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November 12, 2017

Paula C. Littlewood
Executive Director
Washington State Bar Association

In care of:

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RE: WSBA Member Address and Email Records

Dear Ms. Littlewood:

As you know, I am a member of the Washington State Bar Association. Indeed, presently I am a member in good standing with the WSBA. As a member of the WSBA, I am tied to the Fifth Congressional District. I am considering the possibility of running for a position on the WSBA Board of Governors.

The requests I make herein are made as a member of the WSBA. I am not writing to you as a member of the public. The public record laws do not apply to my request. As a member, I am entitled to your fulfillment of my request. *See, e.g., McClintock v. Young Republicans of Philadelphia*, 210 Pa. 115, 59 A. 691 (1904).

As Executive Director of the WSBA you have (under the WSBA Bylaws, Article III C
2) the following duties:

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The Executive Director will keep records of all members of the Washington State Bar Association, including, but not limited to:

- a. physical residence address furnished by the member;
- b. principal office address, telephone number, and email address furnished by the member;
- c. physical street address of any resident agent for the member;
- d. date of admittance;
- e. type and status of membership;
- f. date of transfer(s) from one status to another, if any;
- g. date and period(s) of administrative suspensions, if any;
- h. date and period of disciplinary actions or sanctions, if any including suspension and disbarment;
- i. such other data as the BOG or Washington Supreme Court may from time to time require of each member.

From you, in your capacity as Executive Director, I request in electronic format, the following information regarding my fellow bar association members - names, addresses, email addresses, and Congressional Districts.

Among the purposes for which I seek the records are the following:

- (a) To communicate with my fellow members concerning the affairs of the WSBA Board of Governors, and especially those who members who seek to be elected to the WSBA Board of Governors from the Fifth District;
- (b) To institute measures and advocate policies which may tend to promote the objects for which the corporation was organized;
- (c) To prevent the affairs and property of the corporation from being used to further the private political ambitions of any member or group of members;
- (d) To oppose the election or re-election of incompetent officials; and
- (e) To aid in the election of officers who will be faithful to the best interests of the members, and who will administer the affairs of the association and control its

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property in accordance with the purposes for which the association was created.
RCW 2.48.010.

The WSBA has a database which includes information about my fellow bar association members. It would be simple and non-time consuming for you to have the proper WSBA employee prepare an electronic data file of the information I can use on my Windows computer and in conjunction with WordPerfect Quattro or Microsoft Excel or some other Windows-based program.

I will pay the reasonable costs of the creation of the data file I ask you to have created and provided to me.

The records will only be use for the purposes above. I will not allow the records to be used for any commercial purposes. I will also make it possible for a member to opt out of any email mailings I might make to the member.

I look forward to the information in the format requested.

Sincerely,

s/ Stephen Kerr Eugster
Stephen Kerr Eugster
WSBA # 2003