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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

ANNE BLOCK, an individual

Plaintiff,

vs.

WASHINGTON STATE BAR ASSOCIATION;
SARAH ANDEEN, individually, and in her
capacity as defendant Washington State Bar
Association;
KEVIN BANK, individually and in his capacity as
defendant Washington State Bar Association;
KATHRYN BERGER, individually and in her
capacity as defendant Washington State Bar
Association;
KEITH MASON BLACK, individually and in his
capacity as defendant Washington State Bar
Association;
STEPHANIE BLOOMFIELD, individually and in
her capacity as defendant Washington State Bar
Association;
MICHELE NINA CARNEY, individually and in
her capacity as defendant Washington State Bar
Association;
S. NIA RENEI COTTRELL, individually and in
her capacity as defendant Washington State Bar
Association;
WILLIAM EARL DAVIS, individually and in his
capacity as defendant Washington State Bar
Association;

Civil Case No. 15-CV-02018 RSM

AMENDED COMPLAINT FOR DAMAGES;

1. 42 US U.S.C. § C § 1983 Violations, Damages, Equitable Relief; and
2. 42 U.S.C. § 1988 COSTS and Attorney Fees; and
3. 28 U.S.C. § 1961 et seq. (see 18 U.S.C. §§1964(a) and (c) ["Civil RICO"]
4. Washington's " Little RICO" RCW 9A 82.100(2); and
5. Sherman Anti-Trust Act violation 15 U.S.C. § U.S.C. 1201 et seq. ("ADA"); and
6. Americans with Disabilities Act, 42 U.S.C. 1201 et seq. ("ADA"); and
7. Washington Law Against Discrimination, RCW 49.60 et seq. ("WLAD"); and
8. Violating right to privacy, RCW 9.73.060.

JURY TRIAL DEMANDED

1 STEPHANIA CAMP DENTON,
individually and in her capacity as defendant
Washington State Bar Association;
2 LINDA EIDE, individually and in her capacity as
an employee of defendant Washington State Bar
3 Association;
4 DOUG ENDE, individually and in his capacity as
defendant Washington State Bar Association;
5 MARCIA LYNN DAMEROW FISCHER,
individually and in her capacity as defendant
6 Washington State Bar Association;
7 G. GEOFFREY GIBBS, individually, and in his
official capacity as an employee of defendant
8 Snohomish County and an employee of
Washington State Bar Association;
9 WILLIAM MCGILLIN, individually and in his
capacity as defendant Washington State Bar
Association;
10 MICHAEL JON MYERS, individually and in his
capacity as defendant Washington State Bar
11 Association;
12 JOSEPH NAPPI JR, individually and in his
capacity as defendant Washington State Bar
Association;
13 LIN O'DELL, individually and in her capacity as
defendant Washington State Bar Association and in
14 her marital community with her husband and/or
domestic partner of defendant Mark Plivilech;
15 MARK PLIVILECH, in his individual capacity
and in his marital community with wife and/or
16 domestic partner defendant LIN O'Dell;
17 ALLISON SATO, individually and in her capacity
as defendant Washington State Bar Association;
18 RONALD SCHAPS, individually and in his
capacity as defendant Washington State Bar
19 Association;
20 JULIE SHANKLAND, individually and in her
capacity as defendant Washington State Bar
Association;
21 MARC SILVERMAN, individually and in his
capacity as defendant Washington State Bar
22 Association;
23 TODD R. STARTZEL, individually and in his
capacity as defendant Washington State Bar
Association;
24 JOHN DOE, individually and in his capacity as
defendant Washington State Bar Association;
25 CITY OF DUVALL, a Washington State City and
Municipal Corporation

1 -LORI BATIOT, individually, and in her official
capacity as an employee of defendant City of
2 Duvall;
JOE BEAVERS, individually;
3 LINDA LOEN, individually, and in her capacity as
defendant City of Gold Bar Mayor and Public
4 Records Officer;
CRYSTAL HILL PENNINGTON (nee BERG),
5 individually, and in her marital community with
defendant John Pennington, her husband;
6 KENYON DISEND, A WASHINGTON PLLC
business in Washington;
7 MICHAEL KENYON, individually, and in his
official capacity as an employee and as a
8 shareholder of defendant Kenyon Disend;
MARGARET KING, individually, and in her
9 official capacity as an employee of defendant
Snohomish County and for defendant Kenyon
10 Disend;
ANN MARIE SOTO, individually, and in her
11 official capacity as an employee for defendant
Kenyon Disend;
12 SANDRA SULLIVAN (nee, MEADOWCRAFT),
individually, and in her official capacity as an
13 employee for defendant Kenyon Disend;
KING COUNTY, a Washington State County and
14 Municipal Corporation;
15 CARY COBLANTZ, individually, and in his
official capacity as an employee of defendant King
County;
16 PORT OF SEATTLE, a Washington State Port and
Municipal Corporation;
17 SEAN GILLEBO, individually, and in her official
capacity as an employee of defendant Port of
18 Seattle;
19 KALI MATUSKA, individually, and in her
official capacity as an employee of defendant Port
20 of Seattle;
JULIE TANGA, individually, and in her official
21 capacity as an employee of defendant Port of
Seattle;
22 JAMES TUTTLE, individually, and in her official
capacity as an employee of defendant Port of
23 Seattle;
SNOHOMISH COUNTY, a Washington County
24 and Municipal Corporation;
SARA DIVITTORIO, individually, and in her
25 official capacity as an employee of defendant
Snohomish County;

1 SETH FINE, individually, and in his official
2 capacity as an employee of defendant Snohomish
3 County and an employee of Washington State Bar
4 Association;

5 BRIAN LEWIS, individually, and in his official
6 capacity as an employee and public records officer
7 of defendant Snohomish County;

8 JOHN LOVICK, individually, and in his official
9 capacity as an employee of defendant Snohomish
10 County;

11 JOHN PENNINGTON, individually, and in his
12 marital community with defendant Crystal Hill
13 Pennington, his wife, and in his official capacity as
14 Director of Snohomish County Department of
15 Emergency Management for defendant Snohomish
16 County;

17 SEAN REAY, individually, and in his official
18 capacity as an employee of defendant Snohomish
19 County;

20 MARK ROE, individually, and in his official
21 capacity as an employee of defendant Snohomish
22 County;

23 SKY VALLEY MEDIA GROUP, LLC dba SKY
24 VALLEY CHRONICLE, a Limited Liability
25 Company in Washington;

RONALD FEJFAR, aka RON FAVOR aka RON
FABOUR aka CHET ROGERS individually, and
in his official capacity as an agent for defendant
Sky Valley Media Group, LLC.

Defendants.

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21 Comes now the Plaintiff, Anne Block (“Block”), pursuant to FRCP 15(a)(1)(B) amends
22 her complaint as a matter of course. Plaintiff seeks to protect and vindicate fundamental
23 constitutional rights. Block brings a civil rights action brought under the First and Fourteenth
24 Amendments to the United States Constitution and 42 U.S.C. § 1983, challenging Defendants’
25 restriction on and continuing attempts to punish Plaintiff’s right to engage in protected First

1 Amendment activities; Block should be able to exercise these rights free from defendants'
2 interference.

3 Block requests the Court take notice that the Washington State Constitution prohibits:
4 immunities and "hereditary privileges" [See Article 1, sec 12 and sec 28]; any limitation of civil
5 and criminal actions; and prohibits legalizing the unauthorized or invalid act of any officer. [See
6 Article 2, Section 28(12 and 17)] Defendants have no immunity under any legal theory as the
7 Washington Constitution expressly prohibits immunities whether "hereditary" or statutory. See
8 RCW 4.04.010 voiding common law inconsistent with these constitutional provisions.

9
10 Plaintiff's claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§
11 2201 and 2202; by Rules 57 and 65 of the Federal Rules of Civil Procedure; and by the general
12 legal and equitable powers of this Court. 42 U.S.C. §§ 1983 and 1988; RICO remedies
13 authorized by 28 U.S.C §1961 et seq. see 18 U.S.C. §§ 1964(a) and (c) ("Civil RICO"); mail and
14 wire fraud in violation of 18 U.S.C. §1341; Sherman Anti-Trust Act violation 15 U.S.C. §1;
15 violating the Americans with Disabilities Act, 42 U.S.C. 1201 et seq. ("ADA"); and Washington
16 Law Against Discrimination, RCW 49.60 et seq. ("WLAD"); and for declaratory and injunctive
17 relief under federal law, and state law tort claims against the above named defendants alleges as
18 follows:

19 **I. JURISDICTION AND VENUE**

20
21 1.1 The acts and omissions alleged in this Complaint occurred within the geographical and
22 jurisdictional boundaries of the United States District Court for the Western District of
23 Washington by persons located and residing therein, and events that gave rise to this
24 complaint took place within the geographical jurisdictional boundaries of the Western
25 District of Washington. Venue in this district is therefore appropriate pursuant to 28 U.S.C.

1 §1391.

2 1.2 Block is entitled to sue for and obtain injunctive relief under 15 U.S.C. § 26

3 1.3 This court has subject matter jurisdiction on Anti-Trust violations under the Sherman Act
4 pursuant to 28 U.S.C. § 1337.

5 1.4 This court has subject matter jurisdiction over Block's claims of violations of her
6 constitutional rights under 42 U.S.C. § 1983.

7 1.5 This court has subject matter jurisdiction over Block's state law claims pursuant to the Court's
8 supplemental jurisdiction, 28 U.S.C. §1367. Block is entitled to sue for damages under state
9 law causes of action.

10 1.6 Plaintiff is entitled to relief under the Americans with Disabilities Act, 42 U.S.C. § 1201 et
11 seq. ("ADA");

12 1.7 Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events or
13 omissions giving rise to Plaintiff's claims occurred in this district.

14 1.8 Jurisdiction is conferred on this Court pursuant to 28 U.S.C. §§ 1331 and 1343.

15 1.9 Plaintiff's claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201
16 and 2202, by Rules 57 and 65 of the Federal Rules of Civil Procedure, and by the general
17 legal and equitable powers of this Court. Plaintiff's claim for nominal damages are authorized
18 by 42 U.S.C. § 1983.

19
20 1.11 This Court is authorized to grant Block's prayer for relief regarding costs, including
21 reasonable attorney's fee, pursuant to 42 U.S.C. § 1988.

22 **II. PARTIES**

23 2.0 **PLAINTIFF, ANNE BLOCK ("BLOCK")** is a single woman who is competent to
24 bring this action. She resides within the City of Gold Bar, is a citizen, author, journalist, civil
25 rights activist, and a civilian. She has exercised speech and petition rights secured to her by

1 the First and Fourteenth Amendments to the United States Constitution. For exercising her
2 constitutional rights the Defendants conducted a campaign of prohibited retribution and
3 retaliation, individually and collectively.

4 **2.1 DEFENDANT WASHINGTON STATE BAR ASSOCIATION (“WSBA”)** is a
5 Washington agency, whose officials and employees, as a matter of policy, custom and usage
6 of the WSBA, and with the power conferred upon them by the State of Washington,
7 retaliated collectively and in concert and agreement with the other named defendants against
8 the Plaintiff to wrongfully injure Plaintiff for exercising her First Amendment Rights, her
9 constitutional, and her statutory rights. WSBA is a RICO defendant. WSBA is not a previous
10 defendant in *Block v Snohomish County et al C14-235 RAJ*.

11 **2.2 SARAH ANDEEN (“Andeen”)** is a volunteer agent of defendant WSBA, who as a
12 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon
13 them by the State of Washington, retaliated collectively and in concert and in agreement with
14 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
15 constitutional and statutory rights. Andeen conspired with others to retaliate against Plaintiff
16 and acted outside her authority. Andeen is a RICO defendant and is not a previous defendant
17 in *Block v Snohomish County et al C14-235 RAJ*.

18 **2.3 DEFENDANT KEVIN BANK (“Bank”)** is an agent of defendant WSBA, who as a
19 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon
20 them by the State of Washington, retaliated collectively and in concert and agreement with
21 other named defendants against Plaintiff to wrongfully injure Plaintiff for exercising her
22 constitutional and statutory rights. Bank conspired with others to retaliate against Plaintiff
23 and acted outside his authority. Bank is a RICO defendant and is not a previous defendant in
24 *Block v Snohomish County et al C14-235 RAJ*.
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1 2.4 **DEFENDANT KATHRYN BERGER (“Berger”)** is an agent of defendant WSBA, who
2 as a matter of policy, custom and usage of defendant WSBA, and with the power conferred
3 upon them by the State of Washington, retaliated collectively and in concert and agreement
4 with other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising
5 her constitutional and statutory rights. Berger conspired with others to retaliate against
6 Plaintiff and acted outside her authority. Berger is a RICO defendant and is not a previous
7 defendant in *Block v Snohomish County et al C14-235 RAJ.*

8 2.5 **DEFENDANT KEITH MASON BLACK (“Black”)** is an agent of defendant WSBA,
9 who as a matter of policy, custom and usage of defendant WSBA, and with the power
10 conferred upon them by the State of Washington, retaliated collectively and in concert and
11 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for
12 exercising her constitutional and statutory rights. Black conspired with others to retaliate
13 against Plaintiff and acted outside his authority. Black is a RICO defendant and is not a
14 previous defendant in *Block v Snohomish County et al C14-235 RAJ.*

15 2.6 **DEFENDANT STEPHANIE BLOOMFIELD (“Bloomfield”)** is an agent of defendant
16 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the
17 power conferred upon them by the State of Washington, retaliated collectively and in concert
18 and agreement with other named defendants against the Plaintiff to wrongfully injure
19 Plaintiff. Bloomfield conspired with others to retaliate against the Plaintiff and acted under
20 color of the law. Bloomfield is RICO defendant and is not a previous defendant in *Block v*
21 *Snohomish County et al C14-235 RAJ.*

22 2.7 **DEFENDANT MICHELE NINA CARNEY (“Carney”)** is an agent of defendant
23 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the
24 power conferred upon them by the State of Washington, retaliated collectively and in concert
25 and agreement with other named defendants against the Plaintiff to wrongfully injure

1 Plaintiff for exercising her constitutional and statutory rights. Carney conspired with others to
2 retaliate against Plaintiff and acted outside her authority. Carney is a RICO defendant and is
3 not a previous defendant in *Block v Snohomish County et al C14-235 RAJ.*

4 2.8 **S. NIA RENEI COTTRELL (“Cottrell”)** is an agent of defendant WSBA, who as a
5 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon
6 them by the State of Washington, retaliated collectively and in concert and agreement with
7 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
8 constitutional and statutory rights. Cottrell conspired with others to retaliate against Plaintiff
9 and acted outside her authority. Cottrell is a RICO defendant and is not a previous defendant
10 in *Block v Snohomish County et al C14-235 RAJ.*

11 2.9 **WILLIAM EARL DAVIS (“Davis”)** is an agent of defendant WSBA, who as a matter of
12 policy, custom and usage of defendant WSBA, and with the power conferred upon them by
13 the State of Washington, retaliated collectively and in concert and agreement with other
14 named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
15 constitutional and statutory rights. Davis conspired with others to retaliate against Plaintiff.
16 He acted outside his authority. Davis is a RICO defendant and is not a previous defendant in
17 *Block v Snohomish County et al C14-235 RAJ.*

18 2.10 **STEPHANIA CAMP DENTON (“Denton”)** is an agent of defendant WSBA, who as a
19 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon
20 them by the State of Washington, retaliated collectively and in concert and in agreement with
21 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
22 constitutional and statutory rights. Denton conspired with others to retaliate against Plaintiff
23 and acted outside her authority. Denton is a RICO defendant and is not a previous defendant
24 in *Block v Snohomish County et al C14-235 RAJ.*
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1 2.11 **DEFENDANT LINDA EIDE (“Eide”)** is an employee of Washington State Bar
2 Association, who as a matter of policy, custom and usage of defendant WSBA, and with the
3 power conferred upon them by the State of Washington, retaliated collectively and in concert
4 and in agreement with the other named defendants against the Plaintiff to wrongfully injure
5 Plaintiff for exercising her constitutional and statutory rights. Eide conspired with others to
6 retaliate against the Plaintiff and acted outside her official capacity as a prosecutor. She is a
7 RICO defendant and is not a previous defendant in *Block v Snohomish County et al C14-235*
8 *RAJ.*

9 2.12 **DEFENDANT DOUG ENDE (“Ende”)** is an agent of defendant WSBA, who as a matter
10 of policy, custom and usage of defendant WSBA, and with the power conferred upon them
11 by the State of Washington, retaliated collectively and in concert and agreement with other
12 named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
13 constitutional and statutory rights. Ende conspired with others to retaliate against Plaintiff
14 and acted outside his authority. Ende is a RICO defendant and is not a previous defendant in
15 *Block v Snohomish County et al C14-235 RAJ.*

16 2.13 **DEFENDANT MARCIA LYNN DAMEROW FISCHER (“Fischer”)** is an agent of
17 defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and
18 with the power conferred upon them by the State of Washington, retaliated collectively and
19 in concert and in agreement with other named defendants against the Plaintiff to wrongfully
20 injure Plaintiff for exercising her constitutional and statutory rights. Fischer conspired with
21 others to retaliate against Plaintiff and acted outside her authority. Fischer is a RICO
22 defendant and is not a previous defendant in *Block v Snohomish County et al C14-235 RAJ.*

23 2.14 **DEFENDANT G. GEOFFREY GIBBS (“Gibbs”)** was at all material times a resident of
24 Snohomish County; a Commissioner for defendant Snohomish County; Disciplinary Board
25 member, and/or Board of Governors member, and employee or agent for Defendant WSBA.

1 He is a person who, individually, and in concert and agreement with other named defendants,
2 acted to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating
3 against Plaintiff for exercising those rights. Gibbs conspired with others to retaliate against
4 Plaintiff for exercising her constitutional and statutory rights. Gibbs acted outside his
5 authority. Gibbs is a RICO defendant and is not a previous defendant in *Block v Snohomish*
6 *County et al C14-235 RAJ*.

7 **2.15 DEFENDANT WILLIAM MCGILLIN (“McGillin”)** is an agent of defendant WSBA,
8 who as a matter of policy, custom and usage of defendant WSBA, and with the power
9 conferred upon them by the State of Washington, retaliated collectively and in concert and
10 agreement with other named defendants against Plaintiff to wrongfully injure Plaintiff for
11 exercising her constitutional and statutory rights. McGillin conspired with others to retaliate
12 against Plaintiff. McGillin acted outside his authority. McGillin is a RICO defendant and is
13 not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

14 **2.16 DEFENDANT MICHAEL JON MYERS (“Myers”)** is an agent of defendant WSBA,
15 who, as a matter of policy, custom and usage of defendant WSBA, and with the power
16 conferred upon them by the State of Washington, retaliated collectively and in concert and in
17 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for
18 exercising her constitutional and statutory rights. Myers conspired with others to retaliate
19 against Plaintiff. He acted outside his authority. Myers is a RICO defendant and is not a
20 previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

21 **2.17 DEFENDANT JOSEPH NAPPI JR. (“Nappi”)** is an agent of defendant WSBA, who as
22 a matter of policy, custom and usage of defendant WSBA, and with the power conferred
23 upon them by the State of Washington, retaliated collectively and in concert and agreement
24 with other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising
25 her constitutional and statutory rights. Nappi conspired with others to retaliate against

1 Plaintiff and acted outside his authority. Nappi is a RICO defendant and is not a previous
2 defendant in *Block v Snohomish County et al C14-235 RAJ.*

3 2.18 **DEFENDANT LIN O'DELL ("O'Dell")** is an agent of defendant WSBA, who as a
4 matter of policy, custom and usage, and with the power conferred upon them by the State of
5 Washington, retaliated collectively and in concert and agreement with the other named
6 defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her constitutional
7 and statutory rights. O'Dell conspired with others to retaliate against the Plaintiff and acted
8 outside her official capacity as a prosecutor. O'Dell is RICO and is not a previous defendant
9 in *Block v Snohomish County et al C14-235 RAJ.*

10 2.19 **DEFENDANT MARK PLIVILECH ("Plivilech")** is an employee or agent of defendant
11 Lin O'Dell, and reportedly the husband of defendant Lin O'Dell. Mark Plivilech retaliated
12 collectively and in concert and in agreement with other named defendants against the
13 Plaintiff to wrongfully injure Plaintiff. Mark Plivilech conspired with others to retaliate
14 against Plaintiff. Mark Plivilech is a RICO defendant and is not a previous defendant in *Block*
15 *v Snohomish County et al C14-235 RAJ.*

16 2.20 **DEFENDANT ALLISON SATO ("Sato")** is an agent of defendant WSBA, who as a
17 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon
18 them by the State of Washington, retaliated collectively and in concert and agreement with
19 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
20 constitutional and statutory rights. Sato conspired with others to retaliate against Plaintiff and
21 acted outside her authority. Sato is a RICO defendant and is not a previous defendant in
22 *Block v Snohomish County et al C14-235 RAJ.*

23 2.21 **DEFENDANT RONALD SCHAPS ("Schaps")** is an agent of defendant WSBA, who as
24 a matter of policy, custom and usage of defendant WSBA, and with the power conferred
25 upon them by the State of Washington, retaliated collectively and in concert and in

1 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for
2 exercising her constitutional and statutory rights. Schaps conspired with others to retaliate
3 against the Plaintiff. Schaps is a RICO defendant and is not a previous defendant in *Block v*
4 *Snohomish County et al C14-235 RAJ.*

5 2.22 **DEFENDANT JULIE SHANKLAND (“Shankland”)** is an employee of defendant
6 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the
7 power conferred upon them by the State of Washington, retaliated collectively and in concert
8 and agreement with the other named defendants against the Plaintiff to wrongfully injure
9 Plaintiff for exercising her constitutional and statutory rights. Shankland conspired with
10 others to retaliate against the Plaintiff and acted outside her official capacity as a liaison.
11 Shankland is RICO defendant and is not a previous defendant in *Block v Snohomish County*
12 *et al C14-235 RAJ.*

13 2.23 **DEFENDANT MARC SILVERMAN (“Silverman”)** is an agent of defendant WSBA,
14 who as a matter of policy, custom and usage of defendant WSBA, and with the power
15 conferred upon them by the State of Washington, retaliated collectively and in concert and
16 agreement with other named defendants against Plaintiff to wrongfully injure Plaintiff for
17 exercising her constitutional and statutory rights. Silverman conspired with others to retaliate
18 against Plaintiff and acted outside his authority. Silverman is a RICO and is not a previous
19 defendant in *Block v Snohomish County et al C14-235 RAJ.*

20 2.24 **DEFENDANT TODD R. STARTZEL (“Startzel”)** is an agent of defendant WSBA,
21 who as a matter of policy, custom and usage of defendant WSBA, and with the power
22 conferred upon them by the State of Washington, retaliated collectively and in concert and
23 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for
24 exercising her constitutional and statutory rights. Startzel conspired with others to retaliate
25

1 against Plaintiff and acted outside his authority. Startzel is a RICO defendant and is not a
2 previous defendant in *Block v Snohomish County et al C14-235 RAJ.*

3 2.25 **JOHN DOE (WSBA PROCESS SERVER)** is an agent of defendant WSBA, who as a
4 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon
5 them by the State of Washington, retaliated collectively and in concert and agreement with
6 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her
7 constitutional and statutory rights. John Doe conspired with others to retaliate against
8 Plaintiff. John Doe is a not RICO defendant and is not a previous defendant in *Block v*
9 *Snohomish County et al C14-235 RAJ.*

10 2.26 **DEFENDANT CITY OF DUVALL** is a Washington State City and Municipal
11 Corporation whose officials and employees, as a matter of policy, custom and usage of the
12 City, and with the power conferred upon them by King County, retaliated collectively and in
13 concert and agreement with other named defendants against the Plaintiff to wrongfully injure
14 Plaintiff for exercising her rights. The City of Duvall conspired with others to retaliate
15 against Plaintiff for exercising her constitutional and statutory rights. The City of Duvall is
16 not a RICO defendant and is not a previous defendant in *Block v Snohomish County et al*
17 *C14-235 RAJ.*

18 2.27 **DEFENDANT LORI BATIOI (“Batiot”)** is a police officer for Defendant City of
19 Duvall, who acted and lives within the geographical and jurisdictional boundaries of this
20 court. She is a person who, individually, and in concert and agreement with other persons,
21 acted under color of law to deprive Plaintiff of rights guaranteed by the United States
22 Constitution by retaliating against Plaintiff for exercising her constitutional and statutory
23 rights. Batiot conspired with other named defendants to retaliate against the Plaintiff. Batiot
24 is a RICO defendant and is not a previous defendant in *Block v Snohomish County et al C14-*
25 *235 RAJ.*

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2.28 **DEFENDANT JOE BEAVERS (“Beavers”)** is a resident of City of Gold Bar, who acted and lives within the geographical and jurisdictional boundaries of this court. He is a person who, individually, and in concert and agreement with other persons who acted under color of law, as the City of Gold Bar public records officer and/or Mayor, to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against Plaintiff for exercising those rights. Beavers conspired with others to retaliate against Plaintiff. He is a RICO defendant and is a previous defendant in *Block v Snohomish County et al C14-235 RAJ*; there are new allegations post *Block vs Snohomish County et al*.

2.29 **DEFENDANT LINDA LOEN (“Loen”)** is the Mayor of the City of Gold Bar, who acted and lives within the geographical and jurisdictional boundaries of this court, is a person who, individually, and in concert and in agreement with other persons, acted outside color of law to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against Plaintiff for exercising those rights. Loen conspired with others to retaliate against Plaintiff for exercising her constitutional and statutory rights. She is a RICO defendant and is not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

2.30 **DEFENDANT CRYSTAL HILL PENNINGTON nee BERG (“Hill-Pennington”)** acted and lives within the geographical and jurisdictional boundaries of this court. She is a person who, individually, and in concert and agreement with other persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against her for exercising those rights. Hill-Pennington is currently the wife of Defendant John Pennington and they constitute a marital community under the laws of the State of Washington. Hill-Pennington conspired with others to retaliate against the Plaintiff. Hill-Pennington is a RICO defendant and is a previous defendant in *Block vs Snohomish County et al C14-235 RAJ*; there are new allegations post *Block vs Snohomish County et al*.

1 2.31 **KENYON DISEND, A WASHINGTON PLLC**: was at all material times a Washington
2 PLLC licensed to do business in the state of Washington, whose agents and employees, as a
3 matter of policy, custom and usage, retaliated collectively and in concert and in agreement
4 with other named defendants, acted under color of law to deprive Plaintiff of rights
5 guaranteed by the United States Constitution by retaliating against her for exercising those
6 rights. Kenyon Disend, PLLC conspired with others to retaliate against the Plaintiff for
7 exercising her constitutional and statutory rights. Kenyon Disend, PLLC is a RICO
8 defendant and is not a previous defendant in *Block vs Snohomish County et al C14-235 RAJ*.

9 2.32 **MICHAEL KENYON**: was at all material times an owner, shareholder, and employee of
10 defendant Kenyon Disend, a resident of King County, who acted and lives within the
11 geographical and jurisdictional boundaries of this court. He is a person who, as a matter of
12 policy, custom and usage of Kenyon Disend, PLLC, and individually, and in concert and in
13 agreement with other persons, acted outside color of law to deprive Plaintiff of rights
14 guaranteed by the United States constitution by retaliating against her for exercising those
15 rights. Michael Kenyon conspired with other named defendants to retaliate against the
16 Plaintiff and injure plaintiff for exercising her constitutional and statutory rights. Michael
17 Kenyon is a RICO defendant and is not a previous defendant in *Block v Snohomish County et*
18 *al C14-235 RAJ*.

19 2.33 **DEFENDANT MARGARET KING (“King”)** was employed by Kenyon Disend, a
20 contractor for City of Gold Bar, from April 2010 through the end of December 2012, acting as
21 investigator; and was employed as a prosecutor for defendant Snohomish County from January
22 2013 to the end of 2013, acting as investigator. King is a resident of King County, who acted
23 and lives within the geographical and jurisdictional boundaries of this court. She is a person
24 who, individually, and in concert and agreement with other named defendants, acted outside
25 color of law to deprive Plaintiff of rights guaranteed by the United States Constitution by

1 retaliating against Plaintiff for exercising those rights. King conspired with other named
2 defendants to retaliate against Plaintiff and injure Plaintiff for exercising her constitutional
3 and statutory rights. King acted outside her official capacity as attorney for the City of Gold
4 Bar, and she acted outside her official capacity as prosecutor for defendant Snohomish
5 County. King is a RICO defendant and is not a previous defendant in *Block v Snohomish*
6 *County et al C14-235 RAJ*.

7 **2.34 DEFENDANT ANN MARIE SOTO (“Soto”)** was at all material times an employee of
8 defendant Kenyon Disend, a resident of King County, who acted and lives within the
9 geographical and jurisdictional boundaries of this court. She is a person who, as a matter of
10 policy, custom and usage of Kenyon Disend, PLLC, and individually, and in concert and in
11 agreement with other persons, acted outside color of law to deprive Plaintiff of rights
12 guaranteed by the United States constitution by retaliating against her for exercising those
13 rights. Soto conspired with other named defendants to retaliate against the Plaintiff and
14 injure Plaintiff for exercising her constitutional and statutory rights. Soto is a RICO
15 defendant and is not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

16 **2.35 DEFENDANT SANDRA SULLIVAN nee Meadowcraft (“Sullivan”)** is a special
17 prosecutor employed by Defendant City of Duvall and its law firm Kenyon Disend, who
18 acted and lives within the geographical and jurisdictional boundaries of this court. She is a
19 person who, individually, and in concert and in agreement with other persons, acted under
20 color of law to deprive Plaintiff of rights guaranteed by the United States Constitution by
21 retaliating against Plaintiff for exercising her constitutional and statutory rights. Sullivan
22 conspired with other named defendants to retaliate against the Plaintiff and acted outside her
23 official capacity as a prosecutor. Sullivan is a RICO defendant and is not a previous
24 defendant in *Block v Snohomish County et al C14-235 RAJ*.

1 2.36 **DEFENDANT KING COUNTY** is a Washington State County and Municipal
2 Government whose officials and employees, as a matter of policy, custom and usage of the
3 County, and with the power conferred upon them by the State of Washington, retaliated
4 collectively and in concert and in agreement with other named defendants against the
5 Plaintiff to wrongfully injure Plaintiff for exercising her constitutional and statutory rights.
6 King County is not a RICO defendant and is not a previous defendant in *Block v Snohomish*
7 *County et al C14-235 RAJ*.

8 2.37 **DEFENDANT CARY COBLANTZ** (“Coblantz”) was at material times a county
9 employee with Defendant King County assigned to the City of Shoreline, who acted and lives
10 within the geographical and jurisdictional boundaries of this court. He is a person who,
11 individually, and in concert and agreement with other persons, acted under color of law to
12 deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against
13 Plaintiff for exercising her constitutional and statutory rights. Coblantz conspired with other
14 named defendants to retaliate against the Plaintiff. Coblantz is a RICO defendant and is not a
15 previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

16 2.38 **DEFENDANT PORT OF SEATTLE**: Defendant Port of Seattle is a Washington State
17 Port and Municipal Corporation whose officials and employees, as a matter of policy, custom
18 and usage of the Port, and with the power conferred upon them by King County, retaliated
19 collectively and in concert and agreement with other named defendants against the Plaintiff
20 to wrongfully injure Plaintiff for exercising her constitutional and statutory rights. The Port
21 of Seattle conspired with others to retaliate against the Plaintiff. The Port of Seattle is not a
22 RICO defendant and is not a previous defendant in *Block v Snohomish County et al C14-235*
23 *RAJ*.

24 2.39 **DEFENDANT SEAN GILLEBO** (“Gillebo”) is a police officer for defendant Port of
25 Seattle, who acted and lives within the geographical and jurisdictional boundaries of this

1 court. He is a person who, individually, and in concert and agreement with other persons,
2 acted under color of law to deprive Plaintiff of rights guaranteed by the United States
3 Constitution by retaliating against Plaintiff for exercising those rights. Gillebo conspired
4 with other named defendants to retaliate against the Plaintiff for exercising her constitutional
5 and statutory rights. He is not a RICO defendant and is not a previous defendant in *Block v*
6 *Snohomish County et al C14-235 RAJ*.

7 **2.40 DEFENDANT KALI MATUSKA (“Matuska”)** is a police officer for defendant Port of
8 Seattle, who acted and lives within the geographical and jurisdictional boundaries of this
9 court. She is a person who, individually, and in concert and agreement with other persons,
10 acted under color of law to deprive Plaintiff of rights guaranteed by the United States
11 constitution by retaliating against her for exercising those rights. Matuska conspired with
12 other named defendants to retaliate against the Plaintiff for exercising her constitutional and
13 statutory rights. She is not a RICO defendant and is not a previous defendant in *Block v*
14 *Snohomish County et al C14-235 RAJ*.

15 **2.41 DEFENDANT JULIE TANGA (“Tanga”)** is a police officer for defendant Port of
16 Seattle, who acted and lives within the geographical and jurisdictional boundaries of this
17 court. She is a person who, individually, and in concert and agreement with other persons,
18 acted under color of law to deprive Plaintiff of rights guaranteed by the United States
19 constitution by retaliating against her for exercising those rights. Tanga conspired with other
20 named defendants to retaliate against the Plaintiff for exercising her constitutional and
21 statutory rights. She is not a RICO defendant and is not a previous defendant in *Block v*
22 *Snohomish County et al C14-235 RAJ*.

23 **2.42 DEFENDANT JAMES TUTTLE (“Tuttle”)** is an investigator for defendant Port of
24 Seattle Internal Affairs Unit, who acted and lives within the geographical and jurisdictional
25 boundaries of this court. He is a person who, individually, and in concert and agreement with

1 other persons, acted under color of law to deprive Plaintiff of rights guaranteed by the United
2 States Constitution by retaliating against her for exercising those rights. Tuttle conspired
3 with other named defendants to retaliate against the Plaintiff for exercising her constitutional
4 and statutory rights. He is not a RICO defendant and is not a previous defendant in *Block v*
5 *Snohomish County et al C14-235 RAJ*.

6 **2.43 DEFENDANT SNOHOMISH COUNTY:** Defendant Snohomish County is a
7 Washington State County and Municipal Government whose officials and employees, as a
8 matter of policy, custom and usage of the County, and with the power conferred upon them
9 by the State of Washington, retaliated collectively and in concert and agreement with other
10 named defendants against the Plaintiff to wrongfully injure Plaintiff. Snohomish County
11 conspired with others to retaliate against Plaintiff for exercising her constitutional and
12 statutory rights. Snohomish County is not a RICO defendant and is a previous defendant in
13 *Block vs Snohomish County et al C14-235 RAJ*; there are new allegations post *Block vs*
14 *Snohomish County et al*.

15 **2.44 DEFENDANT SARA DIVITTORIO (“DiVittorio”)** was at all material times a civil
16 prosecutor for defendant Snohomish County. She acted and lives within the geographical
17 and jurisdictional boundaries of this court. She is a person who, individually, and in concert
18 and agreement with other persons, acted under color of law to deprive Plaintiff of rights
19 guaranteed by the United States Constitution by retaliating against Plaintiff for exercising
20 those rights. DiVittorio conspired with other named defendants to retaliate against Plaintiff
21 for exercising her constitutional and statutory rights. DiVittorio acted outside her official
22 capacity as prosecutor with defendant Snohomish County. DiVittorio is a RICO defendant
23 and is not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

24 **2.45 DEFENDANT SETH FINE (“Fine”)** was at all material times a prosecutor for defendant
25 Snohomish County and disciplinary member for the WSBA, acting as an investigator in both

1 capacities. He acted and lives within the geographical and jurisdictional boundaries of this
2 court. He is a person who, individually and in concert and agreement with other persons,
3 acted outside color of law to deprive Plaintiff of rights guaranteed by the United States
4 constitution by retaliating against her for exercising those rights. Fine conspired with others
5 to retaliate against the Plaintiff constitutional and statutory rights. Fine acted outside his
6 official capacity as prosecutor with defendant Snohomish County and the WSBA. Fine is a
7 RICO defendant and is not a previous defendant in *Block v Snohomish County et al C14-235*
8 *RAJ*.

9 2.46 **DEFENDANT BRIAN LEWIS (“Lewis”)** was at all material times the employee and
10 public records officer for Snohomish County. He acted and lives within the geographical and
11 jurisdictional boundaries of this court. He is a person who, individually, and in concert and
12 agreement with other persons, acted under color of law to deprive Plaintiff of rights
13 guaranteed by the United States Constitution by retaliating against her for exercising those
14 rights. Lewis conspired with other named defendants to retaliate against Plaintiff for
15 exercising her constitutional and statutory rights. Lewis is a RICO defendant and is not a
16 previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

17 2.47 **DEFENDANT JOHN LOVICK (“Lovick”)** was at all material times the former
18 Snohomish County Executive. He acted and lives within the geographical and jurisdictional
19 boundaries of this court. He is a person who, individually, and in concert and agreement with
20 other persons, acted under color of law, to deprive Plaintiff of rights guaranteed by the
21 United States Constitution by retaliating against her for exercising those rights. He conspired
22 with other named defendants to retaliate against the Plaintiff for exercising her constitutional
23 and statutory rights. Lovick is a RICO defendant and is not a previous defendant in *Block v*
24 *Snohomish County et al C14-235 RAJ*.

1 2.48 **DEFENDANT JOHN PENNINGTON (“Pennington”)** was at all material times was
2 Director of the Snohomish County Department of Emergency Management, who acted and
3 lives within the geographical and jurisdictional boundaries of this court. Pennington is trained
4 by the U.S. military in media tactics and techniques in which he has engaged against
5 Plaintiff, a civilian. He is a Diplomatic Security Officer, (secret police), who has abused his
6 position to deprive Plaintiff of rights. He is a person who, individually, and in concert and
7 agreement with other persons, acted under color of law, to deprive Plaintiff of rights
8 guaranteed by the United States Constitution by retaliating against her for exercising those
9 rights. He conspired with other named defendants to retaliate against the Plaintiff for
10 exercising her constitutional and statutory rights. He is currently the husband of Defendant
11 Hill-Pennington, and they constitute a marital community under the laws of the State of
12 Washington. Pennington acted outside his official capacity as a Director of Emergency
13 Management with defendant Snohomish County. Pennington is a RICO defendant and is a
14 previous defendant in *Block v Snohomish County et al C14-235 RAJ*; there are new
15 allegations post *Block vs Snohomish County et al*.

16 2.49 **DEFENDANT SEAN REAY (“Reay”)** was at all material times a prosecutor for
17 defendant Snohomish County acting as an investigator. He acted and lives within the
18 geographical and jurisdictional boundaries of this court. He is a person who, individually,
19 and in concert and agreement with other persons, acted outside color of law to deprive
20 Plaintiff of rights guaranteed by the United States Constitution by retaliating against her for
21 exercising those rights. Reay conspired with other named defendants to retaliate against
22 Plaintiff for exercising her constitutional and statutory rights. He acted outside his official
23 capacity as prosecutor for Defendant Snohomish County. Reay is a RICO defendant and is
24 not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

1 2.50 **DEFENDANT MARK ROE (“Roe”)** was at all material times a prosecutor for defendant
2 Snohomish County acting as an investigator and acted outside color of the law. He acted and
3 lives within the geographical and jurisdictional boundaries of this court. He is a person who,
4 individually, and in concert and in agreement with other persons, acted under color of law to
5 deprive Plaintiff of rights guaranteed by the United States constitution by retaliating against
6 Plaintiff for exercising those rights. Roe conspired with others to retaliate against the
7 Plaintiff for exercising her constitutional and statutory rights. He is a RICO defendant and is
8 not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

9 2.51 **SKY VALLEY MEDIA GROUP, LLC dba or aka or commonly known as the “Sky**
10 **Valley Chronicle”** Defendant Sky Valley Media Group, LLC aka or dba or commonly
11 known as the “Sky Valley Chronicle”, was at all material times a Washington Limited
12 Liability Company whose agents and employees, as a matter of policy, custom and usage,
13 retaliated collectively and in concert and agreement with other named defendants against
14 Plaintiff to wrongfully injure Plaintiff for exercising her constitutional and statutory rights.
15 The Sky Valley Media Group, LLC is a RICO defendant and is not a previous defendant in
16 *Block v Snohomish County et al C14-235 RAJ*.

17 2.52 **DEFENDANT RON FEJFAR aka RON FAVOR aka RON FABOUR aka CHET**
18 **ROGERS (“Fejfar”)** was at all material times the agent of Defendant Sky Valley Media
19 Group, LLC. He acted and lives within the geographical and jurisdictional boundaries of this
20 court. He, in concert and in agreement with other named defendants, acted under color of
21 law to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating
22 against Plaintiff for exercising those rights. Fejfar conspired with other named defendants to
23 retaliate against Plaintiff for exercising her constitutional and statutory rights. Fejfar is a
24 RICO defendant and is not a previous defendant in *Block v Snohomish County et al C14-235*
25 *RAJ*.

NON- PARTIES POTENTIAL DEFENDANTS TO BE NAMED LATER

1
2
3 **2.0 SCOTT NORTH (“North”)** was at all material times was a resident of Snohomish County.

4 He acted and lives within the geographical and jurisdictional boundaries of this court. He is
5 a person who, individually, and in concert and agreement with named defendants, acted to
6 injure Plaintiff for exercising her constitutional and statutory rights. He is a potential RICO
7 defendant and is not a previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

8 **2.1 DENISE BEASTON “Beaston”** is an employee with the City of Gold Bar, acted and lives

9 within the geographical and jurisdictional boundaries of this court. She is a person who,
10 individually, and in concert and agreement with other persons, acted under color of law to
11 deprive Plaintiff of rights guaranteed by the United States constitution by retaliating against
12 her for exercising her constitutional and statutory rights. She conspired with other named
13 defendants to retaliate against the Plaintiff. She is a potential RICO defendant and is not a
14 previous defendant in *Block v Snohomish County et al C14-235 RAJ*.

15 **III. FACTUAL ALLEGATIONS**

16
17 3.1 All federal judges in Washington have an inherent conflict of interest that prevents
18 them hearing this case. As members of the Washington State Bar Association, they become
19 liable for its wrongdoing, and therefore are indirect defendants in the cases. The Ninth Circuit
20 has already ruled in *Marshall v. WSBA*, *Pope v. WSBA*, and *Scannell v. WSBA*, that this
21 conflict requires disqualification.

22 3.2 Plaintiff Block is an investigative journalist, civil rights advocate, a citizen of the City
23 of Gold Bar, located in County of Snohomish. Plaintiff is the co-owner of an online political
24 blog called the “Gold Bar Reporter,” which reports on government and government officials
25 in Snohomish County and the City of Gold Bar. As early as 2008 and continuing to the

1 present day, the Plaintiff learned of misfeasance, malfeasance, and corruption within city and
2 county government. Since 2013, Plaintiff actively investigates and reports on corruption
3 within the Washington State Bar Association (WSBA). Plaintiff has attempted to exercise
4 her rights guaranteed by the speech and petition provisions of the First Amendment to the
5 United States Constitution to investigate and report on the ongoing activities (many
6 criminal) of county and city officials up to the date of filing this complaint.

7 3.3 Block is also a former Washington State attorney harassed by defendants out of the
8 practice of law. Block asserts that the individually named defendants have, in bad faith,
9 conspired to deprive her of her vested right to practice law through a number of acts which
10 led to her resignation and disassociation from the bar. Additionally, the individual
11 defendants have conspired to form an Enterprise with the purpose of dominating the WSBA
12 and its disciplinary system so as to allow prosecutors, defense attorneys, practitioners' at
13 large firms, and non-minority attorneys to practice unethically and evade accountability for
14 their misconduct. The conspiracy will hereinafter be referred to as "the enterprise."

15
16 3.4 The enterprise has, as one of its goals, to dominate the Washington State Bar
17 Association by punishing those who oppose or seek to expose the illegal goals of the
18 enterprise. It does this through harassment, extortion, bribing, bullying, and punishing its
19 enemies. It punishes its members with disciplinary actions "to send a message" to those who
20 would oppose WSBA criminal activities and those who exercise their constitutional and
21 statutory rights. In re: the DISCIPLINE OF JOHN SCANNELL, Scott Bugsby, WSBA
22 counsel, said to the Washington State Supreme Court "lets send a message that if you sue us
23 this is what happens to you". Bugsby was referring to lawyers who oppose WSBA illegal
24 conduct suggesting they can look forward to disbarment.

25 3.5 **Background information (not a new allegation):** In December 2008, Plaintiff, a

1 citizen of Gold Bar, Washington, located in Snohomish County, requested records relating to
2 well tampering (malicious mischief RCW 9A.48.070) by a former water employee, which
3 Hill-Pennington, formerly Gold Bar Mayor "Crystal Hill", failed to report to the Snohomish
4 County Sheriff's Office or to Homeland Security for investigation. RCW 35a.12.100 states
5 the mayor "shall see that all laws and ordinances are faithfully enforced and that law and
6 order is maintained in the city, and shall have general supervision of the administration of
7 city government and all city interests." This request for records was made after Plaintiff
8 received a phone call from Gold Bar Council Member, Dorothy Croshaw, informing Plaintiff
9 that the City had just made a secret deal to pay off Karl Majerle in exchange for his silence.
10 Public records obtained from Snohomish County in late 2008 establish that Majerle sabotaged
11 the City's water system and illegally used the City's petro card for his personal use. The City
12 failed report Majerle's crimes in accordance with their duties to the public: defendants Hill-
13 Pennington, Beavers, and Croshaw breached their public duties, violated their oaths of office,
14 conspired, and agreed to cover up Majerle's crimes. RCW 42.20.100 In December 2008,
15 Block exercised her statutory rights pursuant to RCW 42.56 (Public Records Act "PRA")
16 asking the City of Gold Bar for all records relating Karl Majerle. Instead of releasing public
17 records in compliance with the PRA, the City of Gold Bar injured the public records by
18 removing them from the city offices and/or the public official that held them, concealing
19 them, and transferring the records to a private party, the insurance company, American
20 Association for Washington Cities (AWC) representative Eileen Lawrence. RCW 40.16.010
21 states: "Every person who shall willfully and unlawfully remove, alter, mutilate, destroy,
22 conceal, or obliterate a record, map, book, paper, document, or other thing filed or deposited
23 in a public office, or with a public officer by authority of law, is guilty of a class C felony
24 and shall be punished by imprisonment in a state correctional facility for not more than 5
25

1 years or by a fine of not more than one thousand dollars or by both.") The purpose of
2 transferring the records according to council member Jay Prueher was because AWC
3 instructed the city not to turn over the public records because the city would be sued again due
4 to what was contained in the records. As of today, the /city of g/old Bar, Snohomish County,
5 and AWC continue to conceal public records.

6 **3.6 Background information (not a new allegation):** In October 2009, Hill-Pennington
7 Pennington, then acting Mayor of Gold Bar did hold a meeting on a non-regularly scheduled
8 date, at a non-principle location, where notice was not given by posting notice prominently
9 at the principal location, nor by giving notice to the newspaper, radio, or television
10 station, nor was it posted on the City's website pursuant to RCW42.30.080 (Special
11 Meetings). Further, there were no minutes recorded at the special meeting, but were
12 created later following a public records request and lawsuit in late February 2009.

13 **3.7 Background information (not a new allegation):** The members of the 2009 Gold Bar
14 Planning Commission were regular attendees of the City Council meetings. Both the City
15 Council meetings and the Planning Commission meetings were customarily held at the
16 principal location in City Hall on opposite Tuesdays. On the day of this Special Meeting,
17 the Planning Commission was meeting at the principal location. Several members of the
18 planning commission were unaware of the special meeting and did not see any notice of
19 special meeting posted at the principal location which they then occupied. Plaintiff
20 asserts this "special meeting" was in fact a secret meeting in violation of OPMA intended
21 to evade public knowledge and scrutiny. It follows then that if regular attendees
22 (planning commission members) did not see notice, the general public was also unaware
23 of the special meeting. In December 2008 after being informed by council member
24 Dorothy Croshaw of the Majerle settlement, Plaintiff requested all records relating to
25

1 Karl Majerle, which should have included the special meeting notice and meeting
2 minutes. Only after Plaintiff hired an open government attorney and filed suit did the city
3 provide Plaintiff with a notice of special meeting and minutes, which Plaintiff asserts
4 were created after the special meeting took place and after Plaintiff requested records in
5 native format with metadata. The meeting minutes have been provided in native format
6 with metadata, only paper format. The arrangement agreed upon in the secret meeting,
7 under the circumstances constituted bribery and extortion, thus predicate acts under
8 RICO.

9 **3.8 Background information (not a new allegation):** From public records, Plaintiff
10 discovered that on July 8, 2008 the City of Gold Bar terminated Karl Majerle for gross
11 misconduct, sabotaging the city's wells and unlawful use of the city petro card. Mr.
12 Majerle was previously placed on paid administrative leave pending an investigation for
13 his use of the city's petro card in late June 2008. After Majerle was informed he was
14 being placed on administrative leave, he left city hall and went to wells #3 and #4 and
15 shut them down which he admitted in a Loudermill hearing. This hearing was recorded
16 by Majerle and conducted by H. Majerle Hill-Pennington subsequently applied for and
17 was denied unemployment benefits due to his gross misconduct. Majerle retained
18 counsel to fight for unemployment benefits, Brian Dale, Majerle never claimed he was
19 terminated without cause, nor did he ever file or threaten to file a lawsuit. Majerle did
20 sign an at-will employment acknowledgment from the city of Gold Bar upon
21 employment. In a September 2008 letter, Brian Dale suggested the city may not
22 participate in Majerle's unemployment hearing. According to council member Dorothy
23 Croshaw; in October 2008, the secret Gold Bar meeting occurred to arrange Majerle's
24
25

1 payoff in exchange for his silence. In late 2008 Majerle had an unemployment hearing
2 contesting the denial of benefits; the city abdicated their duty and failed to participate
3 and subsequently Majerle received unemployment benefits despite being terminated for
4 gross misconduct; in January 2009, he was given assistance obtaining new employment
5 Hill-Pennington Pennington called the city of Bellevue and gave a "positive reference;
6 Majerle additionally received \$10,000. At the time, G. Geoffrey Gibbs's law firm,
7 representing Majerle, had one of the largest contracts with Snohomish County, and Seth
8 Fine and Sean Reay were in charge of criminal prosecution unit in Snohomish County.
9 Majerle was not prosecuted for his crimes. Telephone retrieved from Snohomish County
10 establishes that Reay and Gibbs communicate on a regular basis. There was no legitimate
11 purpose for the benefits provided to Majerle. There was no legitimate reason not pursue
12 criminal charges against Majerle. Majerle in late summer 2014 told PSI Investigators that
13 he was under an agreement not to talk about the terms of the settlement agreement. In
14 September 2013, then Mayor Joe Beavers announced at a city council meeting that the
15 state auditor ordered him, Joe Beavers, to deposit an additional \$12,000 + in Karl
16 Majerle's retirement account. This was six years past Majerle's termination for cause. Joe
17 Beavers offered no evidence at the meeting of this "order". Neither was their evidence in
18 the state auditor's annual financial audit report to support Joe Beaver's claim. The
19 benefits Majerle received he was not entitled to. The agreement and authorization for
20 payment of these funds to Majerle was misappropriation of public funds (RCW
21 42.20.070(1)). The agreement and payment constitutes bribery, extortion thus a predicate
22 act under RICO.
23

24 **3.9 Background information:** Since August 2009, Plaintiff maintains and reports on local
25 news inside Snohomish County on a BlogSpot called "the Gold Bar Reporter" which is co-

1 owned with another Gold Bar resident, Susan Forbes. As early as 2008 and continuing to the
2 present day, Plaintiff learned of misfeasance, malfeasance, and corruption within city and
3 county government. Plaintiff has attempted to exercise her rights, as guaranteed by the
4 speech and petition provisions of the First Amendment of the United States Constitution, by
5 reporting on the activities of local city and county officials via her co-owned blog the Gold
6 Bar Reporter.

7 **3.10 Background information:** The City of Gold Bar, Snohomish County, and
8 Washington State Bar Association channels its citizen's First Amendment speech and
9 petition rights through a system of formal written public records requests and responses
10 under Washington State's Public Records Act (RCW 42.56), as does Snohomish County and
11 the Washington State Bar. Plaintiff as a news reporter requests, gathers, disseminates and
12 reports on news in Washington State as defined under RCW 5.68.010. Plaintiff has been
13 labeled as news reporter by high ranking members of open government, and in September
14 2015 honored for her contributions in reporting.

15 **3.11 Background information:** In early 2009, after Plaintiff filed suit against the City of
16 Gold Bar seeking access to public records, Seth Fine, acting outside his official capacity as a
17 prosecutor, and in derogation of his responsibility to avoid ex parte contact as a disciplinary
18 board member stole from the WSBA the Plaintiff's WSBA license application and
19 investigative file. He then disseminated Plaintiff's WSBA license application and
20 investigative file to the City of Gold Bar's law firm, Weed, Graafstra, and Benson, Inc. The
21 file was then further disseminated to the City of Gold Bar employees and its governing
22 body. Fine's actions amounted to those of an investigator not a prosecutor or a disciplinary
23 board member. Fine's actions violated Plaintiffs civil rights and served no governmental
24 purpose, and amounted to extortion, thus a predicate act under RICO. 3.11
25

1 3.12 **New Allegation:** In late November 2013, Eide, acting on behalf of Defendant
2 WSBA issued an illegal subpoena for Plaintiff's Gold Bar Reporter news files collected for
3 and in preparation for publication on several political appointees from Snohomish County.
4 None of the files collected, nor were any of the files collected from a potential or past or
5 current client. The files Plaintiff collected were retrieved under the PRA, and many were
6 given to Plaintiff by long-term career county employees. The WSBA's subpoena and
7 attempts to depose and retrieve documents from Plaintiff solely on First Amendment news
8 reporting activity and did not involve a client, only a political appointee, John E.
9 Pennington, and his current wife, the former Mayor of Gold Bar, Hill-Pennington. Without
10 legal authority to issue such subpoenas in violation Plaintiff's constitutional and statutory
11 rights, this constituted extortion and was thus a predicate act under RICO. This also violated
12 Plaintiff's civil rights and served no governmental purpose. Plaintiff learned in late 2013 that
13 the WSBA's complainant and political appointee John E. Pennington was a personal friend
14 to lead Counsel Linda Eide.

15 3.13 **Background information:** Plaintiff published over fifty articles about John
16 Pennington's incompetence, lack of credentials, and criminal history of assaulting women, to
17 head the Department of Emergency Management for Snohomish County, and had requested
18 access to his records starting as early as December 2008 republishing an article written by
19 another political Chad Shue regarding Pennington's online diploma from California Coastal
20 College, an online college the U.S. government reported sold diplomas at a flat rate; and
21 another online diploma mill college U.S. Senator Tom Harkin said was not providing
22 education on PBS's Frontline, Education Inc.

23 See <http://www.washblog.com/story/2006/18/112517/706>

24 See also, <http://www.pbs.org/wgbh/pages/frontline/educating-sergeant-pantzke/tom->
25

[harkin/](#)

1
2 3.14 **Background information:** Public records Plaintiff reviewed since 2009 established
3 that John Pennington made several attempts to use his political influence with the Snohomish
4 County Sheriff's Office since May 2009 to have Plaintiff charged with "cyber-stalking."
5 Pennington's criminal complaints only complained about Plaintiff's constitutional and
6 statutory rights.

7 3.15 **Background information:** In March 2009, Defendant Hill-Pennington,
8 Pennington, Beavers, and Snohomish County to illegally access and retrieve Block's
9 mental health history. Though they retrieved history for some other person, they falsely
10 characterized it as hers and disseminated inside public records.

11 3.16 **Background information:** Additional public records documented that Pennington
12 criminally harassed Plaintiff on the Sky Valley Chronicle Facebook (SVC) and blog spots
13 and through twitter. Public payroll records confirm that many of Pennington's posts on the
14 SVC were made while on the County's payroll; and one threat to physically harm Plaintiff in
15 December 2012 was made while being paid by I-EMA in Paris, Texas.

16 3.17 **Background information:** Plaintiff's investigative pieces included posting police
17 reports documenting that Hill-Pennington violently assaulted a six year child in her care
18 leaving extensive bruises on the child's arms (public records show Mark Roe ensured this
19 was not prosecuted); Hill-Pennington's secreting of public records involving Hill-Pennington
20 and Pennington passing around mug shots; Pennington's racist communication about
21 President Obama; issues relating to John Pennington's involvement in a the rape of a 5 year
22 child from Cowlitz County; and Kenyon Disend' s Special Prosecutor Sandra Sullivan (nee
23 Meadowcraft) assisting Pennington in quashing criminal assault charges of a third trimester
24 pregnant Duvall City Council member, Ann Laughlin, in May 2009. Kenyon Disend,
25

1 Michael Kenyon, Sandra Sullivan, City of Duvall, continue to withhold records relating to
2 Kenyon Disend's assisting Pennington in quashing criminal charges. Snohomish County
3 Prosecutor Mark Roe failed to prosecute Hill-Pennington for child abuse, instead, Roe
4 emailed the child protective services (CPS) officer directing her to not pursue criminal
5 charges. Roe's actions violated Plaintiff's civil rights and served no governmental purpose.
6 Kenyon Disend and its employees Sullivan and Kenyon's assisting Pennington with quashing
7 criminal assault charges in 2009.

8 3.18 **Background information:** In June 2010, Gold Bar's clerk Penny Brenton was
9 ordered by Beavers to write WSBA complaints against Plaintiff which Dorothy Croshaw
10 falsely certified that she had knowledge of. Brenton a paid Gold Bar contractor at the time
11 also stated that Dorothy Croshaw paid her to write the WSBA complaints. Source public
12 records from Gold Bar.

13 3.19 **Background information:** In June 2010, Pennington wrote to Gold Bar's police
14 chief Robert Martin asking him to charge Plaintiff with "cyber-stalking" pointing to a
15 response one of the Gold Bar Reporters wrote to one its readers stating that Gold Bar
16 Reporters should be afraid of John Pennington, which triggered a response that the Gold
17 Bar Reporters were insured by Smith Wesson. Martin's superiors dismissed the
18 complaint as a prior restraint on Free Speech. Pennington never filed an official criminal
19 complaint only sent an email to Gold Bar Deputy Sheriff's Officers trying to misuse his
20 political influence to have Plaintiff charged with a crime.

21 3.20 **Background information:** In April 2011, Beavers assisted Kenyon Disend in
22 obtaining the contract with the City of Gold Bar for legal services. Margaret King was
23 assigned to represent the City of Gold Bar.

24 3.21 **Background information:** One month following Kenyon Disend's contract with Gold
25

1 Bar, Gold Bar's clerk Penny Brenton was ordered by then Mayor Beavers to write a WSBA
2 complaint for former council member Dorothy Croshaw. Croshaw filed a WSBA complaint
3 against Plaintiff in June 2010. Public records confirm Margaret King's involvement in
4 Croshaw complaint filed against Plaintiff solely based on Plaintiff's Gold Bar Reporter
5 publications. The City admitted in a public inspection request that it was collecting Gold Bar
6 Reporter files. In late 2010, the WSBA dismissed King, Croshaw, Brenton and Beavers
7 complaints as restraints on Plaintiff's free speech rights that have nothing to do with the
8 practice of law.

9 **3.22 Background information:** In late 2010 after receiving information that Beavers was
10 stealing money from the City's water fund, Plaintiff filed a Recall Petition against Beavers.
11 In early 2011, King without first seeking permission from the Gold Bar City Council filed a
12 Motion for Sanctions against Plaintiff for exercising her constitutional right to file a Recall.
13 Plaintiff objected noting that RCW and Washington State's Constitution only allows a City to
14 defend a Recall Petition and provides no legal means to file a motion for sanction with tax
15 payer monies on Recall Petitions. Snohomish County Superior Court Judge Krese agreed
16 with Plaintiff dismissing King's illegal motion for sanctions.

17 **3.23 Background information:** In late 2011, Gold Bar council member Chuck Lie (Lie)
18 witnessed the City's strategy inside executive meetings as a three prong approach against
19 Plaintiff: "out money you, and when that didn't work, they moved to defame you, and when
20 that didn't work, they moved to discredit you." Lie also witnessed that the City of Gold Bar
21 used its Executive Meetings for non-permissible purposes (RCW limits what an agency can
22 discuss in executive session) and mainly talked about retaliating against the Gold Bar
23 Reporter by shutting down the Gold Bar Reporters online news blog. Lie further witnessed
24 council members stating that any settlement agreement with Plaintiff would include a
25

1 demand that the Gold Bar Reporter be taken down and Beavers. Lie further witnessed
2 Beavers stating "She (Plaintiff) took Karl Majerle's license so we're going get hers!" Lie is
3 the one who complained to the Department of Health about Majerle lying on his application
4 file with Bellevue which resulted in his termination, not Plaintiff.

5 3.24 **Background information (not a new allegation):** In late 2011, Gold Bar council
6 member Chuck Lie stated "Margaret King is coming after you!" Within one week,
7 Defendant, Margaret King, City of Gold Bar attorney, filed a Motion for Sanctions on a
8 Recall Petition in violation of Washington State Recall laws. Recall laws prohibit the filing
9 of Sanctions using taxpayer monies to file a Motion for Sanctions on Recall Petitions. King's
10 actions violated Plaintiff's civil rights and served no governmental purpose. King's actions
11 amount to extortion, thus a predicate act under RICO.

12 3.25 **Background information (not a new allegation):** In late 2011, King, after receiving
13 Plaintiff's Notice of Unavailability on a public records lawsuit filed against the City of Gold
14 Bar, filed an ex-parte Motion, notifying Plaintiff via email only hours before. Plaintiff was
15 out of the state visiting her terminally ill father. King filed her motion with Snohomish
16 County Superior Court. The motion was then heard not by a Superior Court Judge but by
17 personal friend to Michael Kenyon, Mark Roe, Sean Reay, and associate to Seth Fine,
18 defendant G. Geoffrey Gibbs. Gibbs, a commissioner by permanent appointment.
19 Washington State's Public Records Act prohibits a Commissioner from hearing any issues
20 relating to public records. Gibbs's ignored Washington law, and held two ex-parte hearings,
21 denying Plaintiff's rights to be notified of such hearings and denying Plaintiff a meaningful
22 opportunity to be heard, in violation of the due process clause under the 14th Amendment.
23 Gibbs did so after receiving Plaintiff's Notice of Unavailability. He further issued sanctions
24 against Plaintiff. King, Kenyon, and Gibb's actions violated Plaintiff's civil rights and served
25

1 no governmental purpose. King, Kenyon, and Gibb's actions amount to extortion, thus a
2 predicate act under RICO.

3 **3.26 New Allegation specific to Margaret King, Michael Kenyon, and Ann Marie**
4 **Soto; Background information with respect to Hill-Pennington, Pennington, and Joe**

5 **Beaver:** In January 2012, Margaret King, Michael Kenyon, and Ann Marie Soto Hill-
6 Pennington, Pennington, and Joe Beavers met and conspired to assemble, write, and file the
7 second WSBA complaint against Plaintiff's WSBA license. King, Hill-Pennington and
8 Beavers used city staff, city's public records withheld from the Plaintiff for over three years.
9 In February 2012, Gold Bar's law firm, Kenyon Disend, billed the taxpayers of Gold Bar for
10 the WSBA complaint against Plaintiff.

11 **3.27 New Allegation** In late March 2012, Reay telephoned Plaintiff under the guise of
12 having a CR 26 conference as it relates to a public records case. During this telephone
13 conference Reay threatened Plaintiff and her paralegal that if Plaintiff continued to insist on
14 deposing Pennington he would have Plaintiff and her paralegal arrested. By doing so, Reay
15 was not acting as a prosecutor.

16 **3.28 Background Information** In July 2012, Plaintiff, having received an Order
17 Compelling Snohomish County employees' deposition testimony, deposed Snohomish
18 County's public records officer Diana Rose. Plaintiff, Rose, Reay, Di Vittorio, Gold Bar
19 resident reporter Joan Amenn, and a court reporter were present. Rose admitted under oath
20 that she physically tampered with county public records, removing them from Snohomish
21 County, delivering them to City of Gold Bar. Once Rose admitted that she committed an
22 "injury to public records", a felony in Washington State, Plaintiff questioned Rose on who
23 ordered her to remove County records. This prompted Reay to start screaming at Plaintiff to
24 divert attention. DiVittorio ordered Rose not to answer Plaintiff's questions. Reay and Di
25

1 Vittorio's actions violated Plaintiff's civil rights and served no governmental purpose.

2 3.29 In February 2013, the Snohomish County Daily Herald, acting on information
3 provided to them by Plaintiff exposed Snohomish County Executive Officer Kevin Hulten
4 for criminally harassing Plaintiff. See [http ://www.heraldnet.com/article/20130214/NEWS](http://www.heraldnet.com/article/20130214/NEWS)
5 [01/702149999 \](http://www.heraldnet.com/article/20130214/NEWS)

6 3.30 **Background information (not a new allegation):** In late February 2013, Plaintiff
7 sends Snohomish County a litigation hold demanding that the county preserve all record in
8 native format with metadata as it relates to her. Snohomish County Council refers the Hulten
9 investigation to the King County Major Crimes Unit who confirms that the Herald's story
10 was "right on target." According to King County Major Crimes Unit, Hulten used a "wiping
11 program" in March 2013 to destroy evidence only after receiving Plaintiff's litigation hold.
12 From King County's Major Crimes files from Reardon investigation, public emails between
13 Reardon's executive officers confirmed that Snohomish County Executive Officers were
14 authors on the Sky Valley Chronicle. An online news site which not one person identifies
15 who is writing. In April 2013, Plaintiff receives a news tip from a person alleging to be a
16 Snohomish County insider stating that Pennington and his public records officer Diana Rose
17 (Rose) created a diversion to expose Snohomish County Executive Aaron Reardon's affair
18 with a county social worker named Tamara Dutton. According to the source, this was done
19 because Reardon's affairs were about to become public and Deanna Dawson threatened
20 Reardon that if he exposed her, she would take him down. The Washington State Patrol
21 (WSP) was investigating Reardon for misappropriation of public monies and had interview
22 Dawson about her affair with Reardon. Dawson denied she had an affair with Reardon even
23 though public records from Washington State's Public Disclosure Commission (PDC)
24 documented Dawson was traveling with Reardon in France. In late April 2013, Plaintiff
25

1 published "The Stoning on Tamara Dutton " in April 2013 alleging for the first time that
2 Pennington and Rose assisted Dawson with covering up her extra marital affair with
3 Snohomish County Executive Reardon, throwing Dutton under the bus to protect Dawson.
4 Plaintiff learned in the summer of 2013 that Rose was a very close friend to Dawson.

5 3.31 **Background Information** In May 2013, Plaintiff's private investigators provided
6 Plaintiff with a 30 plus year background search on Pennington. This investigation concluded
7 that Pennington was kicked out of a church in San Diego California for molesting two boys
8 during a church camping trip, he is the only suspect in the rape of a five year old girl from
9 Cowlitz County Washington, picture documents he is molesting his step daughter, and a
10 witness, Ann Laughlin declared under oath that she caught Pennington taking naked showers
11 with his genitalia hanging in the face of a six year old girl (declaration filed in King County
12 Court). As a result, Plaintiff published a story about how Snohomish County DEM John
13 Pennington was kicked out of church after two boys made sexual abuse allegations against
14 him. Instead of denying any of the allegations Plaintiff has leveled against Pennington and
15 suing for defamation in the proper forum should he believe the allegations were false,
16 Pennington filed a series of WSBA complaints in an attempt harass, intimidate, and interfere
17 with Plaintiff's income and business, as well as silence Plaintiff. Pennington filed these
18 complaints directly with his personal friend and WSBA lead counsel, Linda Eide, stating that
19 Plaintiff's publications were "beyond the pale." A careful review of past Gold Bar council
20 meetings confirmed that the phrase "beyond the pale" was used by Hill-Pennington on a
21 regular basis. Block answered Pennington's complaint affirming under oath that she
22 contacted Pennington for comment prior to publishing any of her stories, and Pennington
23 was a political appointee not a client, thus Plaintiff's answer to the WSBA was that it had no
24 jurisdiction in this matter. Plaintiff further asserted New York Times v Sullivan, and
25

1 suggested to the WSBA that if Pennington believes that we've defamed him, then he should
2 file a defamation suit. Public records confirm that Pennington used government resources
3 inside Snohomish County for the WSBA complaint.

4 3.32 **New Allegation** On June 1, 2013 John Lovick is appointed Snohomish County
5 Executive. Since Plaintiff filed her last complaint, she has learned through public records
6 that Snohomish County DEM, Pennington, was not trained, supervised, disciplined, or
7 adequately screened for employment with Snohomish County. Since 2015, Plaintiff has
8 reviewed thousands of public records relating to Pennington and has found no evidence that
9 Pennington was trained, supervised, disciplined, nor was adequately screened. Public
10 records show that Pennington received no civil rights training. Pennington was on paid-
11 administrative leave since April 2014 until terminated by Snohomish County Executive
12 Dave Somers in 2016. Pennington was never disciplined for his conduct as stated herein,
13 even though Plaintiff produced voluminous evidence to Snohomish County to support
14 discipline and in March 2014, then Council Member Dave Somers, stated in an email to
15 Plaintiff that the County never ran a background check on Pennington and he didn't know
16 why. As Snohomish County Executive, Lovick continued disgraced and ousted former
17 Snohomish County Executive Aaron Reardon's policies including the policy "Let
18 Pennington Do as He Pleases" and the policy "Get Anne Block".

19 3.33 **Background Information** In July 2013, Hill-Pennington sent Plaintiff a "tweet"
20 stating "can't wait to go to your disbarment hearing." Plaintiff responded to the WSBA
21 stating that she stands by her articles on Pennington, left the door open for Pennington to
22 contact the Gold Bar Reporters for a retraction, and further asserted her constitutional rights
23 to be left alone in her private affairs that do not involve a client, only a political official who
24 Plaintiff as an investigative journalist has been reporting on for corrupt acts of child and
25

1 criminal assault since August 2009. The WSBA assigned lead counsel Linda Eide. Linda
2 Eide is a first relative to Senator Tracey Eide. Tracey Eide and Pennington are personal
3 friends. Public emails from Snohomish County confirmed that a personal relationship exists
4 between Pennington and WSBA Eide. In the middle of September 2013, the SVC published
5 a story asking the general public to file WSBA complaints against Plaintiff. The SVC also
6 stated that it would be filing its own WSBA complaints. Pennington is the only person who
7 filed and signed the WSBA complaints. In November 2013, WSBA Eide issued a "subpoena
8 seeking all Gold Bar Reporter files relating to Pennington and Hill-Pennington. All property
9 records for a website owned by Plaintiff and all non-clients of Plaintiff
10 "CrystalHillPennington" Eide also issued a subpoena for Gold Bar Reporter files and the
11 deposition of Plaintiff in the same. Eide unilaterally scheduled the deposition for December
12 6, 2015, even after being notified that Plaintiff had been diagnosed with severe diverticulitis,
13 unable to walk, thus disabled.

14 **3.34 Background Information** In August 2013, Gold Bar Reporter's co-owner Susan
15 Forbes contacted the WSBA stating that the Gold Bar Reporter have never sued for
16 defamation, but if the Gold Bar Reporters got their Pennington story wrong we will retract;
17 she left her contact information for Pennington but clearly stated that she will not retract
18 anything until Pennington answers some questions. Pennington never requested a
19 "retraction" and he never responded to Forbes's letter to the Washington State Bar in this
20 matter.

21 **3.35 New Allegation** Summer 2013, Plaintiff learned from Snohomish County public
22 records that Pennington was a personal friend to WSBA Eide. As a result, Plaintiff sent
23 WSBA Ende a letter informing him of the personal relationship between Eide and
24 Pennington requesting that Eide be removed Plaintiff's disciplinary investigation. Ende
25

1 denied any such relationship between Eide and Pennington and refused to remove Eide.

2 3.36 **New Allegation** On December 3, 2013, Plaintiff sent an email to Eide, "objecting" to
3 the WSBA subpoena for records and deposition relating to the same, asserting again that it
4 had no legal right to citing First Amendment, Media Shield (RCW 5.68.010) and in violations
5 of her constitutional rights. Eide ignored Plaintiff's December 3, 2013, objection letter and
6 held an ex-parte deposition on December 6, 2013, even though Enforcement of Lawyer
7 Conduct ("ELC") 5.5 mandates that once Eide received an objection, she was mandated to
8 suspend the deposition until she could obtain a court order. In late 2013, Washington State's
9 Legislature under RCW 5.68.010 mandated that 'no agency with subpoena power can issue a
10 subpoena for media files;" and the WSBA Rules of Professional Conduct ("RPC") had no
11 provision to oversee lawyers First Amendment rights or news reporters on issues not relating
12 to the practice of law. Acting without authority of law, Eide unilaterally sent her request to the
13 WSBA Review Committee asking for an investigation in the middle of February 2014. One
14 day prior to the Review Committee Meeting, Eide sent Plaintiff a Notice asking her if she
15 wanted to submit any evidence. Plaintiff submitted the December 3, 2013 notifying the
16 WSBA that she objected in violation of RCW 5.68.010, attorney-client communication, and
17 her First Amendment rights as a news reporter.

18 3.37 **New Allegation** On February 14, 2014, the WSBA Review Committee issued a
19 formal complaint against Plaintiff based solely on Eide's ex-parte communication. Eide
20 then sent Pennington a copy but not the Plaintiff member at the time. It was immediately
21 published it on the Sky Valley Chronicle site. Plaintiff immediately contacted Eide asking
22 why she disseminated a copy of non-public record before serving a copy on the WSBA
23 member. After receiving Plaintiff's complaint email, Eide sent a server to Plaintiff's house
24 around 9:45 p.m. According to public records reviewed from the WSBA and a witness
25

1 neighbor, the server, defendant, John Doe, intentionally breached the peace hoping that
2 someone would call the police. A neighbor who lives directly across the street from Plaintiff
3 witnessed the breach of peace, came over to John Doe and told him to leave or he would be
4 removed. The next day Plaintiff inspected her front door and noticed that the WSBA server
5 caused extensive damage to the wood frame of Plaintiff's front door. Plaintiff's partner
6 repaired the door and placed a metal plate around the wood frame to secure the door.

7 3.38 **New Allegation** March 3, 2014, Defendant O'Dell is appointed by Defendant Nappi,
8 from 54 hearing officers on the hearing panel. Nappi and O'Dell have a mutual undisclosed
9 conflict of interest: O'Dell routinely refers vulnerable adult cases to the firm, Ewing
10 Anderson, P.S.; Nappi works for Ewing Anderson, P.S. Neither O'Dell, nor Nappi disclosed
11 this conflict of interest.

12 3.39 **New Allegation** On February 19, 2014 Court appointed investigator and special
13 master to assist the Superior Court in Stevens County concluded that O'Dell had committed
14 ethical violations and refused to account for funds that she had gained control over in her
15 role as a limited guardian of a vulnerable adult, Paula Fowler. The unaccounted for funds
16 were between \$3 million and 4 million and remain unaccounted for at the time of filing of
17 this suit. The court eventually found that O'Dell failed her duties as established by statute
18 or standards of practice adopted by the certified professional guardian board and ordered
19 the guardianship ended. O'Dell refused to resign as guardian and still refuses to account
20 for the funds under her control. In addition public disclosures obtained by Plaintiff show
21 that O'Dell has exploited another vulnerable adult Harry Highland, when she paid \$15,000
22 for Highland's house that was assessed at \$208,000.00 in Spokane County. O'Dell and
23 Plivilech are now living in the house.

24 3.40 **New Allegation** The WSBA has a long history of fixing cases in advance by
25

1 paying the chief hearing officer \$30,000 a year to pre-select judges to ensure conviction.
2 This is the only primary duty that the Chief Hearing Officer has over other hearing
3 officers who are "volunteers". O'Dell was chosen primarily for three reasons. First, she
4 owned a construction company that profited from contracts that should have never been
5 allowed because the construction took place on the Oso mudslide site. Since Pennington
6 approved the permits, she would be a natural ally of him. Second, she also ran a
7 partnership which allowed her to exploit vulnerable adults as a guardian and trustee and
8 on probate; she would refer those cases to Ewing Anderson, P.S., Nappi's employer.
9 Finally, and most importantly, she was chosen to fix the case against Anne Block in
10 return for the bar not prosecuting bar complaints against her so she could continue to
11 exploit and profit from her unethical actions as a guardian and trustee. The exchange of
12 the conviction of Anne Block in exchange for her immunity from her illicit actions as a
13 guardian constitutes bribery and a predicated act under RICO.

14
15 3.41 **Background Information** On March 22, 2014, the OSO mudslide occurred
16 resulting in the deaths of 43 people. At the time Pennington was on the east coast being
17 paid by Snohomish when he was under contract for PEMA Emergency Institute. He
18 doesn't get back until March 24, 2014 according to public records obtained by Block.
19 Plaintiff immediately published articles critical of Pennington in his DEM role,
20 including an "I told you so" statement on the Gold Bar Reporter referring to the warnings
21 Plaintiff had published prior to the Oso deaths that Pennington, in the role of DEM,
22 needed to be immediately terminated lest lives be lost in a future disaster due to his
23 incompetence.

24 3.42 In late March 2014, O'Dell and Plivilech set up USPS Box # 70 in Duvall
25

1 Washington located within three blocks from the Penningtons' home in Duvall. O'Dell and
2 Plivilech live in Spokane, four hours away, and had no previously known ties to City of
3 Duvall. The Duvall postmaster (retired) stated seen Hill-Pennington accessing a post office
4 box in Duvall. Plaintiff's investigation revealed neither Hill-Pennington, nor Pennington had
5 a USPS box in Duvall.

6 3.43 **New Allegation** At the end of April 2014, Plaintiff notified the WSBA and the
7 Washington State Supreme Court that she would not be renewing her license and would be
8 disassociating with the WSBA. On May 1, 2014, the Washington State Supreme Court
9 signed her request to dissociate with the WSBA. Post May 1, 2014, Eide and O'Dell
10 continued to threaten plaintiff via email and mail, attempting to unlawfully assert
11 jurisdiction over Plaintiff's First Amendment protected activities that do not relate to RPC
12 or clients, but only relate to Plaintiff's political news reports on the Gold Bar Reporter

13 3.44 **New Allegation** In May 2014, after being notified that Plaintiff does not waive
14 personal and subject matter jurisdiction to the WSBA, Plaintiff notified O'Dell and Eide that
15 she would be out of state on business for two months. O'Dell unilaterally set discovery for a
16 three week period during the time that Plaintiff would be out of state. O'Dell and Eide
17 refused to answer a single discovery request issued by Plaintiff.

18 3.45 **New Allegation** In early May 2014, without waiving personal and subject matter
19 jurisdiction, also noting that Plaintiff was no longer a member, Plaintiff agreed to
20 participate in settlement conference with Eide. The conference amounted to Eide trying to
21 extort Plaintiff's democratic rights, alleging that Plaintiff does not have the legal right to
22 disassociate with the WSBA under the First Amendment. Plaintiff again noted that the
23 WSBA has no jurisdiction over Plaintiff's First Amendment rights to report on Pennington,
24 and now the corruption inside the WSBA.
25

1 3.46 **New Allegation** In early May 2014, after successfully "disassociating " with the
2 WSBA by having the Washington State Supreme Court sign her suspension order for non-
3 payment of fees and noncompliance of CLEs, Plaintiff finally agreed to speak with Lin
4 O'Dell but at all times without waiving her personal and subject matter jurisdiction.
5 Plaintiff's again noted that she was no longer a WSBA member and had disassociated as a
6 result of being criminally harassed by Pennington with the assistance of the WSBA. This
7 was the first time Plaintiff had any communication with O'Dell. During this telephone
8 conversation, Plaintiff called O'Dell a thief and noted that the Gold Bar Reporter
9 discovered that she was stealing elderly clients' homes. Plaintiff also told O'Dell to "go
10 pound sand! I'm not a member of your corrupt organization any longer, so don't contact me
11 again!" At the end of June 2014, Eide had ex-parte communication with Reay trying to
12 quash a legally issued CR45 subpoena Plaintiff issued for Pennington's deposition
13 testimony. Source is public phones records. RPC prohibits the WSBA Hearing Officer
14 from having ex-parte contact with the Office of Disciplinary Counsel. Plaintiff filed
15 WSBA complaints against Eide, O'Dell and Reay, and Ronald Schaps. Without
16 investigating a single allegation, WSBA dismissed Plaintiff's complaints in late 2014.

17 3.47 **New Allegation** Early June 2014 Reay acted outside official County duties, made ex-
18 parte contact with Eide. Plaintiff issued a CR 45 subpoena for WSBA witness, John
19 Pennington. Shortly after Pennington is served, Snohomish County Prosecutor, Sean Reay,
20 acting outside his official County duties and acting as personal attorney for WSBA witness
21 Pennington, did use County resources to make ex-parte email contact with Eide requesting
22 Eide quash the subpoena. Plaintiff sent a public records request to Snohomish County
23 seeking records relating to official duties of Snohomish County Prosecutors and all records
24 that relate to other bar complaints the prosecutors have participated in. Snohomish County
25

1 responded that no responsive records exist.

2 3.48 **New Allegation** June 2014 Eide, ex-parte contact with O'Dell Shortly after Reay
3 contacted Eide to quash the subpoena, Eide made ex-parte contact with O'Dell who then
4 issued a quash order.

5 3.49 **New Allegation** June 2014 Eide unlawfully redacts records When Plaintiff learned a
6 quash order was issued for the subpoena shortly after the subpoena was served, Plaintiff
7 requested Eide's telephone records. Eide unlawfully redacted the phone records for the ex-
8 parte contacts with O'Dell claiming attorney-client privilege.

9 3.50 **New Allegation** June 30, 2014 O'Dell and Eide hold another ex-parte telephone
10 communication. Source is public phones records from the WSBA. O'Dell then sets a
11 hearing date for three weeks later on July 21, 2014. Plaintiff was not notified nor consulted
12 in scheduling the hearing date, time, or location. RPCs and ELCs prohibit the WSBA
13 Hearing Officer from having ex-parte contact with the Office of Disciplinary Counsel.

14 3.51 **New Allegation** Defamation July 2014, Reay authored knowingly false, and libelous
15 statements, intended to defame and marginalize Plaintiff, and published them inside public
16 records that have been archived into digital on-line publications which have been further
17 re-published and disseminated. Those false statements, which continue as published
18 records today, including public records, that caused Plaintiff damages, although not all-
19 inclusive, the statements include:
20

21 (1) That Plaintiff is "delusional".

22 (2) That Plaintiff "accosted" Reay.

23 3.52 **New Allegation** First week of July 2014 The Sky Valley Chronicle defames Plaintiff.
24 While WSBA failed to notify plaintiff of upcoming hearing, the Sky Valley Chronicle,
25 registered to Ron, did receive a hearing notice. The Sky Valley Chronicle then posted a

1 story stating a hearing was scheduled on July 21, 2014 for Ms. Block's "misconduct as an
2 attorney" which is how Plaintiff learned of the scheduled hearing. Plaintiff has never
3 committed "misconduct as an attorney". As of today, the Sky Valley Chronicle has meta-
4 tagged Plaintiff in Google publishing that the "WSBA wants Anne Block disbarred". Several
5 members of the WSBA were contacted and stated that the Sky Valley Chronicle never
6 contacted them and such publication is defamation per se. Since February 13, 2012, the Sky
7 Valley Chronicle has published more than 100 defamatory articles about Plaintiff which
8 remain published to this day.

9 3.53 New Allegation July 2014 WSBA denies reasonable accommodation request,
10 precludes Plaintiff from participating in Hearing. July 21, 2014 Eide, O'Dell, Nappi held ex-
11 parte hearing. When Plaintiff learned via the Sky Valley Chronicle about the scheduled July
12 21, 2014 hearing, Plaintiff immediately contacted the bar. Plaintiff, without waiving personal
13 and subject matter jurisdiction, requested a reasonable accommodation of a telephone
14 hearing so that Plaintiff could use special equipment to accommodate her disability so she
15 could participate in the hearing. Eide did not want the Plaintiff to appear telephonically, and
16 for some reason the Plaintiff does not understand, wanted Plaintiff to appear in a separate
17 room. This was the only option Plaintiff was given by the WSBA. The WSBA refused to
18 engage in the "interactive process". Plaintiff then emailed Eide and said she would be
19 unable to participate due to the refusal for accommodation. Eide responded with a phone
20 number for Plaintiff to call on the day of the hearing. Plaintiff called, as instructed, but was
21 muted out of the hearing, which Plaintiff asserts was retaliatory. O'Dell, in her Findings of
22 Fact and Conclusions of Law, while admitting "the volume was turned down",
23 mischaracterized it as "very slightly" whereas witnesses state Plaintiff was "muted out".
24 Additionally, the WSBA entirely muted or disconnected the Plaintiff. O'Dell lied in the
25

1 Findings of Fact and Conclusions of Law stating Plaintiff terminated the call. When Plaintiff
2 was not responded to when she tried to communicate, which involved objections, and
3 offering evidence, she set down her headset and tried to call into the hearing from another
4 number three times over a 7 minute period but reached voicemail each time. Plaintiff's
5 objections and evidence were never acknowledged. O'Dell and Eide later used Plaintiff's
6 disability as a basis to further the discipline and pre-determined disbarment against Plaintiff.
7 Plaintiff asserts the refusal to make a reasonable accommodation was further retaliation for
8 Plaintiff exercising her statutory and constitutional rights.

9 3.54 **New Allegation** In August 2014, Gibbs, as a WSBA Board of Governors "BOG"
10 had ex-parte contact with the ODC to influence the disciplinary proceedings against
11 Plaintiff violating the RPC; Gibbs has a connection with John Pennington; Gibbs has
12 committed fraud on Snohomish County Citizens; WSBA disciplinary breach of process;
13 WSBA deceives the public. In August 2014, while serving on the WSBA Board of
14 Governors, Gibbs contacted WSBA ODC member, Jean McElroy, via email, complaining
15 about Plaintiff's First Amendment protected activity. To wit, news reports on the Gold Bar
16 Reporter about Gibbs' corruption as it relates to Snohomish County. Gibbs has significant
17 motive to seek to suppress Plaintiff's exercise of free speech as it relates to Gibbs
18 specifically.

19 Plaintiff asserted in the Gold Bar Reporter blog that Gibbs is the reason why
20 Snohomish County yields over 40% of disbarred lawyers in Washington State, that Gibbs
21 had committed fraud upon the Courts, and stole land misusing his influence in his various
22 positions and with Snohomish County Superior Court to steal land from Carolyn Riggs.
23 RPC prohibit ex-parte contact between any WSBA Board member and an ODC member
24 when there is an active investigation.
25

1
2 On the Arbitrator Application and Oath, 9-16-2010, Gibbs filed false statements.

3 Question 3 on the “Supplemental” *Are you now, or have you ever been a party in a civil*
4 *lawsuit?* Gibbs’ response: “Everett Events Center Special District; Snohomish County
5 (condemnation action to acquire land for Everett Events Center)”

6
7 Question 4 on the “Supplemental” *Have you ever been the subject of professional discipline*
8 *of any type by the W.S.B.A. or other Bar Association or other professional regulatory body*
9 *or agency?* (Emphasis added) Gibbs’ response: “No.”

10 Gibbs failed to include on questions 3 and 4: several lawsuits involving him including a
11 lawsuit filed against him in June 1990 by the Washington State Attorney General, Ken
12 Eikenberry, relating to illegal lobbying acts and improper reporting of more than one-
13 hundred thousand dollars. Gibbs was found guilty. The Attorney General issued a statement,
14 published in the Seattle Times, that Gibbs conduct was fraud. The Attorney General found
15 Gibbs’ hidden money in offshore accounts and then forced Gibbs to pay his judgment. Gibbs
16 sought to have the records in these matters sealed.

17
18 The Public Disclosure Commission (“PDC”) permanently revoked Gibbs’ lobbying
19 license. They also contacted the WSBA seeking Gibbs disbarment for his illegal conduct.

20 Gibbs was also sued by the Washington State Food Dealers Association, filed February 8,
21 1990 in King County claiming \$292,728 in damages, accusing Gibbs of using association
22 funds for personal use. Gibbs and his law firm sought a secrecy order, having the records
23 sealed. The Seattle P-I joined by KIRO, Inc. successfully challenged to have the records
24 unsealed.

25 Additionally, in approximately 1998 Gibbs donated to John Pennington’s “Friends of

1 John Pennington” legislative representative campaign through the lobbying group Food
2 Dealers Association of Washington.

3 Curiously, Gibbs was not disbarred for his illegal conduct and the WSBA lists no
4 disciplinary history for Gibbs. More astounding, Gibbs is now not just an active member of
5 the WSBA, but he is either currently or formerly (post fraud conviction) the Treasurer for the
6 WSBA, the Chair of the WSBA Budget and Audit Committee, the Chair of the Investment
7 Committee, the Chair of the Task Force to Revise Rules for Enforcement of Lawyer
8 Conduct, Liaison for the Civil Rights Section, member of the WSBA Rules of Professional
9 Conduct Committee, and member of the Board of Governors, as well as numerous other
10 positions of authority and influence with the Snohomish County Bar Association and
11 Snohomish County Courts. He is also an “active market participant” within the Anderson
12 Hunter Law Firm, P.S.

13 When Plaintiff filed a bar complaint against Gibbs the WSBA ignored it.

14 3.55 **New Allegation O’Dell False Statements** September 2014, Although not all
15 inclusive, the following are some of the false statements:

16 (a) Page 1, ll. 11-12, O’Dell claims Plaintiff attended hearing telephonically which a
17 false statement is. *O’Dell first muted, and then disconnected Plaintiff, thereby*
18 *excluding her from the hearing in both actions.*

19 (b) O’Dell lists three (3) formal charges, none of which are in anyway the subject matter
20 of the original bar complaint or supplemental complaints. And, in fact, none of these
21 formal charges are true.

22
23 1. As to COUNT 1, Plaintiff never “certified that no grievance investigation
24 was pending” when she disassociated and chose to not renew her license,
25 pay dues, or provide proof of insurance. Plaintiff did attest that no client

1 filed a complaint when she added to contract “So long as the issue being
2 investigated pertains to a former client”. Plaintiff has the right to modify
3 contracts. *Berg vs Hudesman 115 Wn. 2d 657 (1990)*.

4 2. As to COUNT 2, Plaintiff filed a motion for a Protective Order on her
5 media files, which the WSBA illegally demanded access to. The motion
6 was never ruled on; it was entirely ignored. O’Dell does not have the
7 authority to rule on that motion and should not have proceeded until that
8 motion was ruled on by the Court. As to the deposition, December 3rd,
9 2013 Plaintiff sent Eide an objection letter stating she would not be
10 appearing at the deposition scheduled December 6, 2013 citing RCW
11 5.68.010 (media shield) and First Amendment grounds and attorney-client
12 protected communication. Media Shield states that any agency with
13 subpoena power seeking deposition of a news reporter or media files must
14 seek a subpoena from the court first. The WSBA in December 2013 had
15 neither power nor authority to seek media files. Eide ignored RCW
16 5.68.010 and unilaterally held an ex-parte deposition on December 6,
17 2013. ELC 5.5(e)(2) states that “a timely objection suspends any duty as
18 to respond to the subpoena until a ruling has been made.” There was no
19 ruling made. The duty is on the WSBA to get a Court order, not on the
20 respondent lawyer.

21
22
23 3. On September 10, 2014 O’Dell published a false statement of
24 unprivileged communications in Findings of Fact, Conclusions of Law,
25 on page 8, ll. 5-9, O’Dell made the following false statement, “The

1 Respondent had no intention of testifying in a deposition or answering
2 interrogatories regarding the allegations she made against the Grievant
3 and others”. O’Dell presumed to know the mind and thoughts of the
4 Respondent/Plaintiff, when in fact the Respondent/Plaintiff was acting
5 ethically and responsibly in protecting her media files, sources, and
6 attorney-client protected communications. The WSBA had no authority to
7 access these files and the duty was on the WSBA to get a court order to
8 overcome the law that protects such files.

9
10 4. On Page 2, ll. 24-26, O’Dell states the hearing continued without Block
11 on the line. O’Dell falsely states the respondent purposefully attempted to
12 disrupt the hearing by discontinuing the call. There is no argument that
13 the hearing continued without the respondent able to fully participate,
14 which was improper, but the action that disrupted the hearing was that of
15 the WSBA by excluding the respondent by way of muting the respondent
16 and then by entirely disconnecting the respondent.

17
18 5. On Page 2, O’Dell falsely asserts “the association had given her several
19 options...” as it relates to Plaintiff’s request for a reasonable
20 accommodation at the July 21, 2014 Hearing.

21
22
23 6. On Page 10, ll. 2-8, O’Dell states “Respondent spent the next months
24 responding to the Grievant with professional and personal attacks against
25 him and his family. She was asked by the association to verify her

1 responses and refused to do so by feigning legal documents to deny
2 further investigation. These actions caused serious harm to the legal
3 system in general and to Mr. Pennington specifically. It is my opinion
4 Respondent did actual harm to this Grievant....” These are false
5 statements.

6
7 7. On Page 12, ll. 17-19, O’Dell states “Respondent filed no supporting
8 documents in defense of allegations set forth in the formal complaint.”

9
10 8. On Page 13, ll-12, “The Respondent continued to attempt to engage the
11 Hearing Officer in exparte communication. Ex 86. In late May 2014 she
12 began emailing the Hearing Officer with “evidence” or “exhibits”.
13 Respondent/Plaintiff made no attempt to engage in ex-parte
14 communications. On Saturday, May 24, 2014 Plaintiff submitted exhibits
15 to both Eide and O’Dell per Eide’s request. Plaintiff was not previously
16 supplied any scheduling order. Regardless, there was no attempt at ex-
17 parte communication as Plaintiff submitted evidence to both parties
18 simultaneously.

19
20 9. On page 14, ll. 3-7 O’Dell states, “She refused to respond to the
21 allegations in the formal complaint, BF16. instead diverting her issues to
22 the Grievant, Snohomish County Officials, WSBA, ODC staff, the
23 Hearing Officer, the Chief Hearing Officer, and Gold Bar Officials.”
24
25

1 10. On page 14, ll. 19-21, O’Dell stated “The Respondent has threatened
2 Linda Eide...and Julie Shankland, assistant general counsel...” O’Dell’s
3 statement is a demonstration of acting with reckless disregard to the true
4 statements Plaintiff made, which were that she intended to sue the
5 WSBA, naming specific persons, not that Plaintiff ever threatened to
6 physically harm anyone.

7
8 11. O’Dell states in the July 21, 2014 hearing transcript, page 19 that
9 Plaintiff’s motion for a protective order was filed on May 28, 2014 and
10 the motion was denied: Plaintiff’s motion was ignored and never ruled on.
11 O’Dell does not have the authority to rule on that motion and should not
12 have proceeded until that motion was ruled on by the Court.

13 12. O’Dell states in the July 21, 2014 hearing transcript, page 19, that she will
14 issue a written decision in the form of Findings of Fact, Conclusions of
15 law 20 days after the hearing is concluded. She did not issue the Findings
16 of Fact and Conclusions of Law until September 10, 2014—51 days later

17
18 NB: the original and subsequent bar complaints by “witness” John
19 Pennington were entirely based on the published content on the Gold Bar
20 Reporter Blog, which is First Amendment protected Activity.

21
22 Content related to John Pennington was specific to him as a government
23 official and his actions that caused him to be unfit to serve in that
24 capacity. O’Dell falsely states Pennington is a private citizen and
25 separates him from government officials.

1 (c) **New Allegation WSBA** Pennington filed at least six (6) bar complaints in 2013 over
2 the course of 43 days about Plaintiff's First Amendment protected activity. The bar
3 failed to list Pennington as a "Vexatious Grievant" and failed to enter an order
4 restraining Pennington from filing grievances for engaging in a "frivolous [and]
5 harassing course of conduct" as to "render the grievant's conduct abusive to the
6 disciplinary system". See ELC5.1 In contrast, when another public employee, in this
7 case an employee for the City of Gold Bar, filed a bar complaint against Plaintiff in
8 2010 also complaining about Plaintiff's blog, the WSBA response was that Plaintiff's
9 conduct was protected free speech which they neither condemned nor condoned.
10 They further instructed Ms. Croshaw to take her complaint to the proper forum if she
11 felt she had been defamed; the WSBA was not the proper forum. Plaintiff asserts
12 Pennington has misused his influence in his formal capacities to alter the course of
13 the WSBA.

14 3.56 **New Allegation** September 2014 O'Dell tells Paula Fowler Johnson that Anne Block
15 will be disbarred; Breach of Process.

16 O'Dell's client, Paula Fowler Johnson, contacted Plaintiff through her Gold Bar Reporter
17 blog approximately September 2014. Prior to this contact, Plaintiff was unaware of Paula
18 Fowler Johnson and her relationship with O'Dell. Fowler Johnson related a conversation to
19 Plaintiff that occurred between Fowler Johnson and Lin O'Dell wherein Fowler Johnson was
20 in her attorney, Richard Wallace's office, with Lin O'Dell. (After the contact from Fowler
21 Johnson, Plaintiff obtained a statement from Paula Fowler Johnson through Plaintiff's
22 investigators.) Fowler Johnson, who objects to O'Dell being her guardian, made a statement
23 to O'Dell to the effect that O'Dell could not be her guardian because she was a defendant in
24 a RICO suit. O'Dell responded that Fowler Johnson need not concern herself with that as
25

1 Anne Block will be disbarred.

2 Back ground information: Fowler Johnson was in a court battle with O'Dell because O'Dell
3 had taken control of Fowler Johnson's multi-million-dollar inheritance through false
4 pretexts, blatant lies to the court, a dozen ex-parte hearings, and altered documents. (See:
5 Stevens County Superior Court Case 06-4-00094-9.) The court found that O'Dell had
6 misappropriated funds and lied to the court. (See Findings of Fact and Conclusions of Law
7 11-20-2014.) Fowler Johnson's claims include the following, but is a small representation of
8 the totality: O'Dell denied Fowler Johnson's basic needs, had her dogs shot, stole her horses,
9 took possession of and sold her real property, and paid a Judge \$5,000 out of estate monies
10 to replace a public defender representing a man accused of assaulting Fowler Johnson's
11 mother—the benefactor of the estate. Additionally, Mark Plivilech a convicted killer, who
12 served time in prison, and partner or husband to Lin O'Dell, went to Fowler Johnson's home
13 and stated to her I will soon own your home. Fowler Johnson's former husband also made a
14 written statement, which is part of the court record, that Plivilech made similar statements to
15 him about owning Fowler Johnson's home. The judge in the Fowler Johnson and O'Dell
16 case, Judge Monasmith, had harsh words for O'Dell (See: Findings of Fact and Conclusions
17 of Law November 20, 2014.) The special investigator appointed by the judge issued a
18 scathing report of O'Dell. (See Investigative report filed 2-19-2014.) O'Dell has yet to
19 comply with Judge Monasmith's order which included providing an accounting and repaying
20 Paula Fowler Johnson's monies. The WSBA, through McGillin, "broomed" two bar
21 complaints filed by Paula Fowler Johnson against O'Dell. (By Lin O'Dell's own words,
22 these complaints should be investigated: "The public is entitled to fair and candid
23 investigation into allegation (sic) of lawyer misconduct and without that candid investigation
24 the public questions the integrity of the entire legal system," page 8, Findings of Fact,
25

1 Conclusions of Law, In re: ANNE BLOCK.)

2 3.57 **New Allegation** In September 2014, O'Dell continued to issue wire and mail threats,
3 and used Plaintiff's free speech statements against her by placing those statements (made
4 only after Plaintiff was no longer a member) into her findings of fact to warrant disbarment.
5 O'Dell also placed for the first time in the WSBA record a false statement and finding that
6 Plaintiff lied about Pennington causing him harm. Since there was no such evidence in the
7 WSBA record documenting that Plaintiff lied about Pennington, Plaintiff objected noting
8 that this not only violated Our U.S. Supreme Court's holdings Re the Discipline of Ruffalo
9 but also violated Plaintiff's 14th Amendment due process rights to be given notice and
10 meaningful opportunity to respond. Plaintiff stands by every article published, and the
11 WSBA file contains no evidence in support of O'Dell's findings that Plaintiff lied about
12 Pennington.

13 3.58 **New Allegation** In late 2014, Plaintiff learned from Snohomish County public
14 phone records that On May 8, 2014 at 1:29 PM, and at 2:35, and 3:28, Sean Reay made
15 ex-parte contact with WSBA Disciplinary Counsel WSBA members at 206-733-5926.
16 Reay is an employee of defendant Snohomish County assigned to prosecute claims
17 brought against the County not monitors WSBA complaints.

18 3.59 **New Allegation** Additional public phone records from Snohomish County also
19 established that On May 13, 2014, at 1:40 Sean Reay called Kenyon Disend, a city attorney
20 for Gold Bar and for the City of Duvall.

21 3.60 **New Allegation** On May 30, 2014, 1:00 PM Sean Reay called WSBA Linda Eide
22 at 206-733-5902. This ex-parte contact provided no valid governmental purpose and was
23 solely to conspire to harm Plaintiff solely based on Plaintiff's protected activities. There
24 was no governmental purpose for a Snohomish County Prosecutor to be calling the
25

1 WSBA lead counsel Eide or Alison Sato on Plaintiff's case while using county resources
2 and while on the county's payroll. Reay was acting outside his official duties as
3 Snohomish County prosecutor.

4 3.61 **New Allegation** In June 2014, a blogger from Snohomish County contacted
5 Plaintiff informing her that defendant WSBA Eide was in fact a first relative to Senator
6 Tracy Eide. Senator Tracy Eide is a personal friend to Aaron Reardon and John
7 Pennington.

8 3.62 **New Allegation** In July 2014, the WSBA become subject to sunshine laws of
9 Washington. Plaintiff sent the WSBA a public records request seeking all records
10 relating to who assigned WSBA hearing officers. Plaintiff received email communication
11 between Chief Hearing Officer Joseph Nappi Jr. and Yakima attorney and WSBA
12 hearing Officer David Thorner discussing how they would pre-decide cases prior to trial,
13 just as they had inside a training session about the Marjia Starwecki complaints. Two
14 WSBA complaints filed against Starwecki were written by WSBA Board member G.
15 Geoffrey Gibbs, but filed anonymously filed with his colleagues inside the WSBA ODC.
16

17 3.63 **New Allegation** Plaintiff is a person with documented major life impairment as
18 defined by the Americans with Disabilities Act (ADA), requested a reasonable
19 accommodation for the July 21, 2014 hearing which the WSBA ignored. Plaintiff filed
20 an Equal Employment Opportunity Complaint (EEO) with the Seattle District Office.
21 The EEO issued a right to sue letter, dated on September 25, 2015, which Plaintiff
22 received by October 1, 2015.

23
24 3.64 **New Allegation** In late 2014, Plaintiff filed WSBA complaints against Lin O'Dell,
25 Linda Eide, and Sean Reay for ex-parte communication in violation of Washington Rules

1 of Professional Conduct. WSBA assigns Ronald Schaps to investigate bar complaints
2 Plaintiff filed against O'Dell Eide and Reay. Schaps admits in letter that he did not
3 investigate Plaintiff's WSBA complaints.

4 3.65 **New Allegation** Pennington defames Plaintiff and engages a Stratfor contractor to
5 stalk Plaintiff, misuses County resources for personal reasons. In early April 2015, Plaintiff
6 reviewed public records from Snohomish County Dept. of Emergency Management
7 (DEM) which included emails between John Pennington and Steve McLaughlin,
8 between March 23, 2014 (immediately following the Oso Mudslide deaths) and July 29,
9 2014. Plaintiff had been actively engaged in blogging about Pennington's incompetence
10 as Snohomish County's DEM and the recent deaths of the 43 Oso Mudslide victims as
11 well as other exposes on Pennington. John Pennington, using county resources (county
12 computers on county time) emailed Steve McLaughlin, a Snohomish County "vendor"
13 per Snohomish County payment warrants, defaming Plaintiff stating as a matter of
14 known fact, that Plaintiff is a "stalker", a "soon-to-be disbarred attorney", and that
15 Plaintiff also goes by the name "Michael Broaks". Steve McLaughlin, of "Sound and
16 See" is a Stratfor agent. Stratfor is a private company previously exposed as a private,
17 global secret police force, based in Texas, that provides confidential intelligence services
18 to large corporations and government agencies, has a web of informants, engages in
19 payoffs, and payment laundering techniques.

20
21 3.66 **New Allegation** In March 2015, Plaintiff acting in capacity as a journalist began
22 investigating the Penningtons involvement with the Duvall Children's Community
23 Theater. Because Plaintiff has ample reason to believe that Pennington is responsible for
24 the rape of a 5 year old child from Cowlitz County, and is raping his step-daughter (JH),
25

1 Plaintiff requested access to records from the Duvall Community Theatre seeking to
2 know if they ran criminal background checks on Hill-Pennington Pennington and John
3 Pennington prior to allowing both access to children. In the middle of March 2015,
4 acting on personal legal advice from Snohomish County Prosecutors Mark Roe and Sean
5 Reay, John Pennington and his wife Hill-Pennington Pennington field a false police
6 report and lodged an intentionally false 911 complaint trying to cover up that PSI
7 investigators while trying to serve a CR 45 subpoena learned that the Penningtons' were
8 guilty of child endangerment leaving three minor children home alone. Although the City
9 of Duvall police officers are under a mandate to report child neglect, the City of Duvall
10 when requested for records relating to their mandated child protected services report
11 admitted that no report was ever filed with Washington State Child Protected Services.

12
13 3.67 **New Allegation** March 2015, The Penningtons filed criminal complaints with the
14 City of Duvall because I, as a licensed attorney in other districts, exercised my legal
15 rights under CR 45 subpoena power to depose Hill-Pennington in a public records case
16 filed seeking access to public records Hill-Pennington continue to withhold and possess
17 under RCW 42.56. In the middle of March 2015, Duvall police officer Lori Batiot
18 advised the Penningtons to Petition for a Restraining order based solely on First
19 Amendment protected free speech and news reporting of the Plaintiff.

20 3.68 **New Allegation** Pennington and Hill-Pennington retaliate for First Amendment
21 Protected Speech; Pennington misuses county resources. Approximately March 2015,
22 Plaintiff sent an email to the Duvall Community Theatre Board of Directors informing
23 them John Pennington is a pedophile and has assaulted women and children. On March
24 19, 2015, in retaliation for this protect speech and true statements warning the public of
25

1 the dangers Pennington posed, the Penningtons acting on legal advice given to them by,
2 Duvall City Police Officer Lori Batiot, filed a Petition for Restraining Order King
3 County attempting to silence Plaintiff. The sole evidence Hill-Pennington and
4 Pennington submitted in support of their petition were altered copies of Plaintiff's Gold
5 Bar Reporter news publication. Judge Meyers dismissed the petition as a prior restraint
6 on free speech. Records show Pennington was being paid by Snohomish County during
7 the time he was in court.

8 3.69 **New Allegation** Pennington and Hill-Pennington retaliate for First Amendment
9 Protected Speech On March 25, 2015 the City of Duvall declined to prosecute
10 Penningtons' criminal complaints based on Plaintiff's First Amendment activity (the
11 same evidence Penningtons' presented to Judge Meyers on March 19, 2015). Source:
12 Public records Plaintiff received from the City of Duvall.

13
14 3.70 **New Allegation:** In late March 2015, Plaintiff issued payment to retrieve over
15 150 pages of exhibits Hill-Pennington and Pennington filed with their Petition for
16 Restraining Order. Plaintiff immediately noted that the exhibits were altered and
17 included false statements alleging that Plaintiff was using anonymous emails and Twitter
18 accounts. Hill-Pennington and Pennington knew that the Twitter and email addresses
19 accounts belonged to real persons aside from Plaintiff including Krista Dashtestani and
20 Brandia Taamu, because Krista Dashtestani physically served Hill-Pennington with a
21 public records request and assisted in the in person deposition of Pennington, and
22 personally met Michael Kenyon in court proceeding involving Hill-Pennington; and
23 Brandia Taamu signs her Twitter and news reports. Hill-Pennington also openly bragged
24 inside her Petition to Restrain Plaintiff's free speech rights that they shut down two of my
25

1 Twitter accounts, and three of Brandia Taamu's Twitter accounts, but the Penningtons
2 conveniently left out that they were using anonymous Twitter accounts themselves,
3 including but not limited to "GodBarReporter" and "NsCrier". GodBarReporter is
4 associated with emergency management and its only "followers" were that of emergency
5 management agencies.

6 **3.71 New Allegation:** On March 25, 2015 or soon thereafter, after attempts by Hill-
7 Pennington and Pennington to have Plaintiff criminally prosecuted in Duvall were
8 denied, and after King County Judge Meyers denied their Petition to Restrain the Free
9 Speech in the form of a Restraining Order on March 19, 2015, Hill-Pennington filed the
10 exact same criminal complaint in Gold Bar, with the exact same altered documents,
11 alleging once again that Plaintiff is cyberstalking the Pennington's simply because the
12 Pennington's object to Plaintiff's First Amendment blogs. The Hill-Pennington criminal
13 complaint then lands directly on the desk of Prosecutor Mark Roe who requests further
14 information as is "NEEDED FOR TRIAL" from Sergeant Casey, a Snohomish County
15 Deputy assigned to Gold Bar. Roe, at some point, refers the case to Mark Larson in King
16 County although in an email from Roe to Larson, Roe states "Okay, here is the deal, the
17 very gracious, Mark Larson, King Count CCD, has agreed to handle the AB cyberst.
18 referral. He would like it mailed directly to him. I told him I don't know if it is fileable or
19 not, but have been told it may require some follow up investigating by SCSO." Roe goes
20 on to state his personal vendetta against Plaintiff stating "I also explained the harassment
21 his office can expect. We agreed that our office does not probably have an actual
22 conflict, but that with AB's repeated attacks on me, almost constant technol warfare
23 against this county and our taxpayers and on-going litigation against both, it might be
24
25

1 best that another county handle the criminal referral.” Larson declines to prosecute the
2 case stating there was threats thus no basis for the complaint. Hill-Pennington also
3 falsely claims to Snohomish County Sheriff’s office that she cannot find work as a result
4 of Plaintiff’s news reports. FEMA contracts confirm that the Pennington’s made over
5 \$150,000.00 with FEMA Emergency Management Institute (“EMI”). Over \$35,000 was
6 awarded to Hill-Pennington, personally, within two-months of her filing the criminal
7 complaint. Hill-Pennington does not live in Snohomish County and the events she
8 complained about occurred in the City of Duvall and yet her complaint has visited at
9 least three jurisdictions, including Snohomish County. Public telephone records from
10 Snohomish County Prosecutors Office document that the Pennington’s had a direct line
11 to both Reay and Roe.

12
13 3.72 **New Allegation: Defamation** on March 19, 2015 Hill-Pennington and
14 Pennington did knowingly make and/or publish false documents and false libelous,
15 recorded statements inside King County, Washington State records, archived into digital
16 on-line publications.

17 3.73 **New Allegation: Defamation** On March 19, 2015, March 25, 2015, and April 1,
18 2015 Hill-Pennington did knowingly file false statements with the King County District
19 Court, City of Duvall, and Snohomish County, respectively. Those false statements were
20 unprivileged communications. They were also further re-published and disseminated,
21 including by and through but not limited to, inside Snohomish County Prosecutor’s
22 office, The City of Edmonds, Zackor and Thomas, The City of Shoreline, and King
23 County Public records. The falsities that Hill-Pennington stated and published, which
24 continues as published public records today, that caused Plaintiff damages, although not
25

1 all-inclusive, include the following knowingly false statements about Plaintiff:

2 (1) Plaintiff repeatedly contacted our children and our children's schools.

3 (2) Plaintiff places information about our [Hill-Pennington and Pennington's]
4 children's schools and their [children's] photos online.

5 (3) States Plaintiff is delusional.

6 (4) States Plaintiff accused Hill-Pennington of poisoning the City's water wells.

7 (5) "...orgies and drug parties with my staff."

8 (6) "That anyone around us is part of a conspiracy to molest or hurt children."

9 (7) Plaintiff purchased a gun to protect herself.

10 (8) Plaintiff is "... sending men to talk to children in [her] home."

11 (9) Plaintiff used multiple on-line identities (that did not belong to Plaintiff, nor
12 did Plaintiff use): KristaDashtestani@comcast.net, Krista@goldbarreporter.org,
13 mbroaks1967@gmail.com

14 (10) [Plaintiff is] "...using 'Michael Broaks' when contacting our child, family,
15 and friends", and @snocoreporter twitter.

16 (11) Stated Plaintiff is "irrational" and "delusional".

17
18
19 3.74 **New Allegation: Defamation** On April 12, 2015 Hill-Pennington did knowingly
20 make the following defamatory statements about Plaintiff:

21 (1) Plaintiff has a "sexual obsession with [Hill-Pennington]"

22 3.75 **New Allegation: Threat on Plaintiff's Life.** April 2015, after the Penningtons
23 failed three times to obtain a restraining order on Plaintiff's First Amendment protected
24 speech or have criminal charges filed against Plaintiff for the same, Plaintiff learned that
25

1 John Pennington had “taken out a hit” on Plaintiff. Confidential Source, to be revealed in
2 depositions or trial.

3 3.76 **New Allegation:** On April 12, 2015, Duvall Police Officer Lori Batiot, called
4 Plaintiff's partner's business phone leaving a threatening message stating that if Plaintiff
5 did not call her back she would come over to her house in Gold Bar, located in
6 Snohomish County. Since Duvall is located in King County, Plaintiff viewed this as an
7 extortionist wire threat to harm Plaintiff and a gross violation of Plaintiff's civil rights
8 over matters protected by the First Amendment. As a result of Officer Batiot's wire
9 threats, Plaintiff requested access to public records under RCW 42.56 involving Batiot,
10 the Penningtons, and Plaintiff. Public records reviewed in January 2016 show John
11 Pennington and Lori Batiot are friends.

12
13 3.77 **New Allegation: Defamation** On May 4, 2015 Lori Batiot did knowingly publish
14 false documents and false libelous, recorded statements inside King County, Washington
15 State records, archived into digital on-line publications which have been further
16 published and disseminated. The falsities that Batiot stated and published, which
17 continues as published records, including public records, today, that caused Plaintiff
18 damages, although not all-inclusive, include the following knowingly false statements
19 about Plaintiff:

- 20 (1) That Plaintiff repeatedly, on multiple occasions, sent multiple men, to the
21 Pennington residence “Block hired people...to go to the Penningtons residence as
22 recently as...”
23
24 (2) That Plaintiff personally went to the Pennington home: “Ms. Block made face-
25 to-face contact with the Pennington children at the door.”

1 (3) Plaintiff has mental health issues.

2 (4) That Plaintiff is unemployed.

3 (5) That Plaintiff is “stalking” Batiot.

4 (6) That Plaintiff’s partner’s business cell number is, in fact, Plaintiff’s home
5 number. Plaintiff alleges Batiot used the phone number on April 12, 2015 as a
6 method to intimidate and harass Plaintiff and Plaintiff’s partner, after the City of
7 Duvall dismissed the Pennington’s criminal complaint on March 25, 2015.
8

9
10 Plaintiff alleges these actions and false statements were in retaliation for
11 Plaintiff’s exercise of First Amendment protected speech and in furtherance of the
12 enterprise.

13 3.78 **New Allegation: False Statements in Public records** on May 4, 2015, Lori Batiot
14 did knowingly make the false statements into public and/or court records which were
15 published and archived into digital on-line publications which have been further
16 published and disseminated. Although not all-inclusive, the knowingly false statements
17 include the following:
18

19 (1) In a King County Shoreline document, Batiot falsely states: Mr. Harrison
20 stated “he would try to keep me from going to federal prison”.

21 (2) “I also told Mr. Harrison very clearly that I found his and Ms. Block’s
22 behavior very alarming.”

23 (3) That she demanded he and Block make no further attempts to directly contact
24 me “or my family and that they were to stay away from my house, schools,
25 and any other place that caused my family and I to be placed in fear of their

harassment”

1
2 (4) That Batiot is “indigent” (as a Duvall Police Officer) thus unable to pay a
3 filing fee for a restraining order.

4 (5) That Plaintiff “implied [Batiot] is a pedophile”.

5 3.79 As of today, Defendants Duvall, Batiot, Penningtons and Michael Kenyon
6 continue to withhold public records involving Plaintiff, retaliating against Plaintiff for
7 exercising her First Amendment protected rights. Plaintiff filed a suit seeking access to
8 public records against the City of Duvall in late June 2015. The suit is still pending in
9 King County Superior Court.

10
11 3.80 **New Allegation: Retaliation for Protected Free** On May 4, 2015, in retaliation
12 for Plaintiff seeking public records about Batiot as they relate to Plaintiff following
13 Batiot’s telephone threats to Plaintiff, Officer Batiot went to Shoreline District Court
14 seeking a restraining order against Plaintiff and seeking to have Plaintiff committed to a
15 mental institution. Officer Batiot made several false statements to the court: She claimed
16 the she, Officer Batiot, was indigent; that Plaintiff was unemployed; had a history of
17 mental health issues; and that Plaintiff was born on June 16, 1967. According to a Duvall,
18 Washington police report in May 2015, the Penningtons requested that the Duvall police
19 department seek a restraining order "to get John in the clear..." Batiot's is the only officer
20 who assisted the Penningtons.

21
22 3.81 **New Allegation: Retaliation for Protected Speech** On May 24, 2015, after
23 arriving at London Heathrow Airport, Plaintiff was fully body clothed searched in a very
24 personal and penetrating manor. She was also illegally detained at Seattle Tacoma
25 International Airport, by two Port Officers and one US Customs Officer, Curtis Chen.

1 The search and detainments were caused and arranged by John Pennington's unlawful
2 use of his Homeland Security connections together with Officer Batiot, both of whom
3 also contacted Cary Coblantz. The same day Pennington contacted Cary Coblantz, a
4 tracker (flag) was placed on Plaintiff's U.S. Passport falsely certifying that Plaintiff was
5 wanted for "possible felony warrant with extradition back to the U.S." Plaintiff was
6 served a partial copy of a temporary restraining order for Officer Batiot by U.S.
7 Customs. Plaintiff learned these facts from public records retrieved from King County
8 Sheriff's Office. Judge Smith, King County Shoreline Division denied Batiot's
9 permanent restraining order and chastised Batiot for wrongly using government
10 resources and paying for none.

11 3.82 **New Allegation** In May 2015, King County Sheriff's Officer Cary Coblantz
12 received at least two phone calls from defendant John Pennington, and immediately
13 following the phone call, Coblantz received an email from the DOJ Interpol confirming
14 what flight number Plaintiff and her partner were coming back to Seattle International
15 Airport from London. After receiving Plaintiff's flight information from Pennington,
16 Coblantz then placed a phone call to the Port of Seattle informing them what flight
17 Plaintiff was on asking the Port of Seattle and US Customs officers to serve a civil order
18 on Plaintiff. The Port of Seattle Officer Matuska, Tanga, and Gillebo elicited the
19 assistance of US Customs Officer Curtis Chen to place a tacker on Plaintiff's passport.
20 The Port of Seattle admitted via a public records request that it has never served a civil
21 order on any other person ever except for Plaintiff. At relevant times, Pennington was
22 being paid by Snohomish County. Coblantz, Tanga, Gillebo, and Tuttle, were being paid
23 by King County. Curtis Chen was being paid by U.S. federal government. Coblantz's
24
25

1 emails retrieved from public records also documented that he was reading another news
2 reporter's website claiming it to be Plaintiff's and then issued a public email to Port of
3 Seattle police that Plaintiff was "anti-government". Tuttle told Plaintiff that he was an
4 internal affairs investigator for the Port of Seattle. Plaintiff learned from Port of Seattle
5 public records, in August 2015, that Tuttle was not an internal affairs investigator.

6 3.83 **New Allegation** Public records from the City of Shoreline confirmed that Coblantz
7 not only conspired with Pennington and Batiot to have Plaintiff charged with "stalking"
8 but he also conspired with City of Duvall Special Prosecutor, a Kenyon Disend
9 contractor, Sullivan. Although Coblantz is assigned to the City of Shoreline, while
10 Sullivan is assigned to Duvall, Sullivan, and Coblantz agree in public records to retaliate
11 to have Plaintiff attempting to charge plaintiff with felony criminal stalking and
12 harassment charges. Plaintiff reviewed the evidence file from King County, City of
13 Shoreline, and confirmed that the only evidence Batiot placed into the records were
14 complaints against the Gold Bar Reporter's news reports. These same records confirmed
15 that Batiot falsely restated what the Penningtons had disseminated to Gold Bar in 2009
16 that Plaintiff had been treated for mental health issues, was unemployed, and was born
17 on June 16, 1967. Batiot and the Penningtons conspired together to have Plaintiff
18 charged with stalking crimes between March 2015 to June 19, 2015. Their conspiracy
19 failed and on September 21, 2015, the Gold Bar Reporter published "Duvall City
20 attorney Sandra Sullivan (Meadowcraft) quashing criminal charges for political favors,
21 EXPOSED" and "Michael Kenyon's Dirty Bag of Secrets Part II."

22
23
24 3.84 On June 19, 2015, Batiot also sought to have Plaintiff committed for a PSY
25 evaluation simply for exposing via her news reports of Batiot's corrupt acts with the

1 Penningtons and exposing her past drunk driving conviction and that she had been
2 terminated for cause from two other police departments. Public records from the City of
3 Brier, Whatcom County and Shoreline confirm that anytime someone would expose
4 Batiot's corrupt acts, she would be claim she was being "stalked".

5 3.85 On June 19, 2015, defendants Beavers, Hill-Pennington, and the Penningtons met
6 at King County District (Shoreline Division) Court to further the efforts of the Enterprise
7 to as the Penningtons had requested of Batiot 'get John in the clear." Beavers live in
8 Snohomish County. Judge Smith denied their attempts to restrain plaintiff and the
9 Enterprise efforts to have Plaintiff arrested and committed for PSY evaluation. Judge
10 Smith further stated to Batiot in open court "you utilized a lot of government resources to
11 get Ms. Block served but you paid for none. Don't you think that's a little unfair?"
12 Although Judge Smith was speaking to Batiot, an onlooker stated "he (Judge Smith) was
13 glaring at John Pennington."

14
15 3.86 **New Allegation** From public records retrieved in August 2015, Reay assisted Hill-
16 Pennington by her giving personal giving legal advice. Public records from King County
17 Courts filed on March 19, 2015, also document that Hill-Pennington referred to Reay as
18 her personal lawyer. Hill-Pennington is a resident of Duvall, located in King County,
19 while Reay serves as Snohomish County prosecutor. By acting as Hill-Pennington and
20 Pennington's legal counsel, Reay acted as their personal counsel, outside the scope of his
21 official duties as a Snohomish County prosecutor.

22
23 3.87 **New Allegation** On September 3, 2015, Roe violated Plaintiff's civil rights by
24 disseminating an email letter, which included high ranking members of the Washington
25 State Legislature, stating that he felt sorry for John Pennington, and then further lied

1 stating that he never had communication with Pennington. On the same day, Plaintiff
2 wrote Roe a response that she thought it was pretty strange for a county prosecutor to be
3 writing a letter to plaintiff, and mighty odd that he would feel sympathetic to a non-county
4 resident who abuses women and children. At the time Roe contacted Plaintiff, he was
5 being paid by Snohomish County taxpayers, and his email confirms that he used
6 Snohomish County servers to disseminate the letter.

7 3.88 **New Allegation** In September 2015, a former Snohomish County Department of
8 Information Services employee Pam Miller gave Plaintiff public records previously
9 requested from Snohomish County but withheld, documenting that defendant DiVittorio
10 and Lewis tampered with public records Plaintiff requested. In late March 2014, Miller
11 objected in a public email that Plaintiff was being treated differently than other
12 requesters in violation of RCW 42.56, and further stated she witnessed Lewis tampering
13 with files ready for Plaintiff to pick up. DiVittorio called an in-person meeting with
14 Miller who stated that DiVittorio screamed at her stating "Do you realize the financial
15 risk you have placed in the County in by writing this email?" Miller was subsequently
16 fired immediately after blowing the whistle on DiVittorio and Lewis's tampering with
17 public records as it relates solely to Plaintiff's records requests. By tampering with the
18 public records, DiVittorio and Lewis' actions violated the public records act and the
19 public trust causing injury to Plaintiff and the public.
20

21 3.89 **New Allegation** On September 25, 2015, Snohomish County Prosecutor Mark Roe
22 telephoned Cowlitz County Sheriff's Office asking if Gold Bar Reporters were correct
23 about Pennington being the prime suspect in the rape of 5 year old child, thus proving
24 Plaintiff's news articles on Pennington were right on target. In 1993 when John
25

1 Pennington was named as the only suspect in the rape of 5 year old girl, defendant
2 Michael Kenyon was the City attorney for Kelso. Today, Michael Kenyon owns one of
3 the largest municipal law firms in Washington State. Clients include Defendants City of
4 Duvall and Gold Bar.

5 3.90 **New Allegation** On October 5, 2015, John Pennington was actively stalking
6 Plaintiff at her place of business in Monroe, Washington, while being paid by Snohomish
7 County. Plaintiff took a picture of Pennington from her office window.

8 3.91 **New Allegation** October 2015, Denial of Reasonable Accommodation. Plaintiff's
9 doctor provided Plaintiff a letter dated October 1, 2015 plainly stating Plaintiff had major
10 surgery scheduled for October 29, 2015 with an anticipated 6-8 week recovery period. The
11 purpose of the surgery was an attempt to restore hearing. Plaintiff received the letter
12 October 7, 2015 and the same day provided it to WSBA liaison, Julie Shankland, as
13 previously directed by Shankland. October 8, 2015 Shankland "denied" Plaintiff's
14 reasonable accommodation request, via email, as "unreasonable" without having engaged
15 in "the good faith interactive process", and further claimed that Plaintiff must file a Motion
16 for Reasonable Accommodation with the Full Disciplinary Board despite no existence of a
17 rule mandating such filings. As the WSBA refused to grant the accommodation in the
18 weeks prior to the scheduled surgery, Plaintiff additionally filed a motion for a reasonable
19 accommodation providing further medical documentation including a post-operative
20 surgery picture and narcotic prescription information which impairs judgment and
21 prohibits operating a vehicle. The Disciplinary Counsel Chair *pro tem*, Stephanie
22 Bloomfield, in an open hearing, unilaterally—without a vote—denied Plaintiff's reasonable
23 accommodation request in violation of General Rule 33, RCW 49.60, and the American's
24
25

1 with Disabilities Act overturning Washington State Supreme Court's holding in *Re:*
2 *DISCIPLINE of Sanai.*

3 3.92 **New Allegation** On October 30, 2015, the WSBA Full Disciplinary Board
4 members Sarah Andeen, Kevin Bank, Keith Mason Black, Kathryn Berger, Stephanie
5 Bloomfield, Michele Nina Carney, S. Nia Renei Cottrell, Marcia Damerow Fischer,
6 Michael Jon Myers, Stephania Camp Denton, Marc Silverman, and William Earl Davis
7 and ODC lead counsel Eide held an ex-parte hearing, violated the Open Public Meetings
8 Act by not voting in public, held an ex-parte hearing only after being notified that
9 Plaintiff was disabled unable to attend, and the WSBA Full Board engaged in in ex-parte
10 communication with the Hill-Pennington and Pennington during the public hearing. A
11 long time open government news reporter videotaped the ex-parte proceedings
12 documenting that the WSBA violated Plaintiff's rights to be accommodated under RCW
13 49.60 and GR 33.

14 3.93 **New Allegation** Pennington, WSBA Conspired, held ex-parte communications.
15 On October 30, 2015, while being paid by Snohomish County, Pennington, met and
16 conspired with the WSBA Full Disciplinary Board, Beavers, Ende, Sato, Eide, and Hill-
17 Pennington at the WSBA Offices. A WSBA employee, who is believed to be defendant
18 Julie Shankland communicated with Pennington, carried a message from Pennington to
19 Defendant Kevin Bank during a public hearing, relating to the WSBA's proceeding
20 against Plaintiff. Shankland, Pennington, and Bank's ex-parte communication during a
21 public hearing was captured on video and posted to the Gold Bar Reporter's U Tube
22 account and titled "WSBA Corruption caught on Camera."
23

24 3.94 **New Allegation** At the October 30, 2015 hearing *Re Block*, WSBA Full
25 Disciplinary Board member Kevin Bank threatened the news reporter videotaping the

1 WSBA's ex-parte hearing against plaintiff. Alison Sato also attempted to force the news
2 camera-woman and intimidate the news reporter from the public hearing even though the
3 Washington State Attorney General issued rule that all public meetings can be legally
4 videotaped. In October 2015, Plaintiff witnessed Pennington stalking her at her place of
5 business located in Monroe, Washington. Plaintiff snapped a picture of Pennington with her
6 iPhone.

7 3.95 **New Allegation** On November 13, 2015, after denying Plaintiff's reasonable
8 accommodation without engaging in good faith discussions, the WSBA Full Disciplinary
9 Board adopted O'Dell September 2014 Findings of Fact, which included false
10 information that Plaintiff, had lied against Pennington. The WSBA's record does not
11 support that Plaintiff lied about Pennington, nor has Pennington denied a single article
12 written by the Gold Bar Reporters.

13 3.96 **New Allegation** On November 17, 2015, Pennington reported to Snohomish County
14 Emergency Command Center (EOC) signed onto the Gold Bar Reporter, shut down
15 Plaintiff's Twitter account, while three people were killed in destructive wind storms. Storms
16 that caused Governor Jay Inslee to declare a state of emergency for Washington. Pennington
17 was on county time and on the county payroll at the time.

18 3.97 **New Allegation** Public records reviewed in December 2015, obtained from the City
19 of Gold Bar document that Loen had a meeting at Gold Bar City Hall with Beavers during
20 the first week of December 2013. Immediately following this meeting, Loen called Plaintiff
21 strongly urging that she "must keep your WSBA license" and you need to go to that
22 deposition. Plaintiff believes that Loen's statement that Plaintiff must go to the deposition
23 was the December 6, 2013 ex-parte deposition held by WSBA Lead Counsel Linda Eide.
24 Soon thereafter, Loen sent Plaintiff an email stating "soon you will have a lot of public
25

1 records". In late 2015, Plaintiff learned that Beavers acting on policy and custom as mayor
2 for the City of Gold Bar used city resources to assist the WSBA by providing altered public
3 records to a WSBA investigator. The City of Gold Bar has an ordinance that place public
4 records request on a "priority list" on a "first come, first served" basis. Plaintiff has public
5 records requests submitted to Gold Bar since 2010, that remain unanswered and on the city's
6 priority list. There is no evidence that Beavers, acting as mayor for the City of Gold Bar,
7 placed the WSBA on a priority list before providing WSBA access to public records. Gold
8 Bar Ordinance 10-14 mandates anyone seeking access to public records be place on the
9 priority list and be provided records accordingly.

10 3.98 **New Allegation** From June 2013 to present, defendants continuously harass Plaintiff,
11 attempt to extort her, physically threaten people who choose to associate with Plaintiff, in a
12 manner which effectively interferes with her right to conduct business as a news reporter and
13 extorted her right to practice law as a result her decision to report on corruption. The WSBA
14 encourages other members of the community to treat the plaintiff as a pariah in the legal
15 profession and allows members to commit violations against her in violation of the rules of
16 professional conduct against Plaintiff with impunity.

17 3.99 **New Allegation** From May 2014 to Present, and only after Plaintiff was no longer a
18 member of the WSBA, Hill-Pennington, Kenyon, Pennington, Beavers, WSBA, Snohomish
19 County, and Gibbs's sign on to the Gold Bar Reporter on an almost on a daily basis. The
20 Gold Bar Reporter has a "tracking device" on the website. Defendants Bank, Roe, DiVittorio,
21 Silverman, Berger, Nappi Jr. O'Dell and Eide are also frequent visitors.

22 3.100 **New Allegation** The anti-trust actions taken by the WSBA are not reviewable by the
23 Washington State Supreme Court, nor does the Washington State Supreme Court exercise
24 supervisory control in this regard. The individual members as well as the WSBA as a whole,
25

1 are market participants with require close supervision by bar.

2 3.101 **New Allegation** With respect to the violations by the bar, the individually named
3 defendants, and other defendants, their criminal activities are outlined in the accompanying
4 RICO statement and will be submitted within 30 days of this filing

5 3.102 **New Allegation** The Washington State Bar Association and its defendants' actions
6 amount to due process violations in violation of the 14th Amendment to the U.S.
7 Constitution.

8 3.103 **New Allegation** With respect to the Washington State Bar Association's infringement
9 on Plaintiff's First Amendment rights without authority of law, such conduct in violation of
10 the First Amendment to the U.S. Constitution to punish and stifle free speech--free speech
11 issues that the WSBA and its defendants have no jurisdiction over.

12 3.104 **New Allegation** The collective actions of the defendants of retaliating against
13 attorneys who oppose their criminal activities, has prevented the plaintiff from obtaining
14 meaningful representation, in violation of the sixth amendment right to counsel.

15 3.105 **New Allegation** A true copy of the WSBA's ex-parte hearing against Plaintiff can be
16 viewed at <https://www.youtube.com/watch?v=qugTLMJaHc>

17 3.106 **New Allegation** As outlined in the accompanying RICO statement the bar targets
18 discipline to minority groups, sole practitioners, opponents of the RICO enterprise, and
19 attorneys from Snohomish County. 41% of all bar discipline comes out of Snohomish
20 County, which is only one of Washington's 49 counties. The bar's selection procedures for
21 discipline has an adverse impact on minority groups which cannot be justified in terms of
22 business necessity. The result of this activity steers the market away from these groups and
23 thus violates the Sherman Antitrust Act.
24

25 3.107 On September 25, 2015, the EEOC issued a right to sue letter under the ADA. This

1 suit is filed within 90 days of receiving the letter.

2 3.108 On November 25, 2015, the EEOC issued a right to sue letter under the ADA. This
3 suit is filed within 90 days of receiving the letter.

4 **IV. LEGALCLAIMS**

5 **A. 42 USC § 1983 CAUSE OF ACTION**

6 4.1 The defendants' retaliation against Plaintiff deprives her of rights secured by the First
7 Amendment to the United States Constitution by persons who act under color of law. The
8 retaliation wrongly deprives citizens, including Plaintiff, of First Amendment Rights and
9 impermissibly chills exercise of those rights by the Plaintiff and similarly situated citizens.

10 4.2 The Defendants have conspired with each other to retaliate against the Plaintiff for her
11 exercise of constitutionally secured rights.

12 4.3 The wrongful violations, acts, and omissions alleged herein have proximately and
13 actually caused damages to the Plaintiff for loss of earning capacity, out-of-pocket losses,
14 impairment of personal and business reputation, personal humiliation and fear, and mental
15 anguish and suffering in an amount to be proved at trial.

16 4.4 The Defendants have demonstrated that they intend to continue their wrongful conduct.
17 The Plaintiff seeks equitable relief in the form of a permanent injunction against the WSBA
18 and its agent defendants.

19 4.5 Plaintiff alleges that the conduct of the individual Defendants was motivated by evil and
20 malicious intent and/or that their conduct involves reckless or callous indifference to the
21 Plaintiffs constitutional rights and that this is a proper case for awarding her punitive damages.
22

23
24 **A. RICO CAUSES OF ACTION: Violation of Federal Racketeering Act (RICO), 18**

25 **USC 1964, and Washington's "Little RICO" RCW 9A 82. 100 (2).**

COUNT ONE:

5.1 1. Acquisition and Maintenance of an Interest in and Control of an Enterprise Engaged in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(b)

5.1a At various times and places partially enumerated in Plaintiff's allegations, the RICO defendants did acquire and/or maintain, directly or indirectly, an interest in or control of a RICO *enterprise* of individuals who were associated in fact and who did engage in, and whose activities did affect, interstate and foreign commerce, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(b).

5.1b During the ten (10) calendar years preceding April 11, 2012, the RICO defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. 1962(b) (Prohibited activities).

5.1c Plaintiff further alleges that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, *i.e.* a continuing threat of their respective *racketeering activities*, also in violation of the RICO law at 18 U.S.C. 1962(b) supra.

COUNT TWO:

5.2. Conduct and Participation in a RICO Enterprise through a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(c)

5.2a. At various times and places partially enumerated in Plaintiff's allegations, all Defendants did associate with a RICO enterprise of individuals who were associated in fact and who engaged in, and whose activities did affect, interstate and foreign commerce.

Likewise, all Defendants did conduct and/or participate, either directly or indirectly, in the conduct of the affairs of said RICO enterprise through a pattern of racketeering activity, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c).

1 5.2b During the ten (10) calendar years preceding March 1, 2003 all Defendants did
2 cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts
3 that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation
4 of the RICO law at 18 U.S.C. 1962(c) (Prohibited activities).

5 5.2c Plaintiff further alleges that all Defendants did commit two (2) or more of the
6 offenses itemized above in a manner which they calculated and premeditated intentionally
7 to threaten continuity, *i.e.* a continuing threat of their respective racketeering activities, also
8 in violation of the RICO law at 18 U.S.C. 1962(c) supra.

9 **COUNT THREE:**

10 **5.3. Conspiracy to Engage in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5),**
11 **1962(d)**

12 5.3a Plaintiff now re-alleges each and every allegation as set forth above, and
13 hereby incorporates same by reference, as if all were set forth fully herein. Substance
14 prevails over form.

15 5.3b At various times and places partially enumerated in Plaintiff's documentary
16 material, all Defendants did conspire to acquire and maintain an interest in a RICO enterprise
17 engaged in a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(b) and (d).

18 5.3c At various times and places partially enumerated in Plaintiff's allegations, all
19 Defendants did also conspire to conduct and participate in said RICO enterprise through a
20 pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(c) and (d).
21 See also 18 U.S.C. §§ 1961(4), (5) and (9).

22 5.3d During the ten (10) calendar years preceding March 1, 2003 many Defendants did
23 cooperate jointly and severally in the commission of two (2) or more of the predicate acts that are
24 itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d).

25 5.3e Plaintiff further alleges that many Defendants did commit two (2) or more of the
offenses itemized above in a manner which they calculated and premeditated intentionally to

1 threaten continuity, *i.e.* a continuing threat of their respective racketeering activities, also in
2 violation of 18 U.S.C. 1962(d) (Prohibited activities *supra*).

3 4 **6 SHERMAN ANTI-TRUST CAUSE OF ACTION**

5 6.1 In furtherance of antitrust and RICO conspiracies, the defendants, primarily
6 through its their control of the WSBA, produces, promotes and uses selection procedures
7 in determining which attorneys get selected for discipline that has the effect of steering
8 the market for attorney services away from solo practitioners, minorities, and toward the
9 services of large firms, prosecutors, defense attorneys and other favored groups. The WSBA
10 decides who or who do not become attorneys, and who gets disciplined. The primary design
11 and effect of the conspiracy is to artificially restrain the pricing of legal services through anti-
12 competitive means that results in the public obtaining unethical legal services at higher
13 costs.

14 6.2 As outlined in this complaint, Block has attempted to exercise her constitutional
15 rights, including her right to shield the sources of political news blog articles she writes; her
16 right to be free from unlawful search and seizure; her right to free speech; her right without
17 censorship as a member of the press; her right to petition and redress government officials;
18 her right be free of conduct perpetrated by the WSBA in violation of the anti-trust laws, due
19 process violations, constitutional violations including her legal right of freedom of
20 association or disassociation and, her right to participate in freedom of the press and
21 freedom of speech without government sponsored interference. The Washington State Bar
22 and its defendants' civil rights violations are continuing and ongoing, causing irreparable
23 harm and violates Plaintiff's First Amendment protected rights, which are outside the
24 WSBA's jurisdiction. In the course of accomplishing this restraint of trade, the defendants
25

1 have also violated RICO by having conducted, and continuing to conduct, the operation
2 and Management of an enterprise, comprised of themselves, and firms closely associated
3 with the WSBA Board and Office of Disciplinary Counsel to monopolize the delivery of
4 legal services.

5 6.3 On November 9, 2015, nine members of the WSBA Practice of Law Board
6 resigned stating in support of the Sherman Anti-Trust violations against the WSBA: "The
7 Washington State Bar Association has a long record of opposing efforts that threaten to
8 undermine its monopoly on the delivery of legal services."

9
10 **7. ADA violations, Washington Law Against Discrimination, RCW 49.60 et seq.**
11 **("WLAD").**

12 7.1 The Actions of the defendants, as above stated constitute violations of the American
13 with Disabilities Act, Washington Law Against Discrimination and RCW 49.60.

14 7.2 As a result, the plaintiff has suffered damages in an amount to be determined at trial.

15
16 **8. Defamation**

17
18 8.1 The defendants negligently and/or willfully and maliciously made defamatory
19 statements about Plaintiff. Many of those statements were published and remain
20 published today. Such statements were false, without privilege, and were published both
21 orally and in writing by Defendants.

22
23
24 8.2 As a direct and proximate result of Defendants' libelous and slanderous statement
25 made and/or published about Plaintiff, Plaintiff has suffered personal injury, including

1 injury and damage to her reputation for which she is seeking compensation in an amount
2 to be proven at trial.

3
4 **VIII. JURY DEMAND.**

5
6 8.1 Plaintiff, Pursuant to Federal Rules of Civil Procedure 38, demands trial by jury of all
7 issues triable by jury.

8 **IX. PRAYER FOR RELIEF**

9
10 WHEREFORE, Plaintiff Anne Block demands judgment as follows:

11
12 9.1 That all Washington federal judges disqualify themselves from hearing this case because
13 they are all members of the WSBA, have formed a close relationship with its leadership and therefore
14 are potential defendants in the case.

15 9.2 A Judgment awarding to Plaintiff against the Defendants, jointly and severally,
16 compensatory damages in the amount as shall be proved at trial;

17 9.4 An award of costs and prevailing party attorney fees against the Defendants jointly and
18 severally; and,

19 9.5 That this Court find that all RICO Defendants, both jointly and severally, have
20 acquired and maintained, both directly and indirectly, an interest in and/or control of a RICO
21 enterprise of persons and of other individuals who were associated in fact, all of whom engaged
22 in, and whose activities did affect, interstate and foreign commerce in violation of 18 U.S.C.
23 1962(b) (Prohibited activities).

24 9.7 That all Defendants and all of their directors, officers, employees, agents, servants and
25

1 all other persons in active concert or in participation with them, be enjoined temporarily during
2 pendency of this action, and permanently thereafter, from committing any more predicate acts in
3 furtherance of the RICO enterprise alleged in COUNT ONE supra.

4 9.8 That all Defendants be required to account for all gains, profits, and advantages
5 derived from their several acts of racketeering activity in violation of 18 U.S.C. 1962(b) and
6 from all other violation(s) of applicable State and federal law(s).

7 9.9 That judgment be entered for Plaintiff and against all Defendants for Plaintiff's actual
8 damages, and for any gains, profits, or advantages attributable to all violations of 18 U.S.C. 1962(b),
9 according to the best available proof.

10 9.10. That all Defendants pay to Plaintiff treble (triple) damages, under authority of 18
11 U.S.C. 1964(c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C.
12 1962(b), according to the best available proof.

13 9.11. That all Defendants pay to Plaintiff all damages sustained by Plaintiff in
14 consequence of Defendants' several violations of 18 U.S.C. 1962(b), according to the best
15 available proof.

16 9.12. That all damages caused by all Defendants, and all gains, profits, and advantages
17 derived by all Defendants, from their several acts of racketeering in violation of 18 U.S.C.
18 1962(b) and from all other violation(s) of applicable State and federal law(s), be deemed to be
19 held in constructive trust, legally foreign with respect to the federal zone [sic], for the benefit of
20 Plaintiff, His heirs and assigns.
21

22
23 ON COUNT TWO:

24 9.13 That this Court liberally construe the RICO laws and thereby find that all
25 Defendants have associated with a RICO enterprise of persons and of other individuals who were

1 associated in fact, all of whom did engage in, and whose activities did affect, interstate and
2 foreign commerce in violation of the RICO law at 18 U.S.C. 1962(c) (Prohibited activities).

3 9.14 That this Court liberally construe the RICO laws and thereby find that all
4 Defendants have conducted and/or participated, directly or indirectly, in the affairs of said RICO
5 enterprise through a pattern of racketeering activity in violation of the RICO laws at 18 U.S.C.
6 §§ 1961(5) ("pattern" defined) and 1962(c) supra.

7 9.15 That all Defendants and all of their directors, officers, employees, agents, servants
8 and all other persons in active concert or in participation with them, be enjoined temporarily
9 during pendency of this action, and permanently thereafter, from associating with any RICO
10 enterprise of persons, or of other individuals associated in fact, who do engage in, or whose
11 activities do affect, interstate and foreign commerce.

12 9.16 That all Defendants and all of their directors, officers, employees, agents, servants and
13 all other persons in active concert or in participation with them, be enjoined temporarily during
14 pendency of this action, and permanently thereafter, from conducting or participating, either
15 directly or indirectly, in the conduct of the affairs of any RICO enterprise through a pattern of
16 racketeering activity in violation of the RICO laws at 18 U.S.C. §§ 1961(5) and 1962(c) supra.

17 9.17 That all Defendants and all of their directors, officers, employees, agents, servants
18 and all other persons in active concert or in participation with them, be enjoined temporarily
19 during pendency of this action, and permanently thereafter, from committing any more predicate
20 acts in furtherance of the RICO enterprise alleged in COUNT TWO supra.

21 9.18 That all Defendants be required to account for all gains, profits, and advantages
22 derived from their several acts of racketeering in violation of 18 U.S.C. 1962(c) supra and from
23 all other violation(s) of applicable State and federal law(s).
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1 9.19 That judgment be entered for Plaintiff and against all Defendants for Plaintiff's
2 actual damages, and for any gains, profits, or advantages attributable to all violations of 18
3 U.S.C. 1962(c) supra, according to the best available proof.

4 9.20 That all Defendants pay to Plaintiff treble (triple) damages, under authority of 18 U.S.C.
5 1964(c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C. 1962(c)
6 supra, according to the best available proof.

7 9.21 That all Defendants pay to Plaintiff all damages sustained by Plaintiff in consequence of
8 Defendants' several violations of 18 U.S.C. 1962(c) supra, according to the best available proof.

9 9.22 That all damages caused by all Defendants, and all gains, profits, and advantages
10 derived by all Defendants, from their several acts of racketeering in violation of 18 U.S.C. 1962(c)
11 supra and from all other violation(s) of applicable State and federal law(s), be deemed to be held in
12 constructive trust, legally foreign with respect to the federal zone [sic], for the benefit of Plaintiff,
13 His heirs and assigns.

14 ON COUNT THREE:

15 9.23. That this Court liberally construe the RICO laws and thereby find that all Defendants
16 have conspired to acquire and maintain an interest in, and/or conspired to acquire and maintain
17 control of, a RICO enterprise engaged in a pattern of racketeering activity in violation of 18 U.S.C.
18 §§ 1961(5), 1962(b) and (d) supra.

19 9.24 have conspired to conduct and participate in said RICO enterprise through a pattern of
20 racketeering activity in violation of 18 U.S.C. §§ 1961(5), 1962(c) and (d) supra.

21 9.25 That all Defendants and all their directors, officers, employees, agents, servants and all
22 other persons in active concert or in participation with them, be enjoined temporarily during
23 pendency of this action, and permanently thereafter, from conspiring to acquire or maintain an
24 interest in, or control of, any RICO enterprise that engages in a pattern of racketeering activity
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1 in violation of 18 U.S.C. §§ 1961(5), 1962(b) and (d) supra.

2 9.26 That all Defendants and all their directors, officers, employees, agents, servants
3 and all other persons in active concert or in participation with them, be enjoined temporarily
4 during pendency of this action, and permanently thereafter, from conspiring to conduct,
5 participate in, or benefit in any manner from any RICO enterprise through a pattern of
6 racketeering activity in violation of 18 U.S.C. §§ 1961(5), 1962(c) and (d) supra.

7 9.27 That all Defendants and all their directors, officers, employees, agents, servants and
8 all other persons in active concert or in participation with them, be enjoined temporarily during
9 pendency of this action, and permanently thereafter, from committing any more predicate acts in
10 furtherance of the RICO enterprise alleged in COUNT THREE supra.

11 9.28 That all defendants be required to account for all gains, profits, and advantages
12 derived from their several acts of racketeering in violation of 18 U.S.C. 1962(d) supra and from
13 all other violation(s) of applicable State and federal law(s).

14 9.29 That judgment be entered for plaintiff and against all Defendants for Plaintiff's
15 actual damages, and for any gains, profits, or advantages attributable to all violations of 18
16 U.S.C. 1962(d) supra, according to the best available proof.

17 9.30 That all defendants pay to plaintiff treble (triple) damages, under authority of 18
18 U.S.C. 1964(c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C.
19 1962(d) supra, according to the best available proof.

20 9.31 That all defendants pay to plaintiff all damages sustained by Plaintiff in consequence
21 of Defendants' several violations of 18 U.S.C. 1962(d) supra, according to the best available
22 proof. 9.32 That all damages caused by all Defendants, and all gains, profits, and advantages
23 derived by all Defendants, from their several acts of racketeering in violation of 18 U.S.C.
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1 1962(d) supra and from all other violation(s) of applicable State and federal law(s), be deemed to
2 be held in constructive trust, for the benefit of Plaintiff, his heirs and assigns.

3 9.33 That the court award damages to the plaintiff for the denial of her civil rights.

4 9.34 That the court issue a declaratory judgment that the Washington State Disciplinary
5 system as applied is unconstitutional because of the large number of ex parte contacts deprives
6 the plaintiff of his right to a fair and unbiased tribunal and for the other reasons given in this
7 complaint.

8 9.35 That this court issue a declaratory judgment that the disbarment order issued by the
9 Washington State Supreme Court is unconstitutional because of the large number of ex parte
10 contacts deprived the plaintiff of his right to a fair and unbiased tribunal and for other reasons
11 given in this complaint.

12 9.36 Such other relief as this Court deems just and equitable under the circumstances of
13 this case.

14 Dated this 18th day of February 2016.



15 Anne K. Block