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SUPREME COURT
STATE OF WASHINGTON
Jun 29, 2015, 8:22 am
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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

JAMES J. O'HAGAN)	CASE NOS. 91019-7 & 91730-2
Petitioner,)	RESPONSE TO COURT COMMISHIONER
VS.)	NARDA PIERCE'S RULINGS AND DIVISION II
PACIFIC COUNTY SUPERIOR)	COURT OF APPEALS DECISION BY
COURT JUDGE MICHAEL SULLIVAN,)	DECLARATION OF JAMES J. O'HAGAN
JOSEPH FIELD AND ASSOCIATES)	
Respondents)	

I James J. O'Hagan swear under the penalty of perjury of the laws of Washington State that the following is true and correct and honestly stated.

Narda Pierce's ruling dated April 17, 2015 is factually incorrect whereas she wrongfully implies that I did not provide notice to the Pacific County Superior Court that I was prepared and ready to present my future damages argument to a jury. Not only did I provide proper Notice to the court I also properly served each and every known persons responsible for organizing together to cause significant portions of my future damages. I also properly requested a Hearing as per previous order of the court. Please see exhibit 1. In an attempt to keep from overwhelming the court, I only provided the court with a sample proof of service in exhibit 1 and I swear under the penalty of perjury, I properly served each and every entity identified on the Notice of Hearing (also provided herein) properly. Exhibit 1 contains true and correct copies of the documents I filed in Pacific County courthouse requesting a hearing to get my future damages jury trial started.

After receiving these documents, Judge Sullivan had a duty to perform, and because of his direct involvement in using his official position to steal over \$360,000.00 from me, and provide it to the judgment debtor, so the judgment debtor could solicit a murder for hire plot to



murder me, Judge Michael Sullivan was not about to allow me to get to a jury and he was determined he was going to do everything within his power to prevent me from ever reaching a jury. I have never received equal protections of our laws, in any of my dealings with Pacific County Superior Court or the Division II Court of Appeals, and all of their actions were designed to continually take my life, liberty and property outside of the presence of a jury, feed a predatory judicial industry and interfere with justice. It is the exact kind of governmental oppression our constitutions were established to prevent in the jury mandatory sections within our constitutions.

NOTICE OF TEMPORARY UNAVAILABILITY

At the time I filed for my future damages jury trial I was financially able to afford to present my future damages jury trial, pay for my expert witnesses, and witness fees. After a person by the name of Gordon Godfrey, assumed improper jurisdiction over me, subjected me to criminal sabotage and attacked my financial ability, I was forced to take on additional employment outside of our farm. Currently I am employed as a project supervisor of a contracting crew working on the petroleum pipeline that runs through Washington State from Canada to Portland. My supervising job is projected to get over in mid September just days before our Cranberry harvest is projected to start. Our cranberry harvest is anticipated to run from September 20 through the end of November. After November I will be ready and capable to present a jury trial, for our future damages, in which I will prevail in obtaining a ten million dollar plus judgment against the persons and entities I identified in my hearing notice.

My new job was necessary for me to be able to attempt to recover from the criminal sabotage I was subjected to and pay for our farming supplies. Performing my farming duties in connection with my new job makes it very difficult for me to respond to the legal industry, as I am physically incapable of doing so. In connection with this document I intend to file a Notice of Appeal to the United States Supreme Court regarding the recent decision I received from the Ninth Circuit Court of Appeals, as it appears to me the Ninth Circuit Court of Appeals Judges are reluctant to address my violations of the separations of powers argument, that created the "Nobility" within our judicial branches that converted justice into a legal industry that does not serve justice.

I fully intend to use some of the funds I earn in connection with my new job and our farming activities to fund another campaign to run for office to address the violations of the separations of powers by state bar members politically. Please do not take any further action to attack or sabotage my ability to engage in commerce, or prevent me from addressing any possible funding you are personally engaged in that may involve you supporting the violation of the separations of powers, because you have a personal desire to protect any "Nobility" you have assumed. Please use a little common sense to protect all of our equality.

DIVISION II COURT OF APPEALS DECISION

As I suspected the Division II Court of Appeals disregarded my request to allow a different Court of Appeals to hear my appeal, ignored the evidence, made a false interpretation of my evidence, and entered a deceiving, dishonest and disrespectful decision in case no. 47078-1-II. Their decision served the function of the judicial industry in keeping a jury from determining any of the facts involved and prevented justice from occurring.

No person on earth should be forced to deal with the amount of frustration I was forced to deal with in this situation. I have never been treated as an equal to any process procedures or dealings in dealing with Joseph Field and his street gang of thugs. After they organized together to steal about 4 million dollars of my property they organized together to take my life and liberty, and force me into involuntary servitude.

I ask each and every one of my justices to honestly tell me if they would accept this type of treatment. If we all had equal protections of our laws and were equally responsible to our laws I would not have been forced into this involuntary servitude. It is and was only possible to force me into this involuntary servitude because individuals had and have "Nobility Attitudes". No jury of my peers would've ever allowed any of it and when I reach a jury of my peers I will ask them to indict each and every one of Joseph Field's street gang on organized criminal charges.

All of the judges who participated in the Field Judgment were obsessed with the Nobility Attitude of the State Bar Associations membership, which is why there was never a jury involved in any of it. To protect myself from the "Nobility Attitude of the State Bar

Membership” it is necessary for me to document the problem and explain it, in laymen’s terms as to how it originated, why it originated and how it is maintained.

Our constitutions were established to protect freedom, and in order to protect freedom we have to have and protect equality. Do not try to kid yourself or anyone else without protecting equality we can never protect freedom. All anyone has to do to understand why the state bar associations have organized together to attack our freedom is to follow the money. Joseph Field and his accomplice’s judges would never have been able to steal over 4 million dollars from me and then take my life, liberty and property then force me into involuntary servitude if we were all equal. The judges involved in attacking my freedom would never have even thought about taking my life, liberty and property without a jury’s involvement if they were my equal and were equally responsible to our laws, whereas the amount of criminal actions it took to steal over 4 million dollars from me then force me into involuntary servitude would wind a common person in prison for life, dubbed a felon and no longer able to enjoy the luxuries of public employment. Their own personal property would be sacrificed to repair the damages they caused.

Any one of the judges involved in the Field Judgment and enforcement actions could’ve determined that they are not my Masters, nor my King, therefore they do not have the power by themselves to take my life, liberty and property and force me into involuntary servitude, that can only be accomplished by a jury of their peers. I want to make it clear I do not give my consent to our Supreme Court Justices to assume “Nobility” over me and if they do assume Nobility over me they do it without my consent and the consent of our constitutions.

I want to make it absolutely clear here and now. I have never given my consent to allow state bar members to organize together to take my life, liberty and property and I do not grant any State Bar Member Nobility over me, and as such I do not give any of them my consent to take any of my life, liberty and property, nor give me life, liberty and property of another, that I leave to the fate of a jury of our peers.

The question is why are we not all equal, if our constitutions were established to make and protect our equality. The answer to that question is exposed by the criminal actions involved in this case and all any interested individual has to do is follow the money. In this case

millions of dollars was stolen from the common man by state bar members then the common man was forced into involuntary servitude by state bar members. If state bar members are allowed to profit from taking the life, liberty and property of the common man then they will continue to take the life, liberty and property of common men and women until they are prevented from doing so.

I am informing our Supreme Court Justices, that I am going to do everything in my power to make each and every one of the state bar members involved in stealing my life, liberty and property face a jury of my peers and explain to the jury why their actions are not that of a "Nobility Attitude" and should not be considered a direct attack on our constitutions and our equality. Like it or not I will continue to make the argument to our legislative and executive branches and to the people that all state bar members who violated the separations of powers, should be banned from ever holding public office and all state bar members who supported the individuals violating the separations of powers should be banned from ever holding any public office ever again. This creation of the "Nobility Attitude" violates all equality arguments any judge or justice could possibly make, and it is not a factual argument they have the power to determine, unless they have absolute power and control over all of our governmental functions.

While this case is a clear example of why the state bar membership has pursued "Nobility" (all any common person has to do is follow the money) it becomes necessary to document how state bar members have created "Nobility" for themselves and their prosperity. The "Nobility" of state bar members was created through violations of the separations of powers whereas it is and was necessary for state bar members to infiltrate the legislative and executive branches of our governments achieve this "Nobility". It is necessary for state bar members to continue to infiltrate our legislative and executive branches to maintain this "Nobility". With the violations of the separations of powers in place, the Judicial Branch has assumed absolute power and control over our entire country, and has enslaved all of us who are not their members or gang associates. All of the other branches of our government become subordinate to the judicial branch, and there is no equality at all.

These violations of the separation of powers are a direct attack on our constitutions, and our equality because: It creates special privileges and immunities for select groups of individuals and thus they have achieved "Nobility" and we are not all equally responsible to our laws and our laws become the laws of the common person.

In socialist and imperial societies, not all individuals are treated equally, there are Nobles and there are subjects. With the violation of the separation of powers came executive and judicial immunities, that essentially created a separate set of laws for the "Nobles" the violation of the separation of powers created. With the violations of the separations of powers we now have a very small group of individuals within our judicial branches running our entire country. Every single non bar member lives in fear of bar association members including each and every senator, congressperson and legislator who are not bar members. The violations of the separations of powers and the organized crimes involved in state bar members organizing together to take individuals life, liberty and property has discouraged voters to the point where less than 2/3rds of our voters actually vote, has caused our domestic tranquility to be regularly attacked to the point where we have been forced to place armed guards at most of our courthouses and schools in my lifetime, and most of our cities are regularly under attack from the silent majority disguised as protesters.

With the creation of their "Nobility" came disrespect for the common person, disrespect for our laws, and the creation of a separate set of laws to benefit their "Nobility". This disrespectful attitude was well taught to the children of our society and is why we have street gangs with their own laws and the silent majority acting out in frustration. In an effort to protect their "Nobility" and protect themselves from being equally responsible to the laws of the common person our state bar members including our judges have had to appease all public employees to acquire safety from the common person by acquiring a safety in numbers situation. In order to have and hold onto this safety in numbers situation the burden on employing so many individuals with public employment has placed us all into ongoing debt that our society will not recover from for several generations if at all. In order to appease the public employees and their safety in numbers situation they have created a situation where public employment is the prestigious employment of our country with higher salaries and more

benefits that the majority of the common person. This prestigious public employment, whose sole purpose is to appease "Nobility" has created more inequality than ever in the history of our country.

By design the creation of the "Nobility" of the state bar associations, and their violations of the separations of powers along with their effort to protect themselves from the laws of the common person by creating enough public employees with higher wages and benefits than the common person, they have attacked our constitutions and turned our free society where all of us are created equal into a socialist imperial society.

If any of our Supreme Court Justices disagrees with my analogy why don't you hold yourself and the judges who have organized with Joseph Field and others including Russell Garrett and Gregory Ursich to steal several millions of dollars from my family then take my life and liberty and force me into involuntary servitude, equally responsible to our laws, and allow a jury to determine the fate of all the State bar members involved.

Like all common street gangs the "Nobility Attitude" of the State Bar membership is maintained by threat and force, and none of the Justices, judges and state bar members have any desire what so ever to allow their "nobility" to be challenged before a jury in any way shape or form.

I do not give my consent to have our Supreme Court Justices to determine any factual determinations, other than determining if the \$164,000.00 Joseph Field and his accomplices took from me without any Juries involvement exceeded the minimum requirement in our constitutions that guarantees me a juries involvement. I do not give my consent for our Justices to determine whether or not the Field Judgment was justifiable or not, I am reserving that factual argument for a jury to determine, since I never received the protections I have with the juries involvement in breaking the conflict of interest in one state bar member determining the fate of another state bar member.

Further more I do not give my consent for any Supreme Court justices to use any case law that was created while members of our judicial branch had violated the separations of powers and infiltrated our legislative and executive branches. I am requiring our Supreme Court Justices to treat Mr. Filed, his criminal accomplices and I as your equals. This is not that difficult

to accomplish simply let go of any "Noble Attitude" any of you may be holding onto and send the argument to a jury of our equals to allow them to make the factual determinations then honor and deal with their determinations.

For all of your information I will not give up my hostile adverse possession of the former Kenyon Kelley Grayland Cranberry farm, and no one will take it away from me without a jury's involvement or brute force, that violates the entire concept of civil law. Like it or not the moment I am brought before the jury either civilly or by brute force I intend to make the arguments contained herein, and it is entirely your choice to assume a "Nobility Attitude" over me and use your official position to attempt to protect your fellow state bar members, and provide them special privileges and immunities by attempting to prevent me from exercising my constitutional right to a jury trial. The government oppression I was subjected to by all of this happened and could've only happened outside of the presence of the jury that was established to protect me from this type of government oppression.

In closing I can honestly tell all of you that Joseph Field and his criminal accomplices would've never attempted to engage in any of the crimes they subjected me to, if they did not believe they had achieved "Nobility". If they all honestly believed our laws applied to all of us equally none of it would've occurred. Please find any ability you may have to use common sense to treat the situation civilly, instead of using the kind of brute force a street gang of thugs would use in the situation. Honor equality instead of exercising imperialism.

Dated this ___ day of June, 2015.

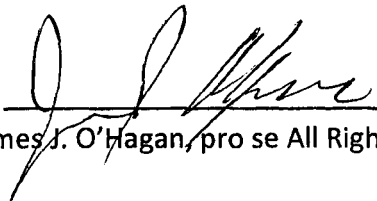
By  _____
James J. O'Hagan, pro se All Rights Reserved

Exhibit 1

James J. O'Hagan
2298 Cranberry Rd
Grayland WA 98547
(360) 267-7911

FILED

2014 JAN -8 PM 1:23

VIRGINIA LEACH CLERK
PACIFIC CO. WA

bl _____ DEPUTY

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

JAMES J. O'HAGAN et all)	Cause # 94-2-00298-0
Plaintiffs)	(Proposed)
Vs.)	NOTICE OF SHOW CAUSE HEARING TO
KENYON K. KELLEY et all)	MAKE ARRANGEMENTS FOR
Defendants)	EVIDENTIARY HEARING
_____)		(CLERK'S ACTION REQUIRED)

- TO; THE CLERK OF THE COURT, P.O. BOX 67 SOUTH BEND WA 98586-0067
- AND TO; THE COURT ADMINISTRATOR P.O. Box 67 South Bend WA 98586-0067
- AND TO; THE COURT ADMINISTRATOR 102 W. BROADWAY MONTESANO WA 98563
- AND TO; PACIFIC COUNTY c/o MARK MCCLAIN P.O. BOX 45 SOUTH BEND WA 98586
- AND TO; Pacific County Drainage District #1 1315 GOULD RD. GRAYLAND WA.
- AND TO; GEORGE BENSON, 21 AVENUE A SNOHOMISH WA 98290-2944
- AND TO; THOMAS S. LINDE, 575 Michigan St. Seattle WA 98108
- AND TO; SHERIFF SCOTT JOHNSON, P.O. BOX 27 SOUTH BEND WA 98586
- AND TO; DAVID POOR c/o NW Farm Credit Services, 1123 S. Market Blvd. Chehalis WA 98532
- AND TO; CARSTEN VON BORSTEL 601 SW 3rd Grass Valley OR 97029
- AND TO; JOSEPH FIELD 621 SW Morrison St. # 1225 Portland OR 97205
- AND TO; GREGORY URSICH, 777 108TH Ave. Ste. 1900 Bellevue WA 98004
- AND TO; BRIAN KELLEY P.O. BOX 156 BOTHELL WA. 98041
- AND TO; SCOTT MARLOW c/o Washington State Attorney General's Office

PLEASE TAKE NOTICE: The following matters are to be set for hearing before the court, by the court administrators as per court order, I ask the Pacific County Court Administrator to make arraignments with the Grays Harbor Court Administrator to set a hearing in the above matter, and allow the parties reasonable time to respond;



1063

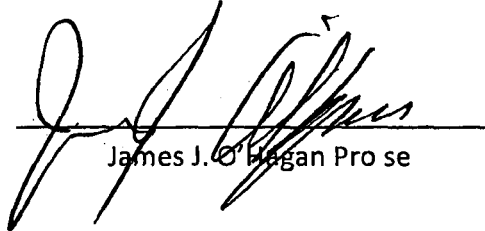
MATTER(S): JAMES J. O'HAGAN'S SHOW CAUSE MOTION FOR COURT TO SET AN EVIDENTIARY HEARING IN THE ABOVE IDENTIFIED MATTERS TO INCLUDE RESPONSIBLE PARTIES AND LITIGATE FUTURE DAMAGES AS PROVIDED FOR IN JUDGMENT

DATE: TO BE SET BY COURT ADMINISTRATORS', AND AMENDED NOTICE WILL SENT TO ALL INTERESTED PARTIES.

TIME:

PLACE:

Dated this 7 day of January, 2014.



James J. O'Hagan Pro se

1 James J. O'Hagan
2 2298 Cranberry Rd
3 Grayland WA 98547
4 (360) 267-7911
5
6
7
8
9

FILED
2013 DEC 27 PM 2:17
VIRGINIA LEACH, CLERK
PACIFIC COUNTY, WA
BY JB DEPUTY

10 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
11 FOR THE COUNTY OF PACIFIC

12 JAMES J. O'HAGAN et all) Cause # 94-2-00298-0
13 Plaintiffs)
14) JAMES J. O'HAGAN'S
15 Vs.) RESPONSE TO PACIFIC COUNTY'S
16) DAVID BURKE'S ANSWER
17) BY DECLARATION OF
18 KENYON K. KELLEY et all) JAMES J. O'HAGAN
19 Defendants)
20 _____)

21 I JAMES J. O'HAGAN swear under the penalty of perjury of the laws of Washington State
22 that the following is true and correct to the best of my knowledge.

23 Comes Now James J. O'Hagan and responds to prosecutor David Burk's answer as
24 follows:

25 I deny Pacific County was improperly served. In connection with this reply I submitted a
26 declaration of service.

27 Pacific County prosecutor David Burke's response is deceitful, dishonest, unfair and an
28 evasion of the facts. His response is in violation of RCW 42.17.010 Declaration of Policy (2) That
29 the people have the right to expect from their elected representatives at all levels of
30 government the utmost of integrity, honesty, and fairness in their dealings. Honesty is always
31 the best policy as when anyone lies or becomes deceitful it always takes more lies and more
32 deceit to try to cover up their lies and deception. An honest answer, and the best defense for
33 any Pacific County Officials to make would have been: It is not Pacific County's fault the
34 attorneys the Risk Pool hired to defend the counties liability in this action, engaged in

1 deceptions, deceit and dilatory practices, whatever damage they caused as a result of using
2 their relationship, and the counties relationship with the court, to obtain preferential treatment
3 is their liability.

4 An honest and fair response for Mr. Burke would have been Pacific County concedes the
5 Risk Pool's attorney engaged in the frivolous argument defense, when in fact by the jury verdict
6 the argument was never frivolous at all and in fact Mr. O'Hagan could prove his damages and
7 was damaged. Mr. Burk could have honestly explained to the court that in Klem vs. Wamu No.
8 87105-1, 2/28/2013 the Washington State Supreme Court determined that Division II Court of
9 Appeals were providing attorneys preferential treatment, during the time the decisions he
10 referred to were being made. Mr. Burke could have documented the fact equitable relief is
11 available to us for the injustices we were subjected to.

12 Instead of being honest and fair Mr. Burke omits responding to any of my arguments
13 that the bad faith decision to dismiss Pacific County, instigated several other bad faith decisions
14 by Pacific County officials that were directly related to the cause of our future damages. Mr.
15 Burke omits responding to any my claims the actions were continual and ongoing by Pacific
16 County officials to interfere with our commerce. Mr. Burke does not respond to the fact the
17 preferential treatment the courts provided to Pacific County officials and attorneys, instigated
18 Pacific County officials and attorneys to engage in several more bad faith decisions that led to
19 an interference with Commerce in the entire area, and ours. The conspiracy to interference
20 with our commerce is documented by Judge Snyder's conclusion of law dated March 23, 2002
21 and the fact the Kelley farm was not farmed and did not contribute to the Commerce in the
22 entire area, because obviously, individuals involved, were determined to prevent O'Hagan's
23 from collecting on the Jury's verdict in their favor. It is and was intentional acts to render the
24 jury's verdict a useless act, and ultimately deny our right to allow a jury to determine the facts.

25 Geo. P. Reintjes Co., Inc. v. Riley Stoker Corp., 71 F. 3d 44, 48 (1st Cir. 1995) "Fraud on the
26 Court" is construed narrowly. It is "reserved for those cases of injustices which, in certain
27 instances are sufficiently gross to demand a departure from rigid adherence to the doctrine
28 of res Judicata. "

29 Appling v. State Farm Mutual Auto Ins. Co., 340 F. 3d 769, 780 (9th Cir. 2003) (quoting United
30 States v. Beggerly, 524 U.S. 38, 46 (1998)). The ninth Circuit has adopted the definition of
31 "fraud upon the court" provided by Professor Moore: " "Fraud upon the court" should , we
32 believe, embrace only that species of fraud which does or attempts to, defile the court itself,

1 or is a fraud perpetrated by officers of the court so that the judicial machinery cannot
2 perform in the usual manner its impartial task of adjudging cases that are presented for
3 adjudication. "

4 Alexander v. Robertson , 882 F. 2d 421, 424 (9th Cir. 1989) (quoting 7 J. Moore & J. Lucas,
5 Moore's Federal Practice 60.33 92d ed. 1978)) . It " includes both attempts to subvert the
6 integrity of the court and fraud by an officer of the court. "

7 In re Intermagnetics Am. , 926 F. 2d 912,916 (9th Cir. (1991). The moving party must "show
8 an unconscionable plan or scheme which is designed to improperly influence the court in its
9 decision."

10 All of the defense attorneys profited from engaging in fraud, deceit, deception and
11 dilatory practices to further victimize the O'Hagan family for attempting to protect their water
12 rights, their civil right to have a jury determine the facts and their right to engage in commerce
13 in the area. The dilatory practices of the attorneys involved have clearly frustrated the courts as
14 described in:

15 Roadway Express v. Pipe 447 US 752 at 757 (1982) " Due to sloth, inattention or desire to
16 seize tactical advantage, lawyers have long engaged in dilatory practices.... the glacial pace of
17 much litigation breeds frustration with the Federal Courts and ultimately, disrespect for the
18 law."

19 Members of the Washington State Bar Association profited handsomely from Pacific
20 County taking of Deer creek from our property whereas: I paid over \$100,000.00 to five
21 attorneys to defend my family from the Risk Pool's attorneys frivolous arguments and the
22 court's fined me over another \$25,000.00 for my attempt to hold Pacific County responsible for
23 their direct involvement in diverting Deer Creek away from our property of which the jury
24 determined our family farm held water rights to and was damaged. Essentially I was forced to
25 pay Washington-State Bar Association members over \$125,000.00 just to assert that I had
26 water rights to Deer Creek that Pacific County had interfered with. We paid all of these legal
27 fees before the court even determined we had water rights. In addition to the initial
28 \$125,000.00 we put into addressing the counties involvement in the takings of our rights and
29 interference with our commerce we were forced to pay over another \$200,000.00 to defend
30 ourselves from Pacific County's attorney Gregory Ursich's well designed bankruptcy fraud
31 schemes. All of this money went out of the Twin Harbors area to slick city slicking attorneys

1 who used our courts to profit from their organized criminal activities, and sabotaging our
2 efforts to farm in the area.

3 If anyone thinks for one moment I authorized Rob Hill to submit the document he
4 submitted, they need to have their head examined. Mr. Burke better be able to come up with a
5 signed document by me authorizing Mr. Hill to submit the document. For any attorney to throw
6 a client under the bus is unethical, immoral and illegal. I believe the document was submitted
7 when I was working road construction in Alaska without my knowledge. It was underhanded,
8 backstabbing dealings between Pacific County, Gregory Ursich and Rob Hill of which caused me
9 a serious amount of grief and damages. Gregory Ursich continually used his Washington State
10 Bar license to coheres officers of our courts to assist him with his criminal activities. I am very
11 sorry but I ask the court to review the documents Pacific County's insurance affiliate, the Risk
12 Pool's attorneys submitted to the court to prove to my family fraud was not involved.

13 The court needs to consider what good was accomplished by the diversion of Deer
14 creek, and the stopping of the farming of the Kelley Grayland cranberry farm for the last 14
15 years just to prevent my family from protecting our water rights and collecting on the jury
16 verdict in our favor. Millions of dollars of damages were caused by the relationships Gregory
17 Ursich and his accomplices, including prosecutors at the federal level and the county level, had
18 with the courts. It does not get any more corrupt or criminal, and the laws that establish the
19 right to a jury trial for criminals also provide for victims in that the laws guarantee victims have
20 at the very minimum the same rights as the criminals do, and that includes a victims right to a
21 jury trial. Judge Snyder exposed the civil conspiracy to defraud us on March 23, 2002. Ever
22 since then there has been an organized effort to conceal the identities of all of the attorneys
23 involved in taking actions to render our jury verdict a useless act. The civil conspiracy was and
24 is a direct cause of our future damages, and until a jury is allowed to identify all of the
25 individuals involved in the civil conspiracy our damages will be continuing and ongoing. Civil
26 conspiracy exists when two or more combine to accomplish an unlawful purpose or to
27 accomplish a lawful purpose by unlawful means. Sound Mind and Body Inc. V. City of Seattle
28 122 Wn. 1074 (2004)

1 Even though the court could use the unpopular minority rule to overturn the appellate
2 court's decision that it was ok to dismiss Pacific County on their fraudulent frivolous argument
3 the court does not have to. Since the court is fully aware there has been no equitable relief, or
4 justice in any of this, the court is required by RCW 4.04.010 to make the action equitable and
5 just. RCW 4.68 and the case law submitted herein requires the court to act in a manner in
6 which justice prevails. Also the actions Pacific County engaged in after they were dismissed was
7 a direct cause of our future damages which is reserved for the jury to determine. It certainly is
8 lawful and would be just and equitable to determine with the minority rule or the case law, that
9 the court is not allowed to reward fraud, and it has the duty to hold everyone responsible for
10 engaging in fraud and dilatory practices responsible for their actions.

11 The Arizona Court of Appeals articulated the minority rule in McElhanon v. Hing, 728 P.2d
12 256 (Ariz. App. 1985), vacated in part on other grounds, 728 P.2d 273 (Ariz. 1986), cert.
13 denied, 481 U.S. 1030 (1987). In McElhanon, the court relied on the public policy behind
14 the Uniform Fraudulent Conveyance Act to hold that "a lien is not necessary before there is
15 an actionable wrong." Id. at 263. McElhanon expressly relied on Dalton v. Meister, 239
16 N.W.2d 9, 17-19 (Wis. 1976), which held that because the Uniform Fraudulent Conveyance
17 Act made fraudulent conveyances of the debtor's property to the grantee a definite legal
18 wrong, that wrong could be the subject of a civil conspiracy.5 McElhanon, 728 P.2d at 263.
19

20 The sad fact is that rewarding the Risk Pool's attorneys for engaging in fraud and
21 dilatory tactics places a larger liability on Pacific County itself and will not solve the problem the
22 courts are facing with fraud being a huge profitable industry that victimizes victims. I ask
23 everyone involved with this to take a moment to consider what if: What if the Risk Pool's
24 attorneys had said (about 20 years ago) we cannot engage in fraud and dilatory tactics and the
25 court needs to hold an evidentiary hearing before the next growing season to determine who
26 has what water rights to make sure water rights are not interfered with, instead of their
27 argument the whole thing is frivolous and Mr. O'Hagan has not and cannot show an
28 interference with his rights. The fraudulent argument of the Risk Pool's attorneys prevented the
29 argument from going to trial for 6 growing seasons and instigated hundreds, if not thousands of
30 bad faith decisions by public officials. The jury verdict is evidence all of it was unjust.

31 It was all of designed to profit from the taking of individuals rights and interfere with
32 commerce. The most unjust thing about all of this is that the O'Hagan family was victimized, the

1 merchants of the area were victimized and the innocent taxpayers were victimized, and the
2 public officials engaging in criminal activity and bad faith decisions all received paychecks for
3 doing so. Many of them were promoted to higher paying positions. Please explain to all of us
4 why Veril Hill was promoted to head up the Washington State Risk Pool, when in fact he was
5 the person who made the bad faith decisions that caused all of this litigation. Veril Hill was
6 promoted for assisting a well organized scheme to profit from the takings of individuals life,
7 liberty and property. It is the epitome of public corruption that no jury will condone.

8 Pacific County was not satisfied from taking our Water rights on Deer Creek as they then
9 assembled with others to take our money, our jury verdict in the case and sabotage our efforts
10 to engage in commerce and farm our cranberries, and I will prove all of it to the jury. The only
11 way Pacific County will get out of any of it, is by deceit, deception, fraud and using their
12 relationship with the courts to obtain preferential treatment and conceal the identifies of the
13 individuals involved, to protect them from their crimes. Since Pacific County was dismissed
14 from this action Pacific County officials has continually and relentlessly attacked my ability to
15 engage in commerce (earn money,) has taken actions to prevent me from collecting on our
16 judgment, has condoned the drainage district's continual flooding of our farm and has
17 intentionally removed the metal Culvert on Deer Creek . **When Bad Faith decisions by public**
18 **officials become a profitable enterprise for any entity, bad faith decisions are encouraged.**

19 None of any of this is anywhere near equable or just and not holding Pacific County
20 responsible for their relentless attacks on my family will encourage more bad faith decisions
21 and attacks on innocent victims life, liberty and property by Pacific County officials. All of
22 Pacific County Public Officials who engaged in actions to take my life, liberty and property were
23 promoted to higher paying jobs for doing so and supporting the profitable fraud industry of the
24 State Bar Associations takings of individual's rights. Beightol v. Kunowsky D.C. Pa. 1974 382 F.
25 Supp. 98 (the Court held) "Absent highly unusual circumstances defenses of Executive
26 Immunity and Good Faith by public officials in carrying out duties should be submitted to
27 jury" Rabon v. Rowen Memorial Hosp., Inc., 269 NS 1, 13, 152 SE 1d 485, 493(1967)
28 "Immunity fosters neglect and breeds irresponsibility, while liability promotes care and
29 caution, which caution and care is owed by the government to its people."

1 Omission, deceiving and denial is engaging in the art of deception. In engaging in the art
2 of deception, Pacific County prosecutor David Burke does not admit or deny my allegations,
3 "Pacific County officials engaged in several actions, (after they were dismissed from the action
4 for the fraudulent frivolous defense), to prevent us from collecting on our judgment and
5 interfering with not only our commerce but commerce in the entire area". Arguing that they
6 were dismissed and ignoring these serious allegations is yet another act of deception and
7 continuing their intent to hinder, delay and defraud us that we have to defend ourselves from.
8 By omission Mr. Burke implies to the court they in fact did engage in the interference of
9 commerce Mr. O'Hagan alleges because they believed they were immune from any and all
10 liabilities they caused to the O'Hagan family. The court is aware that we were never able to
11 collect our judgment and has made prior determinations that, "every time O'Hagan's
12 attempted to collect on their judgment things happened down in Pacific County that prevented
13 them from doing so".

14 Except the documents I have filed, the last document filed in the Pacific County auditor's
15 office regarding ownership of the Kelley Grayland cranberry farm shows, the former Pacific
16 County Sherriff took possession of the Kelley farm to sell it at sheriff sale. The Pacific County
17 Sherriff's office has not documented the fact someone pulled the sheriff sale at the auditor's
18 office. Almost every time I was in the courtroom with several different judges addressing the
19 exact ownership of the Kelley Grayland cranberry farm, a sheriff deputy and prosecutor David
20 Burke were in the courtroom, never once did they reply to the court, "the sheriff's office was in
21 possession of the property or acknowledge to the court that False Representation Concerning
22 Title of the property is a crime" (RCW 9.38.020) and demand that a jury determine the exact
23 ownership of the property. Instead prosecutor David Burke and the former Sherriff's office took
24 the criminal act of omission to continue to protect the attorneys' involvement in clouding the
25 ownership of the property and execute the fraud schemes the Honorable Paul B. Snyder
26 exposed. As long as the attorneys involved in the attorney clause of the FCS/ Fujo Properties
27 agreement can keep a jury from determining the intent of the transfer of the property back to
28 the Kelley's the fraud scheme is executed and they are protected from their fraud crimes.

1 At any time the Pacific County Sherriff can say no we are not going to participate in any
2 fraud, deceit, deception or omission schemes to defraud anyone, we demand that a jury be
3 allowed to determine the exact ownership of the property, the intent involved in the FCS / Fujo
4 Properties Agreement and identify the names of all of the attorneys involved. Instead Mr. Burke
5 alleges Pacific County (for the sheriff's department?) is immune from causing any of our
6 damages. Essentially Pacific County, including the Sheriff's department was assisting in the
7 fraud scheme, and is again, by the act of omission. Being directly involved in, and assisting in a
8 fraud scheme, is not the duty of any public official and in violation of RCW 42.17.010 (2).

9 I ask Prosecutor David Burke, Sherriff Scott Johnson, Sgt. John Huntington and deputy
10 Attorney general Scott Marlow to explain to the court how when Pacific County dismissed my
11 attempt to collect the \$180,000.00 note and interest fraudulently transferred to American
12 Equities, the execution action was dismissed in summary judgment based solely on statements
13 of council, when summary judgment cannot be granted based on statements of council alone.

14 **Statements of counsel, in their briefs or their arguments are not sufficient for a motion to**
15 **dismiss or for summary judgment, Trinset v. Pagliaro, D.C. Pa. 1964, 229 F. Supp. 647**

16 I ask that none of you engage in the criminal act of omission and act as described in RCW
17 42.17.010 (2) with integrity, honesty and fairness. I pray you will not continue to engage in
18 deception, deceit and dishonesty, in an attempt to hinder, delay, defraud us, and steal from us
19 to conceal the criminal actions of others.

20 Furthermore I have presented evidence that Pacific County ignored the court order that
21 prevented them from working in the right of way in the area of the Deer Creek culver without
22 the court's approval. Exhibits 1 & 2 are pictures of the metal culvert that was involved in a
23 considerable amount of controversy this action at the county level and the appellate level.
24 Exhibits 1 & 2 shows Pacific County removed the metal culvert and did not clean out or repair,
25 or replace the original culvert on Deer Creek despite the court injunction, to get the court's
26 permission. Exhibits 1 & 2 are proof that when public official's bad faith decisions become a
27 profitable industry public officials will make more bad faith decisions instead of refraining from
28 making bad faith decisions. Twenty years of litigation should not get us to a situation that is

1 worse, it should have at the very least corrected the problem, so victims are not continually
2 victimized. There was and is no justice in any of this perversion of our Judiciary.

3 "Haines v. Keener, 404 US 519, 30 L Ed 2d 652, 92 S CT 594(1972)a motion to dismiss is not to
4 be granted unless it appears beyond doubt that the plaintiff can prove no set of acts which
5 would entitle him to relief."

6 In Robin L. Miller Construction Co., Inc. v. Coltran 43P.3d 67 (Wash App Div. 1
7 04/01/2002) III Res Judicata "Because an attempt to execute a judgment lien is not a cause of
8 action, we find that Res Judicata principals do not apply" V. Multiple Writs of Execution
9 "Because RMC has not levied a successful execution to date, it is entitled to avail itself of the
10 execution statute". VI Laches "Therefore the doctrine of laches does not preclude RMC from
11 executing upon its judgment". And Fireman's Ins. Co. of Newark, N.J. v. Washburn

12 County, 2 Wis 2d 214, 85 N.W. 2d 840(1957) Government immunity violates the common law
13 maxim that everyone shall have remedy for an injury done to his person or property." The
14 court's have concluded there is no res judicata and laches when an individual has been
15 damaged and other parties share in the responsibility of the damage.

16 The court's have determined in debating RCW chapter 4.68 dismissed parties can be
17 brought back into the litigation to be held liable for their responsibility of the damages
18 occurred. Here in this case, the essential elements have been met, the jury has determined we
19 were damaged, and the court is aware there has been no equitable relief.

20 Seattle Mortg. Co., Inc. v. Unknown Heirs of Gray, 133 Wash.App. 479 (2006) 69 Equitable
21 relief is available where there is no adequate remedy of law. Town Concrete Pipe, 43
22 Wash.App. at 498, 717 P.2d 1384. The court will create a lien in equity where there is no valid
23 lien at law but such a lien is needed to prevent injustice. N. Commercial Co. v. Hermann Co.,
24 22 Wash.App. 963, 968 n. 2, 593 P.2d 1332 (1979).

25 The burden that Pacific County is trying to carry is far too heavy and the hill is too steep
26 for Pacific County to carry the burden alone. It is time Pacific County officials engaged in
27 honesty, integrity and fairness and acknowledged the damages. It is time Pacific County shared
28 the burden and identified the individuals responsible for the damages so the innocent victims
29 of the area are not further damaged by their actions of deceit, deception, dishonesty,


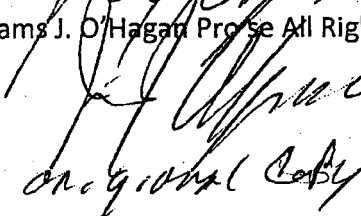
1 unfairness, and intent to hinder, delay, defraud and interfere with our ability to engage in
2 commerce. Omission in this situation is an intentional act of deceit, deception, dishonesty,
3 unfairness and a direct act to hinder, delay and defraud. Refusing to identify the individuals
4 involved or address the wrongdoing is assisting in the conspiracy to defraud my family, and
5 further victimize us. Pretending all of it was and is ok is not justifiably ok.

6 An honest, straightforward and fair answer for Pacific County would have been, and
7 should be, the O'Hagan family has been damaged, and we cannot lawfully participate in the
8 takings of an individual's life, liberty and property, as such we will not participate in any actions
9 that further damages the O'Hagan family and we will do everything in our power to protect our
10 interests and hold all other individuals responsible for damaging the O'Hagan family liable for
11 their actions, as such the court should proceed to the jury as soon as possible. Pacific County is
12 lawfully prevented by our constitutions, from engaging in any actions that unlawfully take an
13 individual's life, liberty and property and, as such they are certainly prevented from contracting
14 with any entity that profits from unlawfully taking an individual's life, liberty and property. In
15 addition to the other admissions I requested, I ask prosecutor David Burke, Sheriff Scott
16 Johnson, Sgt John Huntington and Scott Marlow to disclose to the court the money trail of the
17 \$97,327.57 Grange Insurance payment that was deposited into Gregory Ursich's client trust
18 account for Kenyon Kelley. I ask them to carefully explain Russell Garrett's involvement in the
19 disappearance of the \$97,327.57 Grange insurance payment.

20 All of this is far past ethical conduct violations of State Bar members it is unjust,
21 criminal, has threatened, harassed, intimidated and victimized victims. The court is lawfully
22 bound to stop the threatening, harassing and intimidation of victims, witnesses and informants.
23 The law says the court is bound to make it equitable and just, and allowing a continual barrage
24 of legal documents for 20 years, is threatening, harassing and intimidating, victims, witnesses
25 and informants, that needs to cease and desist.

26
27
28
29

Dated this 23 day of December 2013.

By 
James J. O'Hagan Pro se All Rights Reserved




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4210312012


CERTIFICATE OF SERVICE

I James J. O'Hagan swear under penalty of perjury of the laws of the State of Washington that on December 23, 2013 I mailed a true and correct copy of the enclosed to the following:

FILED
2013 DEC 26 PM 2:32

Pacific County Court Clerk
P.O. Box 67
South Bend WA 98586

~~Pacific County Court Administrator
P.O. Box 67
South Bend WA 98586~~

VIRGINIA LEACH, CLERK
PACIFIC COUNTY, WA
BY  Brian Kelley
P.O. Box 1567
Bothell WA 98041

~~Grays Harbor Co. Court Administrator
102 W. Broadway
Montesano WA 98563~~

Pacific County Prosecutor
P.O. Box 45
South Bend 98586

Gregory Ursich
777 108th Ave. Ste. 1900
Bellevue WA 98004

Thomas S. Linde
575 Michigan St
Seattle WA 98108

George Benson
21 Avenue A
Snohomish WA 98290

Chief Justice
U.S. District Court Clerk
1717 Pacific Ave. RM 3100
Tacoma WA 98402-3200

Joseph Field
621 SW Morrison St. # 1225
Portland OR 97205

Sheriff Scott Johnson
P.O. Box 27
South Bend WA 98586

Dean Takko & Brian Blake
P.O. Box 40600
Olympia WA 98504-0600

Carsten von Borstel
601 SW 3rd
Grass Valley OR 97029

~~Jaime Herrera-Beutler
750 Anderson St. Ste. B
Vancouver WA 98661~~

Washington State Supreme Court
P.O. Box 40929
Olympia WA 98504-0929

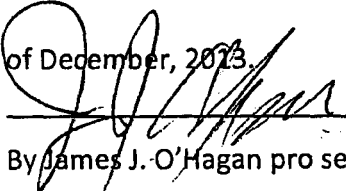
Washington State Bar Assn.
1325 4th Ave. Ste 600
Seattle WA 98101-2539

David Poor c/o NWFC
1123 S. Market Blvd.
Chehalis WA 98532

Scott Marlow
P.O. Box 40100
Olympia, WA 98504

Hon. F. Mark McCauley
102 W. Broadway
Montesano WA 98563

Signed under penalty of perjury this 23 day of December, 2013.


By James J. O'Hagan pro se

1060

Exhibit 14

1 James J. O'Hagan
2 2298 Cranberry Rd
3 Grayland WA 98547
4 (360) 267-7911

FILED

2013 DEC 26 PM 2: 32

VIRGINIA LEACH, CLERK
PACIFIC COUNTY, WA

BY JL DEPUTY

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IN THE SUPERIOUR COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF PACIFIC

JAMES J. O'HAGAN et all)	Cause # 94-2-00298-0
Plaintiffs)	DECLARATION OF
)	JAMES J. O'HAGAN'S
Vs.)	AMEND COMPLAINT TO
)	INCLUDE RESPONSIBLE PARTIES AND
)	LITIGATE FUTURE DAMAGES AS
KENYON K. KELLEY et all)	PROVIDED FOR IN THE LAST
Defendants)	SENTENCE OF OUR JUDGMENT
)	AND RCW CHAPTER 4.68

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COMES NOW James J. O'Hagan and moves the court to schedule a hearing on the enclosed matters. I swear under the penalty of perjury of the laws of Washington State that the following is true and correct to the best of my knowledge. In violation of RCW 4.04.010 there has not been any equitable or just resolution of the matters involved in this case.

In this case there is a court order that I am supposed to arrange for the court administrators to set a hearing date. I am asking Your Honor for a Hearing to allow us to begin to litigate our Future Damages as described in our judgment and resolve these matters. To calculate the amount of time the hearing will take, I ask Your Honor to review the evidence and statements I have provided herein. I ask Your Honor for a hearing date that allows me enough time to properly address the matters herein, and I ask the court to set the hearing far enough down the road to allow me to properly serve notice to the parties identified herein.

The court should be fully informed that I have aggressively pursued Court actions attempting to identify the exact ownership of the Kelley Grayland Cranberry farm and in an effort to protect themselves and others from criminal and civil liabilities the exact ownership of

1 the property has remained clouded. As the Honorable Paul B. Snyder exposed in his conclusion
2 of law, attorneys designed and executed bankruptcy fraud schemes intended to defraud the
3 O'Hagan family. Part of the attorneys and the Kelley's' fraud schemes was to cloud and conceal
4 the property ownership of the Kelley Grayland Cranberry farm, and destroy the property value
5 and the value of the crops.

6 One of the many former judges in this case ruled that the owners of the Kelley farm
7 shall remove the obstruction to the Deer Creek channel so Deer Creek is not obstructed to the
8 O'Hagan family farm, and Pacific County shall not perform work in the Deer Creek drainage
9 without authorization from the court. Since Kenyon Kelley was allowed to remain on the
10 property the court order to remove the blockage he placed into the Deer Creek channel did not
11 occur, and Pacific County recently removed the metal culvert on Deer Creek and completely
12 obstructed Deer Creek from crossing Smith Anderson road between tracts 26 and 27. In order
13 to hold the parties responsible for criminal and civil liabilities the exact factual ownership
14 interests and / or assignees of the Kelley Grayland Cranberry farm will have to be determined.
15

16 To: PACIFIC COUNTY and Pacific County Sherriff's Department;

17 Pacific County was dismissed from this action with the frivolous argument; the jury
18 verdict in this case renders Pacific County's frivolous argument a fraudulent argument.

19 Including but not limited to Geo. P. Reintjes Co., Inc. v. Riley Stoker Corp., 71 F. 3d 44, 48 (1st
20 Cir. 1995) "Fraud on the Court" is construed narrowly. It is "reserved for those cases of
21 injustices which, in certain instances are sufficiently gross to demand a departure from rigid
22 adherence to the doctrine of res Judicata. " Appling v. State Farm Mutual Auto Ins. Co., 340
23 F. 3d 769, 780 (9th Cir. 2003) (quoting United States v. Beggerly, 524 U.S. 38, 46 (1998)). The
24 ninth Circuit has adopted the definition of "fraud upon the court" provided by Professor
25 Moore: " "Fraud upon the court" should , we believe, embrace only that species of fraud
26 which does or attempts to, defile the court itself, or is a fraud perpetrated by officers of the
27 court so that the judicial machinery cannot perform in the usual manner its impartial task of
28 adjudging cases that are presented for adjudication. "

1 Pacific County, including the former Pacific County Sherriff's office (who took possession
2 of the property in 2002) never took any effort to remove the obstruction to the Deer Creek
3 channel, or make sure the court order was properly adhered to, instead Pacific County with the
4 assistance of the former Pacific County Sherriff's office and others concealed the exact
5 ownership of the property for several years to execute the fraud schemes and carry out
6 personal revenges and personal vendettas against the O'Hagan family. These actions were in
7 violation to RCW 9.05.030 and RCW 9.05.060.

8 Out of spite, revenge and for other reasons last year Pacific County removed the Metal
9 replacement culvert on Deer Creek, and did not replace or repair the original Deer Creek
10 culvert, which forever prevented Deer Creek from traveling down anywhere near to its original
11 course and Deer Creek was diverted north into the vicinity of Hanna Creek and the Dixon
12 Culvert. This action by Pacific County was in violation to the court injunction in this case and left
13 the water course of Deer Creek to the O'Hagan farm subject to the mercy of the Kelly property
14 ownership.

15 The dishonest and disrespectful (criminal) actions by the officers of the courts in this
16 matter encouraged Pacific County Officials to be more dishonest and disrespectful (criminal as
17 described in RCW 9.05.060) to the O'Hagan family and overall. I filed criminal complaints at and
18 / on the Pacific County Sherriff's Department and Pacific County for defrauding the O'Hagan
19 family and the entire Twin Harbors Area. Pacific County Sherriff Scott Johnson, deputy
20 prosecutor Mark McClain and I put in a considerable amount of efforts and time to address the
21 crimes addressed herein. Pacific County Sherriff Scott Johnson and deputy Prosecutor Mark
22 McClain recruited Sergeant John Huntington of the Washington State Patrol to investigate the
23 White Collar Crimes involved in this situation and submitted their report to assistant
24 Washington State Attorney General, Scott Marlow.

25 With this charging document I ask Sherriff Scott Johnson and deputy prosecutor Mark
26 McClain to review the court orders and conclusions of law I have provided herein, visit the site
27 of the Deer Creek culvert and the site of the repaved portion of Main Highway SR 105 just
28 north of the Furford Machine Shop, and discuss with the proper road departments the issues
29 that led to the removal of the metal culvert on Deer Creek and the repaved section of SR 105 so

1 they are able to testify honestly and accurately to the accusations stated herein. I ask deputy
2 prosecutor Mark McClain to obtain any authorization the road department obtained from the
3 court that authorized the removal of the culvert and work in the Smith Anderson roadside
4 ditch, which is the subject matter of the injunction expressed in exhibit 3. I ask deputy
5 prosecutor Mark McClain and Sherriff Scott Johnson to obtain a statement from the Pacific
6 County road supervisor testifying to the question of whether or not Kenyon Kelley or his
7 assignees ever cleaned out the portion of the Deer Creek channel just downstream of the Deer
8 Creek culvert, or in spite of the court order the channel remained blocked up.

9 I ask deputy prosecutor Mark McClain to honestly explain to the court how he believes
10 the waters of Deer Creek were able to jump up into the metal replacement culvert on Deer
11 Creek when Deer Creek was dug out by Pacific County below the level of the original culvert on
12 Deer Creek, which was about 18 inches below the Metal replacement culvert. Without being
13 deceitful, dishonest or disrespectful I ask Mr. McClain to explain to the court how the waters of
14 Deer Creek were able to defy Sr. Isaac Newton's basic law of gravity. Each and every one of us
15 knows without a doubt that did not happen, yet deceit, disrespect and dishonesty became a
16 profitable industry in this case. There is no honor in any of the injustices that has occurred in
17 this case. It is clear justice was sacrificed for economics provided to entities desiring dishonesty,
18 disrespect, dishonor and preferential treatment. On February 28, 2013 In Klem vs. WaMu #
19 87105-1 the Washington State Supreme Court determined that our Division II Court of Appeals
20 were providing preferential treatment to officers of our courts, which is exactly what has
21 happened in this case whereas Division II's factual finding that defies the law of gravity is a
22 physical impossibility and complete fraud. Furthermore I ask Sherriff Scott Johnson, Mr.
23 McClain and Mr. Scott Marlow to explain to the court how The Court of Appeals factual finding
24 does not physically defy the law of gravity and how Pacific County's actions in removing the
25 Deer Creek culvert are not an acts of negligence and / or harassing, threatening, intimidating a
26 victim, witness and informant and not an act of criminal sabotage as defined in RCW 9.05.060.

27

28 To Brian Kelley and Fujo Properties Inc.;

1 In an effort to defraud the O'Hagan family of our judgment against them, Kenyon Kelley,
2 Brian Kelley and others purchased the Kenyon Kelley Grayland cranberry farm in the name of
3 Fujo Properties Inc. Together the Kelleys' with the assistance of the former Pacific County
4 Sherriff's office and others ignored the court order to remove the blockage Kenyon Kelley
5 placed in the Deer Creek channel. Out of spite and his personal ability to carry out revenge and
6 personal vendettas, Kenyon Kelley with the assistance of his attorneys and others they
7 maintained blockages in the Deer Creek channel and the culverts under and along side of
8 Evergreen Park roadways and intentionally obstructed the flows of Deer Creek onto the
9 O'Hagan farms. To escape civil and criminal liabilities the individuals involved, and their
10 attorneys, maintained a cloud over the transfer of the Kelley Grayland cranberry farm from
11 Northwest Farm Credit Services to the Kelleys', and concealed the exact ownership of the
12 property.

13

14 To: Pacific County Drainage District No. 1;

15 Out of spite, revenge, personal vendettas and opportunity the Commissioners of Pacific
16 County Drainage District No. 1 intentionally neglected to maintain the main drainage ditch from
17 Summer's Lane to the Pacific County / Grays Harbor County line from 1993 to 2013. This
18 intentional act was an attempt to render our water right arguments a useless act, what was
19 actually accomplished though, was the continual flooding of the O'Hagan cranberry farms in the
20 vicinity and lower elevations near the Main Drainage Ditch. The flooding got so bad it
21 continually flooded out the Grayland Post office, the main Highway and caused several
22 accidents along SR 105. The intentional flooding caused sections of SR 105 to have to be
23 repaved. Over the last several years I, sent several complaints to Pacific County Drainage
24 District Commissioners asking them to please do some maintenance in the area, and all of them
25 were ignored until I managed to get the Washington State Patrol to investigate the situation.
26 The cost to maintain this portion of the main drainage ditch (1 mile) with an excavator was only
27 about \$4,000.00 in 2013. The annual taxes paid into the district in the area affected by the main
28 ditch more than covered the costs to regularly maintain it . The cost to repair and repave the
29 main highway was considerably more expensive. The estimated cost of crop damages from

1 2000 to 2013 due to the intentional flooding this area far outweighed the costs to maintain the
2 main ditch. I sent several public records requests to the Pacific County Drainage District
3 Commissioners asking them to provide expense records to me, to see where they were
4 spending the Drainage District's money and none of the records were provided to me ever. I
5 am and have been a tax paying member of Pacific County Drainage District for over 40 years. To
6 make matters worse Pacific County and /or the Drainage District replaced the culverts under
7 County Line Road and Cranberry Road and set the culverts that are only about 200 feet apart at
8 higher elevations, which causes the main drainage ditch waters to back up behind the culverts.
9 The Drainage District Commissioners are also aware the culverts under the former Solo Alden
10 property are too small and set at higher elevations and back up the waters onto the O'Hagan
11 family farms. The Drainage District commissioners are aware there is a lack of an easement
12 along the main drainage ditch from just north of Summer's Lane to the County Line Road.
13 Pacific County Drainage District No. 1 was originally denied dismissal of summary Judgment in
14 this case but the order was never recorded in the clerk's office and concealed in the judge's
15 closet for over 9 years then slipped into the court records of the case. The action against Pacific
16 County Drainage District was never frivolous and the dishonest and disrespectful actions by
17 the officers of the courts encouraged the officers of Pacific County Drainage district to be more
18 dishonest and disrespectful to the O'Hagan family. The current Drainage District
19 Commissioners relationship with former Drainage District Commissioner and defendant Brian
20 Hulburt enticed their harassment, negligence and the creation of their ongoing nuisance and
21 bad faith decisions.

22

23 To: Gregory Ursich;

24 As the Jury verdict in this case evidenced Kenyon Kelley's attorney engaged in
25 fraudulent arguments. In an attempt to prevail in his fraudulent arguments Gregory Ursich
26 coursed WDOE employees to submit fraudulent documents into this case which eventually led
27 to the May 23, 1999 Arson fires at WDOE Headquarters in Lacy. Kenyon Kelley's attorney
28 Gregory Ursich designed and engineered a bankruptcy fraud scheme for Kenyon Kelley to
29 judgment proof his assets from the Judgment the O'Hagan family has against the Kelley's in this

1 case. Gregory Ursich engineered the bankruptcy fraud scheme and implemented the Kelley's in
2 it to protect himself from malpractice liabilities from representing the Kelley's and Pacific
3 County Drainage District No. 1 at the same time in a conflict of interests. The cover-up of the
4 May 23, 1999 WDOE arson fires led to top ranking investigators and prosecutors ignoring and /
5 or allowing Gregory Ursich to engage in criminal fraudulent actions. A Jury will determine
6 Gregory Ursich is responsible for engineering the fraud schemes and soliciting assistance from
7 others including attorneys and top ranking public officials to assist him in his fraud crimes
8 intended to hinder, delay, defraud, threaten, harass and intimidate the O'Hagan family.
9 Gregory Ursich and his attorney accomplices used their position as officers of the court to
10 defraud the O'Hagan family and defile the course of justice. In addition to other crimes Gregory
11 Ursich and his group of Saboteurs engaged in the criminal activities described in RCW 9.05.060.
12 Gregory Ursich used his position as an officer of the court to assist Kenyon Kelley to
13 fraudulently transfer his Bandon Oregon property and judgment proof the money from the sale
14 of the property. Gregory Ursich used Kenyon Kelley's \$97,327.57 Grange Insurance payment to
15 bribe Kenyon Kelley's bankruptcy trustee Russell Garrett into sabotaging the recovery of
16 Kenyon Kelley's assets. This embezzlement, theft and bribery act occurred after the entry of
17 our judgment and as such, since the money was never recovered it is a direct cause of our
18 future damages. This bankruptcy fraud, embezzlement, theft and bribery is specifically reserved
19 for a jury to determine as authorized in the last sentence of our judgment.

20

21 To: George Benson and Thomas Linde;

22 George Benson and Thomas Linde are attorney accomplices of Gregory Ursich who used
23 their relationship and other attorneys relationships with the court to obtain preferential
24 treatment and defraud and sabotage the O'Hagan family's farming efforts. They are the
25 attorneys involved in the attorney clause of the FCS/ Fujo Properties Agreement and managed
26 to continually use the courts to conceal and cloud the transfers of the property ownership of
27 the Kelley Grayland cranberry farm from Northwest Farm Credit Services back to the Kelley's in
28 the FCS / Fujo properties Agreement. Attorneys George Benson and Thomas Linde played
29 significant roles in maintaining the diversion of Deer Creek from the O'Hagan family farm and

1 defrauding and sabotaging the O'Hagan family farming efforts. In an effort to execute the fraud
2 schemes involved in the transfer of the property back to the Kellys both George Benson and
3 Thomas Linde represented to the court's they were representing North West Farm Credit
4 Services when in reality they were representing the fraudulent transfer of the Kelley Grayland
5 Cranberry farm back to the Kelley's and ultimately their fraud schemes. In accordance with
6 RCW 2.44.030 and 2.44 060 they are jointly and severable responsible for all, of the damages
7 they have caused.

8

9 To: Carsten von Borstel of Fields Unlimited Inc.;

10 Carsten Von Borstel is the owner of Fields Unlimited Inc. and worked with Kenyon Kelley
11 Northwest Farm Credit Services and Kelley's attorneys to defraud the O'Hagan family. Carsten
12 von Borstel recognized how lucrative bankruptcy fraud schemes are and created Fields
13 Unlimited Inc. to compete with attorneys involved in using bankruptcy courts to judgment
14 proof estates and assets. Carsten von Borstel a former member and director of Northwest
15 Farm Credit Services worked with Kelley's attorney Gregory Ursich, David Poor and Northwest
16 Farm Credit Services to defraud and sabotage the O'Hagan family's farming efforts.

17

18 TO; David Poor and Northwest Farm Credit Services;

19 David Poor and Northwest Farm Credit Services engaged in criminal actions to hinder
20 delay and defraud the O'Hagan family. Please refer to exhibits 2, 8, 9, 14, 15, & 16.

21

22 TO Russell Garrett;

23 Russell Garrett is one of many of Kenyon Kelley's bankruptcy trustees. Russell Garrett
24 accepted the \$97, 327.57 Grange insurance bribe from Gregory Ursich and sabotaged the
25 recovery of Kenyon Kelley's assets. Russell Garrett then used his relationship with Joseph field
26 to sabotage my efforts to recover assets from Carston Von Borstel's bankruptcy fraud schemes.

27 TO: Joseph Field;

28 Joseph Field is an attorney that I hired to recover the assets of Carsten von Borstel.

29 Instead of recovering Cartsten von Borstel's assets which would have considerably reduced the

1 amount of damages to the O'Hagan family and the Twin Harbors Area, Joseph Field used his
2 relationships with the courts to obtain preferential treatment and engaged in actions to
3 defraud and sabotage my efforts to address the defendants' bankruptcy fraud schemes. Joseph
4 field used his relationship with the courts to attempt to conceal the frauds his friend Russell
5 Garrett engaged in, in Kenyon Kelley bankruptcy. Joseph Field assisted others to conceal
6 criminal activities within their bankruptcy fraud actions. Joseph Field assisted others in
7 defrauding the O'Hagan family from their judgment in this case and extorted money from the
8 O'Hagan family, in an attempt to economically prevent the O'Hagan family from defending
9 themselves from his and others criminal actions. Joseph Field had accomplices including Marlo
10 Dill and other attorneys. Joseph Field and his criminal accomplices defrauded and sabotaged
11 the O'Hagan's of their judgment and their family's farming efforts. (exhibits 1-16 and
12 Washington State Supreme Court cause No. 98285-7.)

13
14 To: Jane Doe, John Doe and Richard Roe;

15 Together the Does' and Roes' conspired with others to use the courts to hinder, delay,
16 defraud, threaten, harass, intimidate and sabotage James O'Hagan, the O'Hagan family and
17 others including their employees and witnesses.

18
19 To Scott Marlow of the Washington State Attorney General's Office:

20 The social experimental policy that attempted to create executive immunities for all
21 public officials in Washington State is Unconstitutional, an utter failure, entices bad faith
22 decisions by public officials and creates an industry for profit for Washington State Bar
23 Association members from corruption and bad faith decisions by public officials. The policy that
24 attempts to create civil and criminal immunities for public officials making bad faith decisions
25 prays on small businesses that are economically handicapped, and are in a position to be
26 unable to economically defend themselves' from bad faith decision made out of arrogance and
27 attempts to carry out personal vendettas. Policies that result in public officials being rewarded
28 for corruption or making bad faith decisions that wind up taking the life, liberty and property
29 from individuals are Unconstitutional and should not be tolerated in any way shape or form.

1 Promotions obtained from or profiting from arrogant, bad faith decisions and / or corruption
2 are not the foundation of a healthy society. Harassing, threatening and intimidating a victim,
3 witness and / or informant to corruption, bad faith decisions and arrogance of public officials
4 are considered criminal actions and not constitutionally acceptable nor the foundation of a
5 health society. Deputy Attorney general Scott Marlow will provide the court with a copy of the
6 result of Washington State Patrol's John Huntington and Deputy Green's criminal investigation
7 report and recommendation for charges. I hope and pray to continue to work with Scott
8 Marlow and deputy Mark McClain to resolve these matters in an efficient, equitable and just
9 manner in connection with Sergeant Huntington's criminal investigation report and this
10 charging document.

11 CAUSES OF ACTION

12 In addition to the forgoing and other reasons the following are causes of actions in
13 which caused and /or were related to the cause of our future damages, from the judgment we
14 obtained in this case; State Bar Association Members used their relationships with the court to
15 obtain preferential treatment and defraud the O'Hagan family of their judgment and future
16 damages, negligence, nuisance, unlawful taking of property, inverse condemnation, violation of
17 constitutional rights, the defendants actions are continuing and ongoing, are defined in
18 harassment and, implied powers and since Pacific County is a constitutionally established
19 county our State and Federal Constitutions govern our county, Washington State Constitution
20 Article 1 sections 1, 2, 3, 10, 12, 15, 17, 21, 23, 29, 30, 32, 33, 34, 35, apply as well as, RCW
21 2.44.020, RCW 2.44.030, RCW 42.20.040 RCW 42.20.100, RCW 42.23.070, RCW 9.05.030, RCW
22 9.05.060, RCW 9.91.010, RCW 9A.56.140, RCW 9.38.020, RCW 9.45.060, RCW9.45.080, RCW
23 9.45.090, RCW 9.45.100, RCW 10.58.040, RCW 9.62.010, RCW 9.66.010, RCW 9.72.090, RCW
24 9.81.020, RCW 9.92.120, RCW 9.9A.411, RCW 9.9A.555, RCW 9A.04.020, RCW 9A.04.110, RCW
25 9A.08.010, RCW 9A.08.020, RCW 9A36.021, RCW 9A.36.031, RCW 9A.36.041, RCW 9A.36.070,
26 RCW 9A.46.060, RCW 9A.48.070, RCW 9A.56.010, RCW 9A.56.020, RCW 9A.56.030, RCW
27 9A.56.040, RCW 9A.56.190, RCW 9A.56.210, RCW 9A.56.010, RCW 9A.60.020, RCW 9A.60.030,
28 RCW 9A.60.040, RCW 9A.68.050, RCW 9A.68.010, RCW 9A. 68.020, RCW 9A.68.030, RCW
29 9A.68.040, RCW 9A.68.050, RCW 9A.68.060, RCW 42.20.070, RCW 42.20.080, RCW 42.20.100,

1 RCW 42.20.110, RCW 9A.72.010, RCW 9A.72.030, RCW 9A.72.040, RCW 9A.72.050, RCW
2 9A.72.110, RCW 9A.72.120, RCW 9A.72.150, RCW 9A.76.050, RCW9A.76.080, RCW 9A.76.100,
3 RCW9A.76.175, RCW 9A.80.010, RCW 9A.82.060, RCW 9A.82.080, RCW 9A.82.130, RCW
4 9A.82.160, RCW 9A.83.010, RCW 9A.83.020, RCW 9A.83.030, RCW 9.58.010, RCW 2.48.210,
5 RCW 2.48.220, RCW 2.48.230, RCW 4.04.010, RCW 4.40.060, RCW 4.40.070, RCW 4.44.090,
6 RCW 6.32.270, RCW 7.16.040, RCW 7.16.120, RCW 7.16.210, RCW 7.28.070, RCW 7.69.010,
7 RCW 7.69.020, RCW 7.69.030, United State Constitution Article III sections 1, 2, 3, Article IV
8 sections 1, 2, Amendments I, II, III, IV, V, VII, IX, X, XI, XIII, XIV, 18 USC sections 3, 4, 13, 152,
9 153, 154, 201, 210, 211, 217, 218, 241, 242, 371, 402, 641, 645, 654, 662, 1001, 1013, 1016,
10 1018, 1021, 1026, 1028, 1341, 1344, 1349, 1512, 1513, 1514, 1519, 1621, 1623, 1911, 1951,
11 1956, 1957, 2071, 2073, 2075, 11 USC sections 362, 541, 546,547, 548, 549, 550, 551, 704, 721,
12 chapter 7,

13 Arrogance and Nobility, each and every one of these defendants had the ability to read
14 and understand the last sentence in our judgment in this case, they all made a choice to ignore
15 it, and engaged in actions to cause my family additional future damages, because and only
16 because they believed the courts would provide them immunity and protection from the jury.

17 RESERVATION OF RIGHTS

18 I reserve the right to amend this complaint at any time up and during the jury trial to
19 add new parties, claims, assertions and relief sought.

20 PRAYER FOR RELIEF

21 I pray for a court injunction that orders Pacific County to replace the Deer Creek Culvert
22 at the original Deer Creek Culvert's grade, (on level grade with the other culverts under Smith
23 Anderson road in the vicinity of the Deer creek culvert) and remove any and all obstructions to
24 Deer Creek to the culvert in the counties right of way, along Smith Anderson Road.

25 I pray for a court injunction that orders the exact ownership of the Kelley farm to be
26 determined by a jury and the owners of the Kelley farm to remove any and all obstructions to
27 the Deer Creek channel from the original Deer Creek culvert to outfalls on Evergreen Park Road.

28 I pray the court will order the culverts in the Main Drainage Ditch at the County Line
29 Road and Cranberry Road crossings to be installed and maintained at the same level as the

1 County Line Road crossing and require Pacific County to remove any and all obstructions they
2 placed in the culverts (large rocks) that blocked the water flows.

3 I pray the court will order Pacific County Drainage District No. 1 or the property owners,
4 to replace the inadequate culvers at the former Solo Alden property with a bridge or adequate
5 culverts that do not restrict or hold up water flows.

6 I pray the court will order the Pacific County Prosecutor's office to work with the Pacific
7 County Drainage District to resolve the easement problems associated with the main drainage
8 ditch from north of Summers Lane to the County Line Road, and set a date certain the
9 easement problems will be resolved.

10 I pray the court will order the Pacific County Drainage District Commissioners to
11 maintain the entire main drainage ditch in an equitable manner, ie: not just portions of the
12 main drainage ditch where they have a personal desire to improve drainage.

13 I pray the court will order Pacific County Sherriff Scott Johnson to certify to the court on
14 a date certain that the forgoing injunctions have been complied with.

15 In accordance with 18 USC section 1514 I pray the court will enter an anti harassment
16 order against the Washington State Bar Association protecting my family and witnesses from
17 retaliation, harassment, threats, intimidation, fraud, thefts, embezzlements and extortion
18 from members of the Washington State Bar Association.

19 I pray the court will enter an anti-harassment order on Pacific County officials to prevent
20 them from further harassing the O'Hagan family and sabotaging their family farming efforts.

21 I pray the court will allow me to submit admissions and omissions to the defendants and
22 require them to honestly and accurately answer them to reduce the arguments to manageable
23 arguments to prevent unnecessary delays to the court.

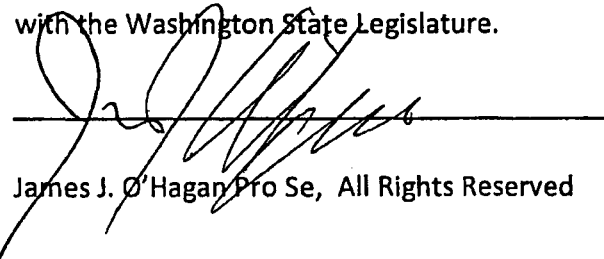
24 With the forgoing injunctions in place I pray the court will require the argument be sent
25 to an Independent Arbitrator to attempt to resolve and identify any remaining issues or;

1 I pray the court will allow the jury to hold all of the owners and their accomplices in
2 concealing and clouding the exact ownership of the Kelley property responsible for all of the
3 civil and criminal liabilities they caused to the O'Hagan family.

4 I pray the court will allow a jury to determine the civil and criminal liabilities the
5 defendants caused the O'Hagan family.

6 I pray the court will allow the Jury to determine if the current policy on providing civil
7 and criminal immunities to public officials is a healthy policy for our society and if not instruct
8 deputy Attorney General Scott Marlow to address the problems associated with making public
9 corruption a profitable business enterprise with the Washington State Legislature.

10 Dated this ~~2nd~~ day of ~~November~~ 2013,
December



James J. O'Hagan Pro Se, All Rights Reserved

11

County of Pacific

IN THE SUPERIOR COURT
FOR PACIFIC COUNTY

I, Virginia Leach, County Clerk of Pacific County, do hereby certify that I have compared the foregoing copy with the original instrument as the same appears on file and of record and that the same is a true and correct copy of the original and the whole thereof.

FILED

JUN 30 2000

By: VIRGINIA LEACH - CLERK
and Seal this 20th day of Nov BY: DEPUTY

SUPERIOR COURT OF WASHINGTON
COUNTY OF PACIFIC

CLERK

JAMES J. O'HAGAN and REBECCA LYNN O'HAGAN, husband and wife,
Plaintiffs,

KENYON KELLEY and STELLA JEAN KELLEY, husband and wife; PACIFIC COUNTY, a political subdivision of the State of Washington; PACIFIC COUNTY DRAINAGE DISTRICT NO. 1, a political subdivision of the State of Washington; and
BRYAN HULBERT and TERI HULBERT, husband and wife,
Defendants.

NO. 94-2-00298-0

JUDGMENT FOR PLAINTIFF

00 9 00228 6

JUDGMENT SUMMARY

Judgment Creditor	Rebecca and James O'Hagan ✓
Judgment Debtor	Kenyon and Stella Jean Kelley ✓
Principal Judgment Amount	\$207,751.79
Interest to Date of Judgment	\$ 9,961.00
Attorneys Fees	\$ 125.00
Costs	\$ 7,640.76
Other Recovery Amount	\$.
Principal judgment shall bear interest at 12% per annum	
Attorneys fees, costs and other recovery amounts shall bear interest at 12% per annum	
Attorney for Judgment Creditor	Robert M. Hill
Attorney for Judgement Debtor	Lindsay Thompson

EXHIBIT A

JUDGMENT ON PLAINTIFF'S CLAIM - 1

Microfilmed
Roll 101

MORGAN HILL, P.C.
1411 State Ave. NE, Suite 102
Olympia, WA 98506-4095
Tel: (360) 357-5700
Fax: (360) 357-5761

II. JUDGMENT

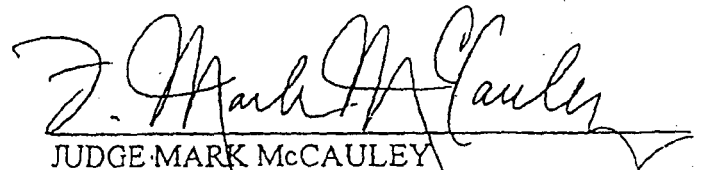
3 This matter was tried by a jury of twelve before the Honorable Mark McCauley, a Grays Harbor
4 Judge sitting in Pacific County, said trial ending on February 11, 2000. The plaintiffs, Rebecca and
5 James O'Hagan appeared pro se and Defendants Kenyon and Stella Jean Kelley appeared by and
6 through their attorney of record, Greg Ursich. The court and jury received the evidence and testimony
7 offered by the parties and witnesses and having heard the arguments of counsel, the jury reached a
8 verdict in favor of the plaintiffs as against the defendant in the amount of \$213,014.37, including a
9 reduction in damages for contributory fault of the plaintiffs, for damages sustained by the plaintiffs up
10 to the date of the trial.

11 The jury also reached a verdict in favor of Defendants Kelley for their counterclaims for
12 negligence and nuisance in the amount of \$2,500.00 plus prejudgment interest in the amount of \$116.91
13 for the period of 2/11/00 - 6/30/00 for a total judgment amount of \$2,616.91. Additionally, prior to trial
14 this Court awarded discovery sanctions in favor of Defendants Kelley as against plaintiffs in the amount
15 of \$2,500.00. Prejudgment interest has accrued thereon in the amount of \$145.67 for the period 1/10/00
16 - 6/30/00. The total judgment amount for the discovery sanctions is \$2,645.67.

17 Based on the foregoing, the Court hereby enters judgment in favor of the plaintiffs against the
18 defendants Kenyon and Stella Jean Kelley in the amount of \$207,751.79 which incorporates an offset as
19 against plaintiffs' judgment an amount equal to Defendant Kelleys' judgments for negligence/nuisance
20 and discovery sanctions plus prejudgment interest as set forth more fully above. Plaintiffs are awarded
21 statutory attorney fees of \$125.00. Plaintiffs' costs, as indicated above in the judgment summary in the
22 amount of \$7,640.76, are comprised of those costs specified in the heretofore previously filed Plaintiff's
23 Amended Cost Statement. Pre-judgment interest at the rate of 12 per cent per annum in the amount of
24 \$9,961.00 has accrued on the principal judgment amount rendered at the time of trial (\$213,014.37) for
25 the period February 11, 2000 to June 30, 2000. Post-judgment Interest on said judgment, attorneys fees
26 and costs is to accrue at the rate of 12 per cent per annum.

27 The issue of future damages is reserved for trial by jury.

28 SIGNED this 30th day of June, 2000.


JUDGE MARK McCAULEY

Sent by:

Robert M. Hill

Robert M. Hill, WSBA 21857
MORGAN HILL, P.C.
Of Attorneys for Plaintiffs

Approved as to form:

Lindsay Thompson, WSBA
Attorney for Defendants Kelley

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Exhibit 6

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

JAMES J. O'HAGAN et all)	Cause # 94-2-00298-0
Plaintiffs)	
Vs.)	SUMMONS
KENYON K. KELLEY et all)	
Defendants)	

TO: Joseph Field and Field Jerger LLP, 621 SW Morrison St. # 12225, Portland OR 97205


You have been identified as an individual and or/ party that is responsible for causing a considerable amount of the judgment creditors historical and future damages. A show cause hearing in the Superior Court of Washington for Pacific County, has been requested by the plaintiff to bring you before the court to address your knowledge and actions related to the plaintiff's historical and future damages. The Judgment creditors' judgment remains unpaid in excess of \$300,000.00 plus their future damages. The Judgment creditors' claim is stated in the petition, a copy of which is served upon you with this summons. The Judgment creditor's judgment was filed on June 30, 2000 # 00-9-00228-6, of which a copy has been provided to you.

In order to defend against or object to this summons, you must answer this summons by stating your defense or objections in writing, and serving your answers upon the person signing this summons not later than five days before the date of the hearing to be set by the clerk's office in accordance with RCW 11.96A.100 (4) and prior orders of the court. Your failure to answer within this time limit might result in a default judgment being entered against you without further notice. A default judgment grants the petitioner all that the petitioner seeks under the petition because you have not filed an answer.

If you wish to seek the advice of a lawyer you should do so promptly so that your written answer, if any may be served on time.

This summons is issued under RCW chapter 4.68 and RCW 11.96A.100 (3).

Dated this 2nd day of December, 2013.



James J. O'Hagan pro se All Rights Reserved
2298 Cranberry Rd., Grayland WA 98547
Phone (360) 267-7911

PROFF OF SERVICE

I MARC C. RUSSELL swear under the penalty of perjury of the laws of the state of Washington that on DEC. 4TH, 2013 I served the person so identified herein a copy of **James J. O'Hagan's Amended Complaint To Include Responsible Parties And Litigate Future Damages As Provided For In The Last Sentence Of Our Judgment, and Summons.**

I served Joseph Field and Field Jerger LLP at 621 Southwest Morrison Street No. 1225, Portland Oregon on DEC. 4TH, 2013 at about 2:36 P. M.

Dated this 4 day of DEC., 2013.

By 

Address 34671 NORTH HWY 101

City State LILLIWAP, WA 98555

Phone 360 877 9712

OFFICE RECEPTIONIST, CLERK

From: James <wayoutwest1@hotmail.com>
Sent: Sunday, June 28, 2015 6:52 AM
To: OFFICE RECEPTIONIST, CLERK; Mark McClain; joe@fieldjerger.com
Cc: Bill Scheidler; bjohnson@tdn.com; bob runyon; bvt tds.net; dtakko@comcast.net; Ed Snook; gmorgan@myfreedomfoundation.org; Greg Rathbun; James; justin russell; KC Hile; Larry Larmon; lindytoday@gmail.com; Loren Dey; Marc Russell; Matt Shea; Me Again; olympiateaparty@gmail.com; patrick@olynet.com; robert powers; Rodney.Green@wsp.wa.gov; GoldBarReporter@comcast.net; rgrunds@pshift.com; dinasomo@gmail.com; scooter2_mc@yahoo.com; metcho23@gmail.com; andrea.jackson@me.com; anewlife4us@msn.com; peacefulstreetslewiscounty@gmail.com; persephoneskloset@gmail.com; andersonearl@emailaccount.com; mcgowans@mishmaxia.com; charles@constitutionalgov.us; pipefighter2@wowway.com; generalcongress@constitutionalgov.us; cwheckman@hotmail.com; nyles314@hotmail.com; annette6371@hotmail.com; alexk; Brian Couch; Emily Anderson; Lorne Dey; anne.k.block@comcast.net; finallyhomerescue@yahoo.com; estes_mchs@yahoo.com; worthingtonjw2u@hotmail.com; billscheidler@comcast.com; kriswarren0@gmail.com; karenm8888@gmail.com; sherry.appleton@leg.wa.gov; bergquist.steve@leg.wa.gov; vincent.byes@leg.wa.gov; michelle.caldier@leg.wa.gov; reuven.carlyle@leg.wa.gov; bruce.chandler@leg.wa.gov; frank.chopp@leg.wa.gov; judy.clibborn@leg.wa.gov; eileen.cody@leg.wa.gov; cary.condotta@leg.wa.gov; richard.debolt@leg.wa.gov; tom.dent@leg.wa.gov; hans.dunshee@leg.wa.gov; susan.fagan@leg.wa.gov; @leg.wa.gov; fey.jake@leg.wa.gov; fitzgibbon.joe@leg.wa.gov; Goodman.Roger@leg.wa.gov; carol.gregory@leg.wa.gov; dan.griffey@leg.wa.gov; mia.gregerson@leg.wa.gov; larry.haler@leg.wa.gov; drew.hansen@leg.wa.gov; mark.hargrove@leg.wa.gov; mark.harmsworth@leg.wa.gov; paul.harris@leg.wa.gov; brad.hawkins@leg.wa.gov; dave.hayes@leg.wa.gov; jeff.holy@leg.wa.gov; zack.hudgins@leg.wa.gov; sam.hunt@leg.wa.gov; ross.hunter@leg.wa.gov; christopher.hurst@leg.wa.gov; laurie.jinkins@leg.wa.gov; norm.johnson@leg.wa.gov; ruth.kagi@leg.wa.gov; christine.kilduff@leg.wa.gov; steve.kirby@leg.wa.gov; kristine.lytton@leg.wa.gov; brad.klippert@leg.wa.gov; linda.kochmar@leg.wa.gov; joel.kretz@leg.wa.gov; dan.kristiansen@leg.wa.gov; Drew.Macewen@leg.wa.gov; chad.magendanz@leg.wa.gov; matt.manweller@leg.wa.gov; joan.mcbride@leg.wa.gov; gina.mccabe@leg.wa.gov; bob.mccaslin@leg.wa.gov; jim.moeller@leg.wa.gov; jeff.morris@leg.wa.gov; luis.moscoso@leg.wa.gov; dick.muri@leg.wa.gov; terry.nealey@leg.wa.gov; ed.orcutt@leg.wa.gov; timm.ormsby@leg.wa.gov
Subject: Supreme Court cause nos. 91019-7 & 91730-2
Attachments: DOC019.PDF; FIELD CFS.docx

Please file these documents as they are related to the recent opinions of Narda Pierce.