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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF JOSEPHINE

John West, Edgar Pelfrey, Winnie,  
Victoria Marshall, Cathy Millard,

Plaintiffs,

v.

LaVonne Griffin-Valade, in her official  
capacity as Oregon Secretary of State,

Defendant.

Case No. \_\_\_\_\_

**COMPLAINT FOR  
DECLARATORY JUDGMENT  
AND INJUNCTIVE RELIEF**

Prayer Amount: \$0 (Equitable Relief  
Only)

Filing Fee: \$281 (ORS 21.135(1))

NOT SUBJECT TO MANDATORY  
ARBITRATION

John West, Edgar Pelfrey, Winnie, Victoria Marshall, and Cathy Millard sue  
LaVonne Griffin-Valade, in her official capacity as Oregon Secretary of State  
("Griffin-Valade") as follows:

1.

West is a resident of Grants Pass and is Chair of the Board of County  
Commissioners for Josephine County. Edgar Pelfrey is a resident of Grants Pass and  
is concerned about electing people who are qualified to represent him in Salem.  
Winnie is the wife of Pelfrey, a resident of Grants Pass, and concerned about having  
effective representation the Salem. Victoria Marshall is a retired teacher, a resident  
of Grants Pass and concerned that her representatives are honest people who cannot

1 be bribed. Cathy Millard is a resident of Grants Pass since January 1977 and is  
2 concerned about having effective representation of her voice in Salem.

3 2.

4 LaVonne Griffin-Valade is the Secretary of State for the State of Oregon. With  
5 respect to elections for State Senate and House Representatives, Griffin-Valade is the  
6 “filing officer” under ORS 254.165.

7 3.

8 Pursuant to the Oregon Constitution Art. IV § 8, a candidate for State Senate  
9 must inhabit the district for which the candidate is running for one year prior to the  
10 election.

11 4.

12 Christine Goodwin currently lives at 317 Aker Drive, Myrtle Creek, Oregon  
13 97457 and has lived there for many years. Christine Goodwin has claimed to live at  
14 721 Bramblewood Lane, Canyonville, OR 97417. That address is the tasting room for  
15 Falk Estates Vineyard. Christine Goodwin does not live at 721 Bramblewood Lane,  
16 Canyonville, OR 97417.

17 5.

18 Christine Goodwin is currently a State Representative representing House  
19 District 4. Christine Goodwin does not live in House District 4; she lives in House  
20 District 2. Christine Goodwin is disqualified from representing House District 4.

21 6.

22 Christine Goodwin is running for State Senate District 2. Christine Goodwin  
23 does not live in Senate District 2; she lives in Senate District 1. Christine Goodwin is  
24 not qualified to represent Senate District 2.

25 7.

26 Pursuant to ORS 254.165, Griffen-Valade is not permitted to print Christine  
27 Goodwin’s name on the ballot as a candidate for Senate District 2 in the primary  
28 scheduled to be held on May 21, 2024.

1 8.

2 Plaintiffs seek declaratory judgment that Christine Goodwin is not qualified to  
3 run for Senate District 2 and is not qualified to hold her seat for House District 2.  
4 Plaintiffs seek an injunction ordering Griffin-Valade to disqualify Christine Goodwin  
5 for House District 4 and not place Christine Goodwin's name on the ballot as a  
6 candidate for Senate District 2 in the primary scheduled to be held on May 21, 2024.

7 9.

8 Time is of the essence because the statutory prohibition against printing  
9 Christine Goodwin's name on the ballot is not effective if the determination of  
10 disqualification is made on or after the 61<sup>st</sup> day before the date of the primary  
11 election. The 61<sup>st</sup> day prior to the May 21, 2024 election is March 21, 2024. Therefore,  
12 a determination of Christine Goodwin's qualification to run for State Senate District  
13 2 must be made by Wednesday, March 20, 2024.

14 10.

15 Due to the urgency, Plaintiffs seek a temporary restraining order, with notice  
16 to Griffen-Valade, that orders the Secretary of State to not place Christine Goodwin's  
17 name on the ballot as a candidate for State Senate District 2 in the May 21, 2024  
18 primary.

19 11.

20 Plaintiffs seek declaratory judgment that Christine Goodwin is not qualified to  
21 represent House District 4. Plaintiffs seek a temporary restraining order requiring  
22 the Secretary of State to disqualify Christine Goodwin from her current seat,  
23 representing House District 4.

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1 **CERTIFICATE OF SERVICE**

2 I certify that on March 14, 2024, I served the foregoing the COMPLAINT FOR  
3 DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF upon the Oregon  
4 Department of Justice by the method indicated below, and address to the following:

5 Brian Marshall  Hand Delivery  
6 brian.s.marshall@doj.state.or.us  Mail Delivery  
7 Thomas Castelli  Overnight Mail  
8 thomas.castelli@doj.state.or.us  Served by E-filing  
9 Marc Abrams  Served by email  
10 marc.abrams@doj.state.or.us  
11 Oregon Department of Justice

12 s/Stephen J. Joncus  
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