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7 **STATE OF WASHINGTON**
8 **THURSTON COUNTY SUPERIOR COURT**

9 IN THE MATTER OF:

10 THE RECALL OF ROBERT
11 FERGUSON

NO.

PETITION TO DETERMINE
SUFFICIENCY OF RECALL
CHARGES AND FOR APPROVAL
OF BALLOT SYNOPSIS

FILING FEE EXEMPT PER
RCW 29A.56.140

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15 COMES NOW NICHOLAS W. BROWN, Attorney General of the State of
16 Washington, by and through Tera Heintz and Karl Smith, Deputy Solicitors General, and
17 petitions the court pursuant to RCW 29A.56.130 for a determination of the sufficiency of recall
18 charges and for approval of the attached ballot synopsis.

19 This petition is based on the relevant provisions of RCW 29A.56, which set forth the
20 procedure for recall of elected public officers. The Attorney General summarizes the charges
21 filed in support of recall as a “ballot synopsis” of two hundred words or fewer and petitions the
22 superior court to approve the synopsis and determine the sufficiency of the charges. In
23 preparing the ballot synopsis and filing the petition, the Attorney General does not
24 authenticate, substantiate, validate, or endorse any legal or factual allegations charged in
25 support of recall. Rather, the Attorney General is merely the statutorily designated conduit for
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1 placing this matter before the court for hearing. This petition is filed pursuant to this statutory
2 procedure.

3 1. On June 9, 2025, Rebecca Faust filed a statement of charges with the
4 Washington Secretary of State, Steve Hobbs, requesting the recall of Robert Ferguson as the
5 Governor of Washington State. Secretary Hobbs is the proper officer with whom to file such
6 charges pursuant to RCW 29A.56.130.

7 2. Upon receipt of the statement of charges, the Secretary of State's duties were
8 (a) to serve a copy of the statement upon the officer subject to recall; and (b) to certify and
9 transmit the charges to the preparer of the ballot synopsis. RCW 29A.56.120. The office of
10 Governor is a statewide office for which the Secretary of State accepts declarations of
11 candidacy, and thus the Attorney General is the preparer of the ballot synopsis for this petition.
12 See RCW 29A.56.130(1)(a); RCW 29A.24.070.

13 3. On June 10, 2025, the Secretary of State transmitted the statement of charges
14 against Governor Ferguson to the Office of the Attorney General, along with a request for the
15 Attorney General's office to prepare the ballot synopsis because the charges include allegations
16 connected to the County Prosecuting Attorney's Office.

17 4. A true and correct copy of the statement of charges is attached as Exhibit A.

18 5. After receiving the charge, the statute directs the Attorney General to prepare a
19 synopsis of not more than two hundred words that is eventually to appear on the ballot if the
20 recall matter qualifies for the ballot. RCW 29A.56.130(1). The ballot synopsis prepared by the
21 Attorney General is attached to this petition as Exhibit B and is transmitted to Governor
22 Ferguson and Rebecca Faust with service of this petition.

23 6. By statute, the Attorney General "shall additionally certify and transmit the
24 charges and the ballot synopsis to the superior court of the county in which the officer subject
25 to recall resides and shall petition the superior court to approve the synopsis and to determine
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1 the sufficiency of the charges.” RCW 29A.56.130(2). This petition is filed, together with its
2 attachments, pursuant to this statutory directive.

3 7. This court has jurisdiction over this action and the proper venue lies in Thurston
4 County because Governor Ferguson is a resident of Thurston County. RCW 29A.56.130(2).

5 THEREFORE, state law directs the court to conduct a hearing to determine the
6 following within 15 days after receiving this petition:

7 1. Whether the statement of charges filed by Rebecca Faust and attached as
8 Exhibit A, is or is not factually and legally sufficient to support the recall of Robert Ferguson,
9 as Governor of Washington State.

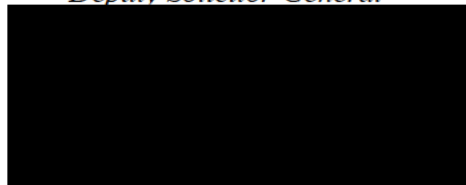
10 2. Whether the ballot synopsis attached to the petition as Exhibit B is adequate,
11 and to correct the synopsis if the court finds it inadequate; and

12 3. Such other and further relief as the court deems just and appropriate.

13 DATED this 25th day of June 2025.

14 NICHOLAS W. BROWN
15 *Attorney General*

16 *s/ Tera M. Heintz*
17 TERA M. HEINTZ, WSBA 54921
18 KARL D. SMITH, WSBA 41988
19 *Deputy Solicitor General*
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In re: Recall of Bob Ferguson

CHARGES

Submitted by Rebecca Faust

- 1) Petitioner Rebecca Faust requests the recall of Robert Watson Ferguson, Governor of the State of Washington.
- 2) Gov. Ferguson has committed misfeasance and violated the oath of office.
- 3) Rebecca Joy Faust is a registered voter in the State of Washington.

Charge #1-2

1. Misfeasance

2. Violation of oath of office

- 4) Bob Ferguson, Governor of the State of Washington, has committed misfeasance and violated the oath of office.
- 5) Bob Ferguson signed into "law" Senate Bill 5106 (2025), officially recognizing the Islamic holidays Eid al-Adha & Eid al-Fitr, in violation of the First Amendment & Fourteenth Amendment to the U.S. Constitution.
- 6) Bob Ferguson knew, or reasonably should have known, that Senate Bill 5106 (2025) violated the U.S. Constitution.
- 7) Bob Ferguson signed Senate Bill 5106 (2025) on April 8, 2025 at the Islamic Center of Tacoma in Tacoma, WA.
- 8) Bob Ferguson's conduct in signing SB 5106 (2025) constitutes a violation of Ferguson's oath of office to uphold the U.S. Constitution.
- 9) Bob Ferguson's conduct in signing SB 5106 (2025) constitutes misfeasance for improper exercise of his discretion to sign legislative bills.

- 1 10)The First Amendment, made applicable to the states by the Fourteenth
2 Amendment, prohibits the government from making “any law respecting an
3 establishment of religion.”
- 4 11)Both Eid al-Adha and Eid al-Fitr are distinctly Islamic religious holidays.
- 5 12)Senate Bill 5106 (2025) gives special state recognition to select holidays,
6 specifically adding two Islamic holidays (Eid al-Adha & Eid al-Fitr) to a statutory
7 list. This recognition is not readily and equitably available to every religion’s
8 holidays. This is official government recognition of select religious events by
9 legislative fiat. It is not the opening of a public forum. It is not an accommodation
10 of personal religious practices. Senate Bill 5106 does not treat all religions and
11 religious holidays equally.
- 12 13)By signing Senate Bill 5106 (2025), Bob Ferguson granted favored status to
13 Islam and its holidays.
- 14 14)Bob Ferguson is an (now inactive) attorney and formerly served as Washington
15 State’s Attorney General. He is (at least, he reasonably should be) familiar with
16 the Bill of Rights, U.S. Constitution, and Constitutional law, including the
17 requirements of the Establishment Clause.

18 **Charges 3-4**

19 **3. Misfeasance**

20 **4. Violation of oath of office**

- 21 15)Bob Ferguson, Governor of the State of Washington, has committed misfeasance
22 and violated the oath of office.

- 1 16) Bob Ferguson signed Senate Bill 5106 (2025) on April 8, 2025 at the Islamic
2 Center of Tacoma in Tacoma, WA.
- 3 17) Bill signings are traditionally public events.
- 4 18) Even if public access to bill signing events is not required by law, the First
5 Amendment, made applicable to the states by the Fourteenth Amendment, would
6 preclude restrictions on access based on religion.
- 7 19) By signing SB 5106 (2025) at a religious venue, Bob Ferguson effectively
8 restricted access to the bill signing event on the basis of religion, *de facto*
9 excluding anyone who would be uncomfortable or unwelcome at an Islamic
10 venue. This violates both the First Amendment's Establishment clause & Free
11 Exercise clause.
- 12 20) Holding a state function at an Islamic venue (as Bob Ferguson did) gave the
13 reasonable appearance of governmental approval of Islam and entangled the
14 state government with the religion of Islam. This violated the First Amendment,
15 made applicable to the states through the Fourteenth Amendment.
- 16 21) Bob Ferguson violated the First & Fourteenth Amendments of the U.S.
17 Constitution by holding the bill signing for SB 5106 (2025) at the Islamic Center
18 of Tacoma.
- 19 22) Bob Ferguson knew, or reasonably should have known, that his actions favored
20 practitioners of one religion at the expense of other religions' practitioners (and
21 non-religious citizens).
- 22 23) Bob Ferguson knew, or reasonably should have known, that his actions violated
23 the First Amendment and Fourteenth Amendment.

1 24) Bob Ferguson is an (now inactive) attorney and formerly served as Washington
2 State's Attorney General. He is (at least, he reasonably should be) familiar with
3 the Bill of Rights, U.S. Constitution, and Constitutional law.

4 25) Bob Ferguson violated his oath of office to uphold the U.S. Constitution.

5 26) Bob Ferguson committed misfeasance by improperly exercising discretion to
6 select venues for bill signings.
7

8 I, Rebecca Faust, believe that these charges are true and have knowledge of the
9 (alleged) facts contained therein.
10

11 I certify under penalty of perjury under the laws of the State of Washington that the
12 foregoing is true and correct.
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14 X _____

15 Rebecca J. Faust

16 June 9, 2025

17 **RECEIVED**

18 JUN 09 2025

19 SECRETARY OF STATE
20 STATE OF WASHINGTON
21

Rebecca Faust

rebecca@recallferguson.com

BALLOT SYNOPSIS OF RECALL CHARGE

ROBERT FERGUSON

GOVERNOR OF THE STATE OF WASHINGTON

The charges that Robert Ferguson, as Governor of Washington, committed misfeasance and/or violated his oath of office allege as follows:

1. On April 8, 2025, Governor Ferguson signed Senate Bill 5106 (2025), which gave state recognition to Eid al-Adha and Eid al-Fitr. Eid al-Adha and Eid al-Fitr are Islamic religious holidays and, by signing Senate Bill 5106, Governor Ferguson granted favored status to Islam and its holidays in violation of the First and Fourteenth Amendments of the United States Constitution.
2. Governor Ferguson signed Senate Bill 5106 at the Islamic Center of Tacoma. By signing the bill at a religious venue, Governor Ferguson violated the Free Exercise and Establishment Clauses of the First Amendment of the United States Constitution by effectively restricting access to the event for individuals uncomfortable or unwelcome at the venue, giving the reasonable appearance of state governmental approval of Islam, and entangling state government in religion.

Should Robert Ferguson be recalled from office based on these charges?