

1
2 SUPERIOR COURT FOR THE STATE OF WASHINGTON
3 IN THE COUNTY OF SNOHOMISH

4 CHRISTOPHER J. HUPY, an individual, and THOMAS
5 BRET HAGGERTY, an individual

6 Plaintiffs,

7 v.

8 The Actors of KING COUNTY SUPERIOR COURT; The
9 FOLOWING King County Superior Court Judges in their
10 professional capacity; SUSAN CRAIGHEAD, PALMER
11 ROBINSON, MARIANE SPEARMAN, JIM RODGES, J.
12 WESLEY SAINT CLAIR, PATRICK H. OISHI, RICHARD
13 MCDERMOTT, MICHAEL TRICKEY, SUSAN AMINI,
14 BETH ANDRUS, MONICA BENTON, ELIZABETH
15 BERNES, BILL BOWMAN, TIMOTHY BRADSHAW,
16 REGINA CAHAN, GREG CANOVA, CHERYL CAREY,
17 JAMES CAYCE, JOHN H. CHUN, ANDREA DARVAS,
18 WILLIAM DOWNING, THERESA DOYLE, JOAN
19 DUBUQUE, RICHARD D. EADIE, BRIAN GAIN, JULIA
20 GARRATT, HELEN HALPERT, BRUCE HELLER,
21 HOLLIS HILL, LAURA INVEEN, RONALD KESSLER,
BARBARA LINDE, DEAN LUM, BARBARA MACK,
LEROY MCCULLOUGH, LAURA GENE MIDDAUGH,
DOUGLASS NORTH, SEAN O'DONNELL, SUZANNE
PARISIEN, KIMBERLY PROCHNAU, JEFFREY
RAMSDELL, JUDITH RAMSEYER, JEAN RIETCHEL,
MARY E. ROBERTS, ROGER ROGOFF, JOHN R. RUHL,
CAROL SHAPIRA, KEN SCHUBERT, CHATHERINE
SHAFFER, LORI-KAY SMITH, JULIE SPECTOR, MARY
YU and any unknown 1 to 30 JOHN AND/OR JANE DOE(S)
at this time. HEREAFTER COLLECTIVELY REFFERED
TO AS "JUDICIAL ACTORS"

Defendant(s).

NO.

COMPLAINT AND
AFFIDAVIT IN
SUPPORT OF

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Comes now the Plaintiffs, CHRISTOPHER J. HUPY and THOMAS BRET HAGGERTY, making the following complaint(s) under the Washington State Constitution, and the Laws of Washington State do hereby allege and avers as follows.

I. PARTIES

1. I, Christopher J. Hupy am an individual residing in the City of Mill Creek, in Snohomish County Washington State, and the Plaintiff herein and affected party. Plaintiff is unrepresented in this matter, he is not an attorney, and is not representing any other individual in this matter. I make this declaration upon personal knowledge, and am otherwise competent to testify to the matters stated herein.
2. I, THOMAS BRET HAGGERTY am an individual residing in the City of Mill Creek, in Snohomish County Washington State, and the Plaintiff herein and affected party. Plaintiff is unrepresented in this matter, he is not an attorney, and is not representing any other individual in this matter. I make this declaration upon personal knowledge, and am otherwise competent to testify to the matters stated herein.
3. Defendant, KCSC Chief Presiding Judge SUSAN J. CRAIGHEAD, was a KCSC Judge at all times material to this action, and did so swear an oath to Support the Constitution of the State of Washington. A Member of the King County BAR Association.
4. Defendant KCSC Assistant Chief Presiding Judge PALMER ROBINSON, was a KCSC Judge at all times material to this action, and did so swear an oath to Support the Constitution of the State of Washington. A Member of the King County BAR Association

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- 2 5. Defendant KCSC Chief Civil Judge MARIANE SPEARMAN, was a KCSC Judge at
- 3 all times material to this action, and did so swear an oath to Support the Constitution
- 4 of the State of Washington. A Member of the King County BAR Association.
- 5 6. Defendant KCSC Chief Criminal Judge JIM RODGERS, was a KCSC Judge at all
- 6 times material to this action, and did so swear an oath to Support the Washington
- 7 State Constitution. A Member of the King County BAR Association.
- 8 7. Defendant KCSC Chief Juvenile Judge J. WESLEY SAINT CLAIR, was a KCSC
- 9 Judge at all times material to this action, and did so swear an oath to Support the
- 10 Constitution of the State of Washington. A Member of the King County BAR
- 11 Association.
- 12 8. Defendant KCSC Assistant Chief Criminal Judge PATRICK H. OISHI, was a KCSC
- 13 Judge at all times material to this action, and did so swear an oath to Support the
- 14 Constitution of the State of Washington. A Member of the King County BAR
- 15 Association.
- 16 9. Defendant KCSC Past Chief Presiding Judge RICHARD MCDERMOTT, was a
- 17 KCSC Judge at all times material to this action, and did so swear an oath to Support
- 18 the Constitution of the State of Washington. A Member of the King County BAR
- 19 Association.
- 20 10. Defendant KCSC Judge MICHAEL TRICKEY, was a KCSC Judge at all times
- 21 material to this action, and did so swear an oath the Support the Constitution of the
- State of Washington. A Member of the King County BAR Association.
11. Defendant KCSC Judge SUSAN AMINI, was a KCSC Judge at all times material to
- this action, and did so swear an oath to support the Constitution of the State of
- Washington. A Member of the King County BAR Association.

- 1 12. Defendant KCSC Judge BETH ANDRUS, was a KCSC Judge at all times material to
2 this action, and did so swear an oath to support the Constitution of the State of
3 Washington. A member of the King County BAR Association.
- 4 13. Defendant KCSC Judge MONICA BENTON, was a KCSC Judge at all times material
5 to this action, and did so swear an oath to support the Constitution of the State of
6 Washington. A member of the King County BAR Association.
- 7 14. Defendant KCSC Judge ELIZABETH BERNS, was a KCSC Judge at all times
8 material to this action, and did so swear an oath to support the Constitution of the
9 State of Washington. A member of the King County BAR Association.
- 10 15. Defendant KCSC Judge BILL BOWMAN, was a KCSC Judge at all times material to
11 this action, and did so swear an oath to support the Constitution of the State of
12 Washington. A member of the King County BAR Association.
- 13 16. Defendant KCSC Judge TIMOTHY BRADSHAW, was a KCSC Judge at all times
14 material to this action, and did so swear an oath to support the Constitution of the
15 State of Washington. A member of the King County BAR Association.
- 16 17. Defendant KCSC Judge REGINA CAHAN, was a KCSC Judge at all times material
17 to this action, and did so swear an oath to support the Constitution of the State of
18 Washington. A member of the King County BAR Association.
- 19 18. Defendant KCSC Judge GREG CANOVA, was a KCSC Judge at all times material to
20 this action, and did so swear an oath to support the Constitution of the State of
21 Washington. A member of the King County BAR Association.
20. Defendant KCSC Judge JAMES CAYCE, was a KCSC Judge at all times material to

1 this action, and did so swear an oath to support the Constitution of the State of
2 Washington. A member of the King County BAR Association.

3 21. Defendant KCSC Judge JOHN H. CHUN, was a KCSC Judge at all times material to
4 this action, and did so swear an oath to support the Constitution of the State of
5 Washington. A member of the King County BAR Association.

6 22. Defendant KCSC Judge ANDREA DARVAS, was a KCSC Judge at all times
7 material to this action, and did so swear an oath to support the Constitution of the
8 State of Washington. A member of the King County BAR Association.

9 23. Defendant KCSC Judge WILLIAM DOWNING, was a KCSC Judge at all times
10 material to this action, and did so swear an oath to support the Constitution of the
11 State of Washington. A member of the King County BAR Association.

12 24. Defendant KCSC Judge THERESA DOYLE, was a KCSC Judge at all times material
13 to this action, and did so swear an oath to support the Constitution of the State of
14 Washington. A member of the King County BAR Association.

15 25. Defendant KCSC Judge JOAN DUBUQUE, was a KCSC Judge at all times material
16 to this action, and did so swear an oath to support the Constitution of the State of
17 Washington. A member of the King County BAR Association.

18 26. Defendant KCSC Judge RICHARD D. EADIE, was a KCSC Judge at all times
19 material to this action, and did so swear an oath to support the Constitution of the
20 State of Washington. A member of the King County BAR Association.

21 27. Defendant KCSC Judge JOHN ERLICK, was a KCSC Judge at all times material to
22 this action, and did so swear an oath to support the Constitution of the State of
23 Washington. A member of the King County BAR Association.

24 28. Defendant KCSC Judge BRIAN GAIN, was a KCSC Judge at all times material to
25 this action, and did so swear an oath to support the Constitution of the State of

1 Washington. A member of the King County BAR Association.

2 29. Defendant KCSC Judge JULIA GARRATT, was a KCSC Judge at all times material
3 to this action, and did so swear an oath to support the Constitution of the State of
4 Washington. A member of the King County BAR Association.

5 30. Defendant KCSC Judge HELEN HALPERT, was a KCSC Judge at all times material
6 to this action, and did so swear an oath to support the Constitution of the State of
7 Washington. A member of the King County BAR Association.

8 31. Defendant KCSC Judge BRUCE HELLER, was a KCSC Judge at all times material to
9 this action, and did so swear an oath to support the Constitution of the State of
10 Washington. A member of the King County BAR Association.

11 32. Defendant KCSC Judge HOLLIS HILL, was a KCSC Judge at all times material to
12 this action, and did so swear an oath to support the Constitution of the State of
13 Washington. A member of the King County BAR Association.

14 33. Defendant KCSC Judge LAURA INVEEN, was a KCSC Judge at all times material to
15 this action, and did so swear an oath to support the Constitution of the State of
16 Washington. A member of the King County BAR Association.

17 34. Defendant KCSC Judge RONALD KESSLER, was a KCSC Judge at all times
18 material to this action, and did so swear an oath to support the Constitution of the
19 State of Washington. A member of the King County BAR Association.

20 35. Defendant KCSC Judge BARBARA LINDE, was a KCSC Judge at all times material
21 to this action, and did so swear an oath to support the Constitution of the State of
Washington. A member of the King County BAR Association.

36. Defendant KCSC Judge DEAN LUM, was a KCSC Judge at all times material to this
action, and did so swear an oath to support the Constitution of the State of
Washington. A member of the King County BAR Association.

- 1 37. Defendant KCSC Judge BARBARA MACK, was a KCSC Judge at all times material
2 to this action, and did so swear an oath to support the Constitution of the State of
3 Washington. A member of the King County BAR Association.
- 4 38. Defendant KCSC Judge LEROY MCCULLOUGH, was a KCSC Judge at all times
5 material to this action, and did so swear an oath to support the Constitution of the
6 State of Washington. A member of the King County BAR Association.
- 7 39. Defendant KCSC Judge LAURA GENE MIDDAUGH, was a KCSC Judge at all
8 times material to this action, and did so swear an oath to support the Constitution of
9 the State of Washington. A member of the King County BAR Association.
- 10 40. Defendant KCSC Judge DOUGLASS NORTH, was a KCSC Judge at all times
11 material to this action, and did so swear an oath to support the Constitution of the
12 State of Washington. A member of the King County BAR Association.
- 13 41. Defendant KCSC Judge SEAN O'DONNELL, was a KCSC Judge at all times
14 material to this action, and did so swear an oath to support the Constitution of the
15 State of Washington. A member of the King County BAR Association.
- 16 42. Defendant KCSC Judge SUZANNE PARISIEN, was a KCSC Judge at all times
17 material to this action, and did so swear an oath to support the Constitution of the
18 State of Washington. A member of the King County BAR Association.
- 19 43. Defendant KCSC Judge KIMBERLY PROCHNAU, was a KCSC Judge at all times
20 material to this action, and did so swear an oath to support the Constitution of the
21 State of Washington. A member of the King County BAR Association.
44. Defendant KCSC Judge JEFFREY RAMSDELL, was a KCSC Judge at all times
material to this action, and did so swear an oath to support the Constitution of the
State of Washington. A member of the King County BAR Association.
45. Defendant KCSC Judge JUDITH RAMSEYER, was a KCSC Judge at all times

1 material to this action, and did so swear an oath to support the Constitution of the
2 State of Washington. A member of the King County BAR Association.

3 46. Defendant KCSC Judge JEAN RIETSCHEL, was a KCSC Judge at all times material
4 to this action, and did so swear an oath to support the Constitution of the State of
5 Washington. A member of the King County BAR Association.

6 47. Defendant KCSC Judge MARY E. ROBERTS, was a KCSC Judge at all times
7 material to this action, and did so swear an oath to support the Constitution of the
8 State of Washington. A member of the King County BAR Association.

9 48. Defendant KCSC Judge ROGER ROGOFF, was a KCSC Judge at all times material
10 to this action, and did so swear an oath to support the Constitution of the State of
11 Washington. A member of the King County BAR Association.

12 49. Defendant KCSC Judge JOHN R. RUHL, was a KCSC Judge at all times material to
13 this action, and did so swear an oath to support the Constitution of the State of
14 Washington. A member of the King County BAR Association.

15 50. Defendant KCSC Judge CAROL SCHAPIRA, was a KCSC Judge at all times
16 material to this action, and did so swear an oath to support the Constitution of the
17 State of Washington. A member of the King County BAR Association.

18 51. Defendant KCSC Judge KEN SCHUBERT, was a KCSC Judge at all times material
19 to this action, and did so swear an oath to support the Constitution of the State of
20 Washington. A member of the King County BAR Association.

21 52. Defendant KCSC Judge CATHERINE SHAFFER, was a KCSC Judge at all times
material to this action, and did so swear an oath to support the Constitution of the
State of Washington. A member of the King County BAR Association.

53. Defendant KCSC Judge LORI-KAY SMITH, was a KCSC Judge at all times material
to this action, and did so swear an oath to support the Constitution of the State of

1 Washington. A member of the King County BAR Association.

2 54. Defendant KCSC Judge JULIE SPECTOR, was a KCSC Judge at all times material to
3 this action, and did so swear an oath to support the Constitution of the State of
4 Washington. A member of the King County BAR Association.

5 55. Defendant KCSC Judge MARY YU, was a KCSC Judge at all times material to this
6 action, and did so swear an oath to support the Constitution of the State of
7 Washington. A member of the King County BAR Association.

8 **II. JURISDICTION AND VENUE**

9 56. This Court has Jurisdiction to review disputes of equity pursuant to RCW 2.08.010
10 and the Washington State Constitution.

11 57. Proper Venue lies in this Court pursuant to RCW 4.12

12 58. This Court has authority to enter Injunction per RCW 7.40.010, and Washington State
13 Supreme Court Rule CR65 (see attached Exhibit I).

14 **III. FACTS**

15 59. KING COUNTY COURTHOUSE is a publicly owned building located at 516 3rd
16 Avenue Seattle, Washington County of King. It was originally built in 1916 to serve
17 the needs of the people; it houses Offices of the King County Sheriff, the King County
18 Council, the King County Prosecuting Attorney, the King County District Court, and
19 the King County Superior Court. It is open to the public Monday through Friday 8:30
20 am until 4:30 pm, excluding holidays. The sole purpose is to serve the needs of the
21 people.

60. Room E-942 is a Courtroom in the King County Courthouse presently assigned to
KCSC Judge Susan Craighead.

- 1 61. The Defendants in this complaint have all sworn an Oath of Office to Support the
2 Constitution of the State of Washington. Article 4 Section 28 Washington State
3 Constitution, See attached Exhibit A.
- 4 62. Article I Section 29 of the Washington State Constitution declares CONSTITUTION
5 MANDATORY. The provisions of this Constitution are mandatory, unless by express
6 words they are declared to be otherwise. Attached as Exhibit A.
- 7 63. Article 8 Section 5 of the Washington State Constitution declares CREDIT NOT TO
8 BE LOANED. The credit of the State shall not, in any manner be given or loaned to,
9 or in aid of any individual, association, company or corporation. Attached as Exhibit
10 A.
- 11 64. Article 8 Section 7 of the Washington State Constitution declares **CREDIT NOT TO**
12 **BE LOANED.** No county, city, town or other municipal corporation shall hereafter
13 give any money, or property, or loan its money, or credit to or in aid of any individual,
14 association, company or corporation, except for the necessary support of the poor and
15 infirm, or become directly or indirectly the owner of any stock in or bonds of any
16 association, company or corporation.
- 17 65. Article 4 Section 13 of the Washington State Constitution declares in part SALARY
18 OF JUDICIAL OFFICERS "No Judicial Officer, except for Commissioners and
19 unsalaried Justices of the Peace, shall receive to his own use any fee's or perquisites
20 of Office."... See attached Exhibit A.
- 21 66. All of the Defendants are Members of the King County BAR Association (hereafter
referred to as KCBA), See attached Exhibit B (KCBA Website page), which is a
private Washington Corporation. See attached Exhibit C (Washington State Secretary
of State Corporation detail).
67. Monthly (at least) Meetings of the King County BAR Association are held at the

1 King County Courthouse, no fee is collected for use of this space. This diversion of
2 resources has been ongoing for years, if not decades.

3 68. Technical support is provided by the King County IT Department professionals at the
4 direction of the Actors of King County Superior Court. No fee has been collected for
5 this service, to the financial benefit of the KCBA.

6 69. Judicial Intellectual Property is provided by the Actors of KCSC to the financial
7 benefit of the KCBA and its members, while depriving the public of same.

8 70. The Actors of King County Superior Court have exposed the public to liability, risk,
9 and harm by providing liability insurance for these meetings of the KCBA, due to
10 possible physical injury at the King County Courthouse, all to the financial benefit of
11 the KCBA.

12 71. Plaintiffs and/or the Public have historically been denied access to these meetings, to
13 the harm of the public and the benefit of the KCBA. See Plaintiffs affidavits in
14 support of Complaint attached as Exhibits D and E.

15 72. Actors of King County Superior Court have denied the public access to meeting
16 information and/or records of meetings to the financial benefit of the KCBA and
17 detriment of the public.

18 73. Plaintiffs have standing to bring this action forth, *In Barnett v. Lincoln, 162 Wash.*
19 *613, 299 P. 392 (1931) a taxpayer brought suit alleging that a city corporation*
20 *executed a contract without requiring a bond from the other party as required by law.*
21 *This court recognized taxpayer standing because "the risk of loss resulting from*
noncompliance or breach of the contract would fall upon the taxpaying public. The
assumption of this risk constitutes a general damage." Id.at 622, 299 P. 392. The
court noted when a municipal corporation violates the law "it is a fair presumption
that every taxpayer will be injured in some degree by such illegal act" even if no

1 *pecuniary harm can be shown. Id. at 623, 299 P. 392.*

2 74. *Port of Seattle v. International Longshoremen's & Warehousemen's Union*, 52 Wn.2d
3 317, 324 P.2d 1099 (1958):It is an established rule in this jurisdiction that one who
4 seeks relief by temporary or permanent **injunction** must show (1) that he has a clear
5 legal or equitable right, (2) that he has a well-grounded fear of immediate invasion of
6 that right, and (3) that the acts complained of are either resulting in or will result in
7 actual and substantial injury to him.

8 75. State ex rel. Lemon v. Langlie, 273 P.2d 464- Wash Supreme Court 1954

9 "A written Constitution is not only the direct and basic expression of the
10 sovereign will, but is the absolute rule of action and decision for all departments
11 and offices of government with respect to all matters covered by it and must
12 control as it is written until it shall be changed by the authority that established
13 it. No function of government can be discharged in disregard of, or in opposition
14 to, the fundamental law. The state Constitution is the mandate of a sovereign
15 people to its servants and representatives. No one of them has a right to ignore or
16 disregard its mandates; and the legislature, the executive officers, and the
17 judiciary cannot lawfully act beyond the limitations of such Constitution."

18 76. King County Superior Court "ZERO LOCAL RULES" LCR 0.1 through LCR 0.17
19 specify that the Administration of King County Superior Court is delegated in many
20 ways that some duties assigned on the Elected Chief Presiding Judge, some on the
21 Executive Committee, and most on the body of Judicial Actors as a whole. These Zero
Local Rules can be seen attached as Exhibit J.

19 **IV. CAUSE OF ACTION**

20 77. The Defendants have engaged in a pattern of long term diversion of Public resources
21 for a Private cause that does not support the poor and/or indigent (clearly an
association of King County Lawyers and Judicial Officers are NEITHER Poor nor
Indigent) but one which generates income via fees and dues for the private

1 Corporation King County BAR Association. Membership into the KCBA requires, in
2 addition to being a member of the Washington State BAR Association, a fee to be
3 paid, additional fee to be paid for participation in the KCBA "Family Law Section",
4 and additional fees to be paid to CLE (Continuing Legal Education) Credit, see
5 attached Exhibit F. The defendants have sworn Oaths to support the Washington State
6 Constitution, this diversion of property, prestige of location, and private disclosure of
7 intellectual property is a violation of article 8 Section 5 of the Constitution which
8 forbids such activity. The Defendants themselves are members of this Private
9 Corporation and benefit from the unlawful acts mentioned above in violation of
10 Article 4 Section 13 of the Washington Constitution from receiving Perquisites of
11 Office. King County BAR Member and Family Law Section Chairperson Susan
12 Carroll (WSBA #36581) stated on April 4, 2014 during a KCBA FLS Meeting that
13 "We (KCBA) have been told we cannot use this space (King County Courthouse
14 courtroom E-942) any longer because it is the use of public funds for a private
15 cause..." admitting the illegal act is known and forbidden. However she further states
16 that there will be (at least) two additional illegal meetings held at the courthouse. See
17 Plaintiffs Attached Affidavit in Support of Complaint Attached as Exhibits D and E.

18 78. The Public has historically been denied access to these meetings, on March 7th, 2014
19 Plaintiffs Hupy and Haggerty were met outside room E-942 by an armed King County
20 Sheriff Deputy who was acting on orders to prevent plaintiffs from entering this
21 meeting, this Deputy made it clear no entry would be allowed. Historically Plaintiff
Hupy has sought pre-approval to attend these KCBA FLS meeting from then
Presiding Judge Richard McDermott and/or Chief Administrator of KCSC Paul
Sherfey all of which were denied. See attached Plaintiffs Affidavits in Support of
Complaint attached as Exhibits D and E.

1 79. At least two additional KCBA FLS meetings have been scheduled and a as yet
2 undetermined number of additional KCBA meetings by the Defendants in King
3 County Courthouse, one on May 2nd, 2014 and one on June 6th, 2014. See attached
4 exhibit G KCBA Website Family Law Section (FLS) page.

5 80. Neighboring Jurisdiction Snohomish County has allowed their local BAR Association
6 (SCBA) use of the Snohomish County Courthouse, however it is limited to typical
7 small office space and a monthly use fee is charged and a lease agreement has been
8 entered, historically this small office space has been home to the media (Everett
Harold) as well. See attached Exhibit H.

9 81. The Defendants are all Superior Court Judges however the doctrine of absolute
10 Judicial Immunity does not apply as these actions were purely administrative in nature
11 and casual (see Plaintiff Affidavits in which KCSC Assistant Presiding Judge Palmer
12 Robinson introduced herself as "Palmer Robinson" while in "street" clothes. In Stump
13 v. Sparkman 435 US 349 Supreme Court 1978 "*Under the doctrine of
14 absolute judicial immunity, judges are subject to suit only for (1) "non-judicial
15 actions, ie, actions not taken in the judge's judicial capacity," or (2) "actions,
16 though judicial in nature, taken in the complete absence of all jurisdiction."* . These
actions were administrative in nature as such no protection from liability exists.

17 82. In and through pre trial discovery it is Plaintiffs reasonable belief that the Defendants
18 have engaged in a long term pattern of diversion of public resources to the sole benefit
19 of private cause. The Defendants have engaged in a (a) Willful, (b) wanton, (c) Ultra
20 Vires, acts.
21

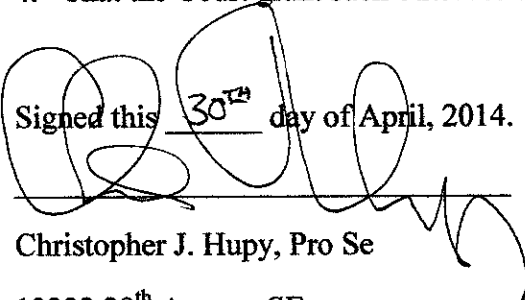
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V. **RELIEF REQUESTED**

Plaintiffs, Christopher J. Hupy and Thomas Bret Haggerty, hereby request that the Court grant the following relief:

1. INJUNCTION prohibiting all unconstitutional and illegal acts is entered to protect the plaintiffs and the citizens at large from imminent irreparable harm.
2. Defendants are enjoined from any additional dissemination of Judicial Intellectual Property to any private gain and/or cause, save for the infirmed and/or poor.
3. Plaintiffs are awarded costs and reasonable attorney fees and/or unbundled Legal Services fees, as required by RCW and/or common law, if any apply.
4. That the Court grant such other relief as may be just and equitable.

Signed this 30th day of April, 2014.



Christopher J. Hupy, Pro Se

13222 29th Avenue SE

Mill Creek, WA 98012

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(503) 931-4991



Thomas Bret Haggerty

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Mill Creek, WA 98012

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425-385-3459

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I swear under penalty of Perjury of the State of Washington and of the Laws of the United States of America, the foregoing complaint and affidavit in support of and all attached appendix documents to be true and correct to the best of my knowledge and belief. Signed this 30TH day of April, 2014 in the city of Mill Creek, County of Snohomish state of Washington. Signed *[Signature]*, Christopher J. Hupy and signed *[Signature]*, Thomas Bret Haggerty.

State of Washington,

ss.

County of Snohomish, Sworn before me this 30th day of April, 2014.

Bockkyun Na (Printed name of Notary)

[Signature] (Signed name of Notary)

My Appointment expires on 11-09-2016.

SEAL-

