

DRATF 5-21-2024

Housing Resource Bainbridge/501(3)c ) Case No. 24-2-0182-18  
 )  
 Plaintiff, Landlord/Owner ) COMPLAINT FOR UNLAWFUL DETAINER  
 ) ( Residential)  
 vs. )  
 ) RESPONDANT AFFIVADIT  
 Louis Charles Hoffmann Alloin, )  
 )  
 Jean Leonie Calliet Alloin Hoffman )  
 )  
 Defendant, Tenants/Occupants )

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NOW COMES, Defendants above named and states:

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1.1 Louis Charles Hoffmann Alloin and Jean Leonie Calliet Alloin Hoffman that has long standing lawful heritage residency on Bainbridge Island, Washington since on/about 1918. Being in good standing with the State of Washington in Kitsap County and compelled with authorization to commence and participate in this unlawful retaliatory vengeance actions of plaintiff discrimination, indifference, intolerance prejudice and hatred disparity named above.

Louis Alloin, Jean Hoffman  
 Defendants Without Attorney of Record  
 321 High School Road NE, D3-292  
 Bainbridge Island, Washington 98110  
 T 206-780-6885

RESPONDENT AFFIVADIT

211 1.2 Plaintiff have acted with retaliations vengeance, to fraudulently  
222 with wanton desire to intentional unlawfully fabricate defendants  
233 behavior to deny enjoyment of domain habitability and present  
244 false affidavit statements before the court of jurisdiction; with  
255 purpose to cause harm, negligent injuries to defendants; by the  
266 acts of discrimination, indifference, intolerance, prejudice to  
277 deny, prevent fair housing habitability for disability/mobility  
288 impairment, deny reasonable accommodations habitability, deny  
299 medical necessity devices, deny Americans With Disability/ADA  
300 Standards and equal opportunity to prevent SSI Work While  
311 Disabled, prevent employment opportunities to achieve self  
322 sustainable on Bainbridge Island. Plaintiff (s) were aware and  
333 did actions known to be unlawful to coerce, intimidate, threaten  
344 and inferior with defendants to exercise rights towards fair  
355 housing habitability and enjoyment of domain habitability, within  
366 Bainbridge Island Community, defendants are seeking lawful,  
377 equitable remedy, reasonable accommodations relief and Bainbridge  
388 Island habitability settlement to continue heritage life style  
399 since 1918, with respectable habitability within island  
400 community, that Housing Resource Bainbridge substantially  
421 endangers or impairs the health or safety of 204w tenant,

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423 1.3 The legislature finds that some tenants live in residences that  
424 are substandard and dangerous to their health and safety and that the  
425 repair and deduct remedies of RCW 59.18.100 may not be adequate to  
46 remedy substandard and dangerous conditions. Therefore, an If a Housing

471 Resource Bainbridge failed to fulfill substantial obligation imposed by  
482 RCW 59.18.060 that substantially endangers or impairs the health or  
493 safety of 204w tenant, including 204 housing structural members that  
504 are of insufficient size, plumbing and sanitation defects that directly  
515 expose the occupants to the risk of illness or injury, defective or  
526 inadequate emergency exits that increase the risk of injury to  
537 occupants, extraordinary remedy is necessary, as Housing Resource  
548 Bainbridge 204w conditions substantially endanger or impair the health  
559 and safety of the tenant habitability disability mobility to enjoyment  
560 of domain life on Bainbridge Island.

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## II

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Defendants seeking remedy and relief did contact and file with United  
State Department of Housing and Urban Development/DHUD/FHEO INTAKE  
BRANCH, represented by Will Fitzsimmons, before March 14,2024, assigned  
Case Management Number 785846, thereby entered with Seattle Region,  
Program Center, Enforcement/Intake Branch, Fair Housing Act Case Number  
10-24-1988, Yana Kamanukhov, Acting Regional Director FHEO Region X-  
Seattle, therefore, HUD Complaint transferred to Washington State Human  
Rights Commission, Andreta Armstrong, Executive Director, Olympia,  
Washington, to which entered Dayna Cooper, Civil Rights Investigator,  
Washington State Human Rights Commission, Olympia, Washington for  
investigations and litigation disposition toward defendants relief,  
remedy and settlement negotiations.

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Defendants seeking remedy and relief did call 911 Emergency Services with Bainbridge Island Police Department, in March 2024 filing a complaint Number 240033500/with amendments (discussions with Joe Clark, Bainbridge Island Police Chief) against Housing Resource Bainbridge, employee Jessica Campbell for unlawful criminal stocking and endangerment harassment, threatening decedents, cause fear and mental distress and anguish to violate defendants public safety, if they sought legal remedies, relief and settlement for unit 2024w failure to make repairs since June 19, 2019, that plaintiff refused to make and ensure the tenant's dwelling unit is habitable, refusing to replace food/meal preparation cooking stove for 1.5+ years violating decedents safe for human health, safety and habitability. Housing Resource Bainbridge violating the implied warranty of habitability, causing Deferent Jean Hoffman, to experience three slip and falls, cause life threatening hospitalization do to Housing Resource Bainbridge Negligence, by forcing and coercing the removal of handrails required by Jean Hoffman home living space mobility and habitability, then demanding occupants to be displaced, demanding residents to destroy belonging, making no provisions for occupant's safety during Housing Resource Bainbridge prejudicial repairs/replacements, as to enforce acts of discriminating practices, toward occupants being elderly age of 99 years and senior age of 74 years, Jessica Campbell behavior believing the residents having no educational capacity nor reasonable knowledge (Refer to: ELMS-PCM, ETS, FWARC and WEB-TEC/etc.).

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Defendant seeking remedy and relief did contact and file complaint on

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April 5, 2024, with United State Department of Justice, American

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Disability Act, Housing and Civil Enforcement Section, Case Number

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433259-BCK. Complaint was directed toward Housing Resource Bainbridge,

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former property Manager and currently Jessica Campbell, who threatened

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occupants disability habitability with discrimination, intolerance,

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with intent to discombobulate occupants, deny, prevent, obstruct

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reasonable accommodation, for enjoyment of domain during all

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inspections, that a Wallace Way NE, 204w unit north window was

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designated a fire escape (Not Posted Exit) for immediate evacuation

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from building, were Jessica Campbell proclaimed 204w fire escape window

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to be safe for emergency use (Noting: window had no platform, requiring

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a head first exist out window, with a 20+ foot straight drop to

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concrete sidewalk). Occupants requested a demonstration which Jessica

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Campbell refused, but told occupants they must leave building in

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emergency through window immediately, then once on sidewalk call 911

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(See Policy Rules), a reasonable man on the street, knowing right from

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wrong, would realize that any exit through 204w window would be a major

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injury or death fall. (No Safe Fire Escape Platform or Egress Exists at

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204w habitability) (Note: no other Housing Resource Bainbridge, is

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subjected to such dangerous public safety requirement for emergency

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exit (See Linda Costello, unit 202w and Jayvin leBlonc, MSW/LSWAIC,

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Poulsbo Fire CARES, Community Support Specialist, Poulsbo,

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Washington)).

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1262 Defendants seeking remedy and relief did contact Washington State  
1273 Department of Social and Health Services, Adult Protection Services, on  
1284 10-9-2023 to 5-13-2024 to report abuse and neglect of Housing Resource  
1295 Bainbridge, Jessica Campbell, who was abusive discrimination toward  
1306 204w occupants to place residents in a compelling dangerous situation,  
1317 by filing false 10 day notices or evict, talking down to occupants with  
1328 indifference, using her authority in such a way, that is offensive  
1339 discrimination, as in demanding Jean Hoffman wheelchair and walker, be  
1340 removed from Housing Resource Property or face eviction, knowing that  
1351 Jean Hoffman would experience forced isolation, mental anguish  
1362 depression and any If a landlord fails to fulfill any substantial  
1373 obligation imposed by RCW 59.18.060 that substantially endangers or  
1384 impairs the health or safety of a tenant, including (i) structural  
1395 members that are of insufficient size or strength to carry imposed  
1406 loads with safety, (ii) exposure of the occupants to the weather, (iii)  
1417 plumbing and sanitation defects that directly expose the occupants to  
1428 the risk of illness or injury, (iv) lack of water, including hot water,  
1439 (v) heating or ventilation systems that are not functional or are  
1440 hazardous, (vi) defective, hazardous, or missing electrical wiring or  
1451 electrical service, (vii) defective or inadequate exits that increase  
1462 the risk of injury to occupants, and (viii) conditions that increase  
1473 the risk of fire, the tenant shall give notice in writing to the  
1484 landlord, specifying the conditions, acts, omissions, or violations.  
1495 Such notice shall be sent to the landlord or to the person or place  
150 where rent is normally paid. would be restricted or prone to further

1511 habitability mobility injuries or succumb to early death from mental  
1522 distraught confinement isolation and lose of productivity. Social  
1533 Services Specialist 3, Lyndsay Morrill, who investigated Housing  
1544 Resource Bainbridge and interview both 204w residents, professionally  
1555 suggested and mailed Washington State Protection Order form, stating  
1566 that 204w residents need to be protect from Housing Resource  
1577 Bainbridge, Jessica Campbell, who has demonstrated unlawful predatory  
1588 behavior and discriminatory harassment conduct, misusing her code of  
1599 conduct and ethic employment authority, to willfully and wanton desire  
1600 to harm/oppres, by ordering the removal/destruction of medical  
1611 necessity bio hazard washer, knowing occupants are involved in home  
1622 medical wound care treatment and inconstant physical therapy, soled  
1633 clothing/fabric disinfecting, requiring effective cleaning medical  
1644 devices, to prevent bacterium transfer, in which Louis contracted  
1655 serious bacterium urinary infection, lasting 6+ months of painful  
1666 treatment, Jean contracted urinary infection as well, including eColi  
1677 infection both requiring medical treatment, because a lose of bio  
1688 medical washer was removed from resident use. (Note 1: small -8 lbs Bio  
1699 medical disinfecting washer, was in use from on/about late 2019 with no  
1700 problems associated with daily bio medical disinfecting use, to middle  
1721 2023 under Housing Resource Bainbridge eviction threat mandatory  
1722 removal, causing residents hardships/distress to comply with UWMC-HHC  
1723 Treatment Plan and implementing forced alternative home bio medical  
1724 disinfecting processes). (Note 2: Jessica Campbell during annual  
1725 inspection, advised the occupant Louis Alloin that Housing Resource  
176 Bainbridge does not recognize Federal ADA Standard as applied to

1771 occupant reasonable accommodations habitability requests, thereby  
1782 ordered disposal of bio medical washer immediately, to which, Jessica  
1793 Campbell knowing medical necessity of occupants, is alleged praying  
1804 that occupants would experience hardships, with difficulty to perform  
1815 medical treatment sanitation obstacles toward habitability of  
1826 reasonable accommodation, were Jessica Campbell could unlawfully  
1837 cause/fabricate discriminatory habitability that would provide a  
1848 unlawful reason of indifference for her to perform eviction  
1859 proceedings.

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Defendants seeking remedy and relief, did contact, Washington State  
Office of the Attorney General, Consumer Protection Division, filing  
complaint number 664209 (received on 4-26-2024) against Housing  
Resource Bainbridge, Jessica Campbell and hired Contractor Dave Koester  
of Raven Feather Construction, License Ravennfl788kz, who colluded  
together to file false unlawful 10 day notice or evict, attempting to  
use Bainbridge Island Chamber of Commerce, that Louis Alloin (Under  
lawfully organized: Environmental Land Management Services- Property  
Care Management/ELMS-PCM subsidiary of Fort Ward Amateur Radio  
Club/FWARC 501(3)c nonprofit, (known to Bainbridge Resource  
Bainbridge)) filed a wrongful complaint with purpose to discrimination,  
falsify alleged community nuisance, upon investigations, the Bainbridge  
Island Chamber of Commerce, Jessica Perkins, responded that no  
complaint had been filed, nor was any compliant in archived filings by

2031 Louis Alloin's, nor any owned business entities, Louis Alloin known to  
2042 be upstanding island community businessman and positive community  
2053 relations. (Proving Jessica Campbell and Dave Koester entered into  
2064 collusionary criminal agreement to willfully wantonly to falsify  
2075 document's against occupant Louis Allion, to deliberately desire to  
2086 publicly disgrace business and community relations on Bainbridge  
2097 Island, including utilize against Occupant's habitability ).

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VI

2131 Housing Resident habitability safety and enjoyment of Fair Housing on  
2142 Bainbridge Island domain live style is paramount to the quality of life Louis  
2153 Alloin and Jean Hoffman have experienced over the family's heritage since  
2164 1918. Peninsula Fire Extinguisher Service, Poulsbo, Washington, was a victim  
2175 of Housing Resource Bainbridge, employee, Jessica Campbell stalking 204w  
2186 Occupants, unlawful inducing/hunting/harassment stalking for reason to file  
2197 false 10 day notice, for purpose to deny occupants habitability and enjoyment  
2208 of safe domain, fire ABC Dry Chemical Suppression Canister D-342 located  
2219 between Housing Resource Bainbridge Unit 202w and 204w (resident 204w has  
2220 fire ADC Dry Chemical Suppression Canister in occupants habitat living area,  
2231 including having FEMA/other organization Fire Training and background as  
2242 former volunteer member in Bainbridge Island and Kingston, Washington, Fire  
2253 Department and Fort Ward Amateur Radio Emergency vhf/uhf/hf radio  
2264 communication capacity as in RACES, ARES, MARS, SAR/not limited too) has  
2275 always had clear emergency access for both unit occupants, the serviceman,  
228 whom on April 12, 2024 rectified the fire suppression canister, told Linda

2291 Costello, 381 Wallace Way NE, Unit 202, Bainbridge Island that porch area had  
2302 no problems meaning no obstructions with easy access to fire Suppression  
2313 Canister D-342, upon Poulsbo Fire CARES, Community support Specialist Team  
2324 Jayvin LeBlanc inspected the porch entry area between 202w and 204w found no  
2335 problems to report.

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#### VII

2368 Habitability Disparity of Treatment of Housing Resource Bainbridge, where  
2379 housing is fundamentally tied to human health as tenants of 204w households  
2380 experiencing inadequacies in Housing Resource bainbridge conditions have had  
2391 negative physical and mental health outlook outcomes, where Housing Resource  
2402 Bainbridge Practice Habitability Disparity of Treatment Indifference, Housing  
2413 Resource Bainbridge disparate treatment violation has occurred where Jessica  
2424 Campbell singled out 204w occupants and treated other residents favorably  
2435 under similarly housing situated on the basis of an impermissible criterion  
2446 under Title VII. Jessica Campbell actions toward 204w occupants were  
2457 motivated by discriminatory intent, as 204w household occupants where forced  
2468 to live in housing that was "severely inadequate," defined as housing with a  
2479 lack of functional operational kitchen, defective bathroom/shower facilities,  
2480 overcrowding in very small one room housing not designed for two independent  
2491 occupants, Housing Resource Bainbridge simply do not attempt to remediate  
2502 hazards in 204w, taking advantage of vulnerable households by neglecting  
2513 property maintenance and being unwilling to allow tenants reasonable  
2524 accommodations to make changes affecting disability and mobility. The  
2525 combination of unsatisfactory Housing Resource Bainbridge, behavior to  
254 talking down with indifference toward tenant, affects the dynamics

2551 relationship concerning housing quality and safety putting 204w occupants,  
2562 particularly because low-income status and LGBTQ minority group support,  
2573 place 204w occupants at risk for abusive discrimination.

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VIII

2606 On June 19, 2018 Louis Alloin and Jean Hoffman were show Housing Resource  
2617 Bainbridge 204w, which was brokered by Cross Sound Church, in which Louis  
2628 Alloin and Jean Hoffman where subjected to extreme hostility by Bainbridge  
2639 Island White Supremacist active group, resulting in Bainbridge Island  
2640 Municipal Court issuing two year restraint order protection in 2018 against  
2651 the group, however Housing Resource Bainbridge refused to allow time to read  
2662 rental agreement and fully to inspect 204w for suitability was prevented, as  
2673 Jean Hoffman and Louis Alloin, where subjected to a barrage of coercion,  
2684 intimidation's, threats of eternal deprivation to homeless on our heritage  
2695 hometown since 1918. Louis Alloin and jean Hoffman vehemently objected to  
2706 204w housing (not 2 bedroom) as insufficient space accommodations (see  
2717 University of Washington Hall Health Primary Care Center, William E Neighbor  
2728 MD, Professor of Clinical Family Medicine, letter insisting on medical  
2739 necessity, that a 2 bedroom housing must be afford, to allow Louis Alloin,  
2740 senior caregiver, opportunity and space to treat Jean Hoffman medical issues  
2751 under home treatment and medical supervision, at Hall Health Primary Care  
2762 Center Consultations, was rejected 3 time, by Phora Elliot, executive  
2773 director and former and Jessica Campbell property manager.)

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