

NO. 92103-2  
COA NO. 71830-4-I

THE SUPREME COURT  
OF THE STATE OF WASHINGTON

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JENIFER L. BLCKMON,  
Respondent,

v.

JOHN P. BLACKMON,  
Petitioner,

Received  
Washington State Supreme Court

OCT 19 2015

E  
Ronald R. Carpenter  
Clerk

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PETITION FOR REVIEW

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By: John P. Blackmon, pro se  
Coyote Ridge Correction Center  
P.O. Box 769  
Connell, WA 99326

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**A.           IDENTITY OF THE PARTY**

I, John Blackmon, petitioner, pro se, asks the court accept a review of the Court of Appeals findings terminating review on this action designated in Part-B of the petition.

**B.           COURT OF APPEALS DECISION**

John seeks review of the Court of Appeals unpublished opinion entered July 20, 2015. A copy of the decision is in Appendix-A.

**C.           ISSUES PRESENTED FOR REVIEW**

1. The division of assets 66% to 33% in favor of the wife is an abuse of discretion, when court's findings of facts do establish 'sole support of child' as basis for a division, and the record shows John's disability providing \$1100.00 child support to the wife for the children.
2. The use of funds in the parent's accounts created for the children is an abuse of discretion when placed on single party instead of recovered from all funds before court's disposal of the total assets of the couple.
3. The court's placing the wife's attorney as agent for the recovery of John's assets is an abuse of discretion, the court failed to ensure the attorney acted to provide the required access to remove John's property in the order.
4. The RCW 26.09.191 required the court limit 'residential time' with the children, which does not extend to limit or block complete contact with the two non-victims.

D.           STATEMENT OF THE CASE

John and Jenifer Blackmon were married in 1993. During their long marriage, John and Jenifer had three children, purchased their home, and obtained substantial assets together. The couple became separated in early 2012 at the time on John's arrest, filing their petition for dissolution on January 25, 2012 in Snohomish County.

On August 15, 2013, a decree of dissolution is entered which dissolved the marriage of the parties and bifurcated the case for considerations of the property division, child support, and their parenting plan at a later date.

On February 14, 2014, following John's conviction at the third criminal trial, the court issued an oral ruling in the dissolution's action, which divided the assets 66% to 33% in favor of the wife as sole supporter of the three children, established child support for John, and created the parenting plan. In doing so, the court found that John would not have any contact with his children for childrens remaining minority lives under RCW 26.09.191 standards.

John filed the pro se notice of appeal in the matter, addressing the trial court's orders on the issues, once court entered an actual written order in the action March 17, 2014 establishing the rulings.

The trial court exceeded statutory authority blocking all child contact, when the court may only block 'residential time' under that statute. This simple does not extend to phone calls, letters, E-mail, and third party contacts being blocked, per the law.

The petition for review presented herein asks the court consider four of the issues presented to the Court of Appeals, wherefore court should grant relief based on the trial records in the action.

**E.            ARGUMENT WHY REVIEW SHOULD BE ACCEPTED**

- 1. THE DIVISION OF THE ASSETS 66% TO 33% IN FAVOR OF JENIFER IS A MANIFEST ABUSE OF DISCRETION WHEN THE FINDINGS UNDER COURT RECORD DO NOT ESTABLISH JENIFER THE 'SOLE SUPPORTER' OF THE CHILDREN, AS COURT CLAIMED IN ENTERING THE ORDERS.**

Based on the court's records at the time the division of assets is determined, Jenifer is not the "sole supporter of the children to their minority age", as John's disability provides his three children \$1100.00+ dollars in support each month. In the finding of facts on the child support order, this same trial court determined that these disability provided payments shall continue to the children as their child support for the remainder of their minority lives. Therefore, the trial court established through the child support order that the wife is not the sole supporter of the three children, as relied on in the findings of fact under the division of assets order. The court's error in the contradicting findings of facts between these two orders resulted in a manifest abuse of discretion, whereby it creates clearly an unjust and inequitable division of the assets not supported by facts in evidence to the trial court at the time of the division order.

The Court of Appeals stated that it "considers evidence that was before the trial court at the time a decision was made". However, the Court of Appeals opinion did not consider the contradiction in trial court's findings of facts between the 'division of assets' and 'child support orders' entered on the record, which established basis for a relief of the appellant court on appeal. The error has allowed this wife to receive the majority of the assets in the division order for being the sole supporter of the children, and substantial support of the child from John's disability, which is unjust and inequitable.

Jenifer is provided double support for the three children from John, where the trial court erroneously found Jenifer 'sole support' of the children, knowing that John's disability provided support to the three children, per court's orders. The trial court abused the court's discretionary powers in making the extremely unequal assets division on the basis that Jenifer is the sole support, when court's record clearly established the trial court's finding untrue.

When the trial court enters an order based on factual findings the court knew to be untrue, the trial court has necessarily based a ruling on untenable grounds. The reviewing courts have long settled that any 'ruling based on untenable grounds' must be reversed before the reviewing courts. SEE State ex rel. Carroll V. Junker, 79 Wn.2d 12, 26, 482 P.2d 775, 784 (1971); Coggle V. Snow, 56 Wa. App. 449, 507, 784 P.2d 554 (1990); In re Marriage of Payne, 79 Wa. App. 43, 899 P.2d 1318 (1995); In re Marriage of Coy, 160 Wa. App. 797, 248 P.3d 1101 (2011); In re Marriage of Littlefield, 133 Wn.2d 39 46-47, 940 P.3d 1362 (1997); In re Marriage of R.E., 144 Wa. App. 393, 183 P.3d 399 (2008)(citing State V. C.J., 148 Wn.2d 672, 686 P.3d 765 (2003), as an abuse of trial court's discretion. The trial court's ruling herein this action relied on unsupported facts that court is proven to know were untrue by the record before the court, and this ruling on the division of assets must be reversed.

2. **THE COURT ABUSED DISCRETION ORDERING JOHN TO REPAY THEIR JOINT ACCOUNTS CREATED FOR THE CHILDREN MONEY SPENT HERE FOR JOHN'S LIVING EXPENSES DURING DISSOLUTION INSTEAD OF TAKING THE MONEY FROM THE COUPLE'S CASH ASSETS BEFORE IT DIVIDED THOSE TOTAL CASH ASSETS.**

The trial court determined the money spent for John's expenses during the dissolution process would be repaid by John, however the

trial court did not equally require the wife to repay the money it provided Jenifer for living expenses from the couple's case assets before the division of assets was entered. Jenifer is on records of the trial court obtaining \$10,000.00+ dollars of the assets for living expenses pre-trial, which the court did not require repaid from her share of the division, nor did the trial court lessen her portion of the cash assets to recover the \$10,000.00+ dollars that belonged to the parties.

John believes that no "reasonable person would take the view adopted by the trial", therefore the trial court abused discretion requiring one party to personally repay their living expenses the party used during the proceedings, when the trial court did allow the other spouse living expenses during proceedings. SEE Davis V. Davis, 13 Wa. App. 812, 813-14, 537 P.2d 1048 (1975).

The trial court's determination rested on the belief the funds were taken from the children's bank account, however the funds were from joint accounts of the parents held for the children, and these funds were the only funds available to John after Jenifer took this couple's cash on hand from the house and all bank accounts, which is placed in trust with the attorneys of the dissolution proceeding, as required. John does not dispute the trial court should order funds repaid to the children's accounts, merely that trial court should of made the repayments from the total cash assets before division under this dissolution proceeding. In the alternative, John would suggest that it is manifestly unreasonable for the trial court to require the repayment of John's living expenses, when the living expenses given to Jenifer were not ordered repaid at the same time. This appears unjust



John's belief simply is that any 'reasonable person' would of repaid any necessary living expense of either party from the total cash assets of the parties before making any order of division for the assets. John share equally in Jenifer's living expenses during the proceedings, where her expenses were paid from the total assets of the couple then being divided by the trial court. However, this trial court failed to require Jenifer share equally in John's living expenses equally, wherefore the trial court required John repay this living expense after completion of the division of assets from those cash assets award to John in the division order. John sees this as a manifest abuse of discretion, and request correction by having the wife Jenifer repay John half of the amount he paid for living, which is proven through the division order. This would result in a justly and equitably divided order on the assets of the couple.

**3. THE COURT'S PLACING JENIFER'S ATTORNEY AS AGENT AND PERSONAL REPRESENTATIVE FOR RECOVERY OF PROPERTY, IT AWARDED JOHN, WHEN THE ATTORNEYS DUTY TO A CLIENT'S CONFLICTED WITH THE COURT'S APPOINTMENT.**

The Court of Appeals dismissed the review of this issue because the court found John failed to cite authority. However, the court's should understand that authority does not exist for an issue raised as first impression issues, requiring determinations for the first time in this action.

The parties were each represented by an attorney in the record, which each had a duty to their individual clients to obtain property for their clients benefit during dissolution. Therefore, Jenifer's attorney held the obligation to his client to maintain all possible property he could for her benefit, and should not have the possition

control, or authority over the properties awarded to John during a dissolution proceeding at any point. The respondent's attorney is placed directly in a position of conflict between Jenifer and John's property interest by the trial court's order. Attorneys are herein officers of the court, making it the attorney's duty to inform this trial court of any conflict of interest created by or through court orders. Jenifer hired Mr. Shea as her personal representative here at the trial court, and the trial court choosing to appoint attorney Shea to represent John for removal of his awarded property is then a conflict to Jenifer's interests. The trial court should have made appointment of John's hired personal representative to ensure these items of awarded property were arranged to be removed within 90 days, per court's orders.

Mr. Shea had a conflict of interest here prior to being appointed by the trial court and thereafter when the court officially appointed him to represent John's interest in the awarded property, showing the attorney was never able to fulfill such fiduciary duties to John, and that the conflict of interest in this matter resulted from him being unable to conduct himself in both Jenifer's and John's best interest at the same time as their individual personal representatives herein the dissolution matter. In re Estate of Langgill, 117 Wash 265, 268, 270 P.28 (1921); In re Estate of Thomas, 167 Wash 127-28, 133-34, 8 P.2d 963 (1932).

The Supreme Court has established and adapted a multifactor type balancing test to determine whether an attorney owes "DUTY" to client or non-client, as was supposed to be addressed by the court on review of this matter, which is: (1) The extent to which the transaction was

intended to benefit the client or non-client (John's a non-client), in the dissolution proceedings; (2) The foreseeability of harm to the John through the counsel's conduct; (3) The certainty that the party will suffer harm or injury;(which John did suffer by loss of all awarded property); (4) The degree of closeness and connections between the appointed attorney Shea's conduct and the harm suffered by John; (5) The policy of prevent similar future harm to a public at large; and (6) The extent to which the profession at large would be unduly burdened by a finding of liability. Trask V. Butler, 123 Wn.2d 843, 872 P.2d 1080 (1994), these were never addressed through review at the Court of Appeals in their opinion, as required.

The attorney, is liable to John once appointed by trial court as personal representative for John's property interest, whereby this attorney did not object to the appointment by the trial court on the basis of bias or conflict with his other client's interest, and did willfully and voluntarily accept the trial court's appointment as a personal representative for the arranging removal of John's property from the marital home and buildings. CP 155, findings of fact 2.21.24.

The trial court record established the husbands family or agents should go through Shea's office to make arrangements for removal of property from the home or buildings; and the attorney would ensure a timely removal was arranged for John's property to be available for the family or agents. This further established a DUTY for the herein attorney Shea to ensure the property awarded John was located and to ensure the property was separated from Jenifer's property to allow an agent access to remove only those items awarded his appointed client at Jenifer's discretion. This was not done for John by Mr. Shea, and it

stands that Mr. Shea is liable to John, his court appointed client for the breach of duty and malpractice, which ultimately resulted in the total loss of all John's court awarded property. Trask V. Butler, 101 Wa.2d 835, 838-39, 872 P.2d 1080 (1994). John, as the court appointed client of Mr. Shea did suffer from ramifications of Mr. Shea as his appointed representative in the property given John in the dissolution proceedings. 2RP (Day 3) at 11; Meneely V. S.R. Smith, Inc., 101 Wa. App. 845, 863, 5 P.3d 49 (2000).

The record established in the trial court shows the court's order appointing Mr. Shea as John's representative for removal of the property awarded John is based on untenable grounds and done in untenable reasons, where the trial court had John's hire attorney in the trial court at the time of the order. The court should, as any reasonable person would have done, appointed John's hired and present attorney as John's personal representative to arrange this removal of John's awarded personal property, not created conflicts of interest for Mr. Shea as representative of both parties to this action. Therefore, John has established the trial court committed reversible error through the abuse of discretion committed herein a order of the trial court appointing Shea to arrange removal of all John's property within 90 days of the order.

The question underlying this abuse of discretion, resulting in a great public interest is whether Shea owed a better duty to John's interest in the awarded properties removal and protection, or duty to Jenifer to obtain the most property in the dissolution for her use or benefit after the marriage is dissolved. SEE Folsom V. Burgerking, 135 Wn.2d 671, 958 P.2d 301 (1998); In re Guardianship of Karen, 110 Wa. App.

76, 81, 38 P.3d 396 (2002)( citing Stagland V. Brock, 109 Wn.2d 675, 680, 747 P.2d 454 (1987)). The attorneys action in accepting court's appointment clearly violated Rules of Professional Conduct 3.4(b); 8.4(c) and 8.4(d), due to his conduct while John's appointed counsel regarding the property removal, and knowing conflict of interest the attorney allowed, without informing the trial court.

However, the reversal and remand must be based on the trial court abusing discretion in appointing the conflicted attorney Shea as these parties dual representative in the action, when the trial court facts establish that John's interest were currently represented through his hired attorney present at the proceedings when the order is entered.

Since "no reasonable person would take the view adopted by this trial court," of appointing Shea as John's representative to arrange removal of John's awarded property, while Shea represented Jenifer's interest in that awarded property of John, then an abuse of court's discretion occurred, which must be correct on review. Especially in in light of the record that John's own representative was present at the trial court hearing, when Shea was appointed to arrange removal of John's awarded property, as the trial court should have appointed John's hire attorney to make the arrangements for her client. Proper remedy would be to remand the matter to the trial court, instructing the trial court appoint a non-conflicted representative to make this arrangement to remove John's awarded property from the home and the building awarded Jenifer in the dissolution proceedings, which is the remedy that John is requesting of this reviewing court.

The reviewing court should address Mr. Shea's duty to inform the trial court of the conflict of interest trial court's order created.

4. THE RCW 26.09.191 REQUIRED THE COURT LIMIT "RESIDENTIAL TIME" WITH THE COUPLE'S CHILDREN FOR JOHN, WHICH IS NOT ALLOWED TO LIMIT OR BLOCK COMPLETELY CONTACT WITH JOHN PHONE CALLS, LETTERS OR E-MAILS OF NON-VICTIMS.

John does not dispute that RCW 26.09.191(4) required the trial court remove his 'residential time' with his children. However, as the law will be given its plain meaning, and the courts will not put words in the statute the courts feel the legislature left out, this does not give the trial court authority to remove all contact with John's two non-victim children.

The premise of the abuse of discretion presented here is court's order is based on untenable grounds, where the statute requires that residential time be removed, not complete contact. "Residential time" is defined as the time the child will spend in the non-custodial home or residence of the non-custodial parent for visitations. John could not seek residential time with his children while incarcerated under the Department of Corrections, as children are not allowed in prison's cells for visitations. The prison cell is John's current residence at the present moment, therefore the trial court should order the child's residential time restricted, per 26.09.191.

The Court of Appeals allowed the trial court authority not given in the statute, when it allowed the complete blockage of contact with John's non-victim children, including phone calls, letters, and these E-mail communications, which statute does not require blocked.

John's contact with his eldest child is prohibited through those criminal proceedings, and is not challenged under this action, whereby John does not seek contact with the eldest child, which RCW 26.09.191 does prohibit clearly, merely his other two children through letters or

phone calls, while he is housed in the Department of Corrections(DOC) facility, which 26.09.191 does not allow blocked. John's sentence to the DOC facilities extends beyond his youngest child's 18<sup>th</sup> birthday, and John does wish to maintain his parent/child relationships, ~~as a~~ father to his youngest children through phone calls and letters.

Thereby, review of the statute should be granted, and Court of Appeals error corrected in providing the trial court authority that statute does not allow, per statute's legislative wording. Wherefore, it is long settled and establish the Court of Appeals will not add to the wording of the statute words the legislature excluded. The trial court did abuse discretion in this instance, blocking contact with the two youngest children completely, and such must be corrected in remand.

**F. CONCLUSIONS**

For the reasons herein stated, the trial court's abuses of its discretion must be corrected.

DATED This <sup>th</sup> 14 day of October 2015.

Respectfully Submitted,

  
John P. Blackmon, pro se

# APPENDIX A



IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

In re the Marriage of:	)	
	)	
JOHN P. BLACKMON,	)	
	)	DIVISION ONE
Appellant,	)	
	)	No. 71830-4-I
and	)	
	)	UNPUBLISHED OPINION
JENIFER L. BLACKMON,	)	
nka JACOBSEN,	)	
	)	
Respondent.	)	FILED: July 20, 2015
_____		

2015 JUL 20 AM 9:15  
COURT OF APPEALS DIV. 1  
STATE OF WASHINGTON

DWYER, J. — John Blackmon appeals from the decree dissolving his marriage to Jenifer Jacobsen.<sup>1</sup> John's appeal is rooted in a dissatisfaction with the manner in which the trial court divided the couple's assets. Finding no error, we affirm.

I

John Blackmon and Jenifer Jacobsen were married in 1993. During their marriage, John and Jenifer had three children. In early 2012, they separated. On January 25, 2012, John filed a petition for dissolution of the marriage in Snohomish County Superior Court.

On August 15, 2013, a decree of dissolution was entered dissolving the marriage of the parties and bifurcating the case. This was done in order for the

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<sup>1</sup> Hereinafter, the parties are referred to by their first names.

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however, to show any entitlement to appellate relief.

Our consideration of John's appeal is controlled by well-settled principles of appellate review. We consider only evidence that was before the trial court at the time a decision was made. See RAP 9.1, 9.11. We do not weigh conflicting evidence or substitute our judgment for that of the trial court. In re Marriage of Rich, 80 Wn. App. 252, 259, 907 P.2d 1234 (1996). The trial court is the judge of the credibility of witnesses, and we review challenged findings of fact only for substantial evidence in the record before the trial court. See Dodd v. Polack, 63 Wn.2d 828, 829, 389 P.2d 289 (1964). Unchallenged findings are verities on appeal. In re Marriage of Brewer, 137 Wn.2d 756, 766, 976 P.2d 102 (1999).

An appellant must provide "argument in support of the issues presented for review, together with citations to legal authority and references to relevant parts of the record." RAP 10.3(a)(6). We generally will not consider claims unsupported by citation to authority, references to the record, or meaningful analysis. RAP 10.3(a)(6); Cowiche Canyon Conservancy v. Bosley, 118 Wn.2d 801, 809, 828 P.2d 549 (1992). Pro se litigants are held to the same standards as attorneys and must comply with all procedural rules on appeal. In re Marriage of Olson, 69 Wn. App. 621, 626, 850 P.2d 527 (1993).

John's appeal is rooted in his dissatisfaction with the manner in which the trial court divided the couple's assets. In dissolution proceedings, the trial court has broad discretion to make a just and equitable distribution of all property

based on the factors enumerated in RCW 26.09.080.<sup>2</sup> In re Marriage of Rockwell, 141 Wn. App. 235, 242-43, 170 P.3d 572 (2007). A trial court does not abuse its discretion by awarding the separate property of one spouse to the other spouse, so long as the award results in a just and equitable distribution of assets. In re Marriage of Irwin, 64 Wn. App. 38, 48, 822 P.2d 797 (1992). A division of property need not be precisely equal; rather, it must be fair to both parties depending on their circumstances at the time of dissolution. RCW 26.09.080.

The trial court has broad discretion in dividing property in a decree of dissolution and will be reversed only upon a showing of a manifest abuse of discretion. Buchanan v. Buchanan, 150 Wn. App. 730, 735, 207 P.3d 478 (2009). A trial court abuses its discretion if its decision is manifestly unreasonable, meaning that its decision is outside the range of acceptable choices, or is based upon untenable grounds. In re Marriage of Littlefield, 133 Wn.2d 39, 46-47, 940 P.2d 1362 (1997). We review the trial court's factual findings for substantial evidence, which is "evidence of sufficient quantity to persuade a fair-minded, rational person of the truth of the declared premise."

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<sup>2</sup> This provision provides, in pertinent part, for the following:

In a proceeding for dissolution of the marriage . . . the court shall, without regard to misconduct, make such disposition of the property and the liabilities of the parties, either community or separate, as shall appear just and equitable after considering all relevant factors including, but not limited to:

- (1) The nature and extent of the community property;
- (2) The nature and extent of the separate property;
- (3) The duration of the marriage or domestic partnership; and
- (4) The economic circumstances of each spouse or domestic partner at the time the division of property is to become effective, including the desirability of awarding the family home or the right to live therein for reasonable periods to a spouse or domestic partner with whom the children reside the majority of the time.

RCW 26.09.080.

Rockwell, 141 Wn. App. at 242 (internal quotation marks omitted) (quoting In re Marriage of Griswold, 112 Wn. App. 333, 339, 48 P.3d 1018 (2002)).

John first contends that the trial court mistakenly failed to consider his disability pension in dividing the couple's assets. As a result of this mistake, John asserts, the trial court abused its discretion. However, John's contention is refuted by the record. No appellate relief is warranted.

John next contends that some of the assets that were awarded to him were no longer owned by either he or Jenifer at the time of distribution. While John acknowledges that he did not discover this fact until after the decree of dissolution had been entered, he nevertheless requests that we reverse the trial court's ruling on the basis of evidence that was not before it. Because neither the facts now asserted to be true nor the claim now presented was advanced to the trial court, before or after trial, no appellate relief is warranted. RAP 2.5(a).

John next contends that the trial court abused its discretion by undervaluing the couple's firearms. In an effort to support this contention, John asserts that the court disregarded witness testimony as to the value of these firearms. It is the court's prerogative to disregard witness testimony that is found not to be credible. Dodd, 63 Wn.2d at 829. In fact, the witness mentioned by John testified that he had not seen the firearms and could not speak to their condition. The firearms eventually sold for \$1,200. The court did not abuse its discretion when it assigned the sale value to the firearms.<sup>3</sup>

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<sup>3</sup> Included within this assignment of error, John asserts that the trial court erred by undervaluing other assets and awarding one item to Jenifer based on a finding that the couple's

John next contends that the trial court abused its discretion by requiring him to assume as liabilities the funds he had withdrawn from his children's savings accounts. John cites no authority in support of his contention. No appellate relief is warranted.

John next contends that the trial court abused its discretion by basing the division of assets and the parenting plan on a finding that John had a mental illness. The record citations provided by John do not legitimate his contention. No appellate relief is warranted.

John next contends that the trial court abused its discretion by directing him and his agents to deal with Jenifer's attorney, Steven Shea, when attempting to take possession of the property that had been awarded to John. John cites no authority in support of this contention. No appellate relief is warranted.

John next contends that the trial court abused its discretion by requiring him to take possession of the property awarded to him within 90 days. He cites no authority in support of this contention. No appellate relief is warranted.

John next contends that the trial court abused its discretion by prohibiting him from having any contact with his children during the remainder of their nonage. We disagree. The court acted within its discretion, and in accordance with RCW 26.09.191,<sup>4</sup> in preventing John from having contact with his minor

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son would desire it in the future. In pressing this claim, John fails to cite to the record or to relevant authority, and he provides no reasoned argument explaining why he is entitled to appellate relief. No relief is warranted.

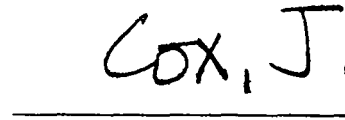
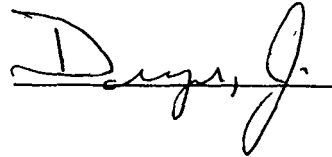
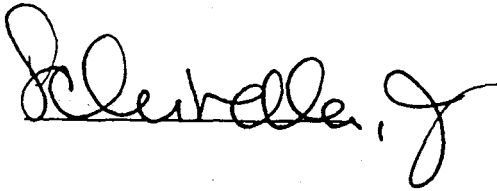
<sup>4</sup> This provision provides, in pertinent part, for the following:

The parent's residential time with the child shall be limited if it is found that the parent has engaged in any of the following conduct: . . . (ii) physical, sexual, or a pattern of emotional abuse of a child; (iii) a history of acts of domestic violence

children, where the court was presented with evidence that John had been convicted of multiple counts of child molestation and one count of child rape, and where the victim of his crimes was his eldest daughter.

Affirmed.<sup>5</sup>

We concur:



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... or an assault or sexual assault which causes grievous bodily harm or the fear of such harm; or (iv) the parent has been convicted as an adult of a sex offense.  
RCW 26.09.191(2)(a).

<sup>5</sup> Jenifer requests an award of attorney fees and costs on appeal, but fails to provide argument in support of her request. Her request is denied. See Wilson Court Ltd. P'ship v. Tony Maroni's, Inc., 134 Wn.2d 692, 710-11 n.4, 952 P.2d 590 (1998).

DECLARATION OF SERVICE

GR 3.1

I, John P. Blackmon, declare that on the 14<sup>th</sup> day of October

2015, I deposited the following documents:

- 1. Petition For Review with APPENDIX-A Received
- 2. Decl. of Service GR-3.1 Washington State Supreme Court
- 3. \_\_\_\_\_ OCT 19 2015
- 4. \_\_\_\_\_
- 5. \_\_\_\_\_ Ronald R. Carpenter
- 6. \_\_\_\_\_ Clerk

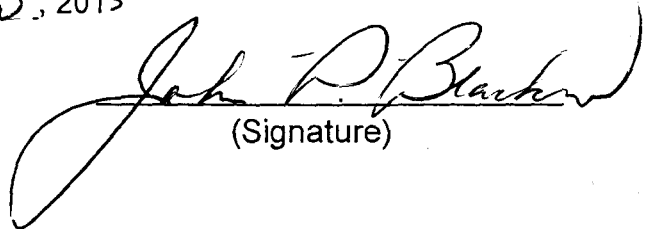
Or a true and correct copy thereof, in the internal mail system of Coyote Ridge  
Correction Center, and made arrangements for postage, addressed as follows:

The Supreme Court  
Temple of Justice  
P. O. Box 40929  
Olympia, WA  
98504-0929

Stevens B. Shea, Attorney  
For Jennifer Blackmon, Respondent  
3014 Hoyt Avenue  
Everett, WA  
98201

I, John P. Blackmon, declared under penalty of perjury, under the laws of the State of Washington, that the forgoing is true and correct.

DATED This 14<sup>th</sup> day of October, 2015

  
 (Signature)