

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

PAUL BRECHT,)	NO.
)	
Plaintiff,)	
)	
v.)	
)	
JANE FRANCES HAGUE a/k/a JANE)	
HAGUE SPRINGMAN, CHARLES EDWARD)	SUMMONS (20/60 DAYS)
SPRINGMAN, MADISON COMMUNICATIONS)	
CORPORATION, BRETT BADER,)	
and JEFFREY DAVIS,)	
)	
Defendants.)	

TO THE DEFENDANTS, JANE FRANCES HAGUE a/k/a JANE HAGUE
SPRINGMAN, CHARLES EDWARD SPRINGMAN, MADISON COMMUNICATIONS
CORPORATION, BRETT BADER, and JEFFREY DAVIS:

A lawsuit has been started against you in the above entitled court by PAUL BRECHT,
Plaintiff. Plaintiff's claim is stated in the written Complaint, a copy of which is served upon you
with this Summons.

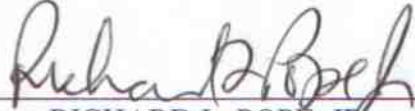
In order to defend against this lawsuit, you must respond to the complaint by stating your
defense in writing, and by serving a copy upon the person signing this summons within 20 days
(60 days if served outside the State of Washington) after the service of this summons, excluding
the day of service, or a default judgment may be entered against you without notice. A default

1 judgment is one where the plaintiff is entitled to what he asks for because you have not
2 responded. If you serve a notice of appearance on the undersigned person, you are entitled to
3 notice before a default judgment may be entered.

4 You may demand that the plaintiff file this lawsuit with the court. If you do so, the
5 demand must be in writing and must be served upon the person signing this summons. Within 14
6 days after you serve the demand, the plaintiff must file this lawsuit with the court, or the service
7 on you of this summons and complaint will be void.

8 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
9 that your written response, if any, may be served on time.

10 This summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State
11 of Washington.

12
13
14 Dated: October 29, 2007 Signed: 
15 RICHARD L. POPE, JR.
16 WSBA # 21118
17 Attorney for Plaintiff

18 SERVE A COPY OF YOUR ANSWER
19 ON PLAINTIFF'S ATTORNEY AT:

20 Richard L. Pope, Jr.
21 1839 - 151st Avenue, S.E.
22 Bellevue, Washington 98007
23 Tel: (425) 747-4463

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

PAUL BRECHT,)	NO.
)	
Plaintiff,)	
)	
v.)	
)	
JANE FRANCES HAGUE a/k/a JANE)	
HAGUE SPRINGMAN, CHARLES EDWARD)	COMPLAINT FOR DAMAGES
SPRINGMAN, MADISON COMMUNICATIONS)	
CORPORATION, BRETT BADER,)	
and JEFFREY DAVIS,)	
)	
Defendants.)	

Parties

1. Plaintiff PAUL BRECHT is a resident of King County, Washington.
2. Defendants JANE FRANCES HAGUE a/k/a JANE HAGUE SPRINGMAN, CHARLES EDWARD SPRINGMAN, BRETT BADER, and JEFFREY DAVIS are believed to be residents of King County, Washington.
3. Defendant MADISON COMMUNICATIONS CORPORATION is a Washington corporation with its principal place of business in King County, Washington.

Jurisdiction and Venue

4. This court has proper venue and jurisdiction as the Plaintiff and the Defendants are residents of King County, Washington and the actions complained of herein, or some of them occurred in whole or in part in King County, Washington.

Basis of Claim

5. Defendant JANE FRANCES HAGUE a/k/a JANE HAGUE SPRINGMAN (“Hague”) is a member of the King County Council for District 6 and is a candidate for re-election to that position in the November 6, 2007 general election.

6. Defendant CHARLES EDWARD SPRINGMAN (“Springman”) is the husband of Defendant Hague.

7. The actions relevant to this lawsuit were done in order to promote the re-election of Defendant Hague and provide continued income for Defendant Hague as a member of the King County Council. This income would be community income and Defendant Hague’s continued service on the King County Council would provide other benefits to the marital community. The marital community of Defendants Hague and Springman is liable for the torts committed herein.

8. Defendant MADISON COMMUNICATIONS CORPORATION (“Madison”) is a campaign consulting firm working for Defendant Hague’s re-election campaign. Defendant Madison is believed to have assisted Defendant Hague with the production and distribution of the defamatory communication for which Plaintiff is suing the Defendants.

9. Defendants BRETT BADER (“Bader”) and JEFFREY DAVIS (“Davis”) are believed to be the principal owners and officers of Defendant Madison and are believed to have assisted Defendants Hague and Madison with the production and distribution of the defamatory communication for which Plaintiff is suing the Defendants.

10. On or about October 26, 2007, Defendant Hague mailed out an 8-1/2” x 11” campaign brochure intended to promote her re-election to the King County Council. This campaign brochure was received by numerous people, including voters and residents of District 6 of the King County Council, on or about October 27, 2007. Exhibit A is a true and correct copy of the campaign brochure in question. Plaintiff is unsure of the number, but would estimate that Defendant Hague mailed between 25,000 and 50,000 copies of the campaign brochure.

11. Defendant Hague’s campaign brochure contained a partial copy and criticism of a campaign brochure her election opponent Richard Pope had previously mailed out to voters.

1 12. In Mr. Pope’s previous campaign brochure, Plaintiff had been quoted as saying:
2 “People are always saying: ‘why can’t we get more decent, capable and honest leaders in politics’
3 – here’s our chance – vote for Richard Pope.” – Paul Brecht, Bellevue Businessman.

4 13. Defendant Hague circled Plaintiff’s name in red (Paul Brecht, Bellevue
5 Businessman) on her campaign brochure, and drew an arrow to a statement she made about
6 Plaintiff, in which Defendant Hague alleged the following defamatory statement about Plaintiff:

7 Paul Brecht tops Pope’s endorsement list. **Brecht also tops law enforcement list with**
8 **multiple domestic violence arrests** and at least one **assault conviction**. (Washington Courts
9 Case Record Search)

10 14. Plaintiff has never been convicted of assault, and no “Washington Courts Case
11 Record Search” would reveal an assault conviction, since no such conviction ever happened.

12 15. Plaintiff is also not on the top of any “law enforcement list” of any sort for any
13 reason. This false claim is especially defamatory in the context that Defendant Hague is making
14 false allegations of an assault conviction against Plaintiff in the very same sentence.

15 16. The statements made about Plaintiff above by Defendant Hague were false and
16 unprivileged, and made intentionally with actual knowledge of their falsity, with reckless
17 disregard as to their truth or falsity, or negligently without due care and caution. Plaintiff has
18 suffered injury and damage as a result of these defamatory statements. Defendant Hague is
19 therefore liable to Plaintiff for the tort of defamation and libel.

20 17. The marital community of Defendants Hague and Springman are also liable to
21 Plaintiff for defamation, as this tort was committed for the benefit of the marital community.

22 18. Defendants Madison, Bader and Davis would also be liable to Plaintiff for the tort
23 of defamation and libel, if they assisted Defendant Hague in the production and distribution of
24 this defamatory publication and acted with the requisite knowledge, recklessness or negligence.

25 19. Defendant Hague (and by extension, the marital community of Defendants Hague
26 and Springman) has respondeat superior liability for the actions of any “staff”, employees, or
27 other agents acting on behalf of Defendant Hague in connection with this defamatory publication,
28 including but not limited to Defendants Madison, Bader and Davis.

EXHIBIT A

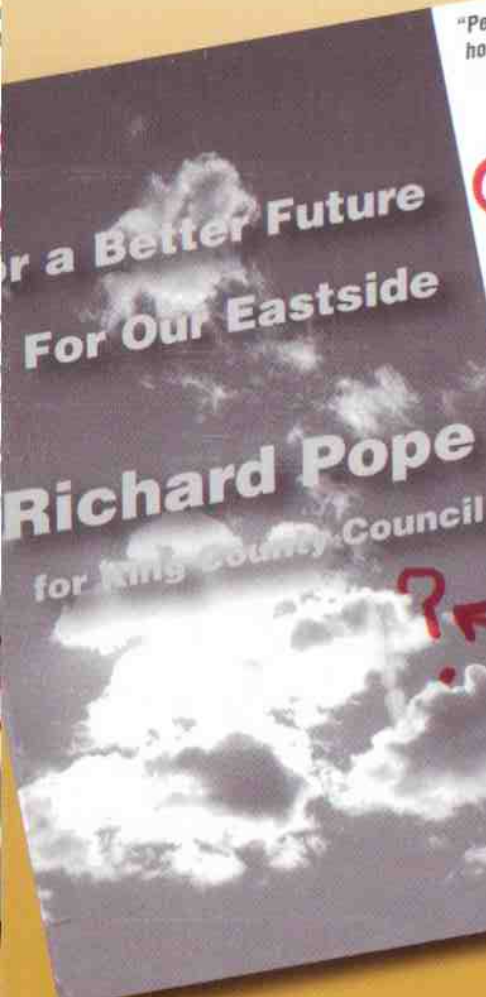
VOTER ALERT

POPE MAILER IS A CLEAR ATTEMPT TO DECEIVE VOTERS

Prsrtd Std
U.S. Postage
PAID
Seattle, WA
Permit #4776

Paul Brecht tops Pope's endorsement list. **Brecht also tops law enforcement's list with multiple domestic violence arrests and at least one assault conviction.**

(Washington Courts Case Record Search)



"People are always saying: why can't we get more decent, capable and honest leaders in politics - here's our chance - vote for Richard Pope."
Paul Brecht, Bellevue Businessman

"Richard Pope was one of the smartest students I've seen in 32 years at the law school."
Professor Richard Kummert, University of Washington School of Law

"Pope recently represented me in a legal matter. He was genuinely interested in my situation. He worked tirelessly to protect my rights."
Rhoda Mutongwizo Lee, Seattle Business Woman

Devoted Father - Raising young daughter with special needs. Active volunteer in his daughter's school.

University of Washington Law School - Graduated third in class with Highest Honors.

Degree in Economics - Academic Researcher and Teacher of Economics. Graduate studies in International Trade.

Law Enforcement - Protected the public safety as Deputy Sheriff and Corrections Officer.

Government - Assisted with the prosecution of drunk driving and other criminal cases.

Active in Church - Sunday School teacher and working to help the disadvantaged.

Law Practice in Bellevue - Working for rights of ordinary citizens for sixteen years.

Wounded Veteran - Writings about Family, Veterans, Decorated with active duty service during the Persian Gulf War.

An Advocate for Disabled Children - Active in the National Society of America and other child advocacy organizations.

Resident of King County - for the last 20 years - very active in civic and community affairs.

When told he'd been featured in a mailer, Prof. Kummert said he did not endorse Pope and **"I do not want to be responsible for putting Richard Pope in public office."** (10/16/2007)

Richard Pope has **been sanctioned by Judges six times, fined thousands of dollars for misconduct** and is **under investigation** by the Washington State Bar Association. Pope told a Judge in 2005 he was "closing down his law practice" because it was **"no longer a viable way to make a living."**

(Lamar v. United Rentals Corporation, et al, Order Removing Plaintiff's Counsel & Response to Order to Show Cause)

Richard Pope has run for office ten times and lost overwhelmingly. **Pope's been consistently rated as "NOT QUALIFIED".**

(www.munileague.org/cec/2007/report/KCCouncil.htm; see also archives of previous races)

Pope was never a King County Prosecutor. In fact, Pope **fought to restrain the late King County Prosecutor Norm Maleng from arresting him.**

(Case No. 97-2-20394-5)



Compare the Candidates

JANE HAGUE

- ✓ Rated **"OUTSTANDING"** by the non-partisan Municipal League of King County.
- ✓ **Endorsed by Democrats, Republicans and Independents** across the Eastside.
- ✓ Named 2006 **"Legislator of the Year"** by the Alliance of Eastside Agencies.
- ✓ **Named "Children's Champion"** by Kirkland/Redmond Boys and Girls Club.
- ✓ **Recipient of the Martin Luther King, Jr. Humanitarian Award.**
- ✓ **Honored by the Trust for Public Lands** for Preserving Vital Open Space.
- ✓ **Endorsed by Eastside Business Alliance** and the **Affordable Housing Council.**

"Jane Hague has been a trusted friend of Eastside families and neighborhoods for over twenty years. She's earned my respect and my vote."

Catherine Morgan, Eastside mother of three

RICHARD POPE

- Rated **"NOT QUALIFIED"** by the non-partisan Municipal League of King County.
- **Not Endorsed by any Community Organization.**
- **His own Party overwhelmingly Refused to Endorse him.**
- **Fined** Thousands of Dollars by Judges.
- **Sanctioned** by multiple Courts.
- Under Investigation by Washington State Bar Association for **"Unprofessional Conduct"**.
- Two Restraining Orders issued for **Threats of Violence against a Woman.**

Case Number: 07-2-34389-0
Case Title: PAUL BRECHT vs JANE FRANCES HAGUE aka JANE HAGUE SPRINGMAN,
CHARLES EDWARD SPRINGMAN, et al.
Document Title: SUMMONS & COMPLAINT
User's Name: Richard Pope
Filed Date: 10/29/2007 1:30:41 PM

User Signed

Signed By: Richard Pope
WSBA #: 21118
Date: 10/29/2007 1:29:17 PM