

1 **PARTIES**

2 Culp for Governor is the campaign of candidate Loren Culp who stood for election
3 for Governor of Washington State in the November 3, 2020 general election. The Culp for
4 Governor campaign is resident of Ferry County, Washington.

5 The WASHINGTON SECRETARY OF STATE is a Subsidiary Corporation of the
6 STATE OF WASHINGTON and is located at 416 Sid Snyder Avenue SW, Olympia, WA,
7 98501-1347, doing business as the constitutionally created office of Secretary of State
8 under Article III, Section 17 thereunder. The Secretary of State of Washington corporation
9 is part of the Government Industry and has 170 total employees across all of its locations.

10 Kim Wyman in her capacity as the WASHINGTON SECRETARY OF STATE
11 performs her functions under color of law in all counties of the State of Washington, and
12 the general election under her supervision as held in King County, Washington, makes
13 venue and jurisdiction proper in King County, pursuant to RCW 4.12.020.

14 The STATE OF WASHINGTON is a corporate entity, D-U-N-S number
15 079248936, doing business as the constitutionally created government of the State of
16 Washington. At the present time, the STATE OF WASHINGTON corporation is acting
17 autonomously under the tyranny of Jay Inslee who has terminated all protections provided
18 by Washington's Constitution, including the rights protected under Article I of said
19 Constitution, and rights protected by the Constitution of the United States, and is in
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22 COMPLAINT FOR INJUNCTIVE RELIEF AND DEMAND FOR AN AUDIT OF THE
PAPER BALLOTS, VOTE COUNTING MACHINES, AND VOTING RESULTS IN
KING, CLARK, THURSTON, PIERCE, KITSAP, AND SKAGIT COUNTIES - 2

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1 violation of federal criminal statutes, 18 USC § 241¹, 18 USC §242² and 18 U.S. Code
2 § 247³. Inslee has terminated the constitutional façade allegedly governing Washington
3 effectively since March 23, 2020.

4
5 ¹ 18 U.S. Code § 241 - Conspiracy against rights.

6 If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State,
7 Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege
8 secured to him by the Constitution or laws of the United States, or because of his having so exercised the
9 same; or

10 If two or more persons go in disguise on the highway, or on the premises of another, with intent to
11 prevent or hinder his free exercise or enjoyment of any right or privilege so secured—

12 They shall be fined under this title or imprisoned not more than ten years, or both; and if death
13 results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to
14 kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they
15 shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to
16 death.

17 ² 18 U.S. Code § 242 - Deprivation of rights under color of law

18 Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any
19 person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights,
20 privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different
21 punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race,
22 than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than
one year, or both; and if bodily injury results from the acts committed in violation of this section or if such
acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be
fined under this title or imprisoned not more than ten years, or both; and if death results from the acts
committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated
sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this
title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.

³ 18 U.S. Code § 247. Damage to religious property; obstruction of persons in the free exercise of religious
beliefs

(a) Whoever, in any of the circumstances referred to in subsection (b) of this section—

(1) intentionally defaces, damages, or destroys any religious real property, because of the religious
character of that property, or attempts to do so; or

(2) intentionally obstructs, by force or threat of force, including by threat of force against religious
real property, any person in the enjoyment of that person's free exercise of religious beliefs, or attempts to do
so; shall be punished as provided in subsection (d).

(b) The circumstances referred to in subsection (a) are that the offense is in or affects interstate or foreign
commerce.

(c) Whoever intentionally defaces, damages, or destroys any religious real property because of the race, color,
or ethnic characteristics of any individual associated with that religious property, or attempts to do so, shall
be punished as provided in subsection (d).

(d) The punishment for a violation of subsection (a) or (c) of this section shall be—

(1) if death results from acts committed in violation of this section or if such acts include kidnapping
or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an
attempt to kill, a fine in accordance with this title and imprisonment for any term of years or for life, or both,
or may be sentenced to death;

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1 **STATEMENT OF FACTS**

2 All elections in Washington are governed by Article VI of Washington’s
3 Constitution, which requires as follows:

4 All persons of the age of eighteen years or over who are citizens of the United
5 States and who have lived in the state, county, and precinct thirty days immediately
6 preceding the election at which they offer to vote, except those disqualified by
7 Article VI, section 3 of this Constitution, shall be entitled to vote at all elections.
8 [AMENDMENT 63, 1974 Senate Joint Resolution No. 143, p 807. Approved
9 November 5, 1974.]

10 In addition, Article VI, Section 3 provides for the disqualification of certain voters,
11 as follows:

12 All persons convicted of infamous crime unless restored to their civil rights and all
13 persons while they are judicially declared mentally incompetent are excluded from

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- 14 (2)if bodily injury results to any person, including any public safety officer performing duties as a direct or proximate result of conduct prohibited by this section, and the violation is by means of fire or an explosive, a fine under this title or imprisonment for not more that 40 years, or both;
 - 15 (3)if bodily injury to any person, including any public safety officer performing duties as a direct or proximate result of conduct prohibited by this section, results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, a fine in accordance with this title and imprisonment for not more than 20 years, or both;
 - 16 (4)if damage to or destruction of property results from the acts committed in violation of this section, which damage to or destruction of such property is in an amount that exceeds \$5,000, a fine in accordance with this title, imprisonment for not more than 3 years, or both; and
 - 17 (5)in any other case, a fine in accordance with this title and imprisonment for not more than one year, or both.
 - 18 (e)No prosecution of any offense described in this section shall be undertaken by the United States except upon the certification in writing of the Attorney General or his designee that in his judgment a prosecution by the United States is in the public interest and necessary to secure substantial justice.
 - 19 (f)As used in this section, the term “religious real property” means any church, synagogue, mosque, religious cemetery, or other religious real property, including fixtures or religious objects contained within a place of religious worship, or real property owned or leased by a nonprofit, religiously affiliated organization.
 - 20 (g)No person shall be prosecuted, tried, or punished for any noncapital offense under this section unless the indictment is found or the information is instituted not later than 7 years after the date on which the offense was committed.

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1 the elective franchise. [AMENDMENT 83, 1988 House Joint Resolution No. 4231,
2 p 1553. Approved November 8, 1988.]

3 These standards require the Secretary of State to ensure that all voters must be: 1)
4 of the age of eighteen years; 2) citizens of the United States; 3) living in the state, county,
5 and precinct thirty days prior to the election; 4) not convicted of an infamous crime
6 without restoration of civil rights; and 5) mentally competent to vote.¹

7 Based on information contained herein and belief, that as of election day, the
8 Secretary of State had not run a USPS address update in more than four years. As of the
9 date of the election on November 3, 2020, according to the USPS data, through the
10 National Change of Address (COA) update, 339,234 registered voters were identified who
11 had moved but whose addresses had not been updated in the Washington State voter data.
12 6,765 had filed a change of address (COA) with the USPS and moved in 2016, *more than 4*
13 *years ago*. Of those that moved, a total of 171,887 had moved out of state, making them
14 ineligible to vote in Washington, and 14,617 matched a COA record for which there was
15 no new address of the registered voter provided, yet these addresses are still in the voter
16 database and believed to have received a ballot at their previous address.

17 In addition, 962 individuals moved out of state yet registered to vote in September
18 and/or October of 2020, of which 358 have voted in the Washington's 2020 general

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20 ¹ Article VI, Section 4 does make exception for the following: For the purpose of voting and eligibility to
21 office no person shall be deemed to have gained a residence by reason of his presence or lost it by reason of
22 his absence, while in the civil or military service of the state or of the United States, nor while a student at
any institution of learning, nor while kept at public expense at any poor-house or other asylum, nor while
confined in public prison, nor while engaged in the navigation of the waters of this state or of the
United States, or of the high seas.

1 election. Of these who moved, then registered in September and October 2020 and then
2 voted, 11 of them moved in 2016, 89 moved in 2017, 161 moved in 2018, 188 moved in
3 2019, and 513 moved in 2020. Of those who moved in 2020, 90 of them registered to vote
4 the same month they moved according to the Washington State voter data as compared to
5 the NCOA updated data.

6 Based on information and belief, that as of election day, the Secretary of State had
7 not updated the voter registration list against the Master Death List and instead mailed over
8 10,000 ballots to the dead. In fact, the Death Master File supplied by the Social Security
9 Administration identified 10,695 registered voters that were deceased. Yet of that number,
10 7,228 voted in the November 2020 general election. This data scrub also identified 6
11 ballots that were sent to residents in prisons.

12 • Of the 12,631 active voters over the age of 100 years old as of 11/3/2020, 6,997
13 have accepted ballots.

14 • Of the 125 Active voters over the age of 110 years old as of 11/3/2020, 3 have
15 accepted ballots.

16 • Of the 36 Active voters over the age of 120 years old as of 11/3/2020, 2 have
17 accepted ballots. (The oldest known human being is 118).

18 • There were 13 active voters that had improbable/invalid birthdates including the
19 years 1800, 1858, 1873, and 0001. Of these, 7 have accepted ballots.

20 Based on information and belief, the Secretary of State and proceeded with the
21 election although the Failed ID Check system had been down for weeks prior to the

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1 election day, resulting in multiple instances of duplicate ballots being distributed. The
2 Secretary of State was alerted to this issue prior to the election and failed to cure.

3 In 2002, the United States Congress adopted the HELP AMERICA VOTE ACT OF
4 2002 (HAVA Act – P.L. 107–252, OCT. 29, 2002) which was designed to establish a
5 program to provide funds to States to replace punch card voting systems, to establish the
6 Election Assistance Commission to assist in the administration of Federal elections and to
7 otherwise provide assistance with the administration of certain Federal election laws and
8 programs, to establish minimum election administration standards for States and units of
9 local government with responsibility for the administration of Federal elections, and for
10 other purposes. This Act was in reaction to the controversy surrounding the 2000 U.S.
11 presidential election, when almost two million ballots were disqualified because they
12 registered multiple votes or none when run through vote-counting machines. HAVA is
13 applicable to all states in all federal elections.

14 Under HAVA, 52 U.S.C. § 21081 requires minimum voting systems standards for
15 the states in federal elections which include in applicable part that “[t]he voting system
16 shall produce a record with an audit capacity for such system.” § 21081(a)(2)(A).

17 52 U.S.C. § 21081(b) defines a “voting systems” to mean:

18 (1) the total combination of mechanical, electromechanical, or electronic equipment
19 (including the software, firmware, and documentation required to program, control, and
20 support the equipment) that is used (A) to define ballots; (B)to cast and count votes; (C) to

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1 report or display election results; and (D) **to maintain and produce any audit trail**
2 **information**; [bold added] and

3 (2) the practices and associated documentation used (A) to identify system
4 components and versions of such components; (B) to test the system during its
5 development and maintenance; (C) to maintain records of system errors and defects; (D) to
6 determine specific system changes to be made to a system after the initial qualification of
7 the system; and (E) to make available any materials to the voter (such as notices,
8 instructions, forms, or paper ballots).

9 52 U.S. Code § 21083 provides in relevant part that “the appropriate State or local
10 election official **shall perform list maintenance with respect to the computerized list**
11 **on a regular basis** to include records on felony status; and to coordinate the computerized
12 list with State agency records on death. Based on information and belief, the Secretary of
13 State, as of election day, had not maintained these records in accord with this federal
14 statute. Based on information and belief, the Secretary of State allowed the election results
15 to be housed on National Guard servers under the control of the Governor who was
16 standing for election at that time, following a malware attack on the Secretary of State’s
17 office in late September.

18 Based on information and belief, the Secretary of State decided to perform a
19 Microsoft Security Patch on November 21 over the objections of staff who voiced
20 concerns that the OS Patch should not be done during the process of vote certification.
21 Such “maintenance” is in direct contravention of HAVA and in violation of 52 U.S.C.

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1 § 21081(b)(1)(D). The OS Security Patch was done because Wyman’s IT personnel
2 reported that the information was “out in the wild” (i.e., easily hacked and possibly already
3 hacked).

4 The right to vote is protected in more than the initial allocation of the franchise.
5 Equal protection applies as well to the manner of its exercise. Having once granted the
6 right to vote on equal terms, the State may not, by later arbitrary and disparate treatment,
7 value one person's vote over that of another. *Bush v. Gore*, 531 US 98, 104-05 (2000),
8 citing *Harper v. Virginia Bd. of Elections*, 383 U. S. 663, 665 (1966) (“[O]nce the
9 franchise is granted to the electorate, lines may not be drawn which are inconsistent with
10 the Equal Protection Clause of the Fourteenth Amendment”). It must be remembered that
11 “the right of suffrage can be denied by a debasement or dilution of the weight of a citizen's
12 vote just as effectively as by wholly prohibiting the free exercise of the franchise.”
13 *Reynolds v. Sims*, 377 U. S. 533, 555 (1964).

14 Based on information and belief, there are intolerable voting anomalies found
15 within the general election results in Washington. Although the Culp campaign prevailed
16 in higher votes than Trump throughout most of the state, the election voter count data
17 collected by Edison Research for the state of Washington during the periods of 11/4/2020
18 @ 8:11PM through 11/24/2020 @ 4:40PM showed that Trump was leading at the start of
19 the vote counts (11/3/2020 @ 8:11PM), but it was quickly lost to Joe Biden on 11/3/2020
20 @ 8:21PM, when within 2 minutes, Joe Biden received 81.08% of his winning votes until
21 11/3/2020 @ 8:22PM. Additionally, there occurred one example of vote flipping of 6,614

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1 votes from the 3rd party candidates over to Joe Biden, on 11/4/2020 @ 8:54PM. The
2 Edison Research data clearly shows 9 more vote count reversals (11/3/2020@8:22PM,
3 11/4/2020@5:00PM, 5:23PM,6:53PM, 1/5/2020@4:38PM,5:56PM, 11/6/2020@4:15PM,
4 and 11/7/2020 @5:20PM.

5 CAUSES OF ACTION

6 *Plaintiffs allege as a first cause of action*

7 Violation of 42 USC § 1983

8 Defendants, at all material times operating under the color of law, have violated the
9 right of equal protection guaranteed to plaintiff pursuant to the Fourteenth Amendment by
10 allowing an unlawful election to go forward, and by thereafter certifying the results of the
11 election when they knew or should have known that the contest did not meet state or
12 federal standards. As a direct and proximate result, plaintiff has been damaged in the cost
13 of the campaign in an amount to be proven at trial.

14 Defendants have allowed many anomalous and otherwise illegal votes to be cast
15 and counted in the general election of November 3, 2020 and have thereby diminished the
16 vote of defendant in violation of the Fourteenth Amendment.

17 Plaintiff demands declaratory judgment that the election 1) fell short of standards
18 imposed on the Secretary of State by Article VI of Washington's Constitution; 2) fell short
19 of standards imposed on the Secretary of State by the HAVA Act; and 3) that the failure to
20 meet the standards so imposed wrongfully deprived plaintiff of a free and fair election.

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1 Plaintiff demands injunctive relief, requiring that the Secretary of State and the
2 State of Washington being enjoined from placing into office any individual claiming to
3 have been elected in the November 3, 2020 general election until the paper ballots, the
4 voting machines and the voting results have been examined by a forensic auditor approved
5 by plaintiff.

6 *Plaintiff alleges as a second cause of action*

7 **Audit**

8 Plaintiff demands that the election results of the November 3, 2020 general election
9 be audited by a forensic auditor as approved by Plaintiff.

10 Plaintiff demands that the election results be audited to determine that 1) the voter
11 voting was a real person of the age of eighteen years; 2) the voter was a citizen of the
12 United States; 3) the voter was living in the state, county, and precinct thirty days prior to
13 the election; 4) the voter was not convicted of an infamous crime without restoration of
14 civil rights; and 5) the voter was mentally competent to vote.

15 Plaintiff demands that the certified paper ballots be recounted by hand to determine
16 the election results, and that the results be certified to this court.

17 Plaintiff demands that a certified neutral and independent forensic auditor inspect
18 and analyze at least one of each kind of machine used in Washington for the 2020 general
19 election, each router used to connect each such machine, and to prepare a report to this
20 court including whether such machines and routers were owned or controlled by a foreign
21 entity, and whether such machines and routers contained any software “backdoors”.

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1 Plaintiff further demands that the Secretary of State be enjoined from destroying or
2 altering any portion of the election information, including without limitation, (1) the total
3 combination of mechanical, electromechanical, or electronic equipment (including the
4 software, firmware, and documentation required to program, control, and support the
5 equipment) that is used (A) to define ballots; (B) to cast and count votes; (C) to report or
6 display election results; and (D) to maintain and produce any audit trail information; and

7 Plaintiff further demands that the Secretary of State be enjoined from destroying or
8 altering any portion of the election information that details the practices and associated
9 documentation used (A) to identify system components and versions of such components;
10 (B) to test the system during its development and maintenance; (C) to maintain records of
11 system errors and defects; (D) to determine specific system changes to be made to a system
12 after the initial qualification of the system; and (E) to make available any materials to the
13 voter (such as notices, instructions, forms, or paper ballots).

14 **RELIEF SOUGHT**

15 Plaintiff seeks declaratory judgment that 1) the general election of November 3,
16 2020 in the state of Washington did not meet the standards imposed by Article VI, Section
17 1 of Washington's Constitution; 2) the general election of November 3, 2020 in the state of
18 Washington did not meet the standards imposed by the HAVA Act of 2002; and 3) the
19 failure to meet said standards resulted in a deprivation of rights to equal protection under
20 the Fourteenth Amendment.

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1 Plaintiff seeks a preliminary and permanent injunction, enjoining the certification
2 of the Secretary of State of the general election of November 3, 2020 from having any
3 legal effect pending an audit by a forensic auditor; and enjoining the Secretary of State
4 from destroying or altering any portion of the election information, including without
5 limitation, (1) the total combination of mechanical, electromechanical, or electronic
6 equipment (including the software, firmware, and documentation required to program,
7 control, and support the equipment) that is used (A) to define ballots; (B) to cast and count
8 votes; (C) to report or display election results; and (D) to maintain and produce any audit
9 trail information; or information that details the practices and associated documentation
10 used (A) to identify system components and versions of such components; (B) to test the
11 system during its development and maintenance; (C) to maintain records of system errors
12 and defects; (D) to determine specific system changes to be made to a system after the
13 initial qualification of the system; and (E) to make available any materials to the voter
14 (such as notices, instructions, forms, or paper ballots).

15 Plaintiff seeks the appointment of a forensic auditor as approved by plaintiff to
16 perform a forensic audit of the paper ballots, their quality and count, the vote counting
17 machines, their random results when tested, and the voting results in King, Clark,
18 Thurston, Pierce, Kitsap and Skagit Counties.

19 Plaintiff further demands damages from defendants in the amount to be proven at
20 trial of all sums paid by the Plaintiff to campaign for an office in a general election that
21 was at all times fraudulent and incapable of placing candidates in the lawful offices created

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1 by the Constitution of the State of Washington, together with attorney's fees and costs, and
2 punitive damages as provided for under 42 USC Section 1983 of an amount sufficient to
3 deter the WASHINGTON SECRETARY OF STATE and the STATE OF WASHINGTON
4 from further fraudulent practices.

5 For such further relief in law or equity this court finds applicable.

6 Dated this 10th day of December 2020.

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