Respondent Names

Justin C. Daniels

Complainant Name

Jeffrey David Wilson

Complaint Description

Jeffrey (Jefé) Wilson

Sun, 19 Dec 2021

To: Washington Public Disclosure Commission

From: Jeffrey D. Wilson, PhD – South Kitsap School Board Director – District #4

Re: Justin C. Daniels Election Fraud in November 2, 2021 Election

Justin C. Daniels is the leader of a criminal conspiracy that has defrauded over a thousand South Kitsap voters in the November 2, 2021 election. Under oath in a Kitsap County Elections hearing on November 4, 2021 Mr. Daniels admitted to on Oct 15, 2021 falsifying his voter residential address (from Mason County to Kitsap County) in order to fraudulently conduct a write-in campaign for South Kitsap School Board – Director #4. It was also proven that one day prior, Mr. Daniels had filed with the PDC for this campaign (October 14, 2021) and completed his C1 using his genuine address on Tee Lake Road in Mason County. Lastly, on October 21, 2021 he registered with Kitsap County Elections as a write-in candidate, again claiming to live in District #4 Area of the South Kitsap School Board in Kitsap County. Do date, he has failed to complete his F1 report and I have made two requests from the PDC to obtain it without success.

Since launching his fraudulent campaign, he has raised campaign funds through various means including a PayPal donations link. He has voted illegally (claiming to be a SK resident) in the November election. Most seriously, he has conned ~1250 South Kitsap Voters into writing in his name in for a school board seat that he could never legally hold, stealing votes from legitimate candidates. I humbly request that you research and address this serious election fraud in Kitsap County.

Daniels Physical Residence and Contact Info (from PDC Filing)

231 Northeast Tee Lake Pines Road

Tahuya, Washington, 98588 Phone: (360) 229-3129

Email: justin7daniels@gmail.com

Class C Felony Actions

- 1. Filing a false voter registration with VoteWA address change (October 15, 2021).
- 2. Falsely registering as an eligible write-in candidate (October 21, 2021)

3. Illegally voting in Kitsap County Elections (November 2, 2021).

Other Fraudulent Actions

- 1. Filing C1 document with PDC to run for SK School board as a Mason County resident.
- 2. Failing to file a F1 document with the PDC after filing his C1.
- 3. Soliciting campaign donations for a fraudulent political campaign in 2021.
- 4. Conning ~1250 people into voting for him in the South Kitsap Election.

Co-conspirators

- 1. Courtney Watson Daniels Campaign Manager
- 2. CElizabeth Turner Campaign Booster

Daniels Campaign Fraud Sites

- 1. https://justindaniels.webador.com/
- 2. https://www.paypal.com/paypalme/JustinCDaniels
- 3. https://www.facebook.com/JustinDaniels1776
- 4. https://www.facebook.com/justin.daniels.984

Evidence

- 1. Challenge of Voter Registration of Justin C. Daniels Finding of Fact (attached PDF)
- 2. https://www.pdc.wa.gov/browse/campaign-explorer/candidate?filer_id=DANIJ-634&election_year=2021
- 3. https://www.kitsapgov.com/auditor/Documents/Results.html

Witnesses

- 1. Paul Andrews Kitsap County Auditor
- 2. Rob Gelder Kitsap County Commissioner
- 3. Chad Enright Kitsap County Prosecutor
- 4. Gerry Knowlton Austin Registration Challenger & Upstanding Kitsap County Voter

Sincerely,		
Jefé		
Jeffrey D. Wilson, PhD South Kitsap School Board Director #4		

What impact does the alleged violation(s) have on the public?

Since launching his fraudulent campaign for the South Kitsap School Board, Justin C. Daniels has raised campaign funds from the public through various means including a PayPal donations link. He has voted illegally (claiming to be a SK resident) in the November

election. Most seriously, he has conned ~1250 South Kitsap Voters into writing in his name in for a school board seat that he could never legally hold, stealing votes from legitimate candidates. I humbly request that you research and address this serious election fraud in Kitsap County.

List of attached evidence or contact information where evidence may be found

Evidence

- 1. Challenge of Voter Registration of Justin C. Daniels Finding of Fact (attached PDF)
- 2. https://www.pdc.wa.gov/browse/campaign-explorer/candidate?filer_id=DANIJ--634&election_year=2021
- 3. https://www.kitsapgov.com/auditor/Documents/Results.html

Daniels Campaign Fraud Sites

- 1. https://justindaniels.webador.com/
- 2. https://www.paypal.com/paypalme/JustinCDaniels
- 3. https://www.facebook.com/JustinDaniels1776
- 4. https://www.facebook.com/justin.daniels.984

List of potential witnesses with contact information to reach them

Witnesses

- 1. Paul Andrews Kitsap County Auditor (Public Official)
- 2. Rob Gelder Kitsap County Commissioner (Public Official)
- 3. Chad Enright Kitsap County Prosecutor (Public Official)
- 4. Gerry Knowlton Austin Registration Challenger & Upstanding Kitsap County Voter (see Challenge Doc Findings for Contact Info)
- 5. Justin C. Daniels Election Fraudster

Co-conspirators

- 1. Courtney Watson Daniels Campaign Manager (facebook https://www.facebook.com/groups/849723755075750/user/44505031/)
- 2. CElizabeth Turner Campaign Booster (facebook https://www.facebook.com/profile.php?id=100073349707311)

Certification (Complainant)

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

BEFORE THE COUNTY AUDITOR KITSAP COUNTY, WASHINGTON

In Re the Challenge to the Voter Registration of Justin C. Daniels

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

I. INTRODUCTION

THIS MATTER came before the Kitsap County Canvassing Board: Paul Andrews, Kitsap County Auditor; Chad Enright, Kitsap County Prosecutor; and Rob Gelder, Kitsap County Commissioner, on November 4, 2021, upon the challenge to the voter registration of Justin C. Daniels (the "Challenged Voter"), pursuant to RCW 29A.08.810-.850. The voter registration challenge was filed by Gerry Knowlton Austin (the "Challenger") and alleges that the Challenged Voter does not maintain a legal voting residence at the address shown on his voter registration records. The Challenger and the Challenged Voter were present at the hearing.

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The voter registration challenge at issue was initiated in writing and was filed on October 21, 2021. The letter to the Challenged Voter with a copy to the Challenger was sent on October 26, 2021, setting a date for the hearing.

23

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER - 1

- 2. The Challenger alleges that the Challenged Voter does not maintain a legal voting residence at the address shown on his voter registration record. The voter registration challenge is made pursuant to RCW 29A.08.810(2) and RCW 29A.08.810(1)(C).
- 3. The Washington Rules of Evidence do not apply to voter registration challenge hearings, see ER 101 (Scope), 1101 (Applicability of Rules), and evidence was therefore liberally admitted for purposes of the hearing.
- 4. Live testimony was presented at the hearing by the Challenger. The Challenger was placed under oath before he gave his testimony. Live testimony was presented at the hearing by the Challenged Voter. The Challenged Voter was placed under oath before he gave his testimony. The Canvassing Board heard and considered the testimony, and the following exhibits:
 - (1): the voter registration challenge dated October 21, 2021, along with the supporting documentation provided therewith.
 - (2): the voter registration record of Gerry Knowlton Austin, dated May 5, 2005.
 - (3): the voter registration record of Justin C. Daniels, dated March 12, 2016.
 - (4): the voter registration address history of Justin C. Daniels, from March 14, 2016, to October 15, 2021.
 - (5): Voter update record showing Justin C. Daniel's address change on October 15, 2021.
 - (6): Candidate filing showing Justin C. Daniels's address as 231 NE Tee Lake Pines Road, Tahuya WA dated October 14, 2021.
 - (7): Candidate filing showing Justin C. Daniels's address as 5208 Durand Place SE, Port Orchard, WA dated October 18, 2021.
 - (8): Canvassing Board's hearing notification letter to Gerry Knowlton Austin dated October 26, 2021.
 - (9): Canvassing Board's hearing notification letter to Justin C. Daniels at 231 NE Tee Lake Pines Road, Tahuya WA 98588, dated October 26, 2021.
 - (10): Canvassing Board's hearing notification letter to Justin C. Daniels at 5208 Durand Place SE, Port Orchard, WA 98366, dated October 26, 2021.
 - (11): certified mail USPS tracking information for the October 26, 2021, letter sent to the Tee Lake Pines Road address, showing the mail piece was picked up.

- (12): certified mail USPS tracking information for the October 26, 2021, letter sent to the Durand Place address with USPS request to schedule redelivery.
- (13): Mason County property information for the Tee Lake Pines address.
- (14) Department of Licensing records for one vehicle registered to Nicole Clausen, another to Nicole R. Clausen, another registered to Nicole Rose Daniels and one to Justin Christopher Daniels, each registered at the Tee Lake Pines Road address.
- (15) Kitsap County Parcel information showing Michael L & Sherri L Schreiber as the owners of the Durand Place address.
- (16): Facebook comment of Justin C. Daniels dated October 28, 2021.
- (17): Email dated October 31, 2021 from Gerry Knowlton Austin correcting the Tahuya Address from his original challenge form.
- (18) Excel file with Kitsap County voter registration data.
- (19) Excel file with Mason County voter registration data.
- (20) Video of Justin Daniels speaking at event.
- 5. The registration of a person as a voter is presumptive evidence of his or her right to vote. RCW 29A.08.810(1). A challenger has the burden to prove by clear and convincing evidence that a challenged voter's registration is improper. RCW 29A.08.840(4). Therefore, in this proceeding, the burden is on the Challenger to prove by clear and convincing evidence that the Challenged Voter does not live at the residential address of 5208 Durand Place SE, Port Orchard, WA 98366 (the "Registered Address").
- 6. For the purpose of registering and voting, "residence" means "a person's permanent address where he or she physically resides and maintains his or her abode." RCW 29A.04.151.
- 7. The Challenger presented evidence related to the Challenged voter's address at 231 NE Tee Lake Pines Road, Tahuya WA 98588 and 5208 Durand Place SE, Port Orchard, WA 98366.

8. The Challenger said the Port Orchard address is owned by Michael L. and Sherri L. Schreiber, that Daniels' original PDC filing was at the Tahuya address and that the Challenged Voter's wife is registered to vote at the Tahuya address. The Challenger said the Challenged Voter's website states, "Today I'm in my 30s living at home, living in the home that I own with my incredible wife Nicole, where we're raising our son and our daughter."

- 9. The Challenged Voter stated, "Everything you said is true. Everything." The Challenged Voter stated, "And I gave you my mom's, my ex mother-in-law, let's keep it technical, But my mother. I used hers because I lived there for so long." The Challenged Voter stated earlier that he had asked his mother, "May I use your address?"
- 10. The ultimate question to be answered in this matter is whether the Challenger has proven that, based on the evidence presented, it is highly probable that the Challenged Voter does not, for voting purposes, reside at the Registered Address.
 - 11. The Challenger's evidence was confirmed by the Challenged Voter.
- 12. Based on the evidence provided by the Challenger, and the confirmation of that evidence by the Challenged Voter, we find that the Challenger has showed by clear and convincing evidence that the Challenged Voter does not physically reside at 5208 Durand Place SE, Port Orchard, WA 98366 for voter registration purposes. The Challenged Voter's voter registration will not reflect this address as his residence.

III. ORDER

THEREFORE, the voter registration challenge is SUSTAINED.

DATED this 8th Day of November.

KITSAP COUNTY ELECTIONS CANVASSING BOARD

PAUL ANDREWS, COUNTY AUDITOR

ROB GELDER, COUNTY COMMISSIONER

CHAD ENRIGHT, COUNTY PROSECUTOR

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER - 5

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20

21

22

23

DECLARATION OF SERVICE

The undersigned declares under penalty of perjury under the laws of the State of Washington that the following is true and correct:

- 1. I am a United States citizen, a resident of the State of Washington, am 18 years of age or older, and am not a party to this proceeding.
- 2. On the date stated below, I caused to be deposited in the United States mail, postage prepaid, by regular first-class mail and by certified first-class mail, the foregoing document addressed as follows:

Gerry Knowlton Austin 4121 SE Dover Court Port Orchard, WA 98366

Justin C. Daniels 231 NE Tee Lake Pines Road Tahuya WA 98588

Justin C. Daniels 5208 Durand Place SE Port Orchard, WA 98366

EXECUTED on this 8th day of November, 2021 at Port Orchard, Washington.

Puller Fardner