification of electronically generated tabulation results for any election subject to a ransomware attack and potential related cyber intrusion;
5. 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;
6. For a Preservation Order directing Auditor, Auditor's agents, employees, and all persons acting in concert with Auditor, to preserve all data, surveillance video, electronic components and paper-based evidence from the Election in Defendants' possession, custody or control ("Election Evidence") pending discovery and trial in this action, with the Election Evidence remanded to the Lincoln County Sheriff for sequestration under lock and key;
7. For a declaration that Auditor's predecessor's actions violated Citizen Plaintiff's 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.)
8. 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,



and Auditor's conduct will cause Citizen Plaintiff to suffer irreparable injury through continued violations of his Constitutional rights:

- a) Allowing or facilitating vote flipping, additions and/or deletions;
- b) Allowing or facilitating ballot box stuffing through lax signature verification;
- c) Allowing or facilitating certification of electronically generated tabulation results for any election subject to substantial loss of access to signature verification data;
- d) Allowing or facilitating party preference tracking and/or ballot identification; and/or,
- e) Allowing or facilitating certification of electronically generated tabulation results for any election subject to a ransomware attack and potential related cyber intrusion;

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

10. 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: 9.29.21

  
By: Tamborine Borrelli

Its: Director

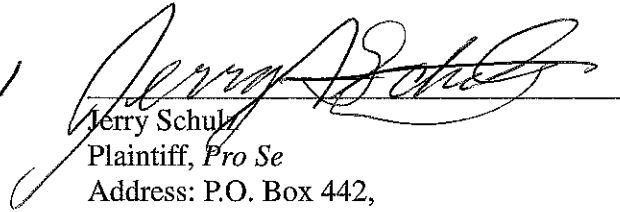
Address: 13402 125<sup>th</sup> Ave NW

Gig Harbor, WA 98329-4215

Phone: 253-375-1255

Dated:

10-04-2021

A handwritten signature in black ink, appearing to read "Jerry Schulz", written over a horizontal line.

Jerry Schulz

Plaintiff, *Pro Se*

Address: P.O. Box 442,

Reardan, WA 99029

Phone: (509) 850-1975

**VERIFICATIONS**

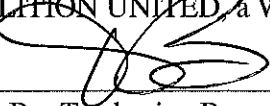
I, Tamborine Borrelli, declare:

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 Thurston County, State of Washington,

on this 29 day of Sept, 2021.

WASHINGTON ELECTION INTEGRITY  
COALITION UNITED, a WA State Nonprofit



By: Tamborine Borrelli  
Its: Director

I, Jerry Schulz, 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

Lincoln, State of Washington, on this 04 day of October, 2021.



Jerry Schulz