

64427-1

64427-1
FILED
COURT OF APPEALS DIV. #1
STATE OF WASHINGTON
2010 APR 15 PM 1:49

No. 64427-1
COURT OF APPEALS DIVISION I
STATE OF WASHINGTON

APPEAL OF SNOHOMISH COUNTY SUPERIOR COURT No. 05-3-00844-1
(ORDER OF CHILD SUPPORT)

DAVID BEACH

v.

MARY LINARES

Appellant's Reply Brief

CERTIFICATE OF SERVICE

Certificate of Service

This is to certify under the penalty of perjury subject to the laws of the State of Washington, that I David Beach served the above entitled pleading on KNAUF SANTOS LAW PLLC; at 3518 Fremont Ave North, #120 Seattle, WA 98103, by Certified U.S., Mail, on April 15, 2010.



David Beach
12600 4th Ave W # 1C
Everett, WA 98204

TABLE OF CONTENTS

A. <i>INTRODUCTION</i>	2
B. <i>ASSIGNMENTS OF ERROR</i>	3
C. <i>ARGUMENT</i>	10
D. <i>CONCLUSION</i>	22

TABLE OF AUTHORITIES
Table of Cases

Case Name	Page
DAVIS v. GLOBE MACH. MFG. CO., 102 Wn.2d 68, 77, 684 P.2d 692 (1984).....	12
Marriage of Daubert 124 IN. App 483,490."	12
Marriage of Gainey . App. 269 , 273-74, 948 P.2d 865 (1997).....	15
Marriage of Goodell Nov. 2005 130 Wn. App. 381.	15
Marriage of Pollard , 99 Wn. App. 48 , 54, 991 P.2d 1201 (2000)	16
Moody , 137 Wn.2d at 994 89 Wn. App. 269 , 273-74, 948 P.2d 865 (1997).....	16
STATE EX REL. CARROLL v. JUNKER, 79 Wn.2d 12, 26, 482 P.2d 775 (1971).....	12
State ex rel. Taylor v. Dorsey, 81 Wn. App. 414, 424, 914 P.2d 773 (1996).....	12

Statutes

RCW 5.28.020, 050,060	12
RCW 9A.72.010, 050,085;	12
RCW 26.19.071	12,13,15,17
RCW 26.21A.270.....	17
RCW.26.116	17

I. INTRODUCTION

The courts should rule in favor of appellant, David Beach, and establish child support within the rules of law, based on facts and history of the case. The ruling should be inclusive of past support amounts for 2008 and 2009 based on actual incomes for both parties, and take into consideration time spent with children. Irrelevant biasing testimony and statements of the Respondent, Mary Linares and her Counsel that are not based on fact should be omitted as they are in fact perjury and they should be charged with and prosecuted to the extent of the law.

II. ASSIGNMENTS OF ERROR

A. Within Respondents Statement of the Case, bottom of page 2, she is accurate about the order entered on June 12, 2009, but as I was unemployed at the end of May 2009, by stating that “Mr. Beach did not pay the required child support and daycare”, Top of Page 3 sounds like I refuse to pay, which is not the case. The simple truth is that the established support amount was approximately the same as my unemployment income. At the same hearing, the motion for contempt was heard. As I was unemployed, not voluntarily, I could not rationally afford to pay the current support, while DCS was already garnishing more than 50% of my net income. Although Respondent and council have stated in

the past, that it is my responsibility to pay what the court demands. It is not DCS' responsibility to collect it. DCS left me with \$217 per week, the courts and respondent demanded that I pay an additional \$500 per month, which would have left me with approximately \$430 per month. That is not enough to live on and the respondent knows this, their award was punitive. Their continued cases are based on greed and malice; not on what it takes to support the children and what is the children's best interest. Swaying the Judges and Commissioners is their goal, finding Page 3 that "he makes decisions to his own financial disadvantage to avoid support of his own children" is proof of this, as every financial decision that I have had to make was in the interest of keeping a roof over our head, and being able to feed the children when I had visitations; since she does not support them in my household, I must be able to.

B. Abuse of discretion, is an issue in this case as the record does not show that the trial court considered all of the relevant factors in both of our incomes. The court reviewed the entirety of my incomes from my social security statements, but failed to see or note the contract nature of my work since my employment was terminated at Microsoft. Instead, as council was able to sway previous Judicial officers, that my employment and unemployment was voluntary, and the fact that I was honest in filing

my unemployment, honesty is a character detriment. Judge Castleberry, used Mrs. Santos' Flawed year-to-date analysis taking into account an extremely short timeframe of 7 months, 5 of which I was employed at a contractors rate of pay with no benefits, the same way she did in 2008 when they were awarded an increase based on less than 3 months of work at a high rate. Had Judge Castleberry used a larger scale the support amount would have more accurately depicted accurate income. Santos' year-to-date analysis for Mr. Beach yields a gross annual income of \$82,416 when in reality my income was approximately \$16,000 less. (Lincoln Bay income 48,585 and Unemployment income of 18,061) Even reading over my social security statement (RP123) did not take into account monies from previous years that I never saw. Microsoft Corp pays for certain benefits, that I had to pay taxes on thus they are added into my statements as income that I did not receive, ie. Health memberships, employee life insurances, 401k contributions ,expenses for doing business (cell phone, internet access, computer supplies reimbursed on corporate credit card), etc. In relation to Mrs Linares' income, she currently pays no taxes, as depicted in **Exhibit 14**, and as she collected a refund in 2008, why does her council discount her income to include taxes to intentionally reduce her net income. Although she has a 4 year degree, allowing her to

spend another 3 years in school, not require her to support our children, and allow her to live off of child support is indeed abuse.

C. In speaking directly to my employment, I have not been “Playing Games” as Mrs. Santos alleges, in May of 2008, the contracting company called me on the 13th, and stated that the company was cutting back and they followed up with a letter on the 14th. It took approximately 2 months from initial contact to starting work my next contract. The start date was not known until a few days prior to me arriving on the job, and as I was still possibly pending passing a background check, I could not count on it as I have been denied employment numerous times at the last minute.

D. The irrelevant testimony in the court room including Paternity of the children was raised by the respondent has no bearing in the case. Although the objections were overruled, it was held against the Me. The truth of the matter is that even if the paternity test had concluded that I was not the father Counsel and Judge Castleberry should know that it has no effect on child support in the state of Washington for children that are over the age of 2 and have been supported by the alleged father for those 2 years unless it was disputed prior to the child reaching that age. So the testimony although irrelevant to the support case, it was raised to attempt

to discredit me, and obviously it worked. Although I may have had an opportunity to revise the rulings that I did not agree with, I was advised by my council, that appealing those rulings would be a waste of money, that I did not have, and it would have been dealt with at the upcoming trial. PG.11 of Respondent's brief states that' "The case history is relevant to the courts decision of child support as the court must decide what amount of income Mr. Beach makes.". This is simply not true; using my actual income is the method that the court should use to determine child support, not allowing the respondent to use subversion and continue to state that I am "Playing Games", it seems very clear to me, as it should to the courts reviewing the evidence, that when I am being forced to overpay support, why should I not be allowed to pursue an honest and fair outcome.

E. Again, the Legal Fee Award would have been reversed had the case been judged with accurate income, Averaged for Mr. Beach across the last few years, 2008: ~\$71k Gross (including taking out my 401k and stocks) and 2009: ~\$66k gross, and for Mrs. Linares; ~\$21k Net for 08 and 09. The actual math would have not improved the Respondent's position. The judgment for legal fees would have gone to the petitioner, as he would have improved his case.

F. Child care expenses have been awarded to the respondent for her ability to “work”; however the Respondent is not currently employed, nor has she been for many years. Although the court has stated that Linares is in need of child care, her testimony that she is paying her roommate is ridiculous. If she pays her roommate for child care of \$100 per week and her roommate includes it as income to unemployment, there is no net benefit to her roommate to watch the children for the few minutes in the morning and in the evening. That only lessens the total income for the household and the respondent has yet to yield discovery that was requested prior to trial to prove that her roommate is even being paid for the child care. From the receipts that Mrs. Linares has provided initially allegedly from her sister, and now from her roommate; the receipt ledger is the same as they have serially corresponding numbers. That leaves me questioning their validity, as if Mrs. Linares is writing the checks, and filling out the receipts at the same time; as she is the one with the receipt book. It seems to be nothing more than an additional way to supplement her support with more subversion.

G. As the Respondent states, “this matter has been ongoing since August 2008 and three separate temporary child support orders were entered between August 2008 and trial.” Based on the amount of support

paid vs. actual income the support order date should be backset to August of 2008. Mrs. Santos states, "Given the many temporary orders and the nature of the case it would be almost impossible to go back to August 2008 and figure out how much child support there should be each month", in reality, it is quite simple as DCS has a record of how much was paid vs. income incurred. Mrs. Santos and the Respondent are afraid that I will no longer be in arrears in support and cannot bring the issue up to continue to file contempt motions as it would prove overpayment especially since the August 4, 2008 order stated that I had to pay \$2,049 even while I was unemployed for 5 of those months, and which my unemployment support amount would have been set at \$494 per month, leaving an overage of \$1,555 per month, or more than \$7,775 for the remainder of 2008. As I was owing much less than that at the end of 2008 and 2009. Again, they lose their ability to continue to harass me with the Superior Court and ask to remand me into custody for failing to pay, as obviously I have.

H. Judgments for back support do double impact the Petitioner. The judgments are in favor of the respondent, yet, DCS is collecting for current arrearages. So once DCS collects the arrearages for any back support owed, the judgments do not simply go away, even if I were to pay off

DCS entirely today the judgments would still exist showing that I still owe her monies in the amount of the judgments; thus the double impact.

I. Mrs. Santos states one part of the court Report, but neglects to mention the whole record, as the Court did demand me to file a fraudulent tax return, which I will prove in my argument, and in doing so forces the Petitioner to willing violate federal laws that supersede that of Snohomish County and the State of Washington.

J. Perjury in Snohomish County Superior court or any court is no basis for Law, and both parties should be reprimanded for such perjury as I can prove the lengths that Respondent and Council will go through to improve their position.

III. ARGUMENT

A. **The Court did commit a manifest abuse of discretion by not using proper income figures for both parties.** The respondent states in trial, that her income is “1440 in change was derived accounting for taxes that are not being taken out of my unemployment but for which I’m obligated to pay” (RP. p109), yet she received a return in 2008 not paying any taxes and assuming she gets the same result in 2009, her net income

should be derived based on tax returns, not an improper calculation. The court mentions, "In regards, to the father's side of the ledger, I am going to use the year-to-date analysis, and that comes out to \$6,868." The figure used was mentioned by Mrs. Linares and council, but not based on FACT as a year-to-date analysis. Figuring how the amount was derived, "That would be David's year-to-date with his work wages and his unemployment period, and the unemployment he receives during those periods considered. Q. So the \$6,868 is his contract position from January 1st to May 31st, and then three months of unemployment, June, July August? A. Correct." (RP p 101 and 102) doing the math I earned 48,585 on my contract, and my first paycheck included work performed at the end of December, regardless, Counting my 1 waiting week of unemployment, multiplying 10 weeks of unemployment at 541 per week yields: 5,410, filing a new claim, with waiting week added additional 605. Adding all of those together, and dividing by 8 yields: \$6825. Although not substantial, it seems the court did not do its own math to make sure the calculations were correct. Using incorrect math, not using a realistic timeline, and compounding that with not taking an accurate look at the respondent's deductions, proves abuse of discretion in setting our incomes. The trial court abused its discretion when its discretionary decision was "manifestly unreasonable or based upon untenable grounds

or reasons "In re Marriage of Daubert 124 IN. App 483,490.", DAVIS v. GLOBE MACH. MFG. CO., 102 Wn.2d 68, 77, 684 P.2d 692 (1984) (citing STATE EX REL. CARROLL v. JUNKER, 79 Wn.2d 12, 26, 482 P.2d 775 (1971))

The respondent's perjury, yet accepted as fact, she herself numerous times in the history of the cases has reported her income as \$1400 gross to 1447 per month Net; while collecting 450 or more per week times 4.3 yields in upwards of \$1935. Simply accepting an income figure that is stated, not proved, and without the court deciding to do the math and validate the testimony makes the income figures bias. Thus the court did not determine actual income based on the Facts and applicable legal standards; the grounds and reasons untenable, as the factual findings cannot be supported by testimony, nor are they based on any evidence in the case. (RCW 9A.72.010, 050,085; RCW 5.28.020, 050,060) RP. 71,73-75,11-112

Per the rules of law, a trial court must determine actual income under RCW 26.19.071(1)-(5) or impute income for a voluntarily unemployed or underemployed parent pursuant to RCW 26.19.071(6). State ex rel. Taylor v. Dorsey, 81 Wn. App. 414, 424, 914 P.2d 773 (1996). Where as the record reveals that the trial court did not rely on factual income during a relevant time period and did not impute income

under RCW 26.19.071(6). The trial courts calculation of support based solely on the temporary employment amount reflecting only 8 months of 2009 (RP. p 101, 102) this income was not one of the reasonable options available under the relevant statutes, it was based on what the Respondent came up with and without discovery, we could not contest the math at the time. RP. p 74,75,88,101,106,109 In relation to the specific reference to how Judge Knight came up with the calculation, not taking into account the nature of contract “temporary” work, and stating that “When it is all said and done, the court has a difficult time finding out exactly what your true income is. I do know what it has been in the past” RP 128 using the Respondent’s flawed calculations is not one of the acceptable options under the law. Council states that there has been a war of attrition, and when I lose my employment it has been voluntary, this is not the case as evidence has proved, and as she cannot prove her statements, it is irrelevant. Mrs. Santos’ Statements PG 7 whereas “In August 2008 his child support was raised and he “lost” his job within two weeks”, the record and prior evidence proves that there was nothing subversive about it I believe, **Exhibit 31**.(not admitted, attached here as **Exhibit A**) My contract in December of 08 ran 4 months and was extended verbally in April, the evidence proves that my employment was coming to an end, it was merely situational that it ended shortly after the April 2009 hearing

Exhibit 11. Even within Mrs. Santos' statements Page 8,"Mr. Beach's year to date income consisted of his job from January 1, 2009 through May 30, 2009 and his unemployment from June 1,2009 through September 2009." This does not mesh with the court record, and seemingly she does not even know how they came up with the year to date. Furthermore, Santos states," he could have used Mr. Beach's historical figures before all this game play started which was \$89,000 a year", again she states that game playing is my involuntary loss of employment at Microsoft in 2008, and she can state it as many time within court documents as she likes but she cannot, and has not, provided an any proof of said game playing for me losing my employment.

B. Linares income: Although Judge Knight made reference to Mrs. Linares' schooling, and that nursing is in demand, however, RP.102, she states that she is in "a nursing program to become a registered nurse", and in response to her ever using existing bachelor's degree, RP 104, "it's a history degree, so I did not have an interest in becoming a teacher, so no," this is proving that she is underemployed while voluntarily not working within the field that her degree is in. Furthermore, when she enrolled in school, she choose to take on a 3 year RN program while on unemployment instead of supporting the children or instead of a one year

program as an LPN so she could support the children sooner. Excerpt from education-portal.com: **Exhibit B** Re : “390 In re Marriage of Goodell Nov. 2005 130 Wn. App. 381” A parent may not avoid his or her child support obligation by remaining voluntarily unemployed or underemployed. RCW 26.19.071 (6) governs the standards for calculating and imputing income when determining child support. It provides in pertinent part:

“The court shall impute income to a parent when the parent is voluntarily unemployed or voluntarily underemployed. The court shall determine whether the parent is voluntarily underemployed or voluntarily unemployed based upon that parent's work history, education, health, and age, or any other relevant factors. . . . Income shall not be imputed for an unemployable parent. . . . In the absence of information to the contrary, a parent's imputed income shall be based on the median income of year-round full-time workers as derived from the United States bureau of census, current populations reports, or such replacement report as published by the bureau of census.” RP.p.71,89

In re Marriage of Gainey that “[a] superior court judge is permitted to take new evidence when considering a motion to revise the ruling of a court commissioner, but he or she is not required to do so.” 89 Wn. App.

269 , 273-74, 948 P.2d 865 (1997). In light of the Supreme Court decision in Moody , this is no longer good law. 137 Wn.2d at 993.

Linares demonstrated her employability when she held jobs as an escrow closer, real estate agent, loan office, loan processor, and assistant manager (Big 5 sporting goods). The mere fact that she lost her job does not render her employment status involuntary; but her decision to go back to school for an additional 3 years of retraining instead of a shorter nursing program does. If Beach lost his job and chose to go back to school, it is likely that the court would impute income to him in order to impose a child support obligation. See e.g. , In re Marriage of Pollard , 99 Wn. App. 48 , 54, 991 P.2d 1201 (2000) in observing schooling: If the shoe were on the other foot, and a noncustodial father sought to reduce his child support obligation because he chose to go to school while on unemployment, most courts would impute income to such a voluntarily unemployed or underemployed parent. While Linares presents evidence of attempts to obtain employment and further her education, she does not provide any reasonable explanation about her efforts to find a job after she was unemployed in 2007 and when she started schooling in 2008 nor does she explain why chose the nursing program she did instead of any of the shorter ones. RP.p.66,68,103-106,109 Thus, the court abused its

discretion when it failed to find Linares voluntarily unemployed and failed to impute her income according to chapter 26.19 RCW app.

C. There was irrelevant testimony in the trial that swayed Judge Knight. Specifically line of questioning in reference to paternity (RP 37), although irrelevant in direct relation to Chapter 26.21A, Uniform interstate family support act, RCW 26.21A.270 specifically states: A party whose parentage of a child has been previously determined by or pursuant to law may not plead nonparentage as a defense to a proceeding under this chapter. As it relates to RCW.26.116 in relevant part: “(1) A man is presumed to be the father of a child if: (a) He and the mother of the child are married to each other and the child is born during the marriage;”. Respondent’s Council should have know this, but was only mentioned to sway the Judicial Official in his ruling, and as it was irrelevant my Council did not feel it was appropriate to further dispute it, “There wasn’t any testimony along those lines as to why the father apparently took a swab of this child’s DNA and submitted that with some of his DNA to have it tested. It came back inconclusive, and he called up the mother so see if she would supply a DNA sample. I didn’t hear any testimony as to why he did that. And the Court is left, because of the boy, to speculate about it. And one of the things I certainly could speculate is that it was done as a

ploy, potentially, to reduce the support obligation. I hope that's not the situation, but one certainly wonders. If it is, it's despicable. I do not find the father really to be that credible." RP 129. Certainly the mother would never voluntarily submit a DNA sample because, although it would not change the support amounts, it would prove the depth of the lies of Mrs. Linares has continued during our marriage.

D. Legal fees: The improvement of the position of the Respondent, was not warranted if the income amounts were set appropriately, and in conjunction of the income changes that had occurred since the mediation, it is not a fair determination. The mediation occurred on the third March 2009, and trial de novo was filed later that same month knowing that it was unfair and did not include resetting of back child support, and my contract was at that time scheduled to end in the middle of April. Even then the arbitrator used my 2008 earned income, but set the respondent's income at a substantially lower monthly amount of \$1610 per month. If there was to have been used accurate income calculations as described above, the outcome would have been different.

E. The issue of child care in order to attend school is not feasible. Mrs. Santos alleges that the issue of child care was not raised at trial,

however referring to RP 89, child care was in fact brought up, and specifically in relation to her roommate watching the children, RP. 90 “She can’t work under the table because she’s also on unemployment, so I’m going to pay her because she’s actually rendering me a service, and she has to claim that on unemployment. So I need to pay her, and then she will have that deducted from her weekly benefits.” This seems erroneous in many ways when you realize that if “Irina Braginskaya” would have watched the children for nothing, there would have been an additional \$100 each month in the household budget. And per the Arbitrator even Mrs. Linares paying her sister for child care seemed suspect. Additionally, in 2008, calculated into child support was approximately \$864 for child care. That child care, which was not used, is calculated into arrearages that DCS is showing as being owed. But as it was fought by the Respondent that I refused to pay it, the arrearage stayed on the DCS books and has never been credited. RP. 89 “Carrie watch the children starting in April?” “right, because I began the nursing program in on March 30th of 2008”. Noting that she then continued to pay her roommate, \$100 per week, yet collected \$864 plus she submitted receipts for child care, which there are judgments for.

F. Start date of October 1, 2009 was not appropriate when a table of income vs. paid support yields large deltas. When one takes a look at my periods of income vs. what I was asked to pay, noting that my employment was not voluntary, August 2008 until December 2008, I was remanded to pay \$2049 per month, or \$12,294 for the 6 month period while I made approximately \$4652 for the entire period. It is not impossible, to reset what the support amount should have been based on actual 2008, and 2009 incomes, and calculating overpayment of child care costs for those years, not even mentioning the 3 months that she was not using the YMCA in 2007 but was paid for it within the original support order, she uses whatever she can to augment her lifestyle including using child support.

G. Judgments for back support do doubly impact Mr. Beach. The set judgments for back support are still being collected by DCS, the additional monies that are showing as owed on all past support judgments including back childcare will be collected by DCS, and yet at the end the judgments for amounts already paid still exist, unless the court remands that the judgments are to be collected from DCS, and once paid can be alleviated by DCS. In essence, once I am caught up with DCS, she can still go after me for those additional judgments and doubly collect the

support arrearages. Although DCS does not add the additional amount they have no responsibility nor power to alleviate them, starting with contempt order Dated June 12, 2009.

H. Mr. Beach was asked to file a fraudulent tax return. Council cites RP 33 fails to note RP 8 where the question and my answer specifically state, “Do you expect to amend the 2008 tax return at all? A. I’m going to have to amend it, yes.” And the report of proceedings October 7, 2009, RP 20 “The reason I did that, Your Honor, was because I knew I already had to file these amendments, and having money owed to the IRS and having it dispersed to me, and then having to repay the IRS for said money didn’t seem like a reasonable responsibility to lie to the IRS.” And which Judge Knight replied “You know what? You got yourself in a jam. I don’t know how you’re going to get out of it, but I ordered you to amend that tax return so that those moneys would be available to your ex-wife so she could get those for support obligations. You decided on your own to amend it and to reduce the tax consequences, and that’s your problem. You did it without any court authorization. I’m standing by. You are now going to file, after I sign this, you’re going to file the exact same tax return that you had in before, but changing that the taxes aren’t going to be applied to next year. And you got yourself into a

jamb, and how you're going to get out of it, I really don't care." Thus I was ordered to file a fraudulent return.

I. Perjury on the part of Mrs. Linares and her Council. Mrs Linares has committed numerous counts of perjury and as I have limited pages in the reply brief, I will keep it short. Starting from her own financial declaration **Exhibit 17** signed August 25 under penalty of perjury: Page 1: Reported Net income "1439" does not match up with either one of her reported net incomes on either of her 2 submitted child support worksheets, exhibits 1. (note: that the two proposed worksheets also have different net income figures for the mother both on pg 2). Page 3 section 4.2, On deposit in banks "160", yet her **Exhibit 16** shows substantially more in her account for that month. Page 3, section 5.1 If her rent is 700 while she is renting, she is paying 15 for Taxes and insurance, how is her total on Page 4, \$915. Section 5.3 does not add up, nor does 5.4. When you add them all up for all expenses 5.12 is less than her amount of 4,151. Now when you go back to Page 1, Monthly household expenses are substantially less than 5221, and much less than 5408 for total expenses. If this declaration was 100% correct as stated as in RP 73, She would be \$3969 indebt every month, and her personal expenses plus tuition would be \$987 per month, and adding a fraction of her vehicle

expenses or her utilities alone wipes out her entire income. In general her income figures, and statements within the RP do match up with much fact. In relation to Council's perjury, I submit **Exhibit C** and **D**, Mrs. Santos' signed request for litigation fees she submitted to Judge Knight, along with my response of errors, they are underlined and refuted.

CONCLUSION

For the above reasons, the Appellant requests that the Court reverse the trial court's summary judgments and strike frivolous claims of Linares set forth in trial, and set support as deemed fair and just for the parties as follows:

1. Specifically in relation to Fathers' income base it on accurate historical information not to be a length of time less than 12 months.
2. Hold Linares responsible for her counts of perjury and award legal fees for cases that were perjured as such to Beach for statements and recorded documentation before Arbitrator, trial judge, and commissioners where evidence exists.
3. Reestablish necessity, reasonableness, and accuracy of child care status of Linares and set proportional shares of expenses

outside of principal care amount accordingly, but not to at any time go over 45% of the obligors total net income.

4. Establish income level for Linares based need to support the children and on decision to go back to school for an additional 3 years.
5. Establish fair support amount for previous years, over paid or underpaid to even out the volatile nature of the case in fluctuating income amounts.
6. Reverse attorney judgments, for litigation up to this point and allow for the amount to be deducted from support obligation over a longer period of time rather than 12 months to maintain supportability of the children in both households.

April 14, 2010

Respectfully submitted,


David Beach

Appellant

EXHIBIT A

Star Technical, Inc.



August 14, 2008

Mr. David Beach
12600 4th Avenue W. # 1C
Everett, WA 98204

David,

As discussed via telephone, I am sorry to confirm that your employment with StarTechnical, Inc. is ending immediately.

The reason for this unexpected change is that our client, The Walt Disney Internet Group, is in the process of reevaluating some initiatives and projects. Unfortunately the work you were doing at Disney is one of the projects that they are stopping to reassess and at this time they don't expect the project to continue.

The change in your employment is in no way a reflection on your work, conduct or attitude. You did an excellent job and the work you did was "solid" per the team at Disney.

I am sorry that this surprised both of us and hope that you find another employment opportunity very quickly.

If we should have something that is a fit for your skills you certainly would be eligible for the position and I would welcome the chance to work with you again.

Thank you and my best wishes.

StarTechnical, Inc.

A handwritten signature in black ink that reads "Jon D. Raymond".

Jon D. Raymond
President

cc: File

10655 NE 4th Street
Suite 701
Bellevue, WA 98004
425.283.5525 Phone
425.283.5565 Fax
800.807.7209 Toll Free
www.StarTechnical.com

EXHIBIT B

How Long Is Nursing School?

How Long is a Nursing School Program?

How long it takes to graduate from a Nursing School program varies depending on the degree or credential sought. The following is a list of available educational and career paths for nurses.

Licensed Practical Nurse (LPN)

Licensed practical nurses--sometimes known as licensed vocational nurses (LVNs)--assist registered nurses and provide basic patient care. Nursing School programs for LPNs are typically one year long and involve classroom work as well as supervised clinical experience. LPN training is available through vocational-technical schools and community colleges.

Diploma in Nursing

To become a registered nurse (RN), candidates must complete a diploma, associate's degree or bachelor's degree in Nursing. Diploma programs are only offered by certain hospitals and are therefore not as prevalent as degree programs. Earning a diploma qualifies licensed graduates for entry-level RN positions. Nursing diploma programs are typically three years long.

Associate Degree in Nursing (ADN)

An associate's degree in Nursing is another educational option for prospective RNs. Nursing School ADN programs last between two and three years and are offered by community colleges. Students study Nursing fundamentals--including anatomy, physiology and nutrition--as well as useful related topics, such as psychology. Upon graduation, RNs holding an associate's degree are qualified for entry-level work as long as they obtain the necessary licensing.

Bachelor of Science in Nursing (BSN)

Similar to a diploma or ADN, a bachelor's degree in Nursing can lead to a career as a registered nurse. However, due to the more in-depth study and experience required for a BSN, RNs holding bachelor's degrees may find better job opportunities and faster advancement in the profession. BSN programs are offered by postsecondary schools and are eight semesters long on a traditional schedule. Many RNs who enter the field with a diploma or ADN choose to pursue a BSN while working full-time; specific Nursing School programs--known as RN-to-BSN programs--are available for this purpose.

Master of Science in Nursing (MSN)

A master's degree in Nursing is generally needed for administrative positions as well as highly specialized care; additionally, earning an MSN opens opportunities in teaching and research. Graduate Nursing programs are offered by colleges and universities; admission to MSN programs requires a bachelor's degree. Nursing School programs for MSN degrees are two years long and involve classroom study, research and clinical experience. At minimum, candidates must hold an MSN before becoming advanced practice nurses.

Advanced Practice Nurse (APN) and Doctor of Nursing Practice (DNP)

An advanced practice nurse may be a nurse practitioner, clinical nurse specialist, certified nurse midwife or certified registered nurse anesthetist; advanced practice nursing is how all four of these specialized professions are described. Although an MSN is currently the prerequisite to becoming an APN, eventually a Doctor of Nursing Practice (DNP) degree will be needed for advanced practice licensure. The DNP is a degree focused on clinical work rather than research and is intended specifically to prepare candidates for APN licensure. Nursing School DNP programs may last from 1-3 years, depending candidates' previous education and experience.

EXHIBIT C

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

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SNOHOMISH

In re the Marriage of:
MARY LEE LINARES,

Petitioner,

v.

DAVID R. BEACH,

Respondent.

NO. 05-3-00844-1

MOTION FOR ATTORNEY AND
LITIGATION FEES FOR APPEAL

I. Relief Requested

Mary Linares [Name of party] moves the court for an order re: Motion for Attorney and Litigation fees for Appeal granting the following relief:

Award the mother \$5,000 in attorney and litigation fees for defense of the appeal filed by the respondent.

II. Statement of Facts/Statement of Grounds

The mother filed a motion for adjustment of child support in the summer of 2008. After several continuances at the respondent's request the hearing was held on August 4, 2008. The court entered a temporary order of child support and daycare at about \$2,000 and set a 90 day review to allow both parties to supplement the record. The respondent apparently lost his job the next week and filed a Petition for Modification of Child Support. The respondent failed to pay the full child support and did not pay the daycare resulting in the children losing their daycare spots. The respondent started to claim

1 unemployment benefits but as soon as DCS caught up with his unemployment benefits to start garnishing
2 the respondent stopped claiming his unemployment benefits and the mother did not receive child support
3 for September, October, and November 2008.

4 The review hearing was held in December 2008 and the court reluctantly reduced the respondent's
5 child support payment based on his unemployment income. The court ordered the respondent to notify the
6 mother and her counsel within 2 days of being reemployed so the mother could ask the court for an
7 adjustment. The respondent was re-employed and started working seven days after the hearing but did not
8 notify the mother or her attorney. The respondent was making \$50 an hour (\$45 per hour then \$5 at the
9 end of the contract for each hour worked) 40 hours a week. The matter was transferred to arbitration in
10 mid January.

11 Arbitration was held in the beginning of March 2009 and an arbitration award was filed. The
12 respondent filed for Trial de Novo which was scheduled for September 18, 2009. At this time the
13 respondent was only paying about \$484 a month in child support for two children but was making over
14 \$8,500 a month at his job. The mother filed a motion for adjustment of the temporary order of child
15 support which was denied as the court felt that the matter was transferred to arbitration and jurisdiction
16 was still with the arbitrator. The mother filed a motion for revision which was granted by judge
17 Castleberry and a new temporary order was entered. The court made several findings including that "it is
18 not a change of circumstances if the father becomes unemployed again. It is clear given the totality of the
19 circumstances that the father loses a job when child support is raised and gets a job when child support is
20 lowered." The mother was awarded temporary attorney fees in the amount of \$3,000 which the father has
21 never paid. The order of child support entered on that day had an error in start date (said to start in April
22 2008 and should have started in April 2009) so an amended order of child support was entered in June
23 2009.
24
25
26

1 The respondent did not pay his full child support and did not pay his daycare obligation so the
2 mother filed a motion for contempt which was heard on June 12, 2009. The respondent was found in
3 contempt for failure to pay child support and daycare. The mother was awarded \$1,200 in attorney fees
4 which the respondent has never paid. The order on contempt gave the respondent several ways to purge
5 the contempt including paying an additional \$500 a month for current and past daycare, which the
6 respondent did not do, he was also to file his 2008 taxes by August 15, 2009 so the mother could get the
7 tax return to offset some of the arrears. The respondent filed his taxes in August 2009 but checked the box
8 asking the IRS to apply his \$7,000 tax return to his 2009 taxes.

9 The trial was a one day trial held on September 18, 2009. The court made several findings
10 regarding the respondent's behavior and set the new order of child support on his year to date income and
11 made him responsible for his proportionate share of daycare. The respondent has filed an appeal from the
12 trial court's decision. **Exhibit 1.**

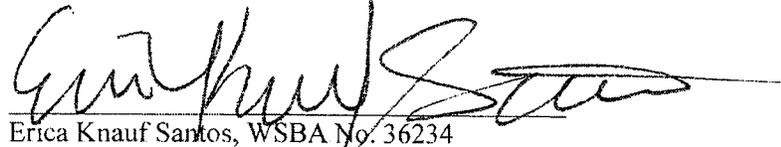
13 As several judicial officers including the trial court have found that the mother's schooling is
14 necessary for her to provide for her children. She was in a field that is in severe decline (escrow) and is
15 going into a field (nursing) that is in high demand. The respondent has paid nothing towards his
16 outstanding attorney fee judgments currently about \$11,000. The mother does not have the money to
17 support her children while the respondent refuses to pay all his support and daycare and pay for the
18 necessary attorney and litigation fees for an appeal. This appeal is nothing more than continued
19 harassment against the mother. The respondent stated to the trial court, to the mother and to her counsel
20 that he intended to file bankruptcy to discharge the attorney fees awards. He has further threatened the
21 mother, in front of her attorney, that he intended to "take her down through the courts" and "would not
22 stop till he destroyed her".

23
24 The mother requests \$5,000 in attorney fees to be paid to Knauf Santos Law, PLLC within 15 days
25 of this order so she can proceed with defending the appeal. There are substantial administrative costs the
26

1 mother will need to pay within the next 30 days that she is unable to pay given her limited income and
2 full time class load.

3
4 I declare under penalty of perjury under the laws of the state of Washington that the foregoing is
5 true and correct.

6 Signed at Seattle, [City] WA [State] on 1-26-10 [Date].

7
8 
Erica Knauf Santos, WSBA No. 36234

9 **III. Statement of Issues/Argument**

10 Whether the mother should be awarded \$5,000 in attorney and litigation fees to defend the appeal
11 filed by the respondent?

12 **IV. Evidence Relied Upon**

13
14 This motion and the relevant files in this matter.

15 **V. Legal Authority**

16 RAP 7.1 states: Authority of trial court before review accepted. The trial court retains full authority
17 to act in a case before review is accepted by the appellate court, unless the appellate court directs
18 otherwise as provided in rule 8.3.

19 RAP 7.2(a) states: Generally. After review is accepted by the appellate court, the trial court has
20 authority to act in a case only to the extent provided in this rule, unless the appellate court limits or
21 expands that authority as provided in rule 8.3.

22 RAP 7.2 (d) states: Attorney Fees and Litigation Expenses On Appeal. The trial court has
23 authority to award attorney fees and litigation expenses for an appeal in a marriage dissolution, a legal
24 separation, a declaration of invalidity proceeding, or an action to modify a decree in any of these
25 proceedings, and in any other action in which applicable law gives the trial court authority to
26

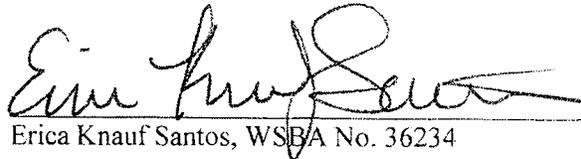
1 do so.

2 This court has the authority under the Rules of Appellate Procedure to award the mother attorney
3 and fees for her defense of the appeal and the mother is in need of an award of attorney and litigation fees.
4 The respondent has made over \$58,000 so far this year during his five months of contract work and six
5 months of unemployment. The mother has made approximately \$20,300 so far on her unemployment and
6 had been having to shoulder the shortfall of the respondent's refusal to pay the full child support and
7 daycare in the last 11 months.

8
9 **VI. Proposed Order**

10 A proposed Order accompanies this motion.

11 Date: 1-26-10


Erica Knauf Santos, WSEA No. 36234

Knauf Santos Law, PLLC
3518 Fremont Ave North, #120
Seattle, WA 98103

12 Notice to party: You may list an address
13 that is not your residential address where
14 you agree to accept legal documents. Any
15 time this address changes while this action is
16 pending, you must notify the opposing
17 parties in writing and file an updated
18 Confidential Information Form (WPF
19
20
21
22
23
24
25
26

Form 1. Notice of Appeal
(Trial Court Decision)
[Rule 5.3a]

SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY

DAVID BEACH)
Petitioner,) No. 05-3-00844-1
) Notice of Appeal to
v.) Court of Appeals
)
MARY LINARES,)
Respondent.)

DAVID BEACH, plaintiff, seeks review by the designated appellate court of the Order of Child Support, Order on Modification of Child Support, Findings/Conclusions on Petition for Modification of Child Support, and associated judgments. The decisions entered there in were entirely based on intentional deception misinformation and false statements before the court by Mary Linares and Council, hence all of the findings are in need of review and correction entered on October 7, 2009

A copy of the decisions are attached to this notice.
11/4/2009

Signature



Petitioner

Petitioner:
David Beach (ProSe)
12600 4th Ave W #1C
Everett, WA 98204

Respondent:
Mary Linares
2406 Everett Ave
Everett WA 98201

Attorney for Respondent:
ERICA KNAUF SANTOS, WSBA #36234
KNAUF SANTOS LAW, PLLC
600 North 36th St. Suite 202
Seattle WA 98103

Exhibit 1

EXHIBIT D

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 SNOHOMISH COUNTY

In re the Marriage of)	
)	
MARY L. LINARES,)	
)	No. 05-3-00844-1
Petitioner,)	
)	DECLARATION OF DAVID
and)	BEACH IN RESPONSE TO MOTION
)	FOR ATTORNEY & LITIGATION
DAVID R. BEACH,)	FEEES FOR APPEAL AND MOTION
)	TO CORRECT FINAL ORDER OF
Respondent.)	CHILD SUPPORT
)	

I, David Beach, declare as follows:

1. My name is David Beach. I am the respondent in this matter, over the age of eighteen, competent to testify, and have personal knowledge of the facts set forth herein.

2. MOTION TO CORRECT TITLE OF FINAL ORDER OF CHILD SUPPORT: The order that was presented and entered by Knauf Santos Law, and signed by Judge Knight is already under appeal in Division I. The order is in place and whether or not it states "Temporary" or "Final" has no bearing on sustainability, but if it was an issue for Erica Santos, should have been taken care of prior to the presentation hearing and not after the order was appealed (RPC RULE 1.1). This motion to correct the final order at this time only serves to convolute the appeal process and requires Me to incur

1 additional expenses to re-file documents to the appeals court that have already been
2 filed. Additionally, since the document is already under appeal the correction of this
3 motion should fall outside of the jurisdiction of this court once the appeal was filed.
4 There is no filed stay of this order and both parties are already subject to it's ruling, as
5 noted by the filing of the Petitioner's contempt motion, and additional modification
6 should be denied until after the appeal is heard.

7
8 3. MOTION FOR ATTORNEY AND LITIGATION FEES FOR APPEAL:

9 The respondent in the Appeal, MARY LEE LINARES, has substantially more income
10 available to her than the Appellant, DAVID BEACH. Mary has an income of \$1849,
11 and an additional ~\$1299 that she is receiving in support for a total of ~\$3148 per
12 month. Whereas I, David, is trying to live on ~\$1058 per month. I do not have the
13 \$5000 to pay for her litigation fees, nor do I have the means to acquire such funds to the
14 end such that I do not have any legal representation in the appeal.

15 The appeal was initiated on my own and I was advised to do it myself as I
16 did not have the funds to continue to pay for representation and as my previous
17 representations have been unwilling to point out to the courts the lies, hearsay, irrelevant
18 statements, and subversions by Mary Linares and Erica Knauf Santos. My previous
19 Attorneys have always stated that the lies/manipulations they tell are irrelevant, the
20 courts will see the truth, and they will not hold Mary or Erica in contempt of court for
21 perjury, fine them, or hold them to their statements as it is too much effort when the case
22 at hand is a simple matter of Child Support. This is not good law.

23 Even within the motion filed and signed by Erica Knauf Santos under penalty of perjury
24 there are many inflammatory, irrelevant, and factually/truthfully inaccurate
25 "Facts/Statements" contained within her Grounds for requested relief:

26 a . Page 1 approximately Line 24: "The respondent failed to pay the full
27 child support and did not pay the daycare resulting in the children losing their daycare

1 spots.” The Fact is that Child Care was included in the aforementioned order and as I
2 was unemployed and had no income other than the approximate \$2000 per month in
3 unemployment it is not reasonable and feasible to for me to give all of my income to
4 DCS for support, I have a right to live.

5 b. Page 2 Lines 2 through 3: “the mother did not receive child support for
6 September, October, and November 2008.” This is a lie. The petitioner already stated in
7 court and via DCS statements that they provided, that there were payments within that
8 timeframe, **Exhibit 1**.

9 c. Page 2 Lines 7 through 8: reference to respondent “started working seven
10 days after the hearing but did not notify the mother or her attorney”. Untrue, **Exhibit 2**,
11 e-mails to Mother and between Father and his attorney both dated within 2 days of
12 employment and the email header information from the mail sent to the mother that
13 cannot be altered.

14 d. Page 2. Lines 11-15: Relevant parts, “March 2009”, relating to
15 respondent, “was making over \$8500 a month at his job”. Again this is not the truth, I
16 was making \$45/hr, figure 40 hours per week, multiplied by 4.3 yields only \$7740 for a
17 short period of time **Exhibit 3**. Council continues to misrepresent incomes for both
18 parties, too high for respondent, and too low for petitioner. This is precisely a reason for
19 the appeal.

20 e. Page 3. Lines 17-20 “The Mother does not have the money to support her
21 children while the respondent refuses to pay all his support and daycare” and “This
22 appeal is nothing more than continued harassment against the mother”. This is simply
23 inflammatory and while I admit I am unable to afford to pay \$1158 plus ~\$329 in child
24 care costs it is not a refusal to do so as “Knauf Santos Law” states it. It simply is
25 currently usury above 50% of my income. Furthermore, in looking back on the case, all
26 except a few motions have been filed by petitioner and as such the vast majority of the
27 documents state MARY LEE LINARES as petitioner NOT DAVID BEACH; the

1 harassment through the court system has been initiated by Knauf Santos Law contrary to
2 the opinion of Mrs. Santos.

3 f. Page 3 Lines 21 through 23: "He has further threatened the mother, in
4 front of her attorney, that he intended to 'take her down through the courts' and 'would
5 not stop till he destroyed her.'" This statement as a quote is hearsay, irrelevant, and a lie
6 as I deny making such a statement. Thus as it being a Statements as fact, is not a fact at
7 all and, is only intended, much like other specific wording of the Petitioner and council,
8 to vilify me and sway the court their direction without the truth being actually heard.

9 g. Page 5 Line 6: "respondent's refusal to pay the full child support and
10 daycare in the last 11 months" Once again inflammatory remarks to sway the courts
11 when I am not making enough on unemployment to pay everything the petitioner has
12 demanded and maintain my household, it becomes a "refusal" to pay rather than an
13 obvious inability. Also, when noted that according to DCS as of 7-30-2009, I was only
14 in arrears by \$441, so obviously I have been paying (Spreadsheet of Payments and DCS
15 Statement provided) **Exhibit 4**.

16 h. Page 4 Lines 4 through 6: "I declare under penalty of perjury under the
17 laws of the state of Washington that the foregoing is true and correct. Signed at Seattle,
18 WA, on 1-26-10", "By Erica Knauf Santos, WSBA No.36234". Although a member of
19 the Washington State Bar Association, there is no legal merit, acceptable reason, nor a
20 statute (that I can locate) that allows one to lie in a declaration or motion to the
21 Snohomish County Courts, or any Court within the United States of America without
22 punishment or punitive penalty. As such, this is what the Appeal is based on versus the
23 facts in the case, and so; the Petitioner nor her representation should be awarded
24 litigation fees for continuing to demonstrate their abuse of the Laws governing the
25 WSBA and the State Of Washington.

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

4. Statement of Issues/Argument:

In direct relation to the entirety of the sworn statement of Council that is signed under penalty of perjury; there is obviously intent to deceive the Court or an explicit intent to disregard and misrepresent statements as fact regardless of her own evidences presented in previous trials and hearings to sway the outcome in her favor, especially when they are added to the inflammatory, irrelevant, and attempted vilifying statements. Thus constituting the definition via intent of Perjury in the first or second degree.

I do not have currently, nor do I have access to, an additional \$5000 in funds for litigation fees. If I had additional funds, they would have gone to the outstanding child support obligation or child care costs, and anything remaining would have gone to hire litigation for myself at the appeal.

Allowing the award in legal fees will only result in an additional contempt hearing where council will again fraudulently be allowed to misstate that I “had or have” the ability to pay the fees, when I do not. This will incur additional fees on her client’s behalf; while I will be, again, forced to contact a public defender to represent me at the hearing.

5. LEGAL AUTHORITY:

RPC RULE 1.1 states:

“A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.”

Comment Section 5 States:

“Competent handling of a particular matter includes inquiry into and analysis of the factual and legal elements of the problem, and use of

1 methods and procedures meeting the standards of competent practitioners. It
2 also includes adequate preparation. The required attention and preparation
3 are determined in part by what is at stake; major litigation and complex
4 transactions ordinarily require more extensive treatment than matters of
5 lesser complexity and consequence. An agreement between the lawyer and the
6 client regarding the scope of the representation may limit the matters for
7 which the lawyer is responsible. See Rule 1.2(c).”

8 **RPC RULE 4.1 states:**

9 “In the course of representing a client a lawyer shall not knowingly:

- 10 (a) make a false statement of material fact or law to a third person; or
11 (b) fail to disclose a material fact to a third person when disclosure is
12 necessary to avoid assisting a criminal or fraudulent act by a client,
13 unless disclosure is prohibited by Rule 1.6.

14 **Comment Section 2 States”**

15 “This Rule refers to statements of fact. Whether a particular
16 statement should be regarded as one of fact can depend on the
17 circumstances. Under generally accepted conventions in negotiation, certain
18 types of statements ordinarily are not taken as statements of material
19 fact. Estimates of price or value placed on the subject of a transaction
20 and a party's intentions as to an acceptable settlement of a claim are
21 ordinarily in this category, and so is the existence of an undisclosed
22 principal except where nondisclosure of the principal would constitute
23 fraud. Lawyers should be mindful of their obligations under applicable law
24 to avoid criminal and tortious misrepresentation.”

25
26 **RCW 9A.72.010 Relevant parts State:**

- 27 (1) "Materially false statement" means any false statement oral or written, regardless

1 of its admissibility under the rules of evidence, which could have affected the course or
2 outcome of the proceeding; whether a false statement is material shall be determined by
3 the court as a matter of law;

4 (2) "Oath" includes an affirmation and every other mode authorized by law of
5 attesting to the truth of that which is stated; in this chapter, written statements shall be
6 treated as if made under oath if:

7 (a) The statement was made on or pursuant to instructions on an official form bearing
8 notice, authorized by law, to the effect that false statements made therein are punishable;

9 (b) The statement recites that it was made under oath, the declarant was aware of such
10 recitation at the time he or she made the statement, intended that the statement should be
11 represented as a sworn statement, and the statement was in fact so represented by its
12 delivery or utterance with the signed jurat of an officer authorized to administer oaths
13 appended thereto; or

14 (c) It is a statement, declaration, verification, or certificate, made within or outside
15 the state of Washington, which is certified or declared to be true under penalty of perjury
16 as provided in **RCW 9A.72.085 which states:**. Whenever, under any law of this state or
17 under any rule, order, or requirement made under the law of this state, any matter in an
18 official proceeding is required or permitted to be supported, evidenced, established, or
19 proved by a person's sworn written statement, declaration, verification, certificate, oath,
20 or affidavit, the matter may with like force and effect be supported, evidenced,
21 established, or proved in the official proceeding by an unsworn written statement,
22 declaration, verification, or certificate, which:

23 (1) Recites that it is certified or declared by the person to be true under penalty of
24 perjury;

25 (2) Is subscribed by the person;

26 (3) States the date and place of its execution; and

27 (4) States that it is so certified or declared under the laws of the state of Washington.

1 **RCW 9A.72.020 states:**

2 (1) A person is guilty of perjury in the first degree if in any official proceeding he makes
3 a materially false statement which he knows to be false under an oath required or
4 authorized by law.

5 (2) Knowledge of the materiality of the statement is not an element of this crime, and
6 the actor's mistaken belief that his statement was not material is not a defense to a
7 prosecution under this section.

8 (3) Perjury in the first degree is a class B felony.

9 **RCW 9A.72.030 states:**

10 (1) A person is guilty of perjury in the second degree if, in an examination under oath
11 under the terms of a contract of insurance, or with intent to mislead a public servant in
12 the performance of his or her duty, he or she makes a materially false statement, which
13 he or she knows to be false under an oath required or authorized by law.

14 (2) Perjury in the second degree is a class C felony.

15
16
17
18
19
20
21 I declare under penalty of perjury under the laws of the state of Washington that the
22 foregoing is true and correct Signed at Everett, WA, on February 9, 2010.

23
24 _____
25 David Beach
26

TOTAL EARNINGS

2430.00

2430.00

EMPLOYER INFORMATION

LINCOLN BAY
1000 2ND AVE
SUITE 1900
SEATTLE, WA 98104

FILING STATUS

S 08

TAX TYPE

SOC SEC
MEDICARE
FEDERAL

AMOUNT

150.66
35.24
165.85

YTD AMOUNT

150.66
35.24
165.85

PAY PERIOD 12/15/08 TO 12/28/08
CHECK DATE 01/02/09 CHECK # 5853

TOTAL WITHHOLDINGS

351.75

351.75

PERSONAL INFORMATION

DAVID R BEACH
12600 4TH AVE W. APT#1C
EVERETT WA 98204

ADJUSTMENTS

GARN

AMOUNT

1039.13 -

YTD AMOUNT

1039.13 -

SS# XXX-XX-3365 EMPL# 000074 DEPT# 000100

TOTAL ADJUSTMENTS

1039.13-

State of Washington
Division of Child Support

Disbursement History

9/8/2009 7:10:11 AM - 4509

NCP: BEACH, DAVID ROBERT

IV-D Case#: 1855892

CP: LINARES, MARY LEE

Process Date	Payment Number	Disb Type	Amount Disb	Pass Through	Check Number	Original Check	Status	Date	Reason
09/04/09	090409F042202	MEDI	302.00	0.00	49859598		EFT	09/10/09	01 - EFT issued
08/19/09	081909F562921	MEDI	293.00	0.00	49676214		EFT	08/24/09	01 - EFT issued
08/18/09	081809F553797	MEDI	293.00	0.00	49664976		EFT	08/21/09	01 - EFT issued
08/10/09	081009F445159	MEDI	293.00	0.00	49560149		EFT	08/13/09	01 - EFT issued
07/30/09	073009F274486	MEDI	293.00	0.00	49432083		EFT	08/04/09	01 - EFT issued
07/27/09	072709F209163	MEDI	293.00	0.00	49368130		EFT	07/30/09	01 - EFT issued
07/17/09	071709F090248	MEDI	293.00	0.00	49303668		EFT	07/22/09	01 - EFT issued
07/10/09	071009F013233	MEDI	293.00	0.00	49230691		EFT	07/15/09	01 - EFT issued
07/06/09	070609F921235	MEDI	293.00	0.00	49149118		EFT	07/09/09	01 - EFT issued
06/28/09	062809F779249	MEDI	293.00	0.00	49051947		EFT	07/01/09	01 - EFT issued
06/22/09	062209F688178	MEDI	293.00	0.00	48993900		EFT	06/25/09	01 - EFT issued
06/15/09	061509F603126	MEDI	22.00	0.00	48922142		EFT	06/18/09	01 - EFT issued
06/12/09	061209F589237	MEDI	270.00	0.00	48910728		EFT	06/17/09	01 - EFT issued
06/08/09	060809S005159	MEDI	341.07	0.00	48655427		EFT	06/11/09	01 - EFT issued
05/26/09	052609S002072	MEDI	341.07	0.00	48676060		EFT	05/29/09	01 - EFT issued
05/11/09	051109S006664	MEDI	341.07	0.00	48532078		EFT	05/14/09	01 - EFT issued
04/28/09	042809S002675	MEDI	341.07	0.00	48367173		EFT	05/01/09	01 - EFT issued
04/13/09	041309S004110	MEDI	341.07	0.00	48207981		EFT	04/15/09	01 - EFT issued
03/30/09	033009S005935	MEDI	341.07	0.00	48020425		EFT	04/02/09	01 - EFT issued
03/16/09	031609S004645	MEDI	341.07	0.00	47881183		EFT	03/19/09	01 - EFT issued
03/03/09	030309S003571	MEDI	341.07	0.00	47739335		EFT	03/06/09	01 - EFT issued
02/17/09	021709S009615	MEDI	341.07	0.00	47559153		EFT	02/20/09	01 - EFT issued
02/02/09	020209S006120	NA	341.07	0.00	47397516		EFT	02/05/09	01 - EFT issued
01/21/09	012109F502102	NA	1,102.48	0.00	47262590		EFT	01/28/09	01 - EFT issued
01/21/09	012109F499799	NA	100.00	0.00	47261794		EFT	01/26/09	01 - EFT issued
01/08/09	010809F346719	NA	1,039.13	0.00	47130963		EFT	01/13/09	01 - EFT issued
10/23/08	102308F317147	NA	245.00	0.00	46292601		EFT	10/28/08	01 - EFT issued
10/20/08	102008F266077	NA	270.00	0.00	46246443		EFT	10/23/08	01 - EFT issued
09/02/08	090208S005467	NA	991.89	0.00	45758510		EFT	09/05/08	01 - EFT issued
08/18/08	081808S002567	NA	821.00	0.00	45611350		EFT	08/21/08	01 - EFT issued
08/04/08	080408S012607	NA	821.00	0.00	45484730		EFT	08/07/08	01 - EFT issued
07/21/08	072108S010130	NA	821.00	0.00	45330615		EFT	07/24/08	01 - EFT issued
07/07/08	070708S001850	NA	821.00	0.00	45178351		EFT	07/10/08	01 - EFT issued
06/16/08	061608S011932	NA	746.00	0.00	44970932		EFT	06/19/08	01 - EFT issued
	Total		14,713.20	0.00					

Total Case Payments printed for IVD # 1855892 : 34

David Beach

From: David Beach [gunrunner_usmc@hotmail.com]
Sent: Wednesday, December 17, 2008 2:18 PM
To: Mary Linares
Subject: I have a job and you will be getting support via DCS soon.