

DEFINITIONS

1 A. "YOU" and "YOUR" shall mean Defendant King County.

2 B. "PLAINTIFF" shall mean PLAINTIFF WASHINGTON ELECTION INTEGRITY COALITION
3 UNITED.

4 C. "COUNTERCLAIM" shall mean the Counterclaims By Julie Wise and King County against
5 PLAINTIFF filed January 6, 2023.

6 **REQUESTS FOR ADMISSION**

7 REQUEST FOR ADMISSION NO. 1: In reference to Paragraph 6 of YOUR COUNTERCLAIM
8 against PLAINTIFF, admit that the tabulation of a ballot occurs at a time that falls after a voter's
9 preparation and deposit of the ballot.

10 REQUEST FOR ADMISSION NO. 2: In reference to Paragraph 6 of YOUR COUNTERCLAIM
11 against PLAINTIFF, admit that the tabulation of a ballot results in a public affirmation of the voter's
12 choices of any measures or candidates listed on said ballot.

13 REQUEST FOR ADMISSION NO. 3: In reference to Paragraph 6 of YOUR COUNTERCLAIM
14 against PLAINTIFF, admit that a "broad mandate" does not constitute a proper exemption under the
15 Public Records Act, RCW 42.56.

16 REQUEST FOR ADMISSION NO. 4: In reference to Paragraph 6 of YOUR COUNTERCLAIM
17 against PLAINTIFF, admit that Article VI, §6 of the Washington Constitution does not exempt cast
18 ballots from public inspection.

19 REQUEST FOR ADMISSION NO. 5: In reference to Paragraph 7 of YOUR COUNTERCLAIM
20 against PLAINTIFF, admit that the Civil Rights Act of 1960, et seq., 52 U.S.C. § 20701-20706 does
21 not exempt cast ballots from public inspection.

22 REQUEST FOR ADMISSION NO. 6: In reference to Paragraph 7 of YOUR COUNTERCLAIM
23 against PLAINTIFF, admit that YOU have, and continue to, retain and preserve all records relating to
24 any act requisite to voting for the November 2020 General Election.

25 REQUEST FOR ADMISSION NO. 7: In reference to Paragraph 7 of YOUR COUNTERCLAIM
26 against PLAINTIFF, admit that all records relating to any act requisite to voting for the November
27 2020 General Election are being retained and preserved "physically or under local officials' direct
28 administrative supervision."

1 REQUEST FOR ADMISSION NO. 8: In reference to Paragraph 8 of YOUR COUNTERCLAIM
2 against PLAINTIFF, admit that cast ballots are anonymous public records under RCW 29A.08.161.

3 REQUEST FOR ADMISSION NO. 9: In reference to Paragraph 8 of YOUR COUNTERCLAIM
4 against PLAINTIFF, admit that contrary to the Article VI §6 Constitutional requirement to “secure to
5 every elector absolute secrecy in . . . depositing his ballot”, YOU maintain publicly available records
6 of voters issued a ballot for an election and who returned a ballot for said election, said records avail-
7 able for public inspection prior to election day for said election.

8 REQUEST FOR ADMISSION NO. 10: In reference to Paragraph 9 of YOUR COUNTERCLAIM
9 against PLAINTIFF, admit that there is no “other statute which exempts or prohibits disclosure of”
10 ballots, ballot images, spoiled ballots, and/or returned (as undeliverable) ballots.

11 REQUEST FOR ADMISSION NO. 11: In reference to Paragraph 10 of YOUR COUNTERCLAIM
12 against PLAINTIFF, admit that Article VI §6 of the Constitution does not require “absolute secrecy”
13 for cast ballots.

14 REQUEST FOR ADMISSION NO. 12: In reference to Paragraph 10 of YOUR COUNTERCLAIM
15 against PLAINTIFF, admit that Article VI §6 of the Constitution does not require “absolute secrecy”
16 for cast ballot images.

17 REQUEST FOR ADMISSION NO. 13: In reference to Paragraph 10 of YOUR COUNTERCLAIM
18 against PLAINTIFF, admit that Article VI §6 of the Constitution does not require “absolute secrecy”
19 for spoiled ballots.

20 REQUEST FOR ADMISSION NO. 14: In reference to Paragraph 10 of YOUR COUNTERCLAIM
21 against PLAINTIFF, admit that Article VI §6 of the Constitution does not require “absolute secrecy”
22 for returned (as undeliverable) ballots.

23 REQUEST FOR ADMISSION NO. 15: In reference to Paragraph 11 of YOUR COUNTERCLAIM
24 against PLAINTIFF, admit that upon receipt of a ballot, YOU do not verify that the voter casting said
25 ballot meets the legal qualifications to vote.

26 REQUEST FOR ADMISSION NO. 16: In reference to Paragraph 13 of YOUR COUNTERCLAIM
27 against PLAINTIFF, admit that Title 29A RCW serves as a comprehensive scheme to ensure that all
28 elections in Washington State are free and equal and are held without interference with the exercise of
the right of suffrage.

**PLAINTIFF WEICU’S REQUESTS FOR
ADMISSION TO DEFENDANT KING COUNTY**

Virginia P. Shogren, P.C.
961 Oak Court
Sequim WA 98382
360-461-5551

1 REQUEST FOR ADMISSION NO. 17: In reference to Paragraph 14 of YOUR COUNTERCLAIM
2 against PLAINTIFF, admit that cast ballots do not constitute information relating to election security
3 exempt from disclosure.

4 REQUEST FOR ADMISSION NO. 18: In reference to Paragraph 14 of YOUR COUNTERCLAIM
5 against PLAINTIFF, admit that public inspection of tabulated ballots would be in the public interest
6 to ensure free and equal elections in Washington State.

7 REQUEST FOR ADMISSION NO. 19: In reference to Paragraph 14 of YOUR COUNTERCLAIM
8 against PLAINTIFF, admit that public inspection of tabulated ballots would not substantially and ir-
9 reparably damage any person.

10 REQUEST FOR ADMISSION NO. 20: In reference to Paragraph 14 of YOUR COUNTERCLAIM
11 against PLAINTIFF, admit that public inspection of tabulated ballots would not substantially and ir-
12 reparably damage vital governmental functions.

13 REQUEST FOR ADMISSION NO. 21: In reference to Paragraph 14 of YOUR COUNTERCLAIM
14 against PLAINTIFF, admit that public inspection of cast ballots is required in order to tabulate votes.

15 REQUEST FOR ADMISSION NO. 22: In reference to Paragraph 21 of YOUR COUNTERCLAIM
16 against PLAINTIFF, admit that YOU will not suffer a concrete and imminent injury from disclosure
17 of the original ballots from the November 3, 2020 General Election.

18 REQUEST FOR ADMISSION NO. 23: In reference to Paragraph 21 of YOUR COUNTERCLAIM
19 against PLAINTIFF, admit that YOU will not suffer a concrete and imminent injury from disclosure
20 of the ballot images from the November 3, 2020 General Election.

21 REQUEST FOR ADMISSION NO. 24: In reference to Paragraph 21 of YOUR COUNTERCLAIM
22 against PLAINTIFF, admit that YOU will not suffer a concrete and imminent injury from disclosure
23 of the spoiled ballots from the November 3, 2020 General Election.

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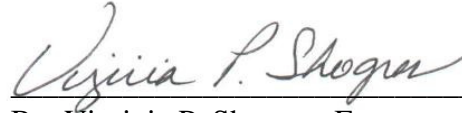
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1 REQUEST FOR ADMISSION NO. 25: In reference to Paragraph 21 of YOUR COUNTERCLAIM
2 against PLAINTIFF, admit that YOU will not suffer a concrete and imminent injury from disclosure
3 of the returned (as undeliverable) ballots from the November 3, 2020 General Election.

4 VIRGINIA P. SHOGREN, P.C.

5 

6 Dated: April 7, 2023

7 By: Virginia P. Shogren, Esq.

8 WSBA No. 33939

9 961 W. Oak Court

10 Sequim, WA 98382

11 360-461-5551

12 vshogren@gmail.com

13 Attorney for Plaintiff WEICU

DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on April 7, 2023, a true and correct copy of the following documents were served upon the parties listed below via the method indicated:

PLAINTIFF WEICU’S REQUESTS FOR ADMISSION TO DEFENDANT KING COUNTY, SET NO. 1

Counsel for Defendants:
Ann M. Summers
Via email: ann.summers@kingcounty.gov
David J.W. Hackett
Via email: david.hackett@kingcounty.gov
Mari Isaacson
Via email: mari.isaacson@kingcounty.gov

Dated: April 7, 2023

s/ Virginia P. Shogren
Virginia P. Shogren
961 W. Oak Court
Sequim, WA 98382
360-461-5551

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SET NO. 1