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SUPERIOR COURT FOR THE STATE OF WASHINGTON  
IN THE COUNTY OF SNOHOMISH

CHRISTOPHER J. HUPY, an individual

Plaintiff,

v.

SUSAN CRAIGHEAD and PALMER ROBINSON in  
their professional and/or personal capacity, and any  
unknown 1 to 75 JOHN and/or JANE DOE(S) at this  
time.

Defendant(s).

15 2 03020 3

NO.

COMPLAINT

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

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**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. Defendant, KCSC Chief Presiding Judge Susan 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.
3. Defendant KCSC 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.
4. Defendant(s) 1-75 John and/or Jane Doe's could include but are not limited to additional actors who conspired to deny constitutional rights such as members of any executive committee and/or any other secret committee and/or association(s). These actors, if any, will be discovered and identified by reasonable and appropriate discovery as allowed under court rule and/or any other applicable governing authority.

**II. JURISDICTION AND VENUE**

5. This Court has Jurisdiction to review disputes of equity pursuant to RCW 2.08.010
6. The Washington State Constitution and the Constitution of the United States.
7. Proper Venue lies in this Court pursuant to RCW 4.12
8. This Court has authority to enter Injunction per RCW 7.40.010, and Washington State Supreme Court Rule CR65.

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**III. FACTS**

**9.** Named defendants are all sitting King County Superior Court Judges who have obtained these positions either by public election or appointment. The purpose of the elected Superior Court Judge position is to serve the needs of the people and protect the Constitution.

**10.** Defendants are all named co-conspirator defendants in 2014 Snohomish County lawsuit 14-2-03819-2 Hupy/Haggerty v. Judges of King County Superior Court, and notice of such was properly served upon them.

**11.** Defendants in this complaint have all sworn an Oath of Office to Support the Constitution of the State of Washington and will faithfully and impartially discharge the duties of judge to the best of their ability. Washington Constitution Art. 4 § 28, Washington RCW 2.08.080.

**12.** Article I § 29 of the Washington State Constitution the people declare CONSTITUTION MANDATORY. The provisions of this Constitution are mandatory, unless by express words they are declared to be otherwise.

**13.** Article I § 3 of the Washington State Constitution the people declare PERSONAL RIGHTS. No person shall be deprived of life, liberty, or property without due process of law.

**14.** Judicial Intellectual Property is provided by Defendants to the personal financial and legal benefit of certain parties while the plaintiff was willfully and deliberately excluded from the same benefit(s).

**15.** Plaintiff is the Petitioner in KCSC Cause 15-2-04469-9 titled Hupy v. City of Seattle.

**16.** Plaintiff has historically been denied access to the King County Courthouse as a direct result of the acts and/or omissions by the defendants.

**17.** On February 24, 2015 Defendant Susan Craighead issued an Order Setting Civil Case

1 Schedule requiring plaintiff to perform various functions by certain dates or be  
2 subjected to case dismissal and/or sanctions. Defendant Craighead also ordered the  
3 assignment of defendant Palmer Robinson to preside over KCSC cause 15-2-04469-9  
4 Hupy v. City of Seattle.

5 **18.** Defendants Craighead has denied constitutional rights of plaintiff by act or omission  
6 by refusing to provide plaintiff a hearing date in KCSC cause number 08-2-22578-0  
7 Calvillo v. Hupy.

8 **19.** Defendants have assumed Judicial disciplinary authority in excess of their function  
9 via King County Superior Court Local Court rules further prejudicing plaintiffs rights.

10 **20.** Plaintiff has standing to bring this action forth has been personally injured by the  
11 actions of the Defendants collectively and individually. Plaintiff has a well grounded  
12 fear additional substantial injury is presently and continues to happen. Plaintiff has a  
13 constitutional right to be free of such abuses taken under the color of law and denial of  
14 due process of law; *Port of Seattle v. International Longshoremen's &*  
15 *Warehousemen's Union, 52 Wn.2d 317, 324 P.2d 1099 (1958): It is an established*  
16 *rule in this jurisdiction that one who seeks relief by temporary or permanent*  
17 *injunction must show (1) that he has a clear legal or equitable right, (2) that he has a*  
*well-grounded fear of immediate invasion of that right, and (3) the acts complained of*  
*are either resulting in or will result in actual and substantial injury to him.*

18 **21.** In State ex rel. Lemon v. Langlie, 273 P.2d 464- Wash Supreme Court 1954  
19 **"A written Constitution is not only the direct and basic expression of the**  
20 **sovereign will, but is the absolute rule of action and decision for all departments**  
21 **and offices of government with respect to all matters covered by it and must**  
**control as it is written until it shall be changed by the authority that established**  
**it. No function of government can be discharged in disregard of, or in opposition**

1 to, the fundamental law. The state Constitution is the mandate of a sovereign  
2 people to its servants and representatives. No one of them has a right to ignore or  
3 disregard its mandates; and the legislature, the executive officers, and the  
4 judiciary cannot lawfully act beyond the limitations of such Constitution."

5 22. Judicial Canons prohibit any judge from hearing a matter in which a reasonable  
6 person could draw into question the impartiality or potential bias of the judge after  
7 being apprised of all relevant facts.

8 23. Defendant Craighead King County Superior Court Chief Presiding Judge job duties  
9 are detailed in GR29 of the Washington Supreme Court Rules for General  
10 Application, is tasked with the training and supervision and/or the delegation of said  
11 requirements to subordinate staff (Co-Defendants and/or unnamed John and/or Jane  
12 Does) or Court Administration employees.

13 **IV. RESERVATION OF RIGHTS**

14 24. Plaintiff reserves any and all rights to amend this complaint and/or any document  
15 within this lawsuit as information which is presently known to plaintiff and/or  
16 defendants becomes relevant and/or any information as yet unknown to either plaintiff  
17 and/or defendants collectively and/or individually is discovered. Plaintiff also reserves  
18 any and all rights to seek additional relief from the court for similar causes of action  
19 and/or monetary relief as would become appropriate.

20 **V. CAUSE OF ACTION**

21 25. The Defendants have engaged in a pattern of diversion of Public resources for a  
Private cause that does not support the poor and/or indigent, but one which generates  
income via fees and/or charges for the private business via the King County BAR

1 Association, at the expense of the plaintiffs' constitutional rights. Defendants have  
2 sworn Oaths to support the Washington State Constitution and to faithfully and  
3 impartially discharge the duties of judge; defendants have violated their oaths of  
4 office by this pattern of egregious and habitual violation of plaintiffs' constitutional  
5 rights.

6 **26.** Defendants are Superior Court Judges however the doctrine of absolute Judicial  
7 Immunity does not apply as these violations of constitutional rights are not normal  
8 judicial functions and the relief sought is non monetary. In Stump v. Sparkman 435  
9 US 349 Supreme Court 1978 "*Under the doctrine of absolute **judicial***  
10 ***immunity, judges are subject to suit only for (1) "non-judicial actions, ie, actions not***  
11 *taken in the judge's **judicial** capacity," or (2) "actions, though **judicial** in nature,*  
*taken in the complete absence of all jurisdiction."*

12 **27.** No Common Law, Statutory Law, and/or Constitutional law exists to shield  
13 defendants with immunity from lawsuits seeking declaratory and/or Injunctive relief.

14 **28.** In and through pre trial discovery it is the Plaintiffs reasonable belief that the evidence  
15 will demonstrate beyond a reasonable doubt that Defendants have engaged in a long  
16 term conspiracy to violate the appearance of fairness doctrine and/or plaintiffs'  
17 constitutional rights.

18 **29.** The Defendants have engaged in a (a) Willful, (b) wanton, (c) Ultra Vires, acts.

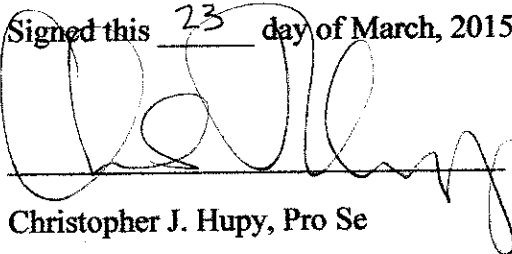
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**VI. RELIEF REQUESTED**

Plaintiff, Christopher J. Hupy, hereby request that the Court grant the following relief:

1. INJUNCTION prohibiting all unconstitutional and illegal acts is entered to protect the plaintiff 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. Declaratory order is issued that the defendants have willfully and deliberately violated their respective Oaths of Office, in and through the denial of plaintiffs' constitutional right to due process of law and access to court.
4. Declaratory order that defendants have violated the appearance of fairness doctrine.
5. Plaintiff is awarded costs and reasonable attorney fees and/or unbundled Legal Services fees, as required by RCW and/or common law, if any apply.
6. That the Court grant such other relief as may be just and equitable.

Signed this 23 day of March, 2015.



Christopher J. Hupy, Pro Se

13222 29<sup>th</sup> Avenue SE

Mill Creek, WA 9801

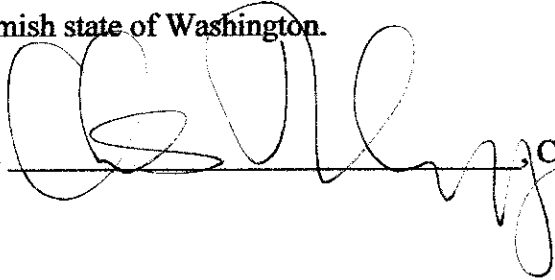
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I swear under penalty of Perjury of the State of Washington and of the Laws of the United States of America, as enforced in the County of Snohomish the foregoing complaint and declaration in support of and all attached appendix documents, if any, to be true and correct to the best of my knowledge and belief.

Signed this 23 day of March, 2015 in the city of Mill Creek, County of Snohomish state of Washington.

Signed  Christopher J. Hupy.