

Honorable Ronald Castleberry
KING COUNTY
Noted on Motion Calendar:
SUPERIOR COURT
Date Filed April 29, 2011
CASE NUMBER Time: 4:11:00 PM
Department 9

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SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY

MARTIN RINGHOFER,)	No. 10-2-41119-4 SEA
)	
Petitioner and Plaintiff,)	
)	DECLARATION OF MARTIN
v.)	RINGHOFER IN SUPPORT OF
)	PLAINTIFF'S MOTION FOR
LINDA K. RIDGE, in her official capacity as)	SUMMARY JUDGMENT
Deputy Chief Administrative Officer,)	
)	
Respondent and Defendant.)	
)	
)	

I, Martin Ringhofer, declare as follows pursuant to GR 13 and RCW 9A.72.085:

1. I am competent to be a witness in this matter and have personal knowledge of the facts stated herein.
2. I am a citizen of Washington and the named petitioner in this action.
3. I am opposed to ineligible persons participating in and unlawfully influencing state and local elections.
4. I collect and analyze data, communicate via email with individuals and groups interested in monitoring unlawful influence in elections to present summarized information to

1 state representatives and senators, and city and county administrators at public engagement
2 events. I use the non-juror information in the public interest to identify and quantify the
3 incidence of unauthorized voter registration and voting in King County. My goal is to
4 continue to promote public knowledge and discussion about the integrity of the juror selection
5 and voter registration processes until procedures are established so that the voter rolls are
6 purged more regularly than once a year, as currently required by state statute.

7 5. I rely on my ability to collect court information in a timely fashion to promote
8 government accountability and judicial transparency.

9 6. Between January and June of 2007, I filed official records requests with all 39
10 Superior Courts in Washington State, seeking the names and addresses of persons summoned
11 for jury service who sought disqualification under one or more of the five statutory grounds
12 provided by RCW 2.36.070.

13 7. Only the Pacific and Douglas County Superior Courts responded with data.
14 The other 37 counties refused to provide data. 91 persons summoned for juror service in the
15 Pacific County Superior Court from January 2007 through June 2007, self-disqualified. 289
16 persons summoned for juror service in the Douglas County Superior Court from July 2006
17 through May 2007, self-disqualified.

18 8. Between February 2010 and November 2010, I filed a second round of official
19 records requests with all 39 Superior Courts in Washington State, including King County,
20 seeking limited information contained on the non-juror's written declarations executed
21 pursuant to RCW 2.36.072(4), namely the names and addresses of persons summoned for jury
22 service from January 1, 2008 to December 31, 2009 who sought disqualification due to the
23

1 five statutory grounds provided by RCW 2.36.070 and their stated reason for self-
2 disqualification.

3 9. Attached hereto as Exhibit A is a true and correct copy of my February 10,
4 2010 request to the King County Department of Judicial Administration.

5 10. Attached hereto as Exhibit B is a true and correct copy of the King County
6 Department of Judicial Administration's response dated March 5, 2010, notifying me that
7 Linda K. Ridge, the Deputy Chief Administrative Officer of the King County Superior Court,
8 was the person I should contact about my request for non-juror information.

9 11. Attached hereto as Exhibit C is a true and correct copy of my October 16, 2010
10 request for non-juror information from Respondent Ridge.

11 12. Attached hereto as Exhibit D is a true and correct copy of Respondent Ridge's
12 response on October 25, 2010. Respondent Ridge refused to provide me with the individual
13 names, addresses, and associated reasons for disqualification or excuse from service from the
14 term specified. Instead she provided me with the total numbers of persons from January 1,
15 2008 to December 31, 2009, who sought disqualification due to the five statutory grounds
16 provided by RCW 2.36.070. Of the 19,132 disqualified jurors, 8,171 were ineligible to vote.
17 Four were under 18 years old, 1,205 were convicted felons, and 6,962 were not U.S. citizens.

18 13. Because Respondent Ridge failed to provide me with the names and addresses
19 of the people disqualified from jury service, I am unable to ascertain how many of the 8,171
20 ineligible voters are listed in the HAVA voter database. Her refusal to release the non-juror
21 records prevented me from cross-checking the HAVA list with the non-juror list in time to file
22 a report with Secretary of State Sam Reed to urge him to purge the disqualified voters from
23 the voter rolls before the election. As a result, it is my belief that disqualified voters were

1 able to influence the November 2010 election results. Her decision to deny my request
2 impinged on my rights and caused me injury as a voter in King County.

3 14. Attached hereto as Exhibit E is a true and correct copy of an email from the
4 Douglas County Prosecuting Attorney dated December 27, 2010 in which he provided me
5 with an individual list of names and addresses for persons summoned for juror service from
6 2008 to 2010 who sought disqualification based on the five statutory grounds provided by
7 RCW 2.36.070. That list is not attached hereto due to size. From that list, a total of 1,361
8 potential jurors self-disqualified, of which, 381 are ineligible to vote. Two were under 18
9 years old, 141 were convicted felons, and 238 were not U.S. citizens. Of the 238 non-citizen
10 disqualified jurors, seven were registered to vote on the statewide Help America Vote Act
11 ("HAVA") voter database.

12 15. I used the information I obtained in Douglas County by sharing with
13 Washington State Senators part of a proposed State Senate Bill which would require the
14 courts to provide this information to the Secretary of State to purge state registration database
15 of persons not eligible to register and vote. I also shared the information with the Secretary of
16 State's Office, requesting they cross check the non-citizen non-jurors and felon non-jurors and
17 remove from voter database.

18 16. On January 14, 2011, I wrote to the Secretary of State's Elections Office to
19 ascertain whether the seven ineligible voters that were in the voter database were in fact
20 ineligible so they could be taken off the list.

21 17. Attached hereto as Exhibit F is a true and correct copy of Shane Hamlin, Co-
22 Director of the Elections Office of the Secretary of State's February 16, 2011 response stating
23 that he would ask his team in the Voter Registration program to double-check if the seven

1 ineligible individuals were in fact registered to vote. Mr. Hamlin informed me that he did not
2 have the authority to ask the suspected ineligible voters to prove their citizenship status.

3 18. Attached hereto as Exhibit G is a true and correct copy of an email dated
4 March 15, 2011, where Mr. Hamlin informed me, "the voter registration team researched the
5 seven individuals you identified as registered voters, but who declined jury service due to
6 citizenship status. Our research confirms that these seven individuals are, in fact, registered to
7 vote in Douglas County."

8 19. Because of my vigilance, the Douglas County Prosecutor is currently
9 investigating the seven ineligible voters to ensure that they are not able to vote in any more
10 elections.

11 20. In January 2011, I requested that the Seattle Municipal Court provide me with
12 the names and addresses of persons summoned for jury service who sought disqualification
13 based on the five statutory grounds provided by RCW 2.36.070. On February 11, 2011, the
14 court responded stating that from January to December 2010, 681 persons claimed
15 disqualification for reason of non-US citizenship. The court did not provide me with a list of
16 names of disqualified jurors. As long as I am unable to ascertain how many of the 681
17 ineligible voters are in the HAVA voter database, these 681 persons in King County could be
18 unlawfully voting and influencing election results.

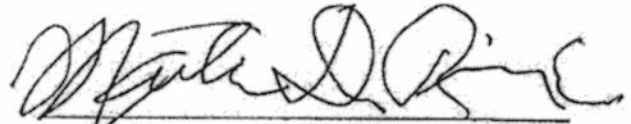
19 21. On March 2, 2011, the Okanogan District Court provided me with an
20 individualized list of names of persons summoned for juror service from 2008 to 2010 who
21 sought disqualification based on the five statutory grounds provided by RCW 2.36.070. A
22 total of 623 potential jurors self-disqualified, of which, 184 claimed disqualification for
23 reason of non-US citizenship. When cross-checked with the statewide Help America Vote Act

1 ("HAVA") voter database, at least three were registered to vote in Okanogan County and at
2 least one was registered in Chelan County.

3 22. Based on my research of voter fraud in Washington State, I believe that it is
4 highly probable that ineligible voters in King County and other counties from which we were
5 provided with the requested data, voted illegally and thus influenced the November 2010
6 election results.

7 I declare under penalty of perjury under the laws of the State of Washington that the
8 foregoing is true and correct.

9 Executed this 31st day of March, 2011 at Kent, Washington.

10 

11 Martin Ringhofer, U.S. citizen registered to vote
12 in King County, Washington

13 03/31/2011

EXHIBIT A

February 22, 2010R

From: Martin D. Ringhofer
7012 - 24th Avenue NW
Seattle, WA 98117

Barbara Miner
King County Superior Court Clerk
516 3rd Avenue
Seattle, WA 98104

Attention: Ms. Barbara Miner
King County Superior Court Clerk
Email: barbara.miner@kingcounty.gov

Subject: Request under Washington State's Public Records Act

Dear Ms. Barbara Miner:

I request that you provide me with a list of the names and addresses of prospective jurors who were disqualified from jury service in your jurisdiction for the time period ranging from January 1, 2008 to December 31, 2009, for any of the five reasons listed below in RCW 2.36.070:

Revised Code Wash. (RCW) 2.36.070 "Qualification of Juror"

A person shall be competent to serve as a juror in the state of Washington unless that person:

- (1) Is less than eighteen years of age;
- (2) Is not a citizen of the United States;
- (3) Is not a resident of the county in which he or she has been summoned to serve;
- (4) Is not able to communicate in the English language; or
- (5) Has been convicted of a felony and has not had his or her civil rights restored.

In addition, please also include the names and addresses of prospective jurors, in your jurisdiction, who were disqualified from jury service, from the time period ranging from January 1, 2008 to December 31, 2009, because of having indicated other reasons for disqualification. Please include the individual's stated reasons for self-disqualification, and provide the total number of potential jurors on your master lists for 2008 & 2009 and the number of summons you sent to prospective jurors for both years. Please provide this information to me in Microsoft Excel format attached to an e-mail or saved on a digital media disc.

Please note, this request is for information on persons who were "disqualified" from jury service, thus they are not properly "jurors" whose names and addresses would be barred from disclosure under the Court General Rules.

Should you decide not to provide the information requested above, I request that you cite to the legal authority that is the basis for your denial (e.g. Revised Code Wash, General Court Rules, etc).

Thank you in advance for your work on behalf of the citizens and for your prompt response.

Best Regards,



Martin D. Ringhofer
martinringhofer@aol.com

7012 – 24th Avenue NW
Seattle, WA 98117
Voice (206) 784-5920
Fax: (206) 783-0890

EXHIBIT B



King County

Department of Judicial Administration
Barbara Atner
Director and Superior Court Clerk
(206) 296-9300 (206) 296-0100 TTY/TDD

March 5, 2010

Martin D. Ringhofer
7012 24th Avenue NW
Seattle, WA 98117

Re: Your Public Disclosure Request

Dear Mr. Ringhofer:

The King County Department of Judicial Administration (DJA) received your February 25, 2010 e-mail correspondence clarifying your public disclosure request sent on February 22, 2010. In your message you clarify that you are requesting:

- (1) All documents containing the names and addresses of prospective jurors who were disqualified from jury service from January 1, 2008 to December 31, 2009 for any of the reasons listed in RCW 2.36.070 or for any other reason (and stating what that reason was);
- (2) All documents containing the total number of jurors on your master lists during 2008 and 2009; and
- (3) All documents indicating the number of summons sent to prospective jurors during 2008 and 2009.

DJA responded to your February 22, 2009 e-mail and referred you to King County Superior Court (KCSC). The information you are requesting in your second e-mail message is similar to that of your first, and so we would again refer you to KCSC. Please contact:

Linda Ridge, Deputy Chief Administrative Officer
King County Superior Court
516 Third Avenue, Room 203
Seattle, WA 98104
(206) 205-2582

I hope you find this information helpful.

Sincerely,

Teresa Bailey
Deputy Director

Seattle:
516 Third Avenue Room E609
Seattle, WA 98104-2386

Regional Justice Center:
401 Fourth Avenue North Room 2C
Kent, WA 98032-4429

Juvenile Division:
1211 East Alder Room 307
Seattle, WA 98122-5598

EXHIBIT C

October 16, 2010

From: Martin D. Ringhofer
7012 - 24th Avenue NW
Seattle, WA 98117

Linda K. Ridge
Deputy Chief Administrative Officer
King County Superior Court
516 3rd Avenue
Seattle, WA 98104
(206) 205-2582
linda.ridge@kingcounty.gov

Attention: Linda K. Ridge
Deputy Chief Administrative Officer

Subject: Request for non-juror information Disqualified for Juror

Dear Ms. Linda Ridge:

I request that you provide me with a list of the names and addresses of non-juror information who were disqualified from jury service in the King County jurisdiction for the time period ranging from January 1, 2008 to December 31, 2009, for any of the five reasons listed below in RCW 2.36.070.

Requestor has good cause for requesting this non-juror information. Requestor is concerned about unauthorized individuals influencing statewide elections. He wants to use the non-juror information to educate the public on voting enforcement issues. Disclosure of the information is in the public interest because it will significantly contribute to public understanding of the operations and activities of the government, in regards to voter enforcement. The data should be released to promote government transparency, so that it can be used to educate the public about the real concern of unauthorized voting.

Revised Code Wash. (RCW) 2.36.070 "Qualification of Juror" A person shall be competent to serve as a juror in the state of Washington unless that person: (1) Is less than eighteen years of age;(2) Is not a citizen of the United States;(3) Is not a resident of the county in which he or she has been summoned to serve;(4) Is not able to communicate in the English language; or(5) Has been convicted of a felony and has not had his or her civil rights restored.

In addition, include the names and addresses of non jurors who were disqualified from jury service from the time period ranging from January 1, 2008 to December 31, 2009, because of having indicated other reasons for disqualification. Please include the individual's stated reasons for self-disqualification, and provide the total number of potential jurors on your master lists for 2008 & 2009 and the number of summons you sent to prospective jurors for both years. Please provide this information to me in Microsoft Excel format attached to an e-mail or saved on a digital media disc.

Should you decide not to provide the information requested above, I request that you cite to the legal authority that is the basis for your denial (e.g. Revised Code Wash, General Court Rules, etc). Thank you in advance for your work on behalf of the citizens and for your prompt response.

Thank you in advance for your work on behalf of the citizens and for your prompt response.

Best Regards,



Martin D. Ringhofer
martinringhofer@aol.com

7012 - 24th Avenue NW
Seattle, WA 98117
Voice (206) 784-5920
Fax: (206) 783-0890

EXHIBIT D

From: Ridge, Linda <Linda.Ridge@kingcounty.gov>
To: MartinRinghofer@aol.com
Sent: Mon, Oct 25, 2010 5:11 pm
Subject: Response to Request for Juror Information

Mr. Ringhofer:

I am writing in response to your email sent Saturday, October 16, 2010, requesting the following:

- (1) "a list of the names and addresses of 'non-juror information' who were disqualified from jury service in the King Count[sic] jurisdiction for the time period ... from January 1, 2008 to December 31, 2009, for any of the five reasons listed ... in RCW 2.36.070[;]"
- (2) "the names and addresses of non jurors who were disqualified from jury service from the time period ranging [during the above time period] because of having indicated other reasons for disqualification[;]" and
- (3) "the individual's stated reasons from self-disqualification, and provide the total number of potential jurors on your master lists for 2008 and 2009 and the number of summons you sent to prospective jurors for both years."

Please note that the Public Records Act, Chapter 42.56 RCW (the "Act"), does not apply to the judicial branch. *City of Federal Way v. Koenig*, 167 Wn.2d 341, 346 (2009). See also, *Spokane & Eastern Lawyer v. Tompkins*, 136 Wn. App. 616 (2007) (superior court not an "agency" under public disclosure act); *Nast v. Michels*, 107 Wn. 2d 300, 305-307 (1986) (courts are not within the realm of the public disclosure act). Therefore, the specific duties imposed by the Act relating to the production of records and citation to exemptions do not apply in this instance.

Access to information relating to the master jury source list is governed by court rule. General Rule 31(k) states that master jury source list information, other than name and address, is presumed to be private. A copy of the master jury source list for the current jury term, containing only names and addresses, is kept on file in the office of the Superior Court Clerk and is available for public viewing in Room E609 of the King County Courthouse. If you have questions about accessing the master jury source list, please contact Teresa Bailey at teresa.bailey@kingcounty.gov.

In addition to the foregoing, General Rule 18(d) states that self-reported juror information concerning the qualification requirements in RCW 2.36.070 "may only be used by the court for the term such person is summoned and may not be used for any other purpose." See also, RCW 2.36.072 (similar wording as court rule).

Based on these rules, the court is unable to provide you with the individualized names, addresses, and associated reasons for disqualification or excuse from service from the term specified as requested in items (1), (2) and (3) above. However, we can provide summary information on total numbers of persons disqualified for jury duty under the statute identified in item (1). This summary information is contained in the Excel file, attached.

With respect to the remainder of your requests, the number of persons on the master jury list for 2008-09 (jury term is September 1-August 30, not calendar year) totaled 394,999; the number contained in the 2009-10 list is 1,657,735. [Please note: effective the 2009-10 jury term, the master jury list is now a duplicate of the jury source list, as allowed by RCW 2.36.010 (9)]. The number of persons summoned in 2008 was 144,973; in 2009, the court summoned 109,452 persons for jury duty.

PLEASE NOTE NEW EMAIL ADDRESS

Linda K. Ridge
Deputy Chief Administrative Officer
King County Superior Court
516 3rd Avenue
Seattle, WA 98104
(206) 205-2582
linda.ridge@kingcounty.gov

1/1/08 - 8/31/09	
HAVE BEEN CONVICTED OF A FELONY AND CIVIL RIGHTS NOT RESTOR	942
LESS THEN EIGHTEEN YEARS OF AGE	3
NOT A CITIZEN	5418
NOT ABLE TO COMMUNICATE IN THE ENGLISH LANGUAGE	5603
NOT RESIDENTS OF JURISDICTION IN WHICH THEY ARE TO SERVE	3482
	15448
9/1/09 - 12/31/09	
NOT A RESIDENT OF KING COUNTY	664
UNABLE TO COMMUNICATE IN THE ENGLISH LANGUAGE	1212
CONVICTED OF A FELONY, CIVIL RIGHTS NOT RESTORED	263
NOT A CITIZEN OF THE US	1544
UNDER 18 YEARS OF AGE	1
	3684

EXHIBIT E

In a message dated 12/27/2010 4:13:38 P.M. Pacific Standard Time, sclm@co.douglas.wa.us writes:

Mr. Ringhofer,

The County's new system that now provides a reason for the juror not serving. Attached is a n Excel file containing a list of prospective 2008-2009 jurors who were deemed not qualified, based upon a response to a jury summons or during jury venire proceedings, for one of the five reasons listed at RCW 2.36.070. Jurors excused for other reasons, i.e. health, military service, financial hardship, etc., are not included.

Steven M. Clem

Douglas County Prosecuting Attorney

Douglas County Courthouse

213 Rainier

P.O. Box 360

Waterville, WA 98858-0360

509-745-8535 (voice)

509-745-8670 (fax)

www.douglascountywa.net

EXHIBIT F

In a message dated 2/16/2011 12:42:13 P.M. Pacific Daylight Time, shane.hamlin@sos.wa.gov writes:

Mr. Ringhofer,

I'm sorry your follow-up email slipped through the cracks of a very busy time of year for us and that I am just now getting back to you. The following is a quick response.

SB 6527 was never scheduled for a public hearing; our office did not have an opportunity to support the bill. However, we supported and testified in favor of SB 6555, a similar bill introduced by Senator Roach and others during the 2008 Legislature.

I will ask our small team in the Voter Registration program to double-check to see if the seven individuals you believe may be noncitizens are in fact registered to vote. However, I will not send a letter to these individuals asking them to prove their citizenship status. I have no authority in law to do so. This double-check, while important, cannot be a top priority for my limited staff (reduced through a series of budget cuts over the last year). I'll try to get our findings back to you by the end of the month.

Thanks again for your diligence in these matters.

Regards,

Shane

Shane Hamlin
Co-Director of Elections
Office of the Secretary of State

Telephone: 360-725-5781
Mobile: 360-789-0786

www.vote.wa.gov

Washington Secretary of State

EXHIBIT G

In a message dated 3/15/2011 5:57:38 P.M. Pacific Daylight Time, shane.hamlin@sos.wa.gov writes:
Mr. Ringhofer,

Secretary Reed believes that only eligible citizens should register to vote and participate in our elections. This idea is fundamental to protecting the integrity of our elections system and ensuring fair elections for all. As I have shared with you before, Secretary Reed has actively pursued ways to systematically screen the voter rolls for non-citizens. I have been on point for several of these efforts over the years and as such, I share your frustration with not having a better system for doing so.

With this email I hope we can conclude our conversation for now, knowing that we share a similar frustration and desire to ensure that only eligible citizens are on the voter rolls.

Now, with regard the key subjects we've most recently discussed:

Authority to cross check voter registrations against disqualified juror data

The Governor's office responded to your questions on this issue correctly. The Secretary of State does not have the authority or obligation to cross check voter registrations against disqualified juror data. As the Governor's office explained, language regarding comparing voter registrations to disqualified juror data that was adopted in Senate Bill 5743, in 2005, was repealed in 2009, via Senate Bill 5270.

Confusion over this issue is a perfect example of why it is vital to always read the current law and not rely on bills adopted in years past for guidance on what is and is not required. I urge you to review the current law to better understand voter registration requirements. All state laws regarding voter registration, including the voter registration database, can be found here: [Chapter 29A.08 Voter Registration - Revised Code of Washington](#).

2011 Legislative Session: Senate Bill 5855

Although our office has supported similar bills in the past, SB 5855 was introduced too late in the Legislative process to receive a hearing. Fortunately, SB 5855 will carry forward to 2012 Legislative Session.

Registered voters in Douglas County

As I said we would, my voter registration team researched the seven individuals you identified as registered voters, but who declined jury service due to citizenship status. Our research confirms that these seven individuals are, in fact, registered to vote in Douglas County. In a previous exchange on this particular issue, you asked if our office could send these individuals a letter asking them to prove eligibility, i.e. prove they are citizens.

Any notification from our office to these voters would function as a voter registration challenge. As you and I have discussed, an individual making a voter registration challenge must have personal knowledge that the voter is ineligible to be registered. I lack personal knowledge that these individuals are not U.S. Citizens. It is not because I disagree with you or do not believe it is important to find and remove ineligible voters from the rolls that I am not sending such a letter. Rather, I must operate within the law; I cannot issue a letter that is, in effect, a voter registration challenge based on third party research.

General Comments

Below is a summary of the comments and points I have made to you over the past two months, or new points that I want to share now that I feel help fully scope the issues at play when we talk about preventing or removing noncitizens from the voter rolls and voter registration in general.

1. There is no single database of noncitizens to screen against the voter rolls.
2. There is no single database of citizens to screen voter registration applications against. REAL ID is not a reality and we may be a long way from a national ID system.
3. All voter registration applicants sign an oath indicating the information provided on the application is true, including citizenship status. Penalties for lying are provided for in law. RCW 29A.08.210 , RCW 29A.08.230 and RCW 29A.84
4. State law, RCW 29A.08.810, states "Registration of a person as a voter is presumptive evidence of his or her right to vote." This means a person's registration is considered valid until someone else successfully challenges the registration under the provisions of Washington's voter registration challenge laws. Voter registration challenge laws are in RCW 29A.08.
5. Our office has a record of seeking access to federal databases that have information about *legal* aliens so that we can to cross check these data against our state voter rolls. Two requests have been made to the U.S. Department of Homeland Security for such access, and both were denied.
6. We asked the Consulate General of Mexico for a list of all individuals living in Washington state that have been issued a Matricula Consular card. Jorge Madrazo, the Consul General of Mexico at the time, made a personal trip to Olympia to tell us they cannot fulfill the request, citing privacy protections in the Geneva Convention.
7. Citizenship or proof of legal presence is not required to obtain a regular driver's license in Washington. DOL has data on "enhanced" driver's licenses and we can work with DOL to get this data; however, only about 20,000 people have an enhanced license and this data is of limited value since it doesn't prove non-citizenship (which is the data needed to produce findings on registered noncitizens).
8. DOL agents are required to ask individuals who indicate they want to register to vote if they are United States citizens. If the DL applicant replies no, the agent is not supposed to complete the motor voter registration process. RCW 29A.08.330
9. Washington courts do collect information from people that receive a jury summons but disqualify themselves based on age, citizenship, residency or felony status. This information is currently protected from release or use for a purpose other than jury summons. RCW 2.36.072 . Senator Pam Roach introduced legislation each of the last several sessions that would require the courts to send our office and the appropriate county auditor disqualified juror data. This could be helpful and we supported similar legislation in the past. The courts were adamantly opposed to this idea and these bills have never made it out of the Senate.

Thank you again for your attention and efforts on this important matter.

Regards,

Shane

Shane Hamlin
Co-Director of Elections

Office of the Secretary of State

Telephone: 360-725-5781

Mobile: 360-789-0786

www.vote.wa.gov

Washington Secretary of State

The State Elections Division facilitates fair, accurate and accessible elections for all Washington voters.