

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.
13

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

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