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COURT OF APPEALS DIVISION I OF THE STATE OF
WASHINGTON

In re the Marriage of:

SYLVIA FLYNN,

**Respondent/Cross-
Appellant,**

vs.

DENNIS FLYNN,

**Appellant/Cross-
Respondent.**

COA No. 64429-7

KCSC No. 07-3-03533-3 KNT

APPELLANT'S OPENING BRIEF

A handwritten signature, possibly "Christopher Carney", is written over a circular stamp. The stamp contains the text "SUPERIOR COURT OF WASHINGTON" around the perimeter.

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INTRODUCTION

This appeal relates to the dissolution of the marriage of Sylvia Flynn (hereafter “Sylvia”)(Petitioner below, Respondent on Appeal), and Dennis Flynn (hereafter “Dennis”)(Respondent below, now Appellant).¹ The trial on this matter was distinguished by Sylvia’s extensive allegations of marital misconduct against Dennis. The trial court responded by abusing its discretion in favoring Sylvia with literally the most one-sided property division that was practically possible given the parties’ assets, as well as by imposing unsupported limitations on Dennis in the parenting plan. Dennis now appeals, requesting remand for a reasonably equitable property division and relief from the unsupported parenting plan restrictions.

ASSIGNMENTS OF ERROR

1. The court erred when it made a disproportionate property division in favor of Sylvia.

Issue: did the court fail to consider Dennis’s economic circumstances, which included disability and living in a residence without running water?

2. The court erred when it based a disproportionate property division in favor of Sylvia on alleged waste of community assets by Dennis.

¹ First names are used for clarity. No disrespect is intended.

Issue: did the court err in awarding to Sylvia a disproportionate share of community assets, where the allegedly wasted assets were not before the dissolution court?

3. The court erred in assigning a value of \$679,000.00 to the parties' real property located at 15415 SE 240th Street, Kent Washington.

Issue: did the court err in assigning a value to the property that was not supported by substantial evidence and was outside the range of values to which the parties' experts testified?

4. The court erred in either failing to make a clear finding of the value of the parties' property located at 9164 SE Fragaria Road, Olalla, Washington, or in assigning a value to it not based on substantial evidence which differed from uncontradicted expert testimony.

Issue: did the court err in not clearly assigning a value to the Olalla property, or to the extent that the court's comments can be taken as an assignment of value, did the court err in assigning a value that is not based on substantial evidence and which was higher than the uncontradicted expert testimony in the case?

5. The court erred in finding that maintenance was appropriate in this case.

Issue: did the court err in finding that maintenance should be awarded to Sylvia and in further finding that Sylvia should receive a disproportionate share of the community assets in lieu of maintenance, where it did not fairly consider the statutory factors and explicitly acknowledged Dennis did not have the ability to pay in light of his disability.

6. The court erred in basing restrictions in the final parenting plan against Dennis.

Issue: did the court err in basing restrictions against Dennis on "the absence or substantial impairment of emotional ties between parent and child," where the only evidence cited by the court to support this finding was not caused by Dennis, and where the court's finding is in opposition to uncontradicted expert testimony?

7. The court erred in conditioning Dennis's visitation with his son on the completion of a sexually deviancy evaluation.

Issue: did the court err in ordering Dennis to undergo a sexual deviancy evaluation when no limiting factors apply in this case, and where uncontradicted expert testimony did not support the need for the evaluation?

8. The court erred in awarding attorney's fees to Sylvia at Dennis's expense.

Issue: was it error to order Dennis to pay Sylvia's attorney's fees where there was no substantial evidence of Dennis's ability to pay nor was there a finding of ability to pay?

9. The court erred in its valuations of deeds of trust awarded to Dennis.

Issue: did the court err in valuing deeds of trust at face value without substantial evidence, when testimony was clear that they are in fact worthless?

10. The court erred in considering "marital fault."

Issue: did the court err in tailoring its property distribution and parenting plan in an apparent effort to punish Dennis for alleged marital fault?

STATEMENT OF THE CASE

The parties were married in 1989, and have two children. 1 Verbatim Report of Proceedings (VRP) (July 29, 2009), at 23. The oldest, a daughter named M.F., reached the age of 18 before trial and was not addressed by the parenting plan. The younger child is a boy named K.F., who turned 12 on July 5, 2009. *Id.* Until separation, Respondent had a close relationship with K.F. and spent a lot of time participating in K.F.'s

activities. 6 VRP (August 6, 2009), at 694-695; 5 VRP (August 5, 2009), at 473-475, 488-489, 499-504.

Dennis brought substantial separate property to the marriage, which he contributed to the community. 4 VRP (August 4, 2009), at 380-383.

During the parties' marriage, they purchased a mortgage company, United Mortgage, and operated it together initially. 4 VRP (August 4, 2009), at 408-410. Over time, Petitioner spent less and less time working in the business and for many years prior to the parties' separation, Respondent was almost exclusively responsible for maintaining the business, which generated the majority of the parties' income. 4 VRP (August 4, 2009), at 411-414.

By 2007, the parties' marriage had deteriorated and in late June 2007 they agreed to separate and attend marriage counseling. 1 VRP (July 29, 2009), at 34. Respondent moved into the parties' vacation home in Olalla, Washington. Id. Respondent later admitted to Petitioner that around this time he had briefly had an extra-marital affair with a woman who worked with him at United Mortgage. Id.

Shortly after Respondent's admission of infidelity, he planned a vacation with a close friend. Initially, the vacation was planned for Mexico, but the destination was later changed to Thailand. Because the

parties were barely on speaking terms at this point, Respondent did not mention to Petitioner that his plans had changed. Petitioner did eventually find out that Respondent went to Thailand. 1 VRP (July 29, 2009), at 34; 7 VRP (August 11, 2009), at 767-768.

Respondent was out of the country on vacation in Thailand from October 14-24 of 2007. On October 30, 2007, Petitioner called police accusing Respondent of possessing child pornography on his computer. 1 VRP (July 29, 2009), at 35. Petitioner told several inconsistent stories about how she allegedly came to find child pornography on Respondent's computer, stating essentially that she had found a CD containing child pornography in Respondent's home. 1 VRP (July 29, 2009), at 35, 37; 4 VRP (August 4, 2009), at 327-335. Petitioner's stories were contradicted by independent witnesses. 5 VRP (August 5, 2009), at 478-479; 6 VRP (August 6, 2009), at 583-588.

Computer forensic examination later revealed that the pornography was likely downloaded accidentally by use of the file-sharing software Limewire. 5 VRP (August 5, 2009), at 522, 526-532. The forensic examination also established that a CD containing alleged child pornography was burned using Respondent's computer while he was out of the country. 5 VRP (August 5, 2009), at 542-546. This evidence was bolstered by keylogging software which had captured photographic

evidence of an individual other than Dennis Flynn downloading apparent child pornography. 5 VRP (August 5, 2009), at 536-541. Finally, forensic examination of the evidence given to police by Sylvia established that the DVD containing alleged child pornography was not produced by Dennis's computer and did not contain files that had ever been on Dennis's computer. 5 VRP (August 5, 2009), at 532-533.

Following the completion of the computer forensic examination, charges against Respondent were dismissed. 4 VRP (August 4, 2009), at 308; 6 VRP (August 6, 2009), at 700, 710.

Following and likely due in large part to the stress of the criminal charges, Respondent was found to be disabled as the result of depression and anxiety. His condition is well-managed by medication, but continues to prevent him from working. He receives monthly disability benefits, a large portion of which are paid to Petitioner in lieu of child support. 6 VRP (August 6, 2009), at 593-596, 599, 646-648.

The parties owned as community property four houses and one office building, as well as considerable personal property and motor vehicles. The parties also held promissory notes and deeds of trust remaining from their now-defunct mortgage business. In addition, the parties carried considerable real estate and consumer debt which must be allocated. The court favored Sylvia with literally the most

disproportionate share of the community assets that was possible with the parties' marital estate. Clerk's Papers ("CP") 89, at 7; CP 86, at 4-7.

ARGUMENT

1. The Court Abused its Discretion in Awarding a Disproportionate Share to Sylvia without Fairly Considering the Statutory Factors

A trial court's distribution of property is reviewed for abuse of discretion. In re Marriage of Rockwell, 141 Wash.App. 235, 242, 170 P.3d 572 (2007). In dividing community assets, RCW 26.09.080 requires the court to consider a nonexclusive list of factors:

- (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.

These statutory factors are not limiting and the trial court may consider other factors such as "the health and ages of the parties, their prospects for future earnings, their education and employment histories, their necessities and financial abilities, their foreseeable future

acquisitions and obligations, and whether the property to be divided should be attributed to the inheritance or efforts of one or both of the spouses.” In re Marriage of Urbana, 147 Wash.App. 1, 11, 195 P.3d 959 (2008)(citing In re Marriage of Olivares, 69 Wash.App. 324, 329, 848 P.2d 1281 (1993), In re Marriage of Zahm, 138 Wash.2d 213, 218, 978 P.2d 498 (1999)). In this inquiry, “the economic circumstances of each spouse upon dissolution are of paramount concern.” Id. If “the decree results in a patent disparity in the parties’ economic circumstances, a manifest abuse of discretion has occurred.” Rockwell, 141 Wash.App. at 243.

At the time of trial, Sylvia had spent the time since the parties’ separation living in the parties’ luxurious home, whereas Dennis had spent the same time living in an unfinished cabin with no running water and an unfinished bathroom. 6 VRP (August 6, 2009), at 658-659, 678. Dennis is disabled, giving him few options to improve his economic circumstances in the future. 6 VRP (August 6, 2009), at 593, 599. The court then perpetuated the disparity in the parties’ economic circumstances by disproportionately favoring Sylvia in the property distribution. Clearly, there is a patent disparity in the parties’ economic circumstances, and the court abused its discretion with regard to the property distribution.

2. The Court Abused its Discretion in Awarding a Disproportionate Share Based on Alleged “Waste” of Community Assets by Dennis

The court awarded Sylvia a disproportionate share of the community assets, asserting that the record showed that Dennis “intentionally squandered community assets[.]” CP 89, at 7.² The court appears by this to be referring to the parties’ loss of a property located at 26815 233rd Place SE, in Maple Valley, Washington, which the court eventually purported to award to Dennis. CP 89, at 4.

Dennis clarified that the property was purchased from the parties by a family friend, Doug Watson. Dennis collects rent on Mr. Watson’s behalf and transfers it to Mr. Watson, but does not own the property. Title is in the Mr. Watson’s name. 5 VRP (August 5, 2009), at 458-460.

When distributing property upon dissolution, the “trial court focuses on the assets then before it;” “if one or both parties disposed of an asset before trial, the court simply has no ability to distribute that asset at trial.” In re Marriage of Kaseburg, 126 Wash.App. 546, 556, 108 P.3d 1278 (2005). It “is abuse of discretion to allow a challenge” on grounds of waste “when the allegations focus on debts and property that are not before the dissolution court.” Id., at 1286.

² For unknown reasons, the last 5 pages of the court’s Findings of Fact and Conclusions of Law are all numbered “10.” For ease of reference, citations to that document are presented as though it were paginated correctly.

Because the parties had already disposed of the Maple Valley property before trial, the property was not before the court. It was therefore an abuse of discretion to rely on the disposition of the Maple Valley property to make a finding of waste.

3. The Court Erred in Assigning a Value to the Parties' Property at 15415 SE 240th Street in Kent, Washington that is not Supported by Substantial Evidence

The court's valuation of community assets is reviewed under the substantial evidence standard. In re Marriage of Rockwell, 141 Wash.App. 235, 242, 170 P.3d 572 (2007). In assigning a value where "the parties offer conflicting evidence in valuation, the court may adopt the value asserted by either party, or any value in between the two." Id., at 250.

Here, the parties each offered expert opinion testimony as to the value of the 15415 SE 240th Street property. Testifying for Sylvia, Darcy Simmons opined that the property had a value of \$750,000.00. 5 VRP (August 5, 2009), at 442. Testifying for Dennis, Carl Shroeder testified that the property was worth \$1,025,000.00. 6 VRP (August 6, 2009), at 654, 658. The court, however, assigned a value of \$679,000.00 to this property. CP 89, at 2. By arriving without explanation at a figure outside

the range of values created by the parties' conflicting expert testimony, the court has made a finding that is not supported by substantial evidence.

4. The Court Erred in Assigning a Value to the Parties' Property at 9164 SE Fragaria Road, in Olalla, Washington that is not Supported by Substantial Evidence

There was uncontroverted expert testimony in this case that the value of the parties' Olalla property was \$180,000.00. 6 VRP (August 6, 2009), at 667. During Dennis's testimony, Sylvia's counsel questioned Dennis about documents seeming to reflect an attempt by Dennis to sell the Olalla property to Jane Ninh for \$237,600.00, a deal that was never actually made. 7 VRP (August 11, 2009) at 808-811. It is unclear whether the court ever actually made a finding of the value of this property, saying only that "Dennis apparently attempted to convey" it to Jane Ninh for \$237,000, "(a price he obviously believes reflects its fair market value)." CP 89, at 3.

When distributing property, a trial court must make a finding of the value of the property, in order "to provide the appellate court with an opportunity to discover whether there has been an abuse of discretion." In re Marriage of Hadley, 88 Wash.2d 649, 657, 565 P.2d 790 (1977). It appears that in this case the court made no finding of the value of the Olalla property, which was error.

To the extent that the court's remark about Dennis's belief in the value of the home can be taken as a finding of value, it is not supported by substantial evidence: the evidence was that Dennis at some point took the initial steps toward offering to sell the property to Jane Ninh, but the deal fell through. This flimsy predicate is not substantial evidence of the value of the property, particularly not measured against the rest of the evidence in the case; to wit, uncontradicted expert testimony. Because the court erred in either failing to value the property, or in assigning a value not supported by substantial evidence, the trial court should be reversed.

5. The Court Erred in Finding that Maintenance was Appropriate in this Case

A court's award of spousal maintenance is evaluated on the abuse of discretion standard. "A trial court abuses its discretion when it does not base its award upon a fair consideration of the statutory factors under RCW 26.09.090." In Re Marriage of Marzetta, 129 Wash.App. 607, 624, 120 P.3d 75 (2005)(citing In re Marriage of Mathews, 70 Wash.App. 116, 123, 853 P.2d 462 (1993)).

In determining maintenance, "some of the non-exclusive factors the court must consider are: the post-dissolution financial resources of the parties; their abilities to independently meet their needs; the time necessary for the party seeking maintenance to find employment; duration

of the marriage; the age, physical, and emotional condition, and financial obligations of the spouse seeking maintenance; and, the ability of the spouse from whom maintenance is sought to meet his needs and financial obligations.” Id. “Of primary concern are the parties’ respective economic positions following dissolution.” Id. Accordingly, “the court’s decision on maintenance ‘is governed strongly by the need of one party and the ability of the other party to pay an award.’” Id. (quoting In re Marriage of Foley, 84 Wash.App. 839, 845-46, 930 P.2d 929 (1997)).

In this case, the court abused its discretion by finding that maintenance should be awarded despite the obvious disparity favoring Sylvia in the parties’ economic positions, and despite explicitly acknowledging that Dennis *did not have the ability to pay maintenance*. CP 89, at 5. The court, having acknowledged that Dennis did not have the ability to pay maintenance, should have concluded that maintenance should not be awarded, not proceeded with the alternative of awarding to Sylvia a disproportionate share of the community property in lieu of maintenance. CP 89, at 5. The finding that maintenance was appropriate, and the reliance on that finding to justify a disproportionate property distribution, constituted abuse of discretion.

6. The Court Erred in Imposing Parenting Plan Restrictions Against Dennis

The court in this case made a finding that restrictions on Dennis's visitation with the parties' son K.F. were justified under RCW 26.09.191(3), finding that there was an "absence or substantial impairment of emotional ties" between Dennis and K.F. This finding is error, for the reasons discussed below.

In order to impose a limitation under RCW 26.09.191(3), the court must find "that the parent's involvement or conduct may have an adverse effect on the child's best interests and if any of several enumerated factors exist, '[t]he absence or substantial impairment of emotional ties between the parent and the child.'" In re Marriage of Watson, 132 Wash.App. 222, 232, 130 P.3d 915 (2006)(quoting RCW 26.09.191(3)). A finding under 26.09.191(3) requires 'more than the normal distress suffered by a child because of travel, infrequent contact of a parent, or other hardships which predictably result from a dissolution of marriage.'" Id., at 233 (quoting In re Marriage of Littlefield, 133 Wash.2d 39, 55, 940 P.2d 1362 (1997)). Further, "any impairment to the parent-child relationship" resulting from loss of contact due to court orders "cannot supply substantial evidence in favor of the RCW 26.09.191(3)(d) restriction." Id., at 234.

In this case, there is no substantial evidence to support a finding that contact with Dennis would have an adverse effect on K.F.'s best interests. In fact, the uncontroverted testimony of the only expert

evaluator was precisely to the contrary: Dr. Wendy Hutchins-Cook testified that it would be in K.F.'s best interest to have facilitated reintegration with Dennis. 6 VRP (August 6, 2009), at 699-700.

The only relevant piece of evidence cited by the court in connection with its RCW 26.09.191(3) finding and restrictions against Dennis was the fact that "there has been no contact between [K.F.] and his father since November 2007." CP 90, at 2. However, court orders prohibited Dennis from having any contact with K.F. during that period. 7 VRP (August 11, 2009) 752-753, 789. Thus, any impairment in the relationship between Dennis and K.F. resulting from this period of separation "cannot supply substantial evidence in favor of the RCW 26.09.191(3)(d) restriction." Watson, 132 Wash.App. at 234. It should also be noted that Dr. Hutchins-Cook's uncontroverted testimony made no mention of any absence or substantial impairment in their relationship. 6 VRP (August 6, 2009), at 699-700.

Because there is no substantial evidence that contact with Dennis would be detrimental to K.F.'s best interests or of any impairment in their emotional ties, and because the court improperly relied on alleged impairment resulting from separation caused by court orders, the court's imposition of restrictions under RCW 26.09.191(3) must be reversed.

7. The Court Erred in Ordering Dennis to Undergo a Sexual Deviancy Evaluation Prior to Having Contact with His Son

The court relied on its finding of a basis for restriction under RCW 26.09.191(3) to require that Dennis undergo a sexual deviancy evaluation before he would be allowed to have any contact with K.F. CP 90, at 2. As stated above, there was no valid RCW 26.09.191(3) finding, and the order to undergo a sexual deviancy evaluation based on a finding must also fail. This is especially true where the court's finding of a need for the evaluation is not based on substantial evidence, and is instead the court's attempt to substitute its own opinion for the uncontroverted expert testimony of the court-appointed evaluator, who did not see any significant risk of harm to K.F. from contact with Dennis, nor sufficient evidence to warrant ordering the sexual deviancy evaluation. 6 VRP (August 6, 2009), at 695-696, 725-726.

The court's imposition of the sexual deviancy evaluation seems to have been motivated solely by the allegations of possession of child pornography. CP 85, at 2; CP 89, at 8. The court's order imposing the sexual deviancy evaluation must be reversed, since as previously discussed the forensic evidence established conclusively that Dennis never intentionally possessed child pornography. 5 VRP (August 5, 2009), at 522, 526-532. The forensic examination also established that a CD

containing alleged child pornography was burned using Respondent's computer while he was out of the country. See 5 VRP (August 5, 2009), at 532-546. Therefore, the imposition of the evaluation requirement is not supported by substantial evidence and is an abuse of discretion requiring reversal.

8. The Court Erred in Ordering Dennis to Pay Sylvia's Legal Fees

The court ordered Dennis to pay Sylvia's legal fees. It is unclear what basis the court relied upon to award these fees, or even exactly what amount was ordered. In the Findings of Fact, the court relied on need vs. ability to pay and imposed \$50,000 in fees. CP 89, at 5. In its Conclusions of Law, the court seemed to rely on Dennis' "lack of cooperation," and again imposed \$50,000. CP 89, at 10. However, in the Decree of Dissolution, the court did not state a basis and imposed a different amount, \$60,000. CP 86, at 9. The court's award of attorney fees against Dennis should be reversed if only because of this incoherence in the court's order, but as discussed below the fee award also fails for lack of substantial evidence and appropriate findings.

The award of attorney's fees is reviewed for abuse of discretion. However, "in making a determination as to attorney fees the needs of the requesting party must be balanced against the other party's ability to pay.

Lack of findings as to either need or ability to pay requires reversal.” In re Marriage of Steadman, 63 Wash.App. 523, 529, 821 P.2d 59 (1991). In this case, the court cursorily claimed that Dennis had the ability to pay legal fees, but simultaneously made a finding that he was unable to pay maintenance. In this case, the finding that Dennis was able to pay legal fees is not supported by substantial evidence and is not accompanied by adequate findings, and should be reversed.

Finally, a “trial court must indicate on the record the method it used to calculate the award,” and must consider “(1) the factual and legal questions at issue; (2) the amount of time spent preparing the case; and (3) the value of the property involved.” In re Marriage of Knight, 75 Wash.App. 721, 729, 880 P.2d 71 (1994). The court in this case did not indicate the method it used, and made no mention of the prescribed factors. The award of legal fees must be reversed.

9. The Court Erred in Assigning Face Value to Worthless Deeds of Trust/Promissory Notes that it Awarded to Dennis

Perhaps in recognition of the grossly disparate property distribution it awarded in favor of Sylvia, the court awarded to Dennis a number of promissory notes and deeds of trust that had been held by the parties’ former mortgage company. CP 86, at 4. Unfortunately, this is at best a cosmetic gesture because the court assigned them their face value,

when the evidence was clear that they were all worthless due to borrower default or foreclosure by an earlier mortgage-holder. 7 VRP (August 11, 2009), at 782-786. To underscore the truth of this point, Dennis offered during trial to stipulate that the notes had zero value and that they should be awarded to Sylvia if the court believed that they had any value. 8 VRP (August 12, 2009), at 993.

A trial court's findings must be supported by substantial evidence. Rockwell, 141 Wash.App. at 242. Because the trial court's findings as to the value of the promissory notes/deeds of trust are not supported by substantial evidence, and in fact the findings are in contradiction to the available evidence, the court's valuations of the notes awarded to Dennis must be reversed.

10. The Court Erred in Considering Marital Fault

In distributing community assets, a court may not consider "marital fault," such as "immoral or physically abusive conduct within the marital relationship[.]" RCW 26.09.080, In re Marriage of Muhammad, 153 Wash.2d 795, 804, 108 P.3d 779 (2005). Considering marital fault with respect to the property division constitutes reversible abuse of discretion. Id.

Viewed as a whole, the court's handling of this case strongly suggest that the court sought to "punish" Dennis for marital misconduct,

awarding a hugely disproportionate property distribution in favor of Sylvia, wherein essentially everything of actual or potential value was awarded to Sylvia, and essentially all of the debt not directly associated with potentially valuable real property was thrust upon Dennis. This kind of punitive property division is precisely what is forbidden under RCW 26.09.080, and the trial court should be reversed for abuse of discretion.

11. Dennis is Entitled to Attorney's Fees on Appeal

Under RCW 26.09.140 and RAP 18.1, this court is empowered to award Dennis attorney fees on appeal. Because Dennis is disabled and was awarded a disproportionately large share of the parties' community debt (CP 89, at 7), he is in need of attorney's fees. Because Sylvia was favored with a disproportionately large share of the parties' community assets, she has the ability to pay. The court should award Dennis his reasonable attorney fees on appeal.

CONCLUSION

The trial court in this case erred in distributing marital assets disproportionately in favor of Sylvia Flynn, and in restricting Dennis Flynn's parenting time with K.F. Appellant requests that this court reverse the trial court and remand with instructions to perform an even distribution of the marital assets and enter a parenting plan without restrictions against Mr. Flynn.

Dated this June 1, 2010.

CARNEY GILLESPIE ISITT PLLP

A handwritten signature in black ink, appearing to read "Christopher Carney", written over a horizontal line.

Christopher Carney, WSBA No. 30325
Attorney for Dennis Flynn

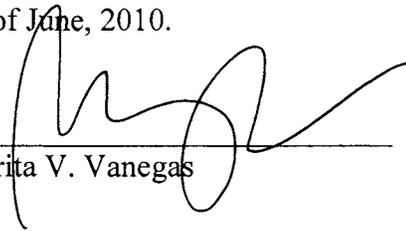
DECLARATION OF SERVICE

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

That on June 1st, 2010, I arranged for service of Appellant's Opening Brief to the court and to the parties to this action as follows:

Office of Clerk Court of Appeals – Division 1 One Union Square 600 University Street Seattle, WA 98101	<input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Messenger <input type="checkbox"/> US Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Email	
Deborah Bianco Deborah A. Bianco, PS 14535 Bel-Red Road, Suite 201 Bellevue, WA 98007	<input type="checkbox"/> Facsimile <input type="checkbox"/> Messenger <input checked="" type="checkbox"/> US Mail <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Email	2010 JUN -1
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DATED at Seattle, Washington this 1st day of June, 2010.



Margarita V. Vanegas