

FILED  
COURT OF APPEALS  
DIVISION II

2016 JUL 11 AM 8:47

STATE OF WASHINGTON

BY MM  
DEPUTY

NO. 48322-0-II

**COURT OF APPEAL OF THE STATE OF WASHINGTON  
DIVISION TWO**

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**LONNIE RAY TRAYLOR a.k.a.**

**RIGHT WORSHIPFUL LONNIE RAY TRAYLOR**

Appellant

v

**MOST WORSHIPFUL PRINCE HALL GRAND LODGE**

**F. & A.M. WASHINGTON AND JURSDICTION and**

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

Respondent (s)

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**APPELLANT'S REPLY BRIEF**

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**Lonnie Ray Traylor  
Pro Se - Appellant  
PO Box 5937 - Lacey, WA 98509**

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## 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

## **INTRODUCTION**

This is a civil case, where the Appellant have not been given due process. The court granted summary judgment in favor of Respondents without demanding the evidence be provided to prove their case.

Respondent is now requesting to be awarded fees for having to respond to Appellant appeal.

All internal remedies have been exhausted and, Appellant was left with no other alternative but to appeal to the court for justice.

Appellant was given an illegal trial that violated the Constitution and By-Laws whereby, Appellant was not properly notified and not given opportunity to present his case in the trial or appeal his case before the Grand Lodge.

Appellant was instructed by the court to visit Attorney James C. Fowler office to review discovery evidence requested by Appellant and report back to the court his findings. Appellant was unable to review the requested evidence because the Trial Recording and 111th Annual Communication Recordings alleged by (Fowler) was missing.

## **STATEMENT OF FACTS**

The section of Respondent Amended brief fails in all parts.

Respondent brief does not lay out all the facts and legal grounds to determine justice of Judge Chushcoffs summary judgment in favor of Respondent.

Respondent brief does not speak of failure by Respondent to withhold Discovery Evidence from the court.

Appellant Complaint was not difficult to interpret, Judge Chushcoff erred in ruling with prejudice granting summary judgment to Respondent without demanding Respondent provide ALL discovery evidence requested by Appellant.

Appellant assert the following:

1. Respondent failed to ever answer Appellant claim filed on November 12, 2014 under WLAD, RCW 49.60.
2. Respondent failed to acknowledge Appellant claims of events for ten year period.
3. Respondent failed to acknowledge breach of contract claim against Gregory D. Wraggs, Sr. "Most Worshipful Grand Master"
4. Respondent failed to acknowledge the minutes of the 111th Grand Session does not show the entire membership voted by a majority to affirm Appellant suspension.

5. Respondent Gregory Wraggs, Sr. is the current elected leader, or "Grand Master", of the Grand Lodge who breach contract agreement; (CP 172), (CP 190), (CP 228), (CP 229)

6. The Masonic Constitution states that the Grand Lodge voting at the Annual Communication; that all votes shall be disposition by majority ballot Title 51.03

**Title 51.03. Voting; manner of, majority**

: 01. Number of Votes. Each member of the Grand Lodge shall have one 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 Lodge. (Reference Titles 126 and 127)

(Explanation: This means every Past Master, Worshipful Master, Senior and Junior Warden will have their regular votes. 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.

Under Masonic law, the Grand Lodge have violated Appellant right to a majority vote. (CP 319)

Respondent brief alleges that under Articles 11 and 12 of the Constitution, the Grand Lodge members, voting democratically as a body at the Annual Communication, is the ultimate authority for all Masonic issues, however his argument fails because it avoid Title 51 that states how ALL motions are to be disposition and this is by a majority vote of the membership which did not happen and neither does any of the discovery evidence provided shows as such.

Respondent brief fails at not acknowledging Article 15.08 of the Constitution that states “a member have a right to pursue legal remedies for resolution once all internal of the Grand Lodge have been exhausted.”

Appellant followed all of the internal process of the Grand Lodge and to no avail the Grand Lodge consistently violated its own rules and process, thus Appellant having exhausted all internal process and had no other recourse but to pursue Civil resolution. (CP 424)

**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.

Respondent brief fail to magnify all part of Article 13 of the Constitution ("Powers of the Grand Master".) It fails to identify, the Grand Master is not given absolute power to violate the constitution Article 13.19 whereby, he is to make a report of his entire official actions at the Annual Communication and the requested discovery do not show or prove otherwise any of the alleged accusations made against Appellant was ever presented before the membership.

**Article 13.19** - 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.

Appellant asserts that the court erred and ruled in favor of Respondent with prejudice 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 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 membership. (CP 536)

The court erred at not holding the Grand Lodge accountable for not following its own rules and violating Appellant rights of due process, where 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.

Respondent brief fails to acknowledge Article 13.22 whereby the Grand Master is not given unlimited power or authorize him to violate the

rules of the constitution under any circumstances and his decisions and actions must be in accordance with the Constitution and By-laws as set forth in the Masonic Code Book. (CP 541)

Article 13.22 - 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.

Appellant believe the decision of the court was contrary to Masonic Law where leadership or Grand Master is not granted unlimited power over the membership and all members, have a right to appeal before the Grand Assembly in accordance within the unchangeable law Landmark No. 13 and Landmark No. 25, that ALL members must comply to include the Grand Master himself. (CP 180) (CP 219)

**Landmark No. 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.

**Landmark No. 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.

The court erred at not demanding Grand Lodge to produce all discovery evidence i.e. Tapes/Audio Recordings that will show the Grievance

and Appeal Committee did not present their report before the Grand Assembly to be voted on by the membership.

Appellant asserts, the discovery evidence provided by the Respondent of the 111th Annual Communication Minutes **WILL NOT** reflects the Grievance and Appeal Committee ever presented a report to the membership for disposition to be voted on **UNANIMIOUSLY OR BY MAJORITY.** (CP 458)

Respondent brief fails at not acknowledging the Grand Lodge violating the rule to conduct a Masonic Trials in accordance with Title 204 and Title 304. When testimony is taken the lodge shall be opened on the highest degree to which the accused has attained.

Respondent brief failed at this because, the discovery evidence will show that no lodge was ever open nor was Appellant afforded opportunity for due process to present his case. (CP 8)

Title 304.07 -When testimony is taken in open lodge the lodge shall be opened on the highest degree to which the accused has attained 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.

Appellant assert the fact the 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 that, Respondent failed to present to the court that will show Appellant DID NOT WALK out of the trial, and that through trial and testimony by others who was present 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. (CP 458)

Appellant asserts these provisions are not decisive of the issue in this case, because this case is now in Civil court and not a Masonic court. Nor should the Grand Lodge at the Annual Communication have the final word on discipline (on all) issues.

This case should be decided in a civil court of law based on Appellant complaint and be remanded back to trial court to be heard by a panel of jurors.

Respondent brief fails to identify the facts that Mr. Lozan was the commission chairman of the trial and have made declaration that he has been

a Mason for over 40 years and have participated in at least 11 Masonic trials. However, Respondent does not conclude that M. Lozan violated Appellant rights in the process and allow Appellant opportunity to present his case and his declaration should not be considered in this matter for violating the normal Masonic procedures in the manner of conducting a Trial. (CP 458)

Appellant asserts the one "oddity" of the trial was that, Mr. Lozan Served as the Chairman of the Commission and it appears that he should know where the whereabouts of the missing trial recordings that will show that Appellant never walked out of the trial. (CP 466) (CP 314)

Appellant asserts that the transcript of the trial provided by Respondent should not be considered as evidence because the information have been tampered with and does not reflect actual statements and actions of Appellant Trial.

In fact Appellant have been requesting this information throughout the entire process of this case since the original complaint was file. Unfortunately, to no avail Respondent continue to resist and fail to provide discovery evidence which give credence and the rationale of

Appellant complaint of discrimination, harassment, unfair treatment and deformation of character. (CP 460) (CP 461) (CP466)

Respondent brief fails at the Annual Communication the members voted to affirm Appellant suspension before the entire membership.

The minutes does not show the Grievance and Appeal Committee never presented a report to the entire Grand Lodge membership for disposition or for a majority vote.

Appellant assert that the decisive, undisputed fact in this case is that the entire Grand Lodge membership Did Not vote using the normal process outlined in Title 51.08 of the Constitution that states in part **“ALL MOTIONS WILL BE DISPOSITIONED BY A MAJORTY VOTE.”** There is no record this process ever happen in accordance with the Constitution and by-laws Title 51.08, neither is it annotated in any of the discovery provided by Respondent.

Appellant have also requested this discovery evidence as well on numerous occasions.

Appellant want to remind the court the just like in the case of Davis v. Pleasant taking a majority vote, Appellant should have been afforded the same opportunity.

Appellant assert the court erred granting summary judgement and not consider the requested discovery "Tape Recordings" to affirm a majority vote was ever taken by the entire Grand Lodge membership.

Appellant suspension, when the 111th Annual Communication does not show or prove that a vote was ever taken on Appellant.

The 111th Annual Communication minutes shows only a motion being made, seconded and carried, however it does not show a Majority Vote taking place. (Resp. Br. 14) (CP 536) (RP 14)

Appellant interpretation of "motion carried" is not considered a majority vote being taken. Moreover, Respondent ignores the Declarations of Mr. Swanigan, Mr. Walker and Mr. Jiles, who were in attendance at the 111th Annual Grand Session and testified that the Grand Lodge Did Not Vote to affirm the suspension. (CP 289) (CP 293)(CP 297)

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MR. TRAYLOR: That's what I'm saying. The minutes do not reflect -- if I can reference the page. THE COURT: You are saying it should have said --if there was a vote, it should say Roy Price, No. 83, seconded. The members voted. Motion carried. MR. TRAYLOR: No, sir. THE COURT: Is that what you are saying? MR. TRAYLOR: I'm saying our process is, to get a majority, there are 100 people in the room; 55 is the majority.

Appellant asserts that the court ruled in favor of Respondent with prejudice, and failed to consider the evidence submitted by Appellant in regards to Appellant and (Wraggs) meeting held on July 24, 2014, where both agreed upon mutual agreement asking Appellant to prepare a Letter, Memorandum of Understanding or Contract and mail it to his home mailing address.

**Definition.** An agreement creating obligations enforceable by law. The basic elements of a contract are mutual assent, consideration, capacity, and legality. In some states, the element of consideration can be satisfied by a valid substitute.

The Court failed to consider discover evidence presented by Appellant to show that the meeting between (Wraggs) and (Traylor) in fact did happen on July 24, 2014 and through trial and testimony others will testify of this meeting among other things to which (Wraggs) have been untruthful about in this matter let alone perjured himself making false statement in contrast regarding Appellant.

In other words, the "appellate court" for Appellant in this matter is the Court of Appeals which, again, "has supreme, inherent and absolute legislative, judicial authority and power to make decision. The Grand Lodge members have erred and violated their rules making their decision.

Appellant have exhausted all internal remedies and now asks the court to review the process of the Superior Court and those of the Grand Lodge to see their errors and remand Appellant case back to trial court for lack of due process and that Appellant is given opportunity to present his case before a jury. (CP 1)

Respondent brief fails regarding Appellant Complaint as Appellant have been dealing with this type of behavior and conduct of the Grand Lodge of "Humiliation Unfair Treatment, Harassment and Acts of Vindictiveness for approximately 10 years!" How long must "A Master Mason in Good Standing" continue to suffer these Injustices by The Abusers of Presumed Power? (CP 308)

This ten year allegation have damage Appellant profession as to how he earn his living and defamed his character and demands monetary relief " for the lost Income as it relates to his profession as a Mortgage Lender over the past ten (10) years at approximately (\$75,000.00 Per Year)".

The ten year allegation presents Appellant claims having been wrongfully accused of "stealing and misappropriating money from his church, private citizens and the organization since 2001 to which the Grand Lodge has never proven .

Appellant have declaration of his Pastor Gregory Christopher, Ms. Tasha Owes and Ms. Scarlett and others who have testified otherwise of the false claim made against Appellant. (CP 78) (487) (489) (492) (508) (CP 433)

Finally, Appellant is asserting that (Wraggs) breached with Appellant of the agreed Memorandum of Understanding to resolve this issue and at most the court did not take into consideration the evidence presented to the court by Appellant.

Appellant raise this question for the court; Why would (Wraggs) Grand' Master respond to Appellant called and asked him to see if he had received his letter and he said, "YES" but , he would be leaving the County and would address this issue with Appellant when he returned from Germany."

There can be no question that (Wraggs) met with Appellant and reneged on a mutual contract between Appellant and himself, thus there can be no question that a contract exists. (CP 172)

Based on these facts, the Court should not affirm the Trial Court Decision and remand Appellant appeal back to trial court.

## ARGUMENT

Respondent failed to acknowledge that in discussion of this issue, cited in the unpublished decision of *Davis v. Pleasant Forest Camping Club*, 171 Wn.App. 1027 (2012), Judge Chushcoff; reference this case and stated that the court get involve when organization do not follow their own rules and in the *Davis v. Pleasant Forest Camping Club* its show where they took an actual vote to determine a majority 66-9.

However discovery evidence does not show or prove that a majority vote was ever taken on Appellant. The 111th Annual Communication minutes ONLY shows a motion being made Seconded and Motion Carried, it Does Not Show a Majority Vote taking place.

Section 51.03. Voting; manner of, majority, exceptions  
: 01. Number of Votes. Each member of the Grand Lodge s hall has 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 Master.

: 03 Manner of Voting. All questions in Grand Lodge shall be decided by members either by voting with t heir left hand or written secret ballot as determined by the Grand Master/Presiding Officer. The election of officers shall be by written secret ballot.

Appellant asserts that the court erred in its ruling that's contrary to Masonic Law Title 51.05 Majority Vote of the Masonic Code Book, which is clear in part that states" All motions are to decide by a simple majority vote."

Respondents Brief it shows that “At the board meeting, of Davis v. Pleasant, the board abruptly announced that they mailed in ballots would not be counted. The Board then distributed new ballots to those that attended the meeting, where a live vote was held and the members in attendance voted by a “Majority 66- 9 for expulsion.

Respondent argument of Appellant cutting and pasting has no relevance to Respondent Not producing ALL discovery evidence i.e. Audio Recordings of the Appellant Trial and Recordings of the Grand Annual Communication to prove Appellant is guilty of the claims made against him.

Respondent request for attorney's fees should not be granted because Respondent Attorney “Fowler” is being paid through the organization “Grand Lodge” insurance. To grant Respondent Attorney “Fowler” his request would be considered insurance fraud and an injustice to his client.

Appellant has made every effort to address the applicable legal issues in this case and labeled them.

Appellant appeal brief only seek the truth to prove his innocence on a legal basis. The sole effect of Appellant efforts is to be given a fair and impartial trial to be heard by a panel of jurors.

Appellant contends that Respondent have no assignment of errors because Respondent is clearly aware of the several times he stood in Judge Chushcoff s Court and stated that he had “ALL” of the discovery at his office, until on April 3, 2015, the court advised Appellant to visit Respondent office to review discovery.

The court erred at not allowing Appellant due process to prove his innocence and shows a lack of due process.

On April 26, 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 erred at not demanding discover on behalf of Appellant to prove his innocence and shows a lack of due process.

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

The court erred at not demanding discover on behalf of Appellant to prove his innocence and shows a lack of due process and show that Appellant did not walk out of the trial.

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

Appellant asserts the court erred at not holding the Grand Lodge accountable for not following its own rules and violating Appellant rights of due process to appeal his case before the Grand Assembly.

These finding was contrary to Masonic Law whereby anyone in leadership or Grand Master is not granted unlimited power and members have a right to appeal before the Grand Assembly.

Article 13:22 - of the Masonic Code Book states: 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.

Appellant argue that the TRIAL COURT DID NOT PROPERLY GRANTED SUMMARY JUDGMENT on the grounds that Appellant Complaint was a Civil Complaint and not a Masonic Complaint.

Appellant argues that if the court believed in the Davis V. Pleasant case for lack of fairness and Due Process why the court would fail at allowing Appellant the same opportunity to present Appellant case before a jury.

Appellant argue that Appellant have requested Discovery Evidence in regards to Appellant Trial and Recordings of the 111th Annual Communication on several occasion, and to no avail Respondent seem to continue withholding evidence from the court to show discrimination, harassment, unfair treatment and deformation of Character toward Appellant.

Appellant argues the court ruled with prejudice in favor of Respondent because Respondent never provided the evidence to prove their case of the accusation made against Appellant.

Attorney Fowler stood in court on (3) three different hearings and stated that “All of the Discovery Evidence Appellant is requesting is in my office” however, to date Respondent have failed produce the Recordings of the Appellant Trial and 111th Annual Communication requested by Appellant.

The court ruling 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 in accordance with Title 51.05 of the Masonic Law.

Appellant argue the proceedings does not reflect Appellant Grievance was presented to the entire membership of the Grand Lodge at the Annual Communication.

Appellant argue 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 their report before the Grand Assembly to be voted on by the membership.

Appellant argue the court failed at not demanding the Grand Lodge to produce discovery evidence i.e. Trial Recording and 111th Annual Communication Recordings because the discovery evidence provided by Respondent WILL NOT reflect the committee ever presented a report before the entire membership for disposition or to be voted on.

Appellant argue that there was never a majority vote taken per the rule in Title 51.04 per the Grand Lodge Constitution. Appellant further argue and disagree with Respondent that our Supreme Court has noted that courts should be very hesitant to interfere with social club membership issues because such clubs “involve primarily an element of fellowship and association which falls outside the law and the review of the courts.”

Appellant argues the aforementioned that Respondent Attorney “James C. Fowler” represented the Grand Lodge in a similar case William C. Rheubottom v. MWPHGLWA (2003) where Attorney Fowler litigated and prevailed on behalf of his client Rheubottom; Court Rulings stated, “we don't follow our own laws.”

Appellant argues this is the same Attorney for the Grand Lodge now, that is attempting to protect them for violating the same rules and regulation involved in Appellant case today.

Appellant question the integrity of Attorney “Fowler” as this appear to be a conflict of interest and confusion as to how can the same organization be found in violation of the same rules in Appellant case and the same rules applied in the case of William C. Rheubottom v. MWPHGLWA (2003).

Appellant argue that the court did not consider the Declarations of Reverend Gregory Christopher, Damion Jiles, Dawn Patterson, Kenneth Swanigan, Charlie Walker III and Tasha Owes and open testimony of Rick Watt who gave open testimony on the alleged missing trial tape that will show Appellant is innocence of stealing any money from the Church, Grand Lodge of Washington or any Private Citizens.

### CONCLUSION

Therefore, Appellant Lonnie Ray Traylor, argue that Respondent remain in non-compliant of Washington Court Rule (CR 26) (34), and (CR 12) timely filings for Production of Documents among other things and have yet to provided Appellant ALL of the information requested

Appellant respectfully request that this Court remand the case back to Superior Trial Court, to determine that justice is served and this case be heard by a jury and that Respondent Attorney James C. Fowler **NOT** be awarded any attorney fees.

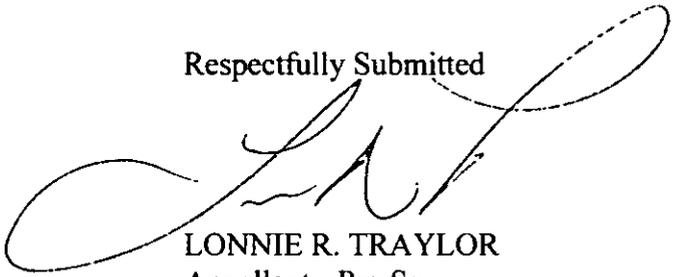
Respondent Attorney James C. Fowler” is being paid through Most Worshipful Prince Hall Grand Lodge Director and Officers Insurance and this should be considered as fraud or double jeopardy.

For the foregoing reasons, Appellant respectfully request that the Court remand the Order Granting Respondent Summary Judgement back to Superior Trial Court 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 that Appellant be given opportunity to present his case before a fair and impartial jury.

Appellant have not been afforded due process, have been discriminated against and his civil right have been violated.

DATED this 11th day of July 2016

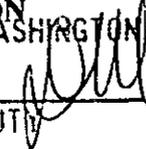
Respectfully Submitted

A handwritten signature in black ink, appearing to read 'L. R. Traylor', with a large, sweeping flourish extending to the left and right.

LONNIE R. TRAYLOR  
Appellant - Pro Se

FILED  
COURT OF APPEALS  
DIVISION II

2016 JUL 11 AM 8:47

IN THE COURT APPEALS OF THE STATE OF WASHINGTON  
STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF PIERCE  
BY 

DEPUTY

**LONNIE RAY TRAYLOR aka**

**RIGHT WORHSIPFUL LONNIE RAY TRAYLOR**

Appellant

Pierce County No. 14-2-14181-1

Court of Appeal Case No. 48322-0-II

v

**DECLARATION OF  
DOCUMENT FILING AND SERVICE**

**MOST WORSHIPFUL PRINCE HALL GRAND  
LODGE F.A.M. WASHINGTON & JURSIDITION  
and MOST WORSHIPFUL GRAND MASTER  
GREGORY D. WRAGGS, SR.**

Respondents

**DECLARATION OF DOCUMENT FILING AND SERVICE**

I, LONNIE RAY TRAYLOR , DECLARE THAT ON THE 11TH DAY OF JULY 2016, WE, CAUSED THE ORIGINAL APPELLANT REPLY 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**

**( ) U.S. MAIL  
( X ) HAND DELIVERED  
( ) AGREED E-SERVICE  
VIA COA PORTAL**