

Zachary J. Pekelis  
[Zach.Pekelis@pacificallawgroup.com](mailto:Zach.Pekelis@pacificallawgroup.com)

May 13, 2024

**VIA EMAIL**The Honorable Steve Hobbs  
Washington Secretary of State  
Legislative Building  
P.O. Box 40220  
Olympia, WA 98504-0220  
[elections@sos.wa.gov](mailto:elections@sos.wa.gov)**Re: Additional information on primary ballot for governor to mitigate voter confusion**

Dear Secretary Hobbs:

I write on behalf of the Bob Ferguson for Governor campaign (the Campaign) to ask that you exercise your statutory authority as Secretary of State to make vital changes to the primary ballot before certifying the list of candidates for governor on May 14, 2024.

As you know, on Friday, May 10, 2024, shortly before the candidate filing period closed, two individuals named Robert Ferguson filed declarations of candidacy for the gubernatorial election, each listing “Bob Ferguson” as the name to appear on the ballot and each expressing a Democratic party preference.<sup>1</sup> It is now obvious that neither individual is a bona fide candidate for office. Neither one has run for or served in elective office on any kind. Each has refused to speak to the media about their backgrounds or purported campaigns. And the two candidates—supposedly *Democratic* rivals—share a campaign manager, who happens to be well-known *Republican* political operative. (Notably, although both candidates swore or affirmed their preference for the Democratic Party when they declared their candidacy, at least one of them votes in Republican presidential primaries.<sup>2</sup>)

The illegitimacy of their suspicious candidacies is now beyond dispute: Glen Morgan, that same Republican operative who now manages both their campaigns—and the Washington State Republican Party’s 2023 “Volunteer of the Year”<sup>3</sup>—has publicly admitted that he “recruited”

---

<sup>1</sup> See Wash. Sec’y of State, VoteWA, Statewide – Governor, Bob Ferguson, <https://voter.votewa.gov/genericvoterguide.aspx?e=888&c=99#/candidates/153913/1576320> (last visited May 11, 2024); Wash. Sec’y of State, VoteWA, Statewide – Governor, Bob Ferguson, <https://voter.votewa.gov/genericvoterguide.aspx?e=888&c=99#/candidates/153913/1576320> (last visited May 11, 2024).

<sup>2</sup> See App’x C.

<sup>3</sup> See We the Governed, *Glen Morgan – Short Bio*, <https://www.wethegoverned.com/glen-morgan-short-bio/> (last visited May 12, 2024).

them to appear on the ballot for the sole purpose of fraudulently siphoning votes from Attorney General Bob Ferguson (AG Ferguson).<sup>4</sup> Mr. Morgan further admitted that he contacted at least a dozen Washington residents who share AG Ferguson’s name to try to get them all onto the ballot, bragging to the Seattle Times: “‘If I had started a little bit earlier, I would have been able to have six Bob Fergusons. . . . I just ran out of time.’”<sup>5</sup>

This is more than just a dirty election trick: it constitutes criminal election fraud under Washington law. It is a felony to “file[] a declaration of candidacy for any public office” using a “surname similar to one who has already filed for the same office, and whose political reputation is widely known, with intent to confuse and mislead the electors by capitalizing on the public reputation of the candidate who had previously filed.”<sup>6</sup> This is precisely what Mr. Morgan and his two recruits (the Fraudulent Candidates) have done. It is also a felony for any person, “with intent to mislead or confuse the electors,” to “conspire[] with another person who has a surname similar to . . . an opponent for the same office whose political reputation has been well established, by persuading such other person to file for such office with no intention of being elected, but to defeat . . . the well-known opponent.”<sup>7</sup> This, too, aptly describes Mr. Morgan’s actions.

Unless corrected by your office, the illegal scheme of Mr. Morgan and the Fraudulent Candidates will cause significant voter confusion and risk grossly distorting the democratic process. Thirty candidates have declared their candidacy for governor this year. Based on the random drawing performed by your office on May 10, 2024—minutes after the Fraudulent Candidates filed—Fraudulent Candidate Robert Arthur Ferguson’s name will appear on the ballot second and Fraudulent Candidate Robert Benjamin Ferguson’s name will appear third. AG Ferguson’s name will appear thirteenth. Thus, without necessary and legally required changes to the ballot, it is a certainty that thousands of voters intending to vote for AG Ferguson will mistakenly cast their ballots for one of the Fraudulent Candidates.

Allowing this criminal farce to go unchecked would effectively disenfranchise countless Washingtonians and seriously risk changing the outcome of the election for our state’s highest office. It would also send the perverse signal that Washington campaigns may deploy such deceptive and anti-democratic tactics with impunity, opening the floodgates to phony, same-named candidates in future elections. In other words, such dishonest and deceptive tactics would soon become the new normal in state elections.

---

<sup>4</sup> See, e.g., Claire Withycombe, *Three Bob Night: Two more Bob Fergusons running for WA governor*, The Seattle Times, May 10, 2024, <https://www.seattletimes.com/seattle-news/politics/three-bob-night-two-more-bob-fergusons-running-for-wa-governor/>; Jerry Cornfield, *Three Bob Fergusons now running for governor as race takes turn for the weird*, Wash. State Standard, May 10, 2024, <https://washingtonstatestandard.com/2024/05/10/three-bob-fergusons-now-running-for-governor-as-race-takes-turn-for-the-weird/>.

<sup>5</sup> *Id.*

<sup>6</sup> RCW 29A.84.320, .320(4).

<sup>7</sup> RCW 29A.84.270.

The Campaign therefore strongly urges you, before certifying the list of candidates for the August primary on Tuesday, May 14, 2024,<sup>8</sup> to exercise your authority as the state’s chief elections officer to adjust candidates’ names so as to fairly and impartially distinguish AG Ferguson from the Fraudulent Candidates to minimize voter confusion.

Under WAC 434-215-060, when “two or more candidates have filed for the same office whose names are so similar as to be confusing to voters, [the filing officer] shall differentiate between the candidates by the inclusion of additional information in connection with the name as it appears on the ballot.”<sup>9</sup> Your authority to “differentiate between the candidates” under this provision is broad: it “may be made by the inclusion of the candidate’s occupation, status as incumbent or challenger, *or by any other means* which, in the judgment of the filing officer, fairly and impartially distinguishes the candidates.”<sup>10</sup>

Not only is your authority broad but, in this situation, exercising it is mandatory. The Fraudulent Candidates have each filed under a name that is not merely “similar” to AG Ferguson’s—it is identical, first name and last. The Fraudulent Candidates also both filed as Democrats so as to further (and falsely) conflate their candidacies’ with AG Ferguson’s. The regulation therefore affirmatively requires your office to modify the ballot so as to fairly and impartially “differentiate between the candidates.”<sup>11</sup> The regulation also contemplates that the filing officer “may solicit suggestions and input from the candidates involved in order to resolve the situation.”<sup>12</sup> The Campaign therefore respectfully requests that you adopt three common-sense ballot alterations to help mitigate voter confusion.

**First**, the Campaign requests that the Fraudulent Candidates be required to use their full first names (Robert) instead of the nickname “Bob,” as well as their middle name or initial. The statute governing candidates’ use of nicknames provides, in relevant part, that “a candidate may use a nickname by which he or she is commonly known as his or her first name, but . . . [n]o candidate may . . . [u]se a nickname designed intentionally to mislead voters.”<sup>13</sup> As explained above, the fraudulent candidates’ entire *candidacies* are designed intentionally to mislead voters. Moreover, at least one of the Fraudulent Candidates is “commonly known” as Robert, not Bob. As shown in Appendix A, Fraudulent Candidate Robert Benjamin Ferguson’s own spouse refers to him as “Robert” in public Facebook posts. As for Fraudulent Candidate Robert Arthur Ferguson, he has been identified as “Robert” (not Bob) in multiple court filings.<sup>14</sup> He is also registered to

---

<sup>8</sup> See RCW 29A.36.010.

<sup>9</sup> WAC 434-215-060.

<sup>10</sup> *Id.* (emphasis added).

<sup>11</sup> WAC 434-215-060; see, e.g., *Erection Co. v. Dep’t of Labor & Indus.*, 121 Wn.2d 513, 518, 852 P.2d 288 (1993) (“It is well settled that the word ‘shall’ in a statute is presumptively imperative and operates to create a duty. . . . The word ‘shall’ in a statute thus imposes a mandatory requirement unless a contrary legislative intent is apparent.”).

<sup>12</sup> WAC 434-215-060.

<sup>13</sup> RCW 29A.24.060, .060(3).

<sup>14</sup> See App’x B.

vote as “Robert” and has voted under that name in the Presidential Primary multiple times—as a Republican.<sup>15</sup>

In contrast to the Fraudulent Candidates, AG Ferguson is known universally as “Bob”—using that nickname in his official capacity as Attorney General,<sup>16</sup> in connection with his current campaign and all past campaigns,<sup>17</sup> and in his everyday life. AG Ferguson thus has the statutory right to be identified as “Bob Ferguson” on the ballot because RCW 29A.24.060 expressly allows a candidate to “use a nickname by which he or she is commonly known,” so long as it does not “denote[] present or past occupation,” “denote[] the candidate’s position on issues or political affiliation,” or “intentionally . . . mislead voters.” However, allowing either of the Fraudulent Candidates to be identified as “Bob Ferguson” would only compound voters’ inevitable confusion, which is of course the whole purpose of their candidacies. As noted above, your office is required under these circumstances to “inclu[de] . . . additional information in connection with the name as it appears on the ballot” to help voters “differentiate between the candidates.”<sup>18</sup> Identifying the Fraudulent Candidates by their full first and middle names is clearly necessary—though not itself sufficient—to meet this regulatory mandate.

**Second**, and even more importantly, the Campaign requests that the ballot identify AG Ferguson and the Fraudulent Candidates by their occupations or current employment, including by identifying AG Ferguson as “Attorney General.” The applicable regulation expressly mentions a “candidate’s occupation” or “status as incumbent” as information that may be included to differentiate candidates with confusingly similar names.<sup>19</sup> Election officials and courts around the country frequently adopt this strategy of identifying similarly named candidates’ current offices or occupations to distinguish between them.<sup>20</sup> Before 1992, in fact, RCW 29.18.060 expressly *required* filing officers, “[w]hen two or more persons file for the same office in any primary election whose surnames are so similar in sound or spelling as to be confusing to the electors,” to “print on the ballot immediately after the surname . . . the *profession, business, trade, occupation* or such other designation as may be required for the definite identification of each.”<sup>21</sup> Under current WAC 434-215-060, including such occupational or professional information is now a matter of discretion. You should exercise that discretion and employ this sensible approach to help voters distinguish between AG Ferguson and the Fraudulent Candidates.

---

<sup>15</sup> See App’x C.

<sup>16</sup> Wash. State Office of the Att’y Gen., *About Bob Ferguson*, <https://www.atg.wa.gov/about-bob-ferguson> (last visited May 12, 2024).

<sup>17</sup> See, e.g., Bob Ferguson for Governor, <https://www.bobferguson.com/> (last visited May 12, 2024).

<sup>18</sup> WAC 434-215-060.

<sup>19</sup> WAC 434-215-060.

<sup>20</sup> See, e.g., Jeremy Rogalski, KHOU-11, *Dueling candidates with same name could cause confusion at the polls*, Feb. 14, 2020, <https://www.khou.com/article/news/investigations/dueling-candidates-with-same-name-could-cause-confusion-at-the-polls/285-29086058-5276-473f-949f-93c9acbee4> (“Election officials did come up with a workaround—of sorts. They allowed candidates in the primary race to add a title after their name. The veteran lawman Jerry Garcia chose to add ‘Harris County Lieutenant’ on the ballot. His opponent Garcia did not submit any title.”).

<sup>21</sup> RCW 29.18.060, *repealed by* Laws of 1990, ch. 59 § 112 (eff. July 1, 1992).

The Campaign is currently unaware of either Fraudulent Candidate’s current occupation. In Mr. Morgan’s interview with a reporter, he stated that Fraudulent Candidate Robert Arthur Ferguson “from Yakima is a retired state worker,” while “the one from Graham is a military veteran.”<sup>22</sup> Obviously, more information would be needed to accurately convey to voters the Fraudulent Candidates’ occupations or professions. Identifying the former as a “retired state worker” could lead some voters to assume that this referred to AG Ferguson—perhaps under the mistaken belief that he had resigned from his current office to run for governor. Instead, the ballot should specifically identify Fraudulent Candidate Robert Arthur Ferguson’s former position or former state agency employer (or both). As for Fraudulent Candidate Robert Benjamin Ferguson, “military veteran” is neither an occupation nor a profession, but rather a status.<sup>23</sup> The ballot should state his current occupation or profession, not any legally protected characteristic.

**Third**, and most critically, to mitigate voter confusion you must also adjust the order in which the three candidates’ names appear on the ballot so as to list AG Ferguson’s name immediately before the two Fraudulent Candidates’ names. This reordering would make salient the fact that three candidates with similar names are running for this office and highlight the differences in their first names, middle names, and occupations that voters might otherwise easily overlook. Alternatively, you could accomplish those same objectives by moving the Fraudulent Candidates down the ballot to appear directly after AG Ferguson (i.e., fourteenth and fifteenth). It is clear, however, that the current sequence—with the Fraudulent Candidates appearing second and third and AG Ferguson appearing thirteenth—is certain to exacerbate voters’ confusion, as many will wrongly assume that one of the first two Fergusons they come across is in fact AG Ferguson. A large body of social science research confirms the significance of ballot order on voter behavior, including studies demonstrating that voters confronted with a long list of candidates often do not read past the first few names.<sup>24</sup> Thus, it is reasonable to assume that many of the hundreds of thousands of voters planning to vote for AG Ferguson will simply not read through ten more names to get to his, and thus end up mistakenly casting their ballot for one of the Fraudulent Candidates. The only way to avoid such errors is to list all three candidates named Ferguson sequentially. Doing so also falls well within your broad authority under WAC 434-215-060 to adopt “any other means which, in the judgment of the filing officer, fairly and impartially distinguishes the candidates.”

In sum, the scheme of Mr. Morgan and the Fraudulent Candidates to dilute voter support for AG Ferguson represents nothing less than a criminal attack on the democratic process. As our state’s chief election officer, you alone among state officials have the power and duty to make necessary and sensible adjustments to the ballot to mitigate voter confusion and deception. In a time when the integrity of our elections nationwide face constant threats from rogue actors—both foreign and domestic—your duty is clear. To address this brazen plot to steal an election on your

---

<sup>22</sup> Cornfield, *Three Bob Fergusons*, supra note 4.

<sup>23</sup> See, e.g., RCW 49.60.180 (prohibiting discrimination in employment on the basis of “honorably discharged veteran or military status”).

<sup>24</sup> See, e.g., MIT Election Data and Science Lab, *Ballot Order Effects*, <https://electionlab.mit.edu/research/ballot-order-effects> (last visited May 12, 2024).

watch, you must exercise the authority of your office to modify the ballot so as to fairly and impartially distinguish AG Ferguson from the Fraudulent Candidates. That is what WAC 434-215-060 requires.

To be sure, the most fair and just outcome would be to simply remove the Fraudulent Candidates from the ballot altogether because their candidacies have come about through the commission of a criminal act designed to perpetrate a fraud upon the electorate. Recognizing, however, that you likely lack the statutory authority to outright reject the Fraudulent Candidates,<sup>25</sup> it is even more imperative that you take all steps within your powers to remediate the deceptive effects of their placement on the primary ballot, to the fullest extent permitted by law. To do anything less would represent a dereliction of duty, establish a dangerous precedent, and turn a blind eye to the criminal corruption of the democratic process.

For the reasons explained above, the Campaign respectfully requests that you adopt all three ballot modifications described above and list the three candidates in question on the primary election ballot as follows:

2. Bob Ferguson (Attorney General)
3. Robert Arthur Ferguson (retired [position] with [state agency])
4. Robert Benjamin Ferguson (current occupation or employment)

Sincerely yours,

PACIFICA LAW GROUP LLP



Zachary J. Pekelis

*Counsel for Bob Ferguson for Governor*

---

<sup>25</sup> See, e.g., *State ex rel., McCaffrey v. Super. Ct. of King Cnty.*, 20 Wn.2d 704, 709–11, 149 P.2d 156 (1944); *McCaulay v. Reeves*, 196 Wash. 1, 4–8, 81 P.2d 860 (1938); *Fischnaller v. Thurston Cnty.*, 21 Wn. App. 280, 283, 584 P.2d 483 (1978).

# APPENDIX A

## Facebook posts from Ashley Ferguson, spouse of Fraudulent Candidate Robert Benjamin Ferguson

**Ashley Ferguson**  
June 18, 2023 · 🌐

Happy Father's Day to the best dad in the world. God blessed us big with this guy ❤️❤️



👍❤️ 35 5 comments

👍 Like      ↻ Share

Most relevant ▾

**Alexis Williams**  
Happy Fathers Day Robert! ...  
47w Like

**Laura Daves Barnette**  
Happy Father's Day, Robert. You are a wonderful dad. I love you very much. ...  
46w Like

**Ashley Ferguson**  
December 26, 2021 · 🌐

I couldn't do it without [Robert Ferguson](#). He's pretty amazing.



**DADDY WE SEE YOU...**  
@\_HAPPYASAMOTHER

UP AT NIGHT WITH YOUR CHILD      ENGAGING AND PLAYING      BEING ACTIVELY INVOLVED IN CHILD READING





Ashley Ferguson

May 3, 2010 · 🌐



[www.mywedding.com/ashleylovesrobert](http://www.mywedding.com/ashleylovesrobert) is our wedding website!

MYWEDDING.COM

Ashley & Robert - wedding website by mywedding.com



1

1 comment



Ashley Ferguson

April 8, 2010 · 🌐



&hearts; robert.

Share



Ashley Ferguson

April 6, 2010 · 🌐



can't believe i missed robert all night...my phone died. oh man.

3 comments

Share

View more comments



Ashley Ferguson

ugh, damn phone. ...

14y



Ashley Ferguson

April 5, 2010 · 🌐



loves robert and the mariners!

Share



Ashley Ferguson

April 3, 2010 · 🌐



loves being at home, but i really wish robert was here.

9 comments

Share



## APPENDIX B

FILED  
KITSAP COUNTY CLERK

2017 OCT 25 AM 11:15

ALISON H. SONNTAG

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF KITSAP

In re the Estate of:

ROBERT WILLIAM FERGUSON

Deceased.

GARY T. FERGUSON, Co-Personal  
representative of the Estate of Robert W.  
Ferguson,

Petitioner,

vs.

ROBERT A. FERGUSON, Co-Personal  
representative of the Estate of Robert W.  
Ferguson,

Respondent.

NO. 16-4-00704-9

15-4-00814-4 ✓

DECLARATION OF ROBERT A.  
FERGUSON  
(DCLR)

Robert A. Ferguson, declares and states as follows:

1. I am a co-personal representative of the Estate of my father, Robert William Ferguson ("Robert"), am over the age of eighteen (18) and competent to testify to the matters herein:

ORIGINAL



1           2.     My sister Judith A. Henry (“Judy”) was the attorney-in-fact for Robert prior to his  
2 death.

3           3.     Judy made herself a joint account holder of Robert’s bank accounts. When Robert  
4 became aware that by virtue of Judy becoming a joint account holder she shared equal ownership  
5 and access rights to the funds in those accounts, he became very angry. By adding herself as a  
6 joint account holder, Judy also prevented me as a co-personal representative of Robert’s estate  
7 to access his accounts after his death.

8           4.     In or about December, 2014, before his death, Robert showed me one of his  
9 account statements and indicated that he believed he had more money than the statement showed.  
10 Robert then asked me to rectify his accounts and I promised him that I would fulfill his request  
11 as executor of his estate.

12          5.     Judy actively opposed my efforts to fulfill Robert’s final request to rectify his  
13 accounts; based on Judy’s opposition, I was forced to retain legal services to enable me to fully  
14 satisfy Robert’s wishes.

15          6.     The final year of Robert’s life was an emotionally turbulent and sad time for  
16 Robert based largely on the facts contained in this Declaration. During that time, Robert suffered  
17 from several medical problems, including diabetes, which required regular care and attention.

18          7.     Prior to his death, Robert initially moved from his house (“Robert’s House”) to  
19 live with Judy, where he was required to pay monthly rent for staying in her house.

20          8.     During the times Robert lived with Judy, he called me regularly to complain that  
21 he was lonely and not receiving adequate care or nutrition. Robert also informed me that Judy  
22 was not managing his medications properly.

23          9.     Judy’s son, Luke, and his family moved into Robert’s House, however they were  
24 not required to pay rent while Robert continued to pay the utility costs for the house. Luke’s  
25 family also got a puppy that damaged much of the interior of Robert’s House as well as the  
26 surrounding yard.

1           10.    In or about January, 2015, Robert contracted pneumonia. He was treated at the  
2 Naval Hospital. After receiving the necessary medical treatment, Robert was released to the  
3 Veteran's Home in Retsil, Washington ("VA Home"), which had an excellent record of care.

4           11.    Robert was released from the VA Home and returned to live with Judy.

5           12.    Eventually Robert moved back to live at the VA Home where he could receive  
6 the proper medical care and social interaction he needed.

7           13.    As Robert's health continued to decline, I visited him regularly at the VA Home.  
8 During these regular visits, I noticed Robert became increasingly unhappy and irritated, as he  
9 often lashed out at the nursing staff.

10          14.    During my visits with Robert, the causes of the decline in his emotional and  
11 physical condition were readily apparent.

12           (a)    Robert was very angry and resentful about losing control over his finances,  
13 especially since Judy had set up automatic deposits into several of Robert's  
14 grandchildren's bank accounts;

15           (b)    All of Robert's possessions had been divided between my two (2) brothers  
16 and Judy and what was left was discarded. Although Robert agreed to give me a  
17 gun safe, a few guns and a pressure washer, Judy took those few precious items  
18 with her when she moved to Arizona. With the assistance of legal counsel, I  
19 eventually had the items returned, however I was required to pay for the items as  
20 well as shipping costs;

21           (c)    The sale of Robert's House caused him great sadness as he knew was  
22 never going to return to the property again;

23           (d)    Robert often expressed the pain he felt because his other two (2) sons,  
24 Gary and Tim never called or tried contacting him. During each visit, I was able  
25 to verify on Robert's cell phone that he never received a phone call from Gary or  
26 Tim. Although I often called Gary and Tim on Robert's behalf during our visits,  
27 they rarely, if ever, took the call.

1           15.    Near the end of Robert's life, Judy moved him to another Veteran's Home in  
2 Arizona, primarily for her own convenience. During my last visit with Robert, his long-time  
3 nurse informed me that Robert told her that he did not want to move. Robert died approximately  
4 three (3) months after the move to Arizona.

5           16.    Everything I have done for Robert during the final years of his life and following  
6 his death as co-personal representative of his estate, I have done solely for his benefit and to  
7 carry out his last wishes.

8           17.    Although Robert spent his life giving so much to his children and their families,  
9 Gary and Tim expressed to me that they wanted nothing to do with Robert or his estate.

10          18.    As co-personal representative of Robert's estate, Gary has proven to be nothing  
11 more than an impediment to the faithful administration of Robert's estate.

12          19.    Soon after Robert died, Gary hired an attorney and incurred approximately  
13 \$1,500.00 in estate fees without first consulting me. Gary then charged Robert's estate for the  
14 attorney's fees, although he was unable to justify the cost.

15          20.    Based on Judy's failure to report our mother's death in 2013, Robert's  
16 military/survivor benefits were not calculated correctly. These issues precluded the issuance of  
17 Robert's 1099R for 2015, which further impeded my ability to administer Robert's estate. I also  
18 spent several hours on the phone with DFAS to resolve these issues.

19          21.    Throughout this process, Gary has been argumentative, toxic and completely  
20 unhelpful. He has made countless irresponsible and/or self-serving decisions, including without  
21 limitation, hiring/firing multiple professionals such as attorneys and an accountant without  
22 reason and charging the estate for all associated fees.

23          22.    During the administration of Robert's estate, I have spent countless hours dealing  
24 with Gary and/or his attorney(s) and meeting their numerous, arbitrary demands while they  
25 continue to drag out this painful process.



### Case Information

19-2-00583-23 | ROBERT A FERGUSON et al vs BOARD OF DIRECTORS OF BEL-AIR COVE COMMUNITY CLUB et al

Case Number  
19-2-00583-23  
File Date  
09/11/2019

Court  
Mason  
Case Type  
COM Commercial

Case Status  
Completed/Re-Completed

### Party

Plaintiff  
FERGUSON, ROBERT A

Active Attorneys ▼  
Lead Attorney  
KELLEY, SHASTA LEA  
Retained

Plaintiff  
FERGUSON, TERRI L

Active Attorneys ▼  
Lead Attorney  
KELLEY, SHASTA LEA  
Retained

Plaintiff  
ROBERT A & TERRI L FERGUSON TRUST

Active Attorneys ▼  
Lead Attorney  
KELLEY, SHASTA LEA  
Retained

Defendant  
BOARD OF DIRECTORS OF BEL-AIR COVE COMMUNITY CLUB

Active Attorneys ▼  
Attorney



Lowell, Richard S.  
Retained

Lead Attorney  
FINDLEY, DANIEL GEARY  
Retained

Attorney  
LOWELL, JOSHUA BENJAMIN  
Retained

Defendant  
D.D. DENOTTA LLC

Active Attorneys ▼  
Lead Attorney  
Gettmann, Kerri  
Retained

### Events and Hearings

09/11/2019 Case Information Cover Sheet
09/11/2019 Summons
09/11/2019 Complaint ▼  Comment for Trespass
09/16/2019 Affidavit Declaration Certificate Confirmation of Service
09/16/2019 Notice of Appearance
09/23/2019 Acceptance of Service
11/07/2019 Affidavit Declaration Certificate Confirmation of Service
11/12/2019 Notice of Association of Counsel

11/14/2019 Notice of Appearance

12/20/2019 Answer and Affirmative Defense

01/28/2020 Notice of Status Conference

02/26/2020 Status Conference ▼

Judicial Officer  
Goodell, Daniel L

Hearing Time  
8:45 AM

02/26/2020 Order Setting Status Conference ▼

Judicial Officer  
Goodell, Daniel L

04/30/2020 Status Conference ▼

Judicial Officer  
Finlay, Amber L

Hearing Time  
8:45 AM

Comment  
All parties will call into conferencing center 1-888-861-0198 Code: 7215876281#

05/04/2020 Order Setting Status Conference ▼

Judicial Officer  
Finlay, Amber L

05/20/2020 Answer and Cross Claim

08/07/2020 Order of Continuance ▼

Judicial Officer  
Goodell, Daniel L

Comment  
STIPULATED ORDER CONTINUING STATUS CONFERENCE DEADLINE

08/10/2020 Notice Withdraw and Substitution of Counsel

08/13/2020 Disclosure ▼

Comment  
OF POSSIBLE PRIMARY WITNESSES


08/24/2020 Disclosure ▼

Comment DENOTTA LLC'S OF FACTS AND EXPERT WITNESSES
09/28/2020 Disclosure ▼  Comment AMENDED FACT AND EXPERT WITNESSES
11/30/2020 Notice ▼  Comment change of address
03/01/2021 Stipulation ▼  Comment FOR ORDER OF DISMISSAL
03/04/2021 Order of Dismissal ▼  Judicial Officer Cobb, Monty D
03/04/2021 Ex Parte Action With Order ▼  Judicial Officer Cobb, Monty D
03/04/2021 Case Resolution Dismissal Without Trial
07/28/2021 Status Conference ▼  Judicial Officer Goodell, Daniel L  Hearing Time 8:30 AM  Cancel Reason Case Completed  Comment Trial Setting Conference


# APPENDIX C


## Voting History of Fraudulent Candidate Robert Arthur Ferguson

Home / Quick Look Up / Robert Arthur Ferguson ES EN









**Robert Arthur Ferguson**

 (509) 697-5065 *(Home)*

 1403 Perry Loop Apt 1 Yakima, WA 98902 *(Voting)*

Voter File VANID

 Stan...
 Script
 Form

 Clear
 Print
 Save

**▼ Voting History** ☰

	'24	'23	'22	'21	'20	'19	'18	'17	'16	'15	'14	'13	'12	'11	'10	'09	'08	'07	'06	'05	'04
General		M	M	M	M		M	M	M		M	M	M	M	Y		M		Y		
Primary			M		M		M		M									M		Y	
Caucus																					
Muni Primary																					Y
Municipal													M								Y
Pres Caucus																					
Pres Primary		M				M-R			M-R												Y-R
Special																					

- ▶ Voter File VANID ☰
- ▶ Vital Stats & Contact Preferences ☰
- ▶ 2008 Caucus ☰
- ▶ Likely Party ☰
- ▶ Districts ☰
- ▶ Also At Voting Address ☰