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COURT OF APPEALS
DIVISION II

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STATE OF WASHINGTON

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NO. 48322-0-II

COURT OF APPEAL OF THE STATE OF WASHINGTON

DIVISION TWO

LONNIE RAY TRAYLOR a.k.a.

RIGHT WORSHIPFUL LONNIE RAY TRAYLOR

Appellant

v

MOST WORSHIPFUL PRINCE HALL GRAND LODGE

F. & A.M. WASHINGTON AND JURSIDICTION and

MOST WORSHIPFUL GRAND MASTER, GREGORY D. WRAGGS, SR.

Respondent (s)

APPELLANT'S BRIEF

Appeal from the Superior Court of Pierce County , Washington

The Honorable Bryan Chuschoff

Lonnie Ray Traylor,

Pro Se - Appellant

PO Box 5937 - Lacey, WA 98509

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APPENDIX'S

- Appendix #1 Title 51 - Voting; Manner of Majority
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- Appendix #4 Article 15.08

TABLE OF AUTHORITIES

Cases

Woolfork's Appeal, 126 Pa. St.47 (1889), (Involving a black group calling itself Masonic) it was observed by the court that "The ancient landmarks of the Masonic fraternity are unalterable.

Smith v. Smith, 2 Desaus 557 (1813; So. Car.) and in Bayliss v. Grand Lodge of Louisiana, 131 La 579, 59 So. 996 (1912). On the ancient landmarks are predicated the rules that govern the Masonic fraternity. Nothing can be adopted in derogatory of these landmarks."

Rheubottom v. MWPHGLWA (2003) where Attorney Fowler litigated and prevailed on behalf of his client Rheubottom; Court Rulings has stated, "we don't follow our own laws."

Eugene Nairn v. Prince Hall Grand Lodge of Bahama (2014) where the Supreme Court rule in (Narin) favor based on the conduct of the Grand Lodge.

(Evans v. Brown, 134 Md 519, 107 Atl. 535, 1919 and M. W. Grand Lodge v. Lee, 128 Md. 42, 96 Atl. 872, 1916)(7 C. J. S. 63) (7 C. J.S. 61, 1980). As a general rule, a member cannot be suspended from or expelled from an association without a fair trial before an impartial tribunal and a reasonable opportunity must be given to defend the charges filed It is established that the proceedings to discipline a member should be conducted in conformity with the rules of the association and the law of the land

Everson v. Order of the Eastern Star, 265 N. Y. 112, 191N. E. 854 (1934), the court held that a member of a fraternal organization cannot be charged with one offense and then be found guilty of another offense.

Universal Lodge v. Valentine, 134 Md. 505, 107 Atl. 531, 1919 and Evans v. Brown, 134 Md. 519, 107 Atl. 335, 1919) In accordance with the general rule, membership in a Masonic group cannot be terminated without notice and an opportunity to be heard.

Statues

RCW 49.60, RCW 4.28.185 (1) (b) and (c), RCW 4.12.0 10

CR 12, CR 26, CR 34, CR 59(a) (7-9)

USC) [1]:657 (USC) [1]:617

UNCHANGEABLE MASONIC LANDMARKS #13 & #25, ARTICLE 13 19, ARTICLE 15.08, ARTICLE 22, TITLE 51.03, TITLE 63.10, TITLE 200.02, TITLE 202.01, TITLE 204.07, TITLE 207.10 TITLE 303.03, TITLE 304.07, TITLE 308.01, TITLE 308.03

I. INTRODUCTION

This is an appeal from the court granting Respondent, Most Worshipful Prince Hall Grand Lodge F & AM Washington and Jurisdiction and Most Worshipful Gregory D. Wraggs, motion for summary judgement.

II. ASSIGNMENT OF ERROR

a. The court erred in not granting appellant Motion for Default

b. The court erred in not demanding or sanction Respondent Attorney Fowler for never providing appellant request for discovery that was requested.

c. The court erred in not sanction Respondent Attorney Fowler court for filing a bogus order dismissing the case without trial and without prejudice.

d. The court erred in not considering their instruction given to appellant to visit Respondent Attorney (Fowler) to determine what discovery he had to offer and report back to the court it findings

e. The court erred in not sanctioning Respondent Attorney (Fowler) for not timely respond to appellant Summary Judgement entered on July 31, 2015.

f. The court erred in not sanctioning Respondent Attorney (Fowler) for not complying with the Case Order Schedule.

g. The court erred in to consider discover evidence presented by Appellant to show the meeting between (Wraggs) and (Traylor) in fact did happen on July 24, 2014,

h. The court erred to consider discover evidence presented by Appellant to show that the 111th Annual Communication do not show that the Grand Lodge took a actual majority vote to suspend Appellant.

i. The court erred to consider discover evidence presented by Appellant to show that the 111th Annual Communication do not show that the Grand Master Annual Report does not show that any official action was taken against Appellant.

II. ASSIGNMENT OF ERROR

j. The court erred in ruling against Respondent Attorney (Fowler) stood in court on (3) three different hearings and stated that "All of the Discovery Information Appellant is requesting is in my office." Only later to inform Appellant that the Masonic Trial Tape Recording is not available and cannot be found.

k. The court erred in considering Mr. Melvin Lozan acted as Judge and Juror and did not allow Appellant opportunity to present his case. The court failed at holding the Grand Lodge accounting for not following it own rules and violating Appellant rights of due process.

l. The court erred in considering that the Grand Lodge did not allow Appellant opportunity to appeal his call before the Grand Assembly during Grand Session.

m. The court erred in considering Declaration Statements or Affidavits on provided on behalf of Appellant.

n. The court erred in t ruling granting Summary Judgement to Respondent Attorney (Fowler)

III. ISSUES PERTAINING TO ASSIGNMENT OF ERROR

1. Why did the court grant Summary Judgment in favor of Respondent when all of the evidence was never submitted to prove if Appellant was guilty?

The court granting Respondent, Prince Hall Grand Lodge F & AM Washington and Jurisdiction and (Wraggs) motion for summary judgement without demanding proof of evidence requested by appellant of the 111th Annual Communication Audio Recording, Masonic Trial Tape, Consider the untimely filling and Bogus Order file by Respondent Attorney (Fowler).

2. Why did the court Not Demand Respondent to produce discovery since it was requested in the original complaint?

On February 26, 2015 and July 12, 2015, Appellant filed Request for Production and Respondent Attorney (Fowler) for never provided appellant request for discovery that was requested. In fact the record will reflect that Respondent Attorney (Fowler) stated that he was in possession of the requested production on several occasion only later state that the audio tape could not be found and could not be made available.

3. **Why did the court Not Sanction of Discipline Respondent Attorney (Fowler) for filing a Bogus Order to Dismiss Appellant Complaint?**

On April 3, 2015, the court ruled not to dismiss appellant complaint, however, Respondent Attorney (Fowler) filed a bogus order dismissing the case without trial and without prejudice on April 3, 2015 that was corrected by the court on April 7, 2015, after it was brought to the attention of the court by appellant.

4. **Why did the court Not Consider the instruction given to Appellant to visit Respondent Attorney (Fowler) office to review and examine discovery?**

On June 5, 2015, Appellant reported back to the court that during Appellant visit and reviewed discovery there were No Masonic Trial Tape of him and neither was there any Audio Recordings of the 111th Annual Communication that the Respondent Attorney (Fowler) stated he had in his office. As of November 6, 2015, Appellant had yet to receive any of the requested production of documents and the court rule in Favor of Respondent without requiring Respondent Attorney Fowler to produce discovery that would prove Appellant was guilty of the allege allegations. This case having been heard on April 3, 2015, the court advised Appellant to visit Respondent Attorney (Fowler) office to review whatever discovery he had and report back to the court the findings and if Respondent did not produce discovery that the court would order them to do so. Instead the court ruled otherwise.

5. **Why did the court Not Sanction Respondent Attorney (Fowler) for failing to comply with or follow the Case Order Schedule?**

On July 31, 2015, Appellant filed his Witness List in accordance with the Case Order Schedule. Respondent Attorney (Fowler) never filed his Witness List and had until September 5, 2015 to do so. All which appear to failed due to timeline in accordance to CR 12 (4) or the Case Order Schedule.

6. **Why did the court Not hold Respondent Attorney (Fowler) to same standard as Appellant for failing to file his documents timely?**

On February 6, 2015, hearing the court instructed Respondent Attorney (Fowler) to timely served Appellant and (Fowler) failed to comply throughout the entire case.

7. **Why did the court Not consider discover evidence presented by Appellant to show that the meeting between Respondent (Wraggs) and Appellant (Traylor) when in fact did happen on July 24, 2014 ?**

Appellant and Respondent (Wraggs) meet on July 24, 2015,to discuss the false allegation that Appellant had been suffering over the past 10 years. (Wraggs) stated to the Appellant that he wanted to reinstate him, but he need to repeal his Grievance filed against the Grand Lodge and Not Pursue Legal Actions against the Grand Lodge.

Appellant and Respondent (Wraggs) agreed to the terms and Respondent (Wraggs) asked Appellant to put the agreement in writing. Appellant complied with Respondent (Wraggs) request only later to have (Wraggs) renege on the agreement and declare under penalty that none of the aforementioned occurred.

Therefore, Appellant had no other choice but to pursue legal action in Civil Court to clear his name of being accused of stealing or misappropriation of funds from the organization, his church and private citizen all of which have never been proven

8. **Why did the court Not consider the Masonic Law Title 51.05 Majority Vote which in part that states" All motions are to decided by a simple majority vote?"**

The court finding was contrary to Masonic Law whereby the court ruled to say that the Grand Lodge voted to affirm Appellant suspension, however the 111th Annual Communication Minutes/Proceedings does not show or prove that a vote was ever taken on Appellant . The 111th Annual Communication minutes shows a motion being made seconded and carried, it does not show a Majority Vote taking place.

9. **Why did the court Not consider the discovery 111th Annual Communication Minutes provided by Respondent showing that Appellant name does not appear in Grand Master Patrick L. Hughes, Annual Address?**

Appellant also argue that this is a violation of Article 13.19 when not reported all actions becomes Null and Void. Appellant argues that if the Grand Master did not mention him in his report then no action under no circumstance should have been taken. Article 13.19 of the Masonic Code Book states" He shall report all his acts and decisions to the Grand Lodge for its approval."

10. **How can the court determine its ruling in favor of Respondent Attorney (Fowler) when he stood in court on (3) three different hearings and stated that "All of the Discovery Information Appellant is requesting is in my office?"**

Only later to inform Appellant that the Masonic Trial Tape Recording is not available and cannot be found?

11. **How can the court determine such ruling in favor of Respondent Attorney (Fowler)?**

When the court instructed Appellant visit (Fowler) office to see what discovery he had to offer, during Appellant visit it was discovered that the Audio Recordings of the 111th Annual Grand Session was not available. Nor was Appellant Masonic Trial Tape which (Fowler) have stated he had in his office. (Failure to Present Discovery) The court failed at demanding discover on behalf of Appellant to prove his innocence and shows a lack of due process.

12. **Why did the court Not consider Mr. Melvin Lozan action?**

Acting as Judge and Juror by not allowing Appellant opportunity to present his case is a violation of Appellant of due process.

14. **Why did the court Not consider that action of the Grand Lodge?**

Preventing Appellant opportunity to appeal before the Grand Assembly during Grand Session is a violation of Appellant of due process.

15. **Why did the court Not consider Declaration Statements or Affidavits provided on behalf of Appellant?**

Appellant filed Declaration statement from the Pastor of his Church, Members of the Organization and other Private citizen.

16. **Why did the court render it ruling granting Summary Judgement to Respondent Attorney (Fowler) on the premise that Appellant wanted to be restored to his position and he had not requested additional time for discovery?**

Appellant filed his complaint specifically on the grounds of Unfair Treatment, Deformation of Character, Being Accused of Theft and Discrimination.

IV. STATEMENT OF THE CASE

This case is about the Appellant being subjected to discrimination, unfair treatment, deformation of character, and accused of theft internally and externally by the Most Worshipful Prince Hall Grand Lodge of Washington and Its Jurisdiction.

Respondent appears to be confused to Appellant complaint possibly, because this is a CIVIL case and NOT a Masonic Case.

Appellant filed his complaint on November 12, 2014, Respondent did not answer until 74 days had elapsed after Appellant filed Motion for Default on February 6, 2015. specifically on the grounds aforementioned to which Respondent Attorney (Fowler) and his client have still yet to answer. **(CP -1)**

Appellant assert that the court advise Respondent Attorney (Fowler) to try and and maybe settle this matter. **(RP - 24)** [1]

Appellant has been accused by this organization of stealing and misappropriation of money from his church, private citizen, and the organization since 2001. **(CP - 458) (APPENDIX - 26). (RP - 16)** [2]

The Grand Lodge has conducted numerous audits and they have never proven any facts that Appellant have stolen or misappropriation of any funds from the organization, Church or any person to which Appellant been accused.

(CP - 169, 400, 402, 421, 427, 454, 545) - (APPENDIX 133 - 134)

Appellant, request that the Court DO NOT DISMISS Complaint because the Court does have Jurisdiction to hear matter as this is NOT a petty dispute over membership in a Masonic Grand Lodge! **(CP 1)**

1. *Report of Proceedings Hearing on April 3, 2015 - "Appellant assert that the court advise Respondent Attorney (Fowler) to try and maybe settle this matter."* ***2.*** *Report of Proceedings Hearing on December 6, 2015 - "My argument, Your Honor, is from this period, these accusations, misappropriation, slander, defamation of character."*

The Respondents have violated their own Constitution and By-Laws (Masonic Code Book) by unfairly treating, Appellant over the past Ten (10) years

On January 26, 2015 Appellant filed Motion for Default that was referred to Judge Bryan Chushcoff court. **(CP - 145)**

On February 9, 2015, Appellant filed Request for Discovery and on February 27, 2015, went before the court seeking assistance in acquiring discovery evidence. Respondent Attorney (Fowler) stated that he was in possession of "ALL of the information being requested and had no problem providing it to Appellant.

(CP– 154) (CP - 158) , (CP - 163) (RP - 5)

On March 9, 2015, Plaintiff filed a Objection to the Motion to Dismiss, Plaintiff, request that the Court Do Not Dismiss Complaint because the Court do have jurisdiction to hear this matter. **(CP 169 - 170)**

On April 3, 2015 the court advise Appellant to visit Respondent Attorney (Fowler) office to review whatever discovery Respondent Attorney (Fowler) had and report back to the court the findings and if the Respondents did not produce discovery that the court would order them to do so. **(RP - 20)** [3]

On April 26, 2015, Appellant visited (Fowler) office to see what discovery he had to offer, during Appellant visit it was discovered that the Audio Recordings of the 111th Annual Grand Session was not available neither were Appellant Masonic Trial Tape which (Fowler) have stated he had in his office. (Failure to Present Discovery)
The court failed at demanding discover on behalf of Appellant to prove his innocence and shows a lack of due process. **(CP 305 - 306)**

3. *Report of Proceedings Hearing on February 27 2015 -"MR. FOWLER: We have those.* ***4.*** *Report of Proceedings Hearing on April 3, 2015 -"Now, as I say, I'm denying the motion without prejudice at this time so the discovery can actually take place pursuant to CR 56 (f)."*

On June 5, 2015, Appellant reported back to the court after review and present a show of violations and examination of discovery. **(RP – 4 - 19)**

As of November 6, 2015, Appellant had yet to receive any of the allege missing discovery (Audio Files and Original Minutes) of the requested production of documents and the court rule in favor of Respondent without requiring Respondent Attorney (Fowler) to produce discovery that would prove Appellant was guilty of the allege allegations. **(RP - 20)** [4]

The Court failed to sanction Respondent Attorney (Fowler) for not complying with Appellant request of discovery for production after making four (4) request in accordance with CR 26 and CR 34. **(CP - 413)**

This finding was contrary to Washington Law which holds that in CR 26 and CR 34. Discovery Methods. Parties may obtain discovery by one or more of the following methods: depositions upon oral examination or written questions; written interrogatories; production of documents or things or permission to enter upon land or other property, for inspection and other purposes; physical and mental examinations; and requests for admission. **(CP - 531)**

Appellant asserts that he did not walk out of the trial, is recorded on the alleged missing MASONIC TRIAL TAPE and the Grand Lodge did not and have not produce the evidence to prove other wise and prevented Appellant from his case appealing before the Grand Assembly neither did the court did not demand Respondent Attorney (Fowler) to produce discovery is a violation of Appellant due process. **(CP - 531, 532), (CP - 448)**

This finding was contrary to Masonic Unchangeable Landmarks whereby all member have a right to appeal before the Grand Assembly. **(APPENDIX 270)**

4. Report of Proceedings Hearing on December 6, 2015 - "MR. FOWLER: The Masonic trial tape of the underlying trial doesn't exist as far as we can tell."

Appellant asserts that the court ruled in favor of Respondent Attorney (Fowler) with prejudice, and not hold the Grand Lodge accountable to their own rules and regulation as well as the civil court rules and violated Appellant due process both procedural and substantive. **(CP - 532)**

On June 12, 2015, Appellant filed Fourth Request for Discovery and to no avail Respondent Attorney (Fowler) continue to ignore Appellant request for the missing evidence needed to prove his innocence. **(CP - 418)**

On July, 31, 2015, Appellant filed Motion for Summary Judgement Motion to Grant Summary Judgment for the following reasons and in accordance with CR 56 (C), whereby, appellant being subjected to unfair treatment, harassment and deformation of character and accused of theft and discrimination. **(CP - 420)**

Appellant asserts here again that, Respondent Attorney (Fowler) failed to comply with property timeline filings and did not respond until after 92 days later filing a Summary Judgement to dismiss the case.

On July 31, 2014, Appellant Replied Respondent Attorney (Fowler) Motion Summary Judgement by Objecting to his untimely filing and response time.

(CP 436-439)

On July 31, 2015 Appellant filed his Witness List, here again Respondent Attorney (Fowler) never filed his Witness List which was due on September 5, 2015. **(CP 432)**

This finding is contrary to Washington Law and the court did not at anytime sanction Respondent Attorney (Fowler) for being in non-compliance of filing his briefs in a timely manner.

Neither did the court discipline Respondent Attorney (Fowler) for non-compliance or hold him to the same standards as Appellant in adhering to the Washington Court Laws.

Appellant finds that the Court failed to find that the Respondent did not comply with proper filing timelines in accordance with CR 12 to respond timely.

Appellant was not treated equally and it appear to be prejudice that the court did not hold Respondent Attorney Fowler to the same standards as the court held Pro Se Traylor when representing Himself. Appellant filed all of his document timely and Respondent Attorney (Fowler) have been negligent in his filings throughout the entire process the case.

Appellant asserts that the court ruled in favor of Respondent Attorney (Fowler) with prejudice, and failed to consider the evidence submitted by Appellant in regards to Appellant and (Wraggs) meeting held on July 24, 2014, whereby in fact the meeting did take place between Appellant and (Wraggs) and both agreed upon mutual agreement asking Appellant to prepare a Letter, Memorandum of Understanding or Contract and mail it to his home mailing address. **(APPENDIX 224-229)**

Appellant complied with (Wraggs) request only later to have (Wraggs) renege on the agreement and declare under penalty that none of the aforementioned occurred and stating that the Grand Lodge had taken a vote to discipline Appellant.

Therefore, Appellant had no other choice but to pursue legal action in Civil Court to clear his name of being accused of stealing or misappropriation of funds from the organization, his church and private citizen all of which have never been proven.

Appellant asserts that the court ruled in favor of Respondent Attorney (Fowler) with prejudice, and not hold the Grand Lodge accountable to their own rules and regulation violated Appellant due process both procedural and substantive.

The finding was contrary to Masonic Law whereby the court ruled to say that the Grand Lodge voted to affirm Appellant suspension, however the minutes of the 111th Annual Communication does not show or prove that a vote was ever taken on Appellant. **(CP - 536), (APPENDIX 224-229), (APPENDIX 338) (RP - 10)** [5]

Appellant explained to the court on November 6, 2015, that what is written is not the actual process, Appellant gave the court and example of how to derive to a Majority by using the number 100 and 51 would result in a majority. **(RP - 10)** [6]

Appellant asserts that the court ruled in favor of Respondent Attorney (Fowler) with prejudice and fail in its ruling because of not considering the actual evidence annotated in the 111th Annual Communication minutes that no actual vote was ever taken and neither have Respondent Attorney (Fowler) produced or provided any evidence proving otherwise. **(RP - 16 - 17)**

Appellant name only appear in Annual Allocution of the Grand Master show that Appellant name appears in outgoing correspondence anywhere in his report to be voted on by the Grand Body. **(CR 318, - 323), (CR - 538), (APPENDIX 386-397)**

Appellant asserts that the court ruled in favor of Respondent Attorney (Fowler) with prejudice that on the June 5, 2015, hearing, stating that the Appellant was not a suspended mason because if there was no actual vote, Appellant is not a suspended member. Appellant replied that he know that but evidentially the Grand Lodge did not. **(RP - 10)**

5. *Report of Proceedings Hearing on December 6, 2015 - I have never had an opportunity to come before this body impartially and present my case and neither has the defendant provided any evidence."* ***6.*** *THE COURT: "So, apparently, you are still a member."*

Appellant asserts that the court ruled in favor of Respondent Attorney (Fowler) with prejudice that the court fail in its ruling because of not considering the actual evidence.

Respondent Attorney (Fowler) stood in court on (3) three different hearings **(Feb 27th, Apr. 3rd and Jun. 5th in 2015),** and stated that "All of the Discovery Information Mr. Traylor is requesting is in my office." Only later to inform Appellant that the Masonic Trial Tape Recording is not available and cannot be found. **(RP - 20)** [7]

The court failed at allowing Appellant due process to prove his innocence and shows a lack of due process.

The fact that Commission was headed by Melvin Lozan who violated Appellant right to present his case with counsel is recorded on the alleged missing Masonic Trial Tape.

The court failed at demanding discover on behalf of Appellant to prove his innocence and shows a lack of due process.

The fact that Appellant did not walk out of the trial, that Commission was headed by Melvin Lozan acted as a conflicting entity Judge and Juror, is recorded on the alleged missing Masonic Trial Tape.

The court failed at holding the Grand Lodge accounting for not following it own rules and violating Appellant rights of due process.

This finding was contrary to Masonic Code whereby anyone in leadership or Grand Master is not granted unlimited power member have a right to appeal before the Grand Assembly. **(CP - 402)**

7. Report of Proceedings Hearing on December 6, 2015 - MR. FOWLER: The Masonic trial tape of the underlying trial doesn't exist as far as we can tell."

The fact through trial and testimony can be disclosed by others present at the trial to testify on behalf of Appellant, can testify to the behavior of Mr. Lozan and the Grand Lodge not allowing Appellant and his counsel to present their case to prove Appellant innocence.

The court failed at holding the Grand Lodge accounting for not following it own rules and violating Appellant rights of due process.

The fact that Respondent Attorney (Fowler) or his client has NEVER since the beginning of requesting the Production of Documents complied with Appellant request. **(RP - 17)** [8]

In fact Respondent Attorney (Fowler) stated "The information Appellant has requested is **NOT ADMISSIBLE** and will not make a difference in this case.
Respondent Attorney (Fowler) remain to be vigilant and not providing Appellant this information. Respondent Attorney (Fowler) has previously stated "The information being requested by Appellant is not admissible and will not have any bearing or effect the outcome to this trial" **(CP - 427)**

Maybe this is the reason why (Fowler) and his client feel that they do not have to produce this evidence?

The court failed at demanding discovery in accordance with CR 26 and CR 34 otherwise Appellant have no way to prove his innocence.

The fact that Respondent Attorney (Fowler) or his client has never produces all discovery showing that Grand Master reported to the Grand Lodge at the 111th Annual Communication all his official acts is a lack of due process in accordance with the Masonic Law.

8. *Report of Proceedings Hearing on December 6, 2015 - "I need that evidence to present to the court. My first request of it were for a copy to be presented to the court so the court -- The court needs to hear the facts.*

NOTE: The minutes of the 111th Annual Communication does not reflect that the Grand Master presented a report that included Appellant name to the to the Grand Body for Disposition or to be voted on.

The action taken to suspend Appellant is illegal and a gross violation of the Grand Lodge Masonic Code Book and clearly shows and demonstrates unfair and discriminative treatment toward Appellant. **(CP - 402)**

The court failed at holding the Grand Lodge accounting for not following it own rules and violating Appellant rights of due process, whereby the current and past administration have violated the Fundamental and Unchangeable Masonic Laws setting them aside to unfairly treat, falsely accuse and discriminate against Appellant for stealing or misappropriation of money they have yet to prove even after numerous audits have been done.

The court failed at holding the Grand Lodge accountable for not producing discovery evidence that will show that in fact, the Grievance and Appeal Committee presented there report before the Grand Assembly to be voted on by the membership.

The court failed at holding the Grand Lodge accountable for not producing discovery evidence because the fact is that, the discovery evidence provided by the Respondent of the 111th Annual Communication Minutes and **WILL NOT** reflect the committee presented a report to the Grand Body for disposition to be voted on .

UNAMIIOUSLY OR BY MAJORITY. (CP - 402),

V. ARGUMENT

Lonnie Ray Traylor This action is being brought under Washington Law against Discrimination, RCW49.60 et seq.

Appellant opposed unlawful activities occurring within the Most Worshipful Prince Hall Grand Lodge F & A.M. State of Washington and Jurisdiction.

In response, Appellant was subject to discrimination and defamed of character within our Masonic organization. Respondents knew or should have known through complaints of their violations of our Constitution and By-Laws Masonic Code Book. Respondents failed to take prompt and effective action to prevent discrimination from occurring year after year over the past Ten (I 0) years.

This has been an ongoing matter as it pertains to fair and impartial treatment and my status as a Prince Hall Mason for Washington and Jurisdiction. Year after year I'm faced with negative and false accusations made against me for stealing that have yet to be proven.

Appellant have been illegally charged and tried, I have been illegally investigated and even keep out of the organization illegally for the past four years. I have surrendered to the court with sincerity of what I, consider has been bad practices in violating my rights as a member in accordance to the Masonic Code Book to be given

DUE PROCESS.

In this document, I am submitting all of the facts and evidence whereby, I have not, been given opportunity to present my case before trial commission and Grand Lodge of a jury of my peers in civil court.

Reinstatement of the decision of Grand Lodge Suspension should be issue because:

a) Appellant was never given a opportunity to present his appeal,

b) Appellant be given a meaningful opportunity to challenge his Suspension,

c) Appellant has suffered irreparable harm in his character and professional employment,

d) Appellant requested a copy of the trial tape and trial minutes, date, that still have yet to be provided,

e) In the event Appellant goes forward with Court actions, all parties will be named and this may be damaging to those that hold special clearances on their jobs.

f) Granting Appellant reinstatement is the appropriate way to resolve this matter,

g) Appellant is asking only to be given an opportunity to present his appeal to the entire body and let the body speak, not just a chosen few, rather than just a few Past Grand Masters (5 or more) or the Grievance and Appeal Committee who presented a recommendation at Grand Lodge.

On July 14,2014, I Lonnie Ray Traylor had a conversation with the Newly Elected Grand Master Gregory D. Wraggs, Sr. regarding my suspension. It was determined that the whole process was wrong and I should not be suspended. Therefore, we should sit down and talk.

A meeting was set for July 24,2014, at 7:00pm at the Masonic Hall in Tacoma Washington located at 1702, Martin Luther King, Jr, Way South.

Appellant attended the meeting with Grand Master Wraggs that lasted approximately 1.5 hour.

During our meeting Grand Master Wraggs stated that he wanted to reinstate me, only if I rescind my appeal and not pursue legal action against the Grand Lodge. He also stated that the Grand Lodge was not financially sound to go to court on such matter as this.

Appellant agreed with Respondent (Wraggs) and we agreed that all of the negative accusation made against me needed to be closed out and to never surface again. Respondent (Wraggs) and Appellant, both agreed that we would come up with a memorandum of understanding and he requested that I put it in writing and mail it to his home address.

Appellant prepared the letter as requested in the form of a contractual agreement and memorandum of understanding signed with notary on July 28, 2014 and mail on July 30, 2014, to this date the letter was never returned to me, only later to hear that Grand Master Wraggs breach our contract and distributed a letter throughout the jurisdiction sustaining the Grievance and Appeal Committee Recommendation on the illegal subject matter which is in contrast of what both Respondent (Wraggs) and Appellant agreed on. Upon leaving the meeting we both shook hands on the five point of fellowship and agreed that the suspension would be lifted and I would be reinstated as soon as he receive the letter Respondent (Wraggs) and Appellant agreed upon.

Respondent (Wraggs) again, directed me to mail this letter to his home address. On July 30,2014, Appellant sent him the letter notarized, seal and signed contract agreement.

CONTRACUAL AGREEMENT

Respondent (Wraggs) never responded to my letter or contacted me. Appellant call Respondent (Wraggs) to see if he indeed had received Appellant letter and he said YES, but he would be leaving the County and would address this issue with me when he returned from Germany. Upon his return Respondent (Wraggs) never contacted Appellant.

Only later, Respondent (Wraggs) breach this agreed upon contract and to issue a correspondence throughout the jurisdiction indicating that Appellant (Traylor) is still suspended, base on Grievance and Appeal recommendation, Appellant never received the correspondence address to me regarding this information. Appellant got a copy that was address to S.G.I.G. Daniel Lunsford. To date Appellant still have not received the correspondence address to him.

On September 20, 2014 after receiving the letter address to SGIG Daniel L. Lunsford that was received in RW Lonnie Ray Traylor PO Box, Appellant (Traylor) contacted Respondent (Wraggs) on the phone to discuss his decision. (Notification of Grand Lodge Suspension)

Respondent (Wraggs) stated that he had spoken to some the Past Grand Masters (Who?) and others. (Who?) Respondent (Wraggs), also stated his rationale was that the Grand Lodge Unanimously Voted and Agreed on the Suspension. NOT TRUE - Reference Minutes. How is this possible if the brother are not allowed to speak on the issue.

Appellant (Traylor) ask Respondent (Wraggs) what happened to our agreement he and Appellant had at our meeting that was held on July 14, 2014, Appellant (Traylor) stated that he was disappointed to his decision based on our previous agreement.

MASONIC CODE BOOK VIOLATIONS

Appellant find the organization violated IAW Title 204.03and 304.03. The evidence of both the accuser and the accused, IF OFFRED, shall be received in any Masonic Trial. The status of a mason under charges is not affected until conviction.

Appellant find the organization violated Section 300.0 I: Every subordinate lodge, when the Grand Lodge does not assume original jurisdiction, have the right, and it shall be its duty to exercise discipline over all of its members, and over all non-affiliated as well as affiliated Masons (except present Masters and the Grand Master) residing or sojourning within its territorial jurisdiction for any violation of the moral or Masonic law.

Appellant find the organization violated Title 300. There were NO Properly Prepared Masonic Charges Framed/File or Signed against Brother Lonnie Ray Traylor in his Lodge Julius A. Headen No. 102, accordance to Our Current and Updated Masonic Code Book.

Appellant find the organization violated Section 300.02: Any Master Mason may present changes against a brother to the Grand Lodge as provided in Title 200, Section 200.02.

It is the intention of this Grand Lodge that all cases of which a subordinate lodge has jurisdiction, which are begun in the Grand Lodge, shall be referred to such subordinate lodge for trial except in extreme cases, which the Grand Lodge or the Grand Master may deem for the best interest of the fraternity, that the same be tried by the Grand Lodge or, except in cases of trials of Worshipful Masters and subordinate lodges.

Appellant find the organization violated Section 300.02 **Not signed by the Appellant** nor referred to such subordinate lodge for trial nor was any explanation of the exception of extreme cause for the **UNSIGNED/ILLEGAL CHARGES** described by the Grand Master as to what his rationale were if any nor what he deem was the best interest of the fraternity to determine a Grand Lodge Trial.

Appellant find the organization violated Section 300.03,When the Grand Master or Grand Lodge shall transfer the charges filed in the Grand Lodge to a subordinate lodge for trial of an accused Mason, it shall be the duty of such lodge, within thirty (30) days from the time the charges are transferred to it, to proceed and fairly try the accused in the same manner as if the charges had been filed in the lodge in the first instance, provided that in such cases the Junior Warden, in his official capacity, shall sign the charges as the accuser and the Master shall see that his name is so attached and that the case is impartially and fairly tried.

Appellant find the organization violated Title 203: Section 203.02: In case where the Grand Lodge is in session, the Grand Secretary shall receive the charges and upon receipt notify the Grand Master, who shall present to the Grand Body at the time of the session in which charges were filled, said charges. This further violated our Masonic Code because it was stated by the Trial Commission RW Melvin Lozan stated this was a Grand Lodge Trial.

Appellant find this a conflict and gross violation to the code and abuse of power of the Grand Master to appoint and give instruction in contrast with our CODE.

Appellant determined there was never any Official Signed and Dated copy the Unsigned Illegal Charges /Accusations were never presented to me/Defense Team. The Evidence of Law Violations Title 202.0 I Why were we having a Masonic Trial?

Appellant find the organization violated Title 202 Section 202.01. All charges of Un-Masonic conduct (that is, of Masonic offense) shall be made in writing specifying with reasonable certainty the character of the offense alleged, and the time and place of its commission, as near as may be practical, and be signed by the accuser, who must be a Master Mason in good standing. Charges must be so explicit that the accused will have a fair understanding of what he has to answer.

Appellant find the organization violated Section 304.07. When testimony is taken in open lodge the lodge shall be opened on the highest degree to which the accused has attained in Ancient Craft Masonry, but the decision as to guilt or innocence and the question of punishment shall be severally determined in and by a lodge of Master Masons. There was never a Lodge opened on the highest degree to which my Masonic trial could be conducted and objections made to the fact.

Appellant find the organization violated Section 204.07. When testimony is taken in open session the Grand Lodge shall be opened on the highest degree to which the accused has attained in Ancient Craft Masonry, but· the decision as to guilt or innocence and the question of punishment shall be severally determined in and by a lodge of Master Masons. I was never allowed into the Grand Lodge to be tried in accordance to Landmark: 13 - The right of every mason to appeal From the decision f his brethren in al Lodge convened, to the Grand Lodge or General Assembly of Mason.

Appellant further believe that we held an **ILLEGAL TRIAL ON ILLEGAL CHARGES** on a brother and the **GRAND MASTER ABUSED HIS POWER** ILLEGALY due to not presenting legal document (Masonic Charges) IAW with our Code.

Appellant find the organization violated Established and Legal TIMELINES LAW Title 300.01; Title 300.02;Title 300.03;Title 200.02; Title 200.05; Title 203. 02 and Title 203.03. The original date of Trial was scheduled for May 15,2014 at 7:00P.M. in which official notice was given.

STATEMENT OF FACTS

Appellant filed his complaint on November 12, 2014, Respondent did not answer until 74 days had elapsed and Appellant filed Motion for Default hearing for February 6, 2015. The court error and did not hold Respondent Attorney accountable untimely filing and to the same standard of fillings as Appellant In fact the court allowed Respondent Attorney to provide a copy of his answer to complaint the day of trial.

Appellant find that the court and Respondent Attorney was negligent in their action of untimely file and violated CR 12 of Washington State Court Rules.

Appellant filed for Request for Discovery on February 26, 2015, and attended a hearing on February 27, 2015 where the court stated that if the Respondent did not provide Discovery, to come back and the court would demand the discovery to be provided.

Received only a portion of the discovery that included everything except the audio files for the 111th Annual Communication and Audio File of the Masonic Trial which the Respondent Attorney allege he had in his office.

On April 3, 2015, Appellant Objected to Respondent Motion to Dismiss based on the grounds Appellant filed his complaint specifically on the grounds of DISCRIMINIATION to which the Respondent and his attorney has yet to answer.

This case is about the Appellant being subjected to discrimination, unfair treatment, deformation of character within the Most Worshipful Prince Hall Grand Lodge of Washington and Its Jurisdiction.

The Respondents have violated their own Constitution and By-Laws (Masonic Code Book) by discriminating against the Appellant for over the past Ten (10) years. The Appellant has been accused of misappropriation of funds since 2001.

The Grand Lodge has conducted numerous audits over the past ten years, and they never have discovered any missing funds.

Appellant asked the Court to examine the Appellant's complaint and his objection to consider the following and determine fairly how can anyone be given a fair and impartial trial when;

1) The Grand Master Filed The Charges

2) The Grand Master Appointed The Investigation Committee

3) The Grand Master Is The Final Decider and

4) The Grand Master Presides Over The Annual Communication

Appellant affirms this is **NOT DUE PROCESS** (neither Substantive or Procedural) and this appears to the Appellant to be in the true spirit of **DISCRIMINATION** and **HARRASSMENT.**

Appellant requests that the Court does **NOT DISMISS** this matter because of the following:

a) Appellant was never given an opportunity to present his case or appeal,

b) Appellant was never given a meaningful opportunity to challenge his Suspension,

c) Appellant has suffered irreparable harm in his character and professional career,

d) Appellant have previously requested a copy of the trial tape and trial minutes. To date, the Appellant has **NOT** received any of the Requested Discovery Information!

Appellant requested that the Court does NOT DISMISS this matter because, the Respondent and his attorney failed to responded in a timely manner to Appellant complaint and address the issues, which were identified in Appellant complaint. Contract Agreement from a meeting held between Respondent (Gregory D. Wraggs, Sr.) and

Appellant. This is another example of unethical conduct and breach of (verbal) contract, discriminative actions, and violation of the organization own rule and regulation against Appellant.

Appellant find that the court errored in not sanction Respondent Attorney Fowler for filing a bogus order dismissing the case that were heard on April 3, 2015 and the Appellant had to contact the court on April 7, 2015 to be corrected.

April 3, 2015, Appellant was instructed by the Judge to visit (Fowler) office to see what discovery he had to offer, during Appellant visit it was discovered that the Audio Recordings of the 111th Annual Grand Session was not available. Nor was Appellant Masonic Trial Tape which (Fowler) have stated he had in his office. (Failure to Present Discovery) The court failed at demanding discover on behalf of Appellant to prove his innocence and shows a lack of due process.

On Saturday, April 25, 2015, Appellant receive a enveloped from (Fowler) office that were alleged to be on a memory stick containing Prince Hall documents numbered PH000001-477, as well as eight audio recordings of proceedings dated July 14, 2014. In addition it was alleged that Transcript from the Illegal Masonic Trial held against Appellant on May 20, 2014. However, there were **NO AUDIO FILES INCLUDED.**

On Monday, April 26, 2015, Appellant contacted (Fowler) office to schedule and appointment to review and examine the original discovery exhibits. In review of the discovery exhibits, Appellant finds that the illegal Masonic Trial Tape was not him. Appellant also discovered the audio recordings for the 111th Annual Communication was not audible. Mr. Fowler assistant Nancy stated that was the recordings that was provided by their clients.

Respondent have not responded to ALL of the facts and evidence whereby, the Appellant has requested or ever been given opportunity to present his case before trial commission or Grand Lodge. The Appellant is requesting that the court DISMSS, Appellant case in favor of Appellant , because Respondent did not follow it own rules and regulations of their Masonic Code Book.

Appellant ask the court to exam the Appellant complaint and consider the following and determine how can anyone be give a fair and impartial trial when;

a) The Grand Master Filed The Charges

b) The Grand Master Appointed The Investigation Committee

c) The Grand Master Is The Final Decider

d) The Grand Master Is The Preside Over The Annual Communication

Appellant affirms this is **NOT DUE PROCESS** and is a clear and definite and the Grand Lodge have violated the Laws .

Appellant request the court to review this mater because of the following:

a) Appellant was never given a opportunity to present his appeal,

b) Appellant be given a meaningful opportunity to challenge his Suspension,

c) Appellant has suffered irreparable harm in his character and professional employment,

d) Appellant requested a copy of the trial tape and trial minutes, date, that still have yet to be provided.

Appellant request that the court review this mater because The Respondent (Gregory D. Wraggs, Sr.) Grand Master, gave his **DECLARATION** under perjury and penalty that Mr. Traylor asked him the New Grand Master to over turn his suspension and he declined to do so, and he was going follow the vote of the members of the Grand Session. **THIS IS NOT A TRUE STATEMENT.**

Appellant find that the Committee on Grievance and was in error with their report and recommendation in accordance the Masonic Code pertaining specifically to their duties. Charges was never filed on the Appellant in his Subordinate Lodge. therefore, the Committee on Grievance and Appeal is in error.

Preventing Appellant to state his case before the Grand Lodge is another example of unethical con-duct and actions and violation of the organization own rule and regulation against Appellant. Appellant, in accordance with Landmark No 25 of the Masonic Code Book states " A member have the right to appeal before the General Assembly.

Appellant also finds this to be a violation of his constitutional rights as well whereby the United State Constitution is clear on; *Amendment I Freedoms, Petitions, Assembly* Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press, or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

Amendment VII -Rights in civil cases; In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.

During the 111th Annual Communication, Appellant was NOT permitted to attend let alone state his case before the Grand Lodge In fact the sitting Grand Master would not only allow Appellant into the Session to present his case, he also suppressed correspondence to be ready before the body in regard to Appellant case and appeal.

The sitting Grand Master had the hotel security to ask Appellant to leave the premises because he was causing a disturbance.

It's alleged that the Grand Lodge vote, sustain the Grand Master in these illegal action, however there is not proof, the members vote with a Majority in accordance to Title 51.03 of the Constitution and By-laws. The 111th Annual Communication minutes will reflect that Grand Master (Hughes) was asked on numerous occasion to allow the Appellant into the Grand Lodge so that he could state his appeal before the Grand Assembly and to no avail the Grand Master refused.

Members of the Grand Assembly ask the Grand Master (Hughes) why were Right Worshipful Traylor suspended and he stated that in report it would show the specific's.

Appellant finds that Grand Master (Hughes) does not report any irregularities against Appellant. Grand Master (Hughes) was asked why can Right Worshipful Traylor be allowed into the Grand Lodge and again to no avail the Grand Master did not respond on later to allegedly have members vote without a Majority to suspend Appellant until July 2018.

Appellant, was left with no other recourse but to pursue civil action against Respondent, due to their abuse of power in the position of Grand Masters' both Past (Hughes) and Present (Wraggs) as the Grand Lodge continue to violate their own rules to **HARASS AND UNFARILY TREAT AND DEFAME APPELLANT CHARACTER OF MATTER THAT JUST DOES NOT EXIST.**

On June 5, 2015, Appellant filed motion for summary judgement against Respondent for not complying with the court instruction to produce discovery evidence. Appellant was instructed by the court to go and review the discovery that the Respondent attorney had state all along was his possession at his office. Upon Appellant arriving there to examine the Documents and Audio files, it was discovered that no Audio files were available i.e. 111th Annual Communication Audio or Masonic Trial Tape. This information was confirm by Respondent Attorney Fowler assistant Nancy.

Appellant asserts that the court ruled in favor of Respondent Attorney Fowler with prejudice that the court fail in its ruling because of not considering the actual evidence annotated in the 111th Annual Communication minutes that no actual vote was ever taken and neither have Respondent Attorney Fowler produced any evidence proving otherwise. Neither does the Annual Allocution of the Grand Master show that Appellant name appears anywhere in his report to be voted on by the Grand Body.

On June 5, 2015, the court asked Respondent Attorney (Fowler) had he listen to the Audio Files?

Respondent Attorney (Fowler) stated he had only the information provided to him by his clients.

Appellant asserts that the court stated at the June 5, 2015, hearing the court stated that the Appellant was not a suspended mason because if there was no actual vote, Appellant is not a suspended member. Appellant replied that he know that but evidentially the Grand Lodge did not.

On June 12, 2015, Appellant filed another Request for Discovery to Respondent Attorney Fowler and to no avail Appellant was ever provided the requested information which at this time was the audio files i.e. 111th Annual Communication and Audio of the Masonic Trial.

In fact, Respondent Attorney stated the Audio of the Masonic Trial was missing and could not be made available.

Appellant found this to be in total contrast of what Respondent Attorney Fowler had previously stated in early hearings. Respondent Attorney Fowler stated on the record that he had all of the requested discovery at his office.

On July 31, 2015, Appellant filed Reply to Respondent Attorney Fowler letter dated July 22, 2015 in regard to the Appellant Response for Production of Documents after the Fourth (4) Request. Attorney Fowler Letter for (Respondent) state's in his letter "I received today your "Response To Request For Production Of Documents". I assume this is in response to my voicemail and earlier letter to you."

Appellant again responded to Attorney Fowler Letter for (Respondent) letter dated July 14, 2015, with response stating the facts of what HAD been received and what HAD NOT been received from Attorney Fowler Letter for (Respondent) letter. Appellant have not received any voicemails from in regard to this matter.

In fact, Appellant stated in his **RESPONSE TO REQUEST PRODUCTIONS OF DOCUMENTS** "Appellant is responding to Attorney Fowler for (Respondent) that

Appellant is in receipt of what appear to be final and approved minutes of the 111th Annual Communication this is the same if not identical information previously sent to Appellant.

However, Appellant was still not provided with the Audio Recordings of the 111th Annual Communication and Uncorrected Minutes. Neither was the Audio Recording of Appellant Trial. Therefore, Appellant finds that Respondent remain in non-compliance of the aforementioned rules for production of documents and have not provided Appellant ALL of the information requested."

Although, Attorney Fowler Letter for (Respondent) letter have provide a portion of the Request for Production of Documents Appellant contend ALL of the request information have not been given since filing of his complaint on November 12, 2014.

a) The Uncorrected Minutes for the 2014 Annual Communication

b) The Tape Recording of the 2014 Annual Communication, or

c) Tape Recording of Appellant Masonic Trial

On April 3, 2015, the court advised Appellant to come to your office to review and examine the evidence which Respondent (Fowler) told the court he had in his office.

Upon Appellant arrival and examination there were no trace of ANY Audio for the 111th Annual Communication or the Masonic Trial.

On June 5, 2015, the same information was requested and the court again advise both the Appellant and Respondent to cooperate in the matter. Appellant filed a request and allotted Respondent (Fowler) Fifteen (15) Days to produce the missing information and Respondent (Fowler) failed to do so.

Appellant received a thumb drive from Respondent (Fowler), however it was in complete having only having the Official Minutes and 111th Annual Communication Proceeding **NO AUDIO FILES.**

Appellant had requested the Audio of the Masonic Trial on numerous occasions which, Respondent (Fowler) have stated they had this information.. NOW Respondent (Fowler) have unveiled, that they never had the AUDIO at all, after stating to the court they have. Respondent (Fowler) have informed Appellant that the only recording device that was in use is the small recorder that I gave to you when you visited our office. Appellant, finds this is apparent untruth for many reasons.

On Monday, April 26, 2015, Appellant visited (Fowler) office to review and examine the original discovery exhibits. In review of the discovery exhibits the Masonic Trial Tape was not him. Appellant also discovered the audio recordings for the 111th Annual Communication was not audible or available.

Attorney Fowler for (Respondent) assistant Nancy stated that was the recordings that was provided and she is the same person that was in the room with Appellant the during the duration of time while Appellant exam the discovery exhibits.

In both previous and current request of the materials provided, I disagree with Attorney Fowler Letter for (Respondent) that they have provided all of the Request for Production of Documents that's' been specifically identified in Appellant reply.

In response to Attorney Fowler Letter for (Respondent) suggestion to potentially resolve these issues by telephone or by email is not Appellant is not in agreement and prefer all communication is done by US. Mail.

On July 31, 2015 Appellant filed his Witness List that was due by August 5, 2015. Respondent had until September 2, 2015 to file their witness list. The records will reflect that the Respondent again failed at filing documents timely and the court failed to discipline or sanction Respondent for not following court protocol and holing Respondent to the same standard as Appellant as it pertains tot Washington Court Rules.

In accordance with CR 12 CR 12 states *"Within the period fixed by any other applicable statutes or rules. A party served with a pleading stating a cross claim against another party shall serve an answer thereto within 20 days after the service upon that other party. The Appellant shall serve a reply to a counterclaim in the answer within 20 days after service of the answer or, if a reply is ordered by the court, within 20 days after service of the order, unless the order otherwise directs. The service of a motion permitted under this rule alters these periods of time as follows, unless a different time is fixed by order of the court."*

Appellant find the Court failed to find that the Respondent did not comply with proper filing timelines in accordance with CR 12 to respond timely and violated Appellant rights of due process both Procedural and Substantive .

On September 8, 2015, received letter from Respondent Attorney stating he did not understand Appellant Motion for Production of Document and that he had provided all of the requested discovery minus the missing Audio Recordings.

Appellant responded to Attorney Fowler for (Respondent) that Appellant is in receipt of what appear to be final and approved minutes of the 111th Annual Communication this is the same if not identical information previously sent to Appellant.

However, Appellant was still not provided with the Audio Recordings of the 111th Annual Communication and Uncorrected Minutes. Neither was the Audio Recording of Appellant Trial.

Therefore, Appellant finds that Respondent remain in non-compliance of the aforementioned rules for production of documents and have not provided Appellant ALL of the information requested."

On October 9, 2015, Appellant discovered that Respondent Attorney Fowler filed a summary judgement which should have not ben allowed to be heard by the court. Respondent Attorney Fowler never responded to Appellant motion for summary judgement in the timeline of accordance to CR 12.

On October 23, 2015, Respondent Attorney Fowler filed response to Appellant motion for summary judgement stating that he was not going to reply and to incorporate in summary judgement as his reply.

On October 23, 2015, Respondent Attorney Fowler filed an Objection to Appellant motion for summary judgement all the fall outside of proper filing timelines. (CR 12)

On November 4, 2015, Appellant is replied to Respondent Attorney Fowler RESPONSE filing dated October 26, 2015, and **RESPONSE** filing dated November 2, 2015, and his **SUMMARY JUDGEMENT** filing dated October 9, 2015, All of which appear to fail due to timeline in accordance to CR 12.

Appellant asked the court forgiveness for this late filing as this has not been Appellant typical approach in complying to the Rule of the Court. However due to the later filings of Respondent Attorney (Fowler)

Appellant was left with no choice but to be put under distress again to either response or reply to another non-compliance action of the Respondent Attorney (Fowler)

Appellant requested that the court **DO NOT** allow Respondent Attorney (Fowler) Argument of his delinquent filings be heard or even considered as he in **NEGLIGENT** in his response in either replying or responding timely to Appellant.

Respondent Attorney (Fowler) appear to feel that he can break the rules at his will and pleasure and NOT comply with the same rules and Appellant that is held to the same standard as an attorney.

Respondent Attorney (Fowler) have been delinquent in his response and or replying to Appellant every since Appellant filed his complaint on November 12, 2014, and did not response to the complaint until after 74 days had elapsed, and hand carried his response to the first hearing date and presented to the Appellant the day of hearing.

Respondent Attorney (Fowler) on April 3, 2015, filed a bogus order in the court dismissing Appellant complaint in its entirety and without prejudice and no trial even after the Judge and ruled NOT to dismiss. .**CP 301)**

On April 7, 2015, Appellant contacted the court to regarding the bogus order filed by Respondent Attorney (Fowler) to be corrected .

Appellant finds this to be unethical and disrespectful to Appellant, Attorney's who have to follow the rule and more especially the Judge.

Appellant responded to Respondent Attorney (Fowler) was in regards to Production of Documents, informing him that Appellant have not received all of the requested discovery; i.e.; 111th Annual Communication Uncorrected Minutes, 111th Annual Communication Audio Recordings, and Appellant Masonic Trial Tape, all which is important to prove Appellant innocence.

Respondent Attorney (Fowler) have been diligent in remaining vigilant in not providing this information after stating in court on several occasion that he had ALL of the information in his office, only later to state that the Masonic Trial Tape does not Exist now!!!

Respondent Attorney (Fowler) have been delinquent in his response and or replying to Appellant Witness List for Rebuttal in accordance with the Case Schedule. Appellant filed his Witness List on July 31, 2015 and Respondent had until September 5, 2015 to file their Witness List. Ninety Two days have elapsed since Appellant have filed Respondent Attorney (Fowler) still have yet to file a Witness List.

Respondent remain in non-compliance of the aforementioned rules for production of documents (CR 26 and 34), and timely filings (CR 12) and **NOT ALLOW** Respondent Attorney (Fowler) to argue or object to Appellant Summary Judgement.

On November 6, 2015, the court ruled in favor of Respondent Summary Judgement on the grounds of Appellant not requested continuance for discovery and being restored to his positions and the organization took a ingeminate vote against appellant.

Appellant argued the facts: that Appellant Lonnie Ray Traylor be given the opportunity to present his case in front of a jury, for unfair treatment, deformation of character, harassment and discrimination.

The procedural history of the Honorable Judge Bryan Chushcoff, who ruled to dismiss Appellant Complaint with prejudice on November 6, 2015 without considering all discovery requested by Appellant

Respondent Attorney Fowler did not timely respond to Appellant Summary Judgement entered on July 31, 2015 until November 4, 2015 (92 days) later. Respondent Attorney Fowler never provided Appellant discovery that was presented from the original complaint filed on November 12, 2014.

On November 11, 2015, Appellant filed a motion for reconsideration to the court of Honorable Bryan Chuschoff.

Appellant requested the court reconsider it decision for the following;

PROCEDURAL HISTORY

1. This matter having been assigned to the Honorable Judge Bryan Chushcoff, ruled in favor of Respondent Summary Judgement with prejudice on November 6, 2015.
2. Respondent Attorney Fowler did not timely respond to Appellant Summary Judgement entered on July 31, 2015 until November 4, 2015. (92 days later.)
3. Respondent Attorney Fowler never provided Appellant discovery that was presented from the original complaint filed on November 12, 2014. (74 days) later.)
4. Respondent Attorney Fowler was never sanction from the court for filing a bogus order dismissing the case on April 3, 2015 that was corrected by the court on April 7, 2015. After Appellant notified the court of the bogus order.

STATEMENT OF FACTS

Appellant filed his civil complaint on November 12, 2014, specifically on the grounds of unfair treatment, deformation of character and discrimination within the Prince Hall Grand Lodge of Washington and Jurisdiction to which the Respondent and his Attorney (Fowler) has yet to answer.

EVIDENCE RELIED UPON

Appellant rely upon CR 59(a)(7), (8) and (9) CR 26 and 34 and CR 12, Landmarks #13 & #25, Article 13 19, Article 15.08, Article 22, Title 51.03, Title 63.10, Title 200.02, Title 202.01, Title 204.07, Title 207.10 Title 303.03, Title 304.07, Title 308.01, Title 308.03

LEGAL AUTHORITY

The Court may reconsider a prior order when:

- There is no evidence or reasonable inference from the evidence to justify the verdict or the decision, or that it is contrary to law;
- Error in law occurring at the trial and objected to at the time by the party making the application; or
- That substantial justice has not been done. CR 59(a) (7-9).

Here, Appellant respectfully request the Court to consider the November 6, 2015 order regarding Respondents' Order Granting Summary Judgement because it is contrary to Washington law, and substantial justice has not been done.'

VI. SUMMARY OF ARGUMENT

Respondent Attorney Fowler moved for summary judgement base on the statute that the court does not interfere with Private Organization or Clubs business.

Appellant submit that he file his complaint on the grounds of and civil matter and a not pertaining to membership. Appellant have been accused of theft, deformation of character, unfair treatment and discrimination to which the organization have accused Appellant of being guilty.

Appellant have never be given the opportunity to present his case to prove his innocence and prove that he is actually guilty of stealing money from any one or any organization in front of a jury to which he's been accused., due to lack of due process, unfair treatment, deformation of character, harassment and discrimination.

CONCLUSION

Therefore, Appellant Lonnie Ray Traylor finds that Respondent remain in non-compliance of the aforementioned rules for production of documents and have not provided Appellant ALL of the information requested.

For the foregoing reasons, Appellants respectfully request that the Court consider the Order Granting Summary Judgement because it is contrary to Washington Law, Masonic Unchangeable Laws and the United State Constitutional Law (Procedural and Substantive) because substantial justice has not been done and Appellant Lonnie Ray Traylor be given opportunity to present his case in front of a jury, for unfair treatment, deformation of character, harassment and discrimination.

Appellant Lonnie Ray Traylor plead to the court that all requests for Production of Documents have been exhausted as well as ALL internal remedies of the Grand Lodge to resolve this matter internally after making several attempts in accordance with the internal processes and ask the court to reconsider and grant that Appellant case be remanded back to trial court and be heard by jury for a lack for due process of the court, attorney, and organization.

DATED this 22nd day of March 2016

Respectfully Submitted

LONNIE R. TRAYLOR

Appellant - Pro Se

Lonnie Ray Traylor , Pro Se
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(253) 861-8939
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NO. 48322-0-II

COURT OF APPEAL OF THE STATE OF WASHINGTON

DIVISION TWO

LONNIE RAY TRAYLOR a.k.a.

RIGHT WORSHIPFUL LONNIE RAY TRAYLOR

Appellant

v

MOST WORSHIPFUL PRINCE HALL GRAND LODGE

F. & A.M. WASHINGTON AND JURSIDICTION and

MOST WORSHIPFUL GRAND MASTER, GREGORY D. WRAGGS, SR.

Respondent (s)

APPELLANT'S BRIEF

APPENDIX'S

APPENDIX-1

On the first (1st) day of each Annual Communication, the Grand Lodge shall convene at the hour of nine o'clock a.m. and the following order of proceedings and business shall be observed:

1. Prayer by the Chaplain.
2. Roll call of officers.
3. Committee on Credentials announcement.
4. Solemn Ceremonies of opening the Grand Lodge in ample form.
5. Reading and approving minutes of any communication not before read and approved (unless dispensed with).
6. Announcement of committee appointments, regular and standing, by the Grand Master.
7. Annual Message of the Most Worshipful Grand Master.
8. Annual reports of the R.W. Deputy Grand Master, R.W. Grand Senior Warden, R.W. Grand Junior Warden, R.W. Grand Treasurer, R.W. Grand Secretary, R.W. Grand Lecturer, Grand Trustee Board, Obituary Committee, and miscellaneous business.
9. Report of Director of Youth.
10. Miscellaneous business.

Section 50.04. Hours of labor after first day

After the first (1st) day of the Annual Communication the Grand Lodge may convene at nine (9) o'clock a.m. or at the will and pleasure of the Grand Master.

TITLE 51

Order of Business

Section 51.01. The order of business at each session after the morning of the first day may be as follows:
1. Reading and approving minutes of the preceding session.
2. Report of unfinished business.
3. Report of committees.
4. Special orders, if any.
5. Consideration of Amendments to the Constitution, By-Laws, Regulations and Rules, if any.

Section 51.02. Time limit for presenting amendments and resolutions

All proposed amendments and resolutions to the Code which require action by the Committee on Jurisprudence or the Code Committee must be sent to the Grand Secretary's office by January 15th preceding the Annual Communication of the Grand Lodge.

***2003**
Section 51.03. Voting; manner of, majority, exceptions

:01. **Number of Votes.** Each member of the Grand Lodge shall have one (1) vote, plus one additional vote for each proxy held provided that an individual member shall not be allowed to act as proxy for more than one (1) Lodge. (Reference Titles 126 and 127)(Explanation: This means every Past Master, Worshipful Mas ter, Senior and Junior Warden will have their regular votes.

Additionally, the WM will have a vote for the Lodge. If the WM is absent and Wardens present, the SW will carry two (2) votes for the Lodge and the Junior Warden one vote. The WM's vote as a PM is lost. If none of the principal officers are present and a proxy is sent, then the proxy will carry the lodge votes (3) for the WM, SW, JW.

But, the fourth (4th) vote, which the WM would carry for himself as a PM is lost. If the proxy is a Past Master he will carry four (4) votes.

:02. **Tie Vote.** In all cases of a tie, the Presiding Officer in addition to his proper vote, shall have the deciding vote.

:03. **Manner of Voting.** All questions in Grand Lodge shall be decided by members either by voting with their left hand or written secret ballot as determined by the Grand Master/Presiding Officer. The election of officers shall be by written secret ballot. The written secret ballot may be conducted by means of the use of electronically scored ballots.

:04. **Disposal of Question.** Whenever a vote shall be required to dispose of any question submitted to Grand Lodge, the affirmative and negative of such shall be taken directly thereon unless the question is resolved in some preliminary manner agreeable to Masonic Law. Before any vote shall be taken, the report and recommendation of any committee to which the question may have been referred shall be read.

:05. **Majority Vote Required.** All motions are to be decided by a simple majority vote except as provided for in Title 51.03.03 above.

:06. **Blank Ballot.** A blank ballot does not count as a vote.

:07. **Motion in Order.** When a motion is under discussion no other motion shall be in order except to amend, commit, or postpone.

:08. **One Amendment at a Time.** A motion to amend the main question must be decided before another motion to amend can be received.

:09. **Subject-Matter cannot be Amended.** A motion presented as an amendment but which actually changes the subject-matter of the original motion shall not be entertained.

:10 **Reconsideration.** No member except one of the majority which decided the question shall be entitled to move for reconsideration.

:11 **Speaker to Stand.** Any member who wishes to speak shall rise and remain standing until recognize and shall address the presiding officer.

:12 **Proposition Should be in Writing.** Every proposal and resolution shall be put in writing if so requested by any member.

:13 **Adjournment.** A motion to adjourn is not in order, but the Grand Lodge at any time may be called off at the will and pleasure of the Grand Master.

Section 51.04. Calling off: A motion to adjourn is never in order but the Grand Lodge, at any time, may be called off at the will and pleasure of the Grand Master.

APPENDIX-2

*2003
:15. In the interim between the communications of the Grand Lodge, the Grand Master may make special assessment against the subordinate lodges or the members thereof to meet any contingency or emergency which may arise in consequence of a deficiency in the treasury to meet the requirements of the Grand Lodge. Prior to making a special assessment, an attempt at resolving these deficiencies shall be met by cost cutting measures, such as stopping travel of all officers, cutting budgets, etc.

*2003
:16. He shall observe and have authority to exercise a general supervision and government over the fraternity in his jurisdiction during the recess of the Grand Lodge.

*2003
:17. The Grand Master shall see that the Ancient Landmarks and the laws of this Grand Lodge are observed, and shall do and perform the duties of Ancient Grand Masters agreeably to the requirements of Masonry and this Grand Lodge.

:18. He shall see that the Masters are qualified as required by the laws of this Grand Lodge, and he may remove from office any who is not so qualified.

:19. He shall report all his acts and decisions to the Grand Lodge for its approval. The acts and decisions of the Grand Master, approved by the Grand Lodge, shall become and be final and conclusive. Those acts and decisions which the Grand Lodge fails to approve, or which the Grand Lodge disapproves, shall become null and void upon the close of Annual Communication of the Grand Lodge to which they are presented. Those acts and decisions of the Grand Master which are not presented to the Grand Lodge become null and void at the close of the Grand Lodge Annual Communication to which they should have been reported or presented.

:20. In accordance with one of the Ancient Landmarks of Free Masonry, the Most Worshipful Grand Master shall have the power to make Masons at sight, which power shall be exercised in the following manner: The Grand Master shall summons to his assistance not less than six (6) Master Masons, shall convene a Lodge, and without any previous investigation or balloting, confer the First, Second and Third degrees of Masonry on the candidates, after which the Lodge so convened shall be dissolved.

:21. The brother or brothers so made Masons shall be entitled to a certificate of the fact from the Grand Master, which shall serve in lieu of a demit.

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:22 The Grand Master is NOT be granted unlimited power to set aside any portion of this Constitution and By-laws except in extreme situations/circumstances which would render great harm to this Grand Lodge. Otherwise, his decisions and actions must be in accordance with the Constitution and By-laws as set forth in this Code Book.

ARTICLE 14

New Lodges

Section 14.01. No dispensations shall be issued for establishing of new lodges by order of the Grand Lodge or by the Grand Master without the recommendation of the nearest lodge, provided, however, the Grand Lodge or Grand Master may grant such dispensation without such recommendation when it appears that refusal to give such recommendation by the nearest lodge is not based upon good Masonic reason.

Section 14.02. No petitions for new lodges shall be considered by any lodge until it has laid over fifteen (15) days for consultation and consideration.

Section 14.03. No dispensation for a new lodge shall be issued until the sum of fifty ($50.00) dollars shall be paid to the Grand Lodge. The charter fees shall be seventy -five ($75.00) dollars, which sum shall be paid to the Grand Lodge before the issuance of the charter.

Section 14.04. Every petition for a new lodge shall be signed by eleven (11) or more Master Masons, accompanied by a certificate from the Grand Master, or his deputy, or from the Master Masons who signed said petition, that the proposed Master is a person of executive ability and able to open and close a lodge and to have the degrees of Masonry properly and correctly conferred upon applicants.

Section 14.05. No dispensation or charter for constituting a new lodge shall be granted to any person or persons whomsoever residing out of the jurisdiction of this Grand Lodge, if within the jurisdiction of any other constitutional Grand Lodge which is recognized by this Grand Lodge.

THE TWENTY FIVE LANDMARKS OF MASONRY

1. The Modes of recognition.

2. The division of Symbolic Masonry into three degrees.

3. The legend of the third degree.

4. The government of the fraternity by a presiding officer called a Grand Master, who is elected from the body of a tile craft.

5. The prerogative of the Grand Master to preside over every assembly of the Craft, wheresoever and whensoever held.

6. The prerogative of the Grand Master to grant dispensations for conferring degrees at irregular times.

7. The prerogative of the Grand Master to grant dispensation for opening and holding lodges.

8. The prerogative of the Grand Master to make Masons on sight.

9. The necessity of Masons to congregate in lodges.

10. The government of every lodge by a Master and two Wardens.

11. The necessity that every lodge, when duly congregated, should be tyled.

12. The right of every Mason to be represented in all general meetings of the craft and to instruct his representatives.

13. The right of every Mason to appeal from the decision of his brethren in a Lodge convened, to the Grand Lodge or General Assembly of Masons.

14. The right of every Mason to visit and sit in every regular lodge.

15. That no visitor, not known to some brother present as a Mason, can enter a lodge with out undergoing an examination.

16. That no lodge can interfere in the business or labor of another lodge.

17. That every Freemason is amendable to the Laws and regulations of the Masonic Jurisdiction in which he resides.

18. That every candidate for initiation must be a man, free born and of lawful age.

19. That every Mason must believe in the existence of God as the Grand Architect of the Universe.

20. That every Mason must believe in a resurrection to a future life.

21. That a book of the law of God must constitute an indispensable part of the furniture of every lodge.

22. That all men, in the sight of God, are equal and meet in the lodge on one common level.

23. That Freemasonry is a secret society in possession of secrets that cannot be divulged.

24. That Freemasonry consists of a speculative science founded on an operative art.

25. That the landmarks of Masonry can never be changed.

These constitute the landmarks, or as they have sometimes been called, "the body of Masonry," in which it is not in the power of man or a body of men to make the least innovation.

:08. To exclude a member, on causes shown, temporarily from a regular or special communication of the lodge, except the Master and the Grand Master.

:09. To make By-Laws for its local government subject to the approval of this Grand Lodge.

:10. To levy an assessment upon its members for Masonic purposes.

:11. To appeal to the Grand Lodge from the decision of its Master.

:12. To exercise concurrent penal jurisdiction over its own members (except the Master, Grand Master) and over affiliated and non-affiliated Masons residing within the limits of its jurisdiction, in accordance with the laws and regulations of the Grand Lodge.

:13. To select a name for itself.

:14. To designate and change its regular time and place of meeting upon approval of the Grand Master and/or Grand Lodge.

Section 15.03. It shall be the duty of every Subordinate Lodge under the jurisdiction of this Grand Lodge to take cognizance of any and all unmasonic conduct of its members, except the Master and Grand Master, and of all Masons affiliated and non-affiliated residing within its jurisdiction, as provided by the law, except in those cases where the Grand Lodge takes original jurisdiction for the trial of the accused. The Grand Lodge and its subordinate lodges shall have and exercise concurrent jurisdiction over Masonic offenses, in all cases where the lodge has jurisdiction.

Section 15.04. The Charter of a Subordinate Lodge under the jurisdiction of this Grand Lodge may be suspended or forfeited and the lodge dissolved by the judgment of the Grand Lodge for the commission of any of the following offenses:

:01. Contumacy to the authority of the Grand Master of this Grand Lodge.

:02. Departure from the original plan of Masonry and Ancient Landmarks.

:03. Disobedience to, or violation of, the Constitution, By-Laws, Edicts and Regulations of this Grand Lodge.

Section 14.06. No lodge under dispensation, continued as such by the Grand Lodge, shall confer the Degrees in Masonry for a less sum than that prescribed by the Grand Lodge for Chartered Lodges.

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Section 14.07. No new lodge shall be chartered until it has served a minimum of three (3) months under dispensation. Before issuing a Dispensation a thorough investigation of the character of the individuals requesting permission to set up a lodge shall have taken place. A report will be submitted to the Grand Master for his evaluation and assessment.

ARTICLE 15

Subordinate Lodges

Section 15.01. The constitution and By-Laws of this Grand Lodge shall become and be a part of the By-Laws of all the Subordinate Lodges under the jurisdiction of this Grand Lodge, and all such Subordinate Lodges and the members thereof are subject thereto and shall obey the same. No Subordinate Lodge shall have power to enact or make any law, rule, regulation or do anything in violation of or contrary to the Constitution, By-Laws, Regulations or Edicts of this Grand Lodge.

Section 15.02. Every Subordinate Lodge under the jurisdiction of this Grand Lodge has the right:

:01. To retain possession of its warrant of constitution at the will of this Grand Lodge.

:02. To do all the work of Ancient Craft Masonry.

:03. To transact all business that can be legally transacted by regularly congregated Masons in a Subordinate Lodge.

:04. To be represented at all communications of the Grand Lodge in manner as prescribed by the Grand Lodge.

:05. To increase its members by the admission of new members under the restriction of the Grand Lodge.

:06. To elect its officers as provided in its Charter, By-Laws and the laws of this Grand Lodge.

:07. To install its officers after being elected as provided in its Charter, By-Laws and the laws of this Grand Lodge.

Section 15.07. All chartered lodges under the jurisdiction of this Grand Lodge shall furnish the Grand Trustee Board and the Grand Secretary annually, a true and correct inventory of all properties, both real and personal. Said inventory shall be signed by the Master and attested by the Secretary under the seal of the Lodge. The failure to furnish such inventory subjects the Master to such actions as the Grand Lodge may deem necessary.

Section 15.08. No lodge, or any member thereof, under the jurisdiction of this Grand Lodge, shall resort to civil courts to establish any right or to redress any grievances arising out of the membership in the Order or connected therewith until it or he shall have exhausted the remedies within the Order and in a manner provided by the Constitution, laws and regulations of this Grand Lodge.

ARTICLE 16

Deputy Grand Master and Grand Wardens

The Deputy Grand Master and the Grand Wardens shall assist the Grand Master in the discharge of the duties of his office as he may direct, perform all duties incumbent on their said office by established custom or usage, and exercise such powers as may by contingency arise under the provisions of Section 10.01, Article 10, of this Constitution, and shall perform such other duties as may be prescribed by law.

ARTICLE 17

Duties of Grand Treasurer, Grand Secretary Grand Lecturer and Grand Trustees

The Grand Treasurer, Grand Secretary, Grand Lecturer and Grand Trustees shall perform such duties as shall be prescribed by law.

ARTICLE 18

The Appointed Grand Officers

The appointed Grand Officers shall perform such duties and services as the tradition and usage of the craft prescribe and such other services as the Grand Lodge or Grand Master may direct.

:04. Ceasing to meet for one (1) year or more, or refusing to pay Grand Lodge taxes, dues, or assessment.

:05. The indiscriminate making of immoral candidates whereby the reputation of the Institution in the vicinity of the lodge may be impaired.

All convictions for the commission of any of the above mentioned offenses committed by a Subordinate Lodge must be by an impartial review of the Grand Lodge. The Grand Master may arrest the charter of a lodge until the setting of the Grand Lodge for the commission of any of the above mentioned offenses.

Section 15.05. The By-Laws of every Subordinate Lodge, under the jurisdiction of this Grand Lodge, shall state that such lodge owes its allegiance to the Most Worshipful Prince Hall Grand Lodge, Free and Accepted Masons, of Washington and Jurisdiction, and subject to its Constitution, By-Laws, Edicts and Regulations, and that it holds a charter from said Grand Lodge, and that the Constitution and By-Laws of the Grand Lodge are a part of the By-Laws of the Lodge.

Section 15.06. All property of every kind and nature, wherever located, belonging to Subordinate Lodges under the jurisdiction of this Grand Lodge, is held by such lodges in trust for the benefit of their members and for the furtherance of the objects of Freemasonry in this jurisdiction. Such property shall not be partitioned or distributed among, or conveyed or transferred to the individual members of such lodges. Upon the dissolution of a Subordinate Lodge, its property shall revert to this Grand Lodge and shall be at once turned over to the Trustees of this Grand Lodge by the several subordinate officers or other persons having custody. Said property shall be held in trust for a period of five (5) years, and if such lodge shall be revived and re-obtain its warrant within such period the Trustees of this Grand Lodge shall restore said property to the revived Lodge; but if such Lodge shall not be revived within five (5) years, said property shall become and be the property of this Grand Lodge for the general purposes of the craft and shall be subject to such disposal as this Grand Lodge shall determine.

Nothing in this Section shall be so construed as to prevent the free transfer of the property of Subordinate Lodges in the conduct of their regular and legitimate business and without intent to evade the objects of this Section.

FILED
COURT OF APPEALS
DIVISION II

2016 MAR 22 AM 8: 20

STATE OF WASHINGTON
BY _____
DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF PIERCE

LONNIE RAY TRAYLOR a.k.a.

RIGHT WORSHIPFUL LONNIE RAY TRAYLOR

Pierce County No.**14-2-14181-1**

Court of Appeal Case No. **48322-0-II**

Appellant

v

DECLARATION OF

DOCUMENT FILING AND SERVICE

MOST WORSHIPFUL PRINCE HALL GRAND

LODGE F.A.M. WASHINGTON & JURSIDICTION

and MOST WORSHIPFUL GRAND MASTER

GREGORY D. WRAGGS, SR.

Respondents

DECLARATION OF DOCUMENT FILING AND SERVICE

I, LONNIE RAY TRAYLOR , DECLARE THAT ON THE **22ND DAY OF MARCH 2016,** I CAUSED THE ORIGINAL **APPELLANT OPENING BRIEF** TO BE FILED IN THE COURT OF APPEALS DIVISION TWO AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

[X]	**JAMES C. FOWLER, WSBA # 15560** 1201 PACIFIC AVE STE 1900 TACOMA, WA 98402	( ) (X) ( )	U.S. MAIL **HAND DELIVERED** AGREED E-SERVICE VIA COA PORTAL