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7	IN THE CIRCUIT COURT O	OF THE STATE OF OREGON					
8	FOR THE COUNTY OF JOSEPHINE						
9 10 11	John West, Edgar Pelfrey, Winnie, Victoria Marshall, Cathy Millard, Plaintiffs,	Case No COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF					
12 13 14 15	v. LaVonne Griffin-Valade, in her official capacity as Oregon Secretary of State, Defendant.	Prayer Amount: \$0 (Equitable Relief Only) Filing Fee: \$281 (ORS 21.135(1)) NOT SUBJECT TO MANDATORY ARBITRATION					
16 17 18 19 20	LaVonne Griffin-Valade, in her official cap ("Griffin-Valade") as follows:						
21 22	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 $61^{\rm st}$ day before the date of the primary			
11	election. The $61^{\rm st}$ 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	CLAIMS			
2	<u>First Claim</u>			
3	(Disqualification to run for Senate District 2)			
4	12.			
5	Plaintiffs reallege and incorporate by reference the preceding paragraphs.			
6	13.			
7	Christine Goodwin is not qualified to run for State Senate District 2. Oregon			
8	Constitution Art. IV § 8. Griffen-Valade is prohibited from placing Christine			
9	Goodwin's name on the ballot pursuant to ORS 254.165. Plaintiffs seek a temporary			
10	restraining order prohibiting the Griffen-Valade from placing Christine Goodwin's			
11	name on the primary ballot for State Senate District 2.			
12	Second Claim			
13	Second Claim			
14	(Disqualification to hold House District 4)			
15	14.			
16	Plaintiffs reallege and incorporate by reference the preceding paragraphs.			
17	15.			
18	Christine Goodwin is not qualified to hold her seat for House District 4.			
19	Pursuant to Oregon Constitution Art. IV § 8 Christine Goodwin must be disqualified			
20	from her seat representing House District 4. Plaintiffs seek a temporary restraining			
21	order compelling the Griffen-Valade to disqualify Christine Goodwin from her House			
22	District 4 seat.			
23	Attorneys' Fees			
24	16.			
25	In seeking equitable relief, Plaintiffs are entitled to an award of their			
26	reasonable attorneys' fees pursuant to <i>Swett v. Bradbury</i> , 335 Or 378 (2003).			
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28				

1	WHEREFORE, Plaintiffs pray for judgment in their favor against Griffen-					
2	Valade as follows: (1) declaratory judgment that Christine Goodwin is not qualified to					
3	run for State Senate District 2; (2) a temporary restraining order, a preliminary					
4	injunction and a permanent injunction prohibiting Griffen-Valade from placing					
5	Christine Goodwin's name on the ballot for Senate District 2 in the May 21, 2024					
6	primary; (3) declaratory judgement that Christine Goodwin is not qualified to					
7	represent House District 4; (4) temporary restraining order, a preliminary injunction					
8	and a permanent injunction requiring Griffen-Valade to remove Christine Goodwin					
9	as Representative for House District 4; (5) an award of Plaintiffs' reasonable					
10	attorneys' fees; and (6) such further relief a	and thi	s Court finds just.			
11						
12		R	despectfully submitted,			
13						
14	Dated: March 15, 2024	By:	s/ Stephen J. Joneus			
15			Stephen J. Joncus, OSB No. 013072			
16			JONCUS LAW P.C. 13203 SE 172 nd Ave Ste 166 #344			
17			Happy Valley, Oregon 97086			
18			(971) 236-1200 steve@joncus.net			
19			Attorney for Plaintiffs			
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CERTIFICATE OF SERVICE I certify that on March 14, 2024, I served the foregoing the COMPLAINT FOR DECLARATORY JUDGMENT AND INJUNCTIVE RELIEF upon the Oregon Department of Justice by the method indicated below, and address to the following: __ Hand Delivery Brian Marshall __ Mail Delivery brian.s.marshall@doj.state.or.us __ Overnight Mail Thomas Castelli __ Served by E-filing thomas.castelli@doj.state.or.us x Served by email Marc Abrams marc.abrams@doj.state.or.us Oregon Department of Justice s/Stephen J. Joncus