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AUG 31 2016

No. 74818-1-1

COURT OF APPEALS, DIVISION I OF THE STATE OF
WASHINGTON

DAVID WILEY, Appellant

v.

JENNIFER WILEY, Respondent

REPLY BRIEF OF APPELLANT

David Wiley
Appellant, Pro Se
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TABLE OF CONTENTS

	Page(s)
I. Issues presented in Reply	1
II. Reply to Counter-Statement of the Case	1-2
III. Reply to Argument	
1. THIS REVIEW IS NOT BASED SOLELY UPON THE DISCRETION OF THE TRIAL COURT.	3-7
2. THERE IS ONLY CONTESTED TESTIMONY CONTRADICTED BY EVIDENCE TO SUPPORT THE TRIAL COURT FINDING OF DOMESTIC VIOLENCE.	7-8
3. PRIVACY IS A STATE OF WASHINGTON RIGHT WHICH EXTENDS BEYOND THE FEDERAL RIGHT TO PRIVACY.	8-11
4. THERE WAS NOT SUBSTANTIAL EVIDENCE OF DOMESTIC VIOLENCE.	11
5. SEPARATE LEGAL ACTION DOES NOT CHANGE THE FACTS OF THE CASE.	12-13
6. DUE PROCESS INCLUDES THE RIGHT TO CONFRONT YOUR ACCUSER & EQUAL PROTECTION OF THE LAWS.	13-15
7. EQUAL PROTECTION APPLIES TO THE RULES OF THE COURT	15-16
8. DAVID WILEY ASSIGNED OBVIOUS ERROR, NOT DUE PROCESS VIOLATION TO THE FINDING OF INJURY TO THE CHILDREN.	16-17
9. THE CONTRADICTORY STATEMENTS BY JENNIFER WILEY IN OPENING EACH CASE DOES VIOLATE JUDICIAL ESTOPPEL.	18-19
10. JENNIFER'S CONTRADICTORY RIGHTS ASSERTED TO THE TWO PARTIES BEDROOMS VIOLATED EQUITTABLE ESTOPPEL.	19-20
11. DAVID WILEY ALREADY SUBSTANTIALLY ADDRESSED HIS EQUAL PROTECTION CLAIM.	20
12. PROCEEDINGS WERE COLORED BY THE APPEARANCE OF BIAS.	20-21
IV. Conclusion	21-22

TABLE OF AUTHORITIES

	Page
Table of Cases	
<u>Ancheta v. Daly</u> , 77 Wash. 2D 255, 259, 461 P.2d 531, 534 (1969)	4
<u>Boguch v. Landover Corp.</u> , 153 Wn. App. 595, 619, 224 P.3d 795 (2009)	4
<u>Bose Corp. v. Consumers Union of United States, Inc.</u> , 466 U.S. 485, 514 n.31 (1984)	17
<u>Brin v. Stutzman</u> , 89 Wn. App. 809, 951 P.2d 291 (1998)	5
<u>Carey v. Piphus</u> , 435 U.S. 247, 266-67 (1978)	12
<u>Carle v. McChord Credit Union</u> , 65 Wn. App. 93, 111, 827 P.2d 1070 (1992)	4
<u>CITY OF BELLEVUE v. JACKE</u> 96 Wn. App. 209	9
<u>Cowiche Canyon Conservancy v. Bosley</u> , 118 Wn.2d 801, 819, 828 P.2d 549 (1992)	5
<u>Fuentes v. Shevin</u> , 407 U.S. 67, 81 (1972)	14
<u>Glover for Cobb v. Tacoma Gen. Hosp.</u> , 98 Wn.2d 708, 718, 658 P.2d 1230 (1983).	5
<u>Gourley</u> , 158 Wn.2d. 460, 145, 468 P.3d 11835 (2006)	12
<u>In re Marriage of Drlik</u> , 121 Wn. App. 269, 277, 87 P.3d 1192 (2004)	6
<u>In re Marriage of Rockwell</u> , 141 Wn. App. 235, 242, 170 P.3d 572 (2007)	4
<u>In re Welfare of T.B.</u> , 150 Wn. App. 599, 607, 209 P.3d 497 (2009)	17
<u>Lybbert v. Grant County</u> , 141 Wn.2d 29, 35, 1 P.3d 1124 (2000)	20

<u>Marshall v. Jerrico, Inc.</u> , 446 U.S. 238, 242 (1980)	12
<u>Mathews v. Eldridge</u> , 424 U.S. 319, 333, 348, 96 S. Ct. 893, 47 L. Ed. 2D 18 (1976)	13
<u>Morgan v. Prudential Ins. Co. of Am.</u> , 86 Wn.2d 432, 545 P.2d 1193 (1976).	17
<u>Nelson v. Adams</u> , 120 S. Ct. 1579 (2000)	12
<u>Norcon Builders, LLC v. GMP Homes VG, LLC</u> , 161 Wn. App. 474, 484, 254 P.3d 835 (2011)	20
<u>Reid v. Pierce County</u> , 136 Wash.2d 195, 206, 961 P.2d 333 (1998)	9
<u>Southwest Wash. Prod. Credit Ass'n. v. Seattle-First Nat'l Bank</u> , 19 Wash. App. 397, 406, 577 P.2d 589, 594 (1978), rev'd on other grounds, 92 Wash. 2D 30, 593 P.2d 167 (1979).	17
<u>State v. Byers</u> , 85 Wash. 2D 783, 786, 539 P.2d 833, 834 (1975)	3
<u>State v. Byers</u> , 88 Wash. 2D 1, 554 P.2d 1334 (1977)	3
<u>State v. CPC Fairfax Hosp.</u> , 129 Wn. 2d 439, 452-53, 918 P.2d 497 (1996)	13
<u>State v. Eisfeldt</u> , 185 P.3d 580, 584 (Wash. 2008)	9
<u>State v. Lewis</u> , 115 Wn.2d 294, 298-99, 797 P.2d 1141 (1990)	5
<u>State v. Myrick</u> , 688 P.2d 153, 154 (Wash. 1984)	9
<u>State v. Oxborrow</u> , 106 Wash 2d 525, 542-43, 723 P.2d 1123, 1133(1986)	3
<u>State v. Rohrich</u> , 149 Wn.2d 647, 654, 71 P.2d 638 (1990)	4
<u>State v. Rohrich</u> , 149 Wn.2d 647, 654, 71 P.3d 638 (2003)	5

<i>United States v. United States Gypsum Co.</i> , 333 u.s. 364, 395 (1948)	3
<i>Willener v. Sweeting</i> , 107 Wn.2d 388, 393, 730 P.2d 45 (1986)	5
<i>Yousoufian v. Office of Ron Sims</i> , 168 Wn.2d 444, 458, 229 P.3d 735 (2010)	4

Constitutional Provisions

U.S. Const. amend. IV	4, 9
Wa. Const. section VII	9
U.S. Const. Amend. V	15
U.S. Const. amend. XIV, § 1	10, 15
Wa. Const. section XI	20, 21

Statutes

18 U.S.C. § 16	1
RCW 26.50.010 “Domestic Violence Definitions”	1
RCW 26.50.060 “Relief-Duration-Relaignment”	2
RCW 10.99.010 “Domestic Violence statutes Purpose – Intent”	6
RCW 9A.52.020 “Trespass – Definition”	7
RCW 9a.46.110 “Stalking – Definition”	7, 22
RCW 26.44.015 “Child Abuse – Limitations”	8
RCW 9A.16.100 “Use of force on children”	8
RCW 26.44.020 “Child Abuse Definitions”	8
42 U.S.C. § 13925	9
RCW 59.18 et. Seq	10

Regulations and Rules

RAP 3.3	2
Code of Judicial Conduct 1	15
Code of Judicial Conduct 2.2	16, 20
Code of Judicial Conduct 2.3	20
Code of Judicial Conduct 2.15	21

Other Authorities

Restatement of the Law, Second, Torts, § 652(b)	10
Judicial Estoppel	18, 19
Equitable Estoppel	19, 20

I. Issues presented in Reply

1. Shall a discovered Fear of Imminent Harm be a defense to Trespass or Stalking?
2. Does Joint ownership of a property eliminate the expectation of privacy established by inhabitation?
3. What reasonable limits (if any) can be set to the unequal application of court rules?
4. How can a Commissioner uphold and promote impartiality of the court when it arbitrarily applies the court rules to only one side in a party?

II. Reply to Counter-Statement of the Case

No facts are in evidence that David Wiley has been violent by legal definition 18 U.S.C. § 16 and Jennifer Wiley's own sworn testimony (CP 335, CP 445-446). Allegations of violence towards my brother Tom Wiley (CP 446) were refuted by Tom Wiley himself (CP 372-373). This case relies on the definition of Domestic violence RCW 26.50.010 “the infliction of fear of imminent physical harm, bodily injury or assault, between family or household members;”. Opposing party left out the key word Infliction in their characterization of events. Allegations of

controlling behavior were contested (CP 374-421, 422-435, 589-692) and are irrelevant to the definition of Domestic Violence unless it includes behavior defined as Domestic Violence.

It was the finding of Commissioner Stewart that David had not harassed Jennifer (RP 2-1-16 pg 9-10) about the lock based on email record "Tristan's bed" submitted (CP 402). Jennifer's statements on behalf of the children were refuted and are hearsay objected to in writing by David Wiley (CP 385-6, section M),

David Wiley did not file two responsive pleadings. There is one pleading by Jeff Cared (CP 422-435) and one pleading by David Wiley (CP 374-421). Both pleadings were filed by Jeff Jared, David's attorney during proceedings.

Although the order is set to expire February 1st, 2017 it may be renewed every year indefinitely per RCW 26.50.060 (3). Finally, the statement that only the issuance of the Protection Order is before the court is false. RAP 3.3 states "if two or more cases have been tried together or consolidated for trial, the cases are consolidated for the purpose of review unless the appellate court otherwise directs." The Appellate Court has not directed they be heard separately. Therefore by the rules of the court they are to be heard together.

III. Reply to Argument

1. THIS REVIEW IS NOT BASED SOLELY UPON THE DISCRETION OF THE TRIAL COURT.

Washington has created an exception for reviewing trial court findings when constitutional rights are at issue. State v. Byers, 85 Wash. 2D 783, 786, 539 P.2d 833, 834 (1975)(probable cause), rev'd on other grounds, State v. Byers, 88 Wash. 2D 1, 554 P.2d 1334 (1977). A constitutional fact is defined as a fact whose determination will decide an issue of constitutional rights. In such instances the appellate court applies a de novo review to the constitutional facts (as opposed to all facts). The “abuse of discretion” standard is appropriate when concerns of judicial economy dictate that the trial court be responsible for the decision or the trial judge is in a better position to make the decision because he or she can observe the parties. State v. Oxborrow, 106 Wash 2d 525, 542-43, 723 P.2d 1123, 1133(1986). According to the United States Supreme Court, a finding is “clearly erroneous” when the reviewing court, in considering the entire body of evidence, is left with the definite and firm conviction that a mistake has been committed, even though there is evidence to support the lower court's finding. United States v. United States Gypsum Co., 333

U.S. 364, 395 (1948). Washington courts have said that under the “clearly erroneous” test, the reviewing court may conduct a broader, more intensive review than under the “substantial evidence” test. Ancheta v. Daly, 77 Wash. 2D 255, 259, 461 P.2d 531, 534 (1969).

Furthermore, faith & reliance on testimony over evidence is unreasonable. This is reversible error as the court's findings of fact must be supported by substantial evidence In re Marriage of Rockwell, 141 Wn. App. 235, 242, 170 P.3d 572 (2007). Even if the court applied the correct legal standard to any supported facts, ***it's still untenable and reversible if the court*** adopts a view that no reasonable person would take. Yousoufian v. Office of Ron Sims, 168 Wn.2d 444, 458, 229 P.3d 735 (2010) (quoting State v. Rohrich, 149 Wn.2d 647, 654, 71 P.2d 638 (1990)). A trial court abuses its discretion when its decision is manifestly unreasonable or based upon untenable grounds. Boguch v. Landover Corp., 153 Wn. App. 595, 619, 224 P.3d 795 (2009). Discretion is abused when ***no reasonable person*** would have ***taken the view adopted*** by the trial court. Carle v. McChord Credit Union, 65 Wn. App. 93, 111, 827 P.2d 1070 (1992). The finding of reasonableness necessarily involves factual determinations and factual determinations will not be disturbed on

appeal, when they are supported by substantial evidence. Glover for Cobb v. Tacoma Gen. Hosp., 98 Wn.2d 708, 718, 658 P.2d 1230 (1983).

A discretionary decision rests on "untenable grounds" or is based on "untenable reasons" if the trial court relies on *unsupported facts* and the court's decision is "manifestly unreasonable" if "the court, despite applying the correct legal standard to the supported facts, *adopts a view 'that no reasonable person would take.'*" State v. Rohrich, 149 Wn.2d 647, 654, 71 P.3d 638 (2003) (quoting State v. Lewis, 115 Wn.2d 294, 298-99, 797 P.2d 1141 (1990)). Appellate courts may determine whether the trial court's findings of fact are supported by substantial evidence. Willener v. Sweeting, 107 Wn.2d 388, 393, 730 P.2d 45 (1986).

"Substantial evidence is evidence in sufficient quantum to *persuade a fair-minded person* of the truth of the declared premise." Brin v. Stutzman, 89 Wn. App. 809, 951 P.2d 291 (1998), citing Cowiche Canyon Conservancy v. Bosley, 118 Wn.2d 801, 819, 828 P.2d 549 (1992). In Brin, the trial court was reversed on one judgment by Division One because there was not substantial evidence supporting some findings for that judgment.

Domestic Violence is not just fear of harm, it is the **Infliction** of that Fear by someone in a Domestic relationship. The court errs when it

does not consider all words in a statute to have meaning. When statutory language is left undefined, we apply its common meaning as defined by the dictionary. In re Marriage of Drlik , 121 Wn. App. 269 , 277, 87 P.3d 1192 (2004). All common definitions require direct action and a sense of punishment. Both of these are missing in Commissioner Stewart's findings.

RCW 10.99.010 states: “The legislature finds that the existing criminal statutes are adequate to provide protection for victims of domestic violence. However, previous societal attitudes have been reflected in policies and practices of law enforcement agencies and prosecutors which have resulted in differing treatment of crimes occurring between cohabitants and of the same crimes occurring between strangers.” and “It is the intent of the legislature that the official response to cases of domestic violence shall stress the enforcement of the laws to protect the victim and shall communicate the attitude that violent behavior is not excused or tolerated. Furthermore, it is the intent of the legislature that criminal laws be enforced without regard to whether the persons involved are or were married, cohabiting, or involved in a relationship.”

The trial court never stated (RP 2-1-16) what violence was being stopped with this order. Furthermore a quick survey of all law show that

trespass into someone's personal living space is prohibited even in landlord-tenant situations where the occupant has NO legal claim to the property. No reasonable person could find that Jennifer's intrusion into David's locked, secluded, private bedroom constitutes an infliction of Domestic Violence on Jennifer when she found paper targets and other documents she photographed. Entering premises when he or she is not invited or otherwise privileged to so enter or remain is the criminal definition of Trespass per RCW 9A.52.020. A person commits the crime of stalking if he or she intentionally and repeatedly harasses or follows another person to place them in a state of fear RCW 9a.46.120. By the volume of evidence, Jennifer was clearly not only aware David did not want her intruding on his bedroom. Shall a fear of imminent harm be made an "after the fact defense of trespass and stalking"?

2. THERE IS ONLY CONTESTED TESTIMONY
CONTRADICTED BY EVIDENCE TO SUPPORT THE TRIAL COURT
FINDING OF DOMESTIC VIOLENCE.

Every one of Jennifer Wiley's allegations of Domestic Violence was refuted by David Wiley (CP 374-425) as detailed in Appellant's brief. There is not one single piece of testimony which describes David as violent except in disciplining the Wiley children. There was no finding of

domestic violence towards the Wiley children (RP 2-1-16 & CP 321-326) and has not been brought for Review. Furthermore, RCW 26.44.015 prohibits the Court from authorizing interference in child-raising practices including reasonable parental discipline which are not injurious to the child's health, welfare, or safety. Unreasonable use of force on children is defined by RCW 9A.16.100 and does not include spanking. Neglect which cause harm to the child's health, welfare, or safety as which Jennifer permitted against the Wiley children may constitute Child Abuse under RCW 26.44.020. Evidence and testimony of Jennifer's hazardous neglect leading to injury of the Wiley children was presented by David Wiley (CP 374-421, CP 589-692)

Evidence in attachments to the trial court makes unreasonable most of the claims brought against David. Testimony of bad character even if found credible do not rise to the level of Domestic Violence. Commissioner Stewart made findings only on three allegations and these are the substantive issues on review.

3. PRIVACY IS A STATE OF WASHINGTON RIGHT WHICH EXTENDS BEYOND THE FEDERAL RIGHT TO PRIVACY.

In Jennifer's Petition for an Order for Protection (CP 447) she testifies without detail to attending courses on domestic violence. Classes

of this nature are facilitated by Government officials & programs under 42 U.S.C. § 13925. As Jennifer was receiving undisclosed advice by Government officials & programs this trespass may constitute a U.S. Const. Amend. IV violation. Under the 4th Amendment, the government is only prevented from conducting “unreasonable” searches and seizures, a standard that varies with public perception. By contrast, the Wa. Const. Section VII flatly prohibits invasions of privacy without authority of law. State v. Myrick, 688 P.2d 153, 154 (Wash. 1984). The common law right of privacy exists in this state and individuals may bring a cause of action for invasion of that right.” Reid v. Pierce County, 136 Wash.2d 195, 206, 961 P.2d 333 (1998). More recently, the Supreme Court refused to permit use of evidence obtained by a search initiated by a person who was not a state actor. State v. Eisfeldt, 185 P.3d 580, 584 (Wash. 2008).

This right to privacy can be violated by a Domestic partner when a separation upon seclusion has been established. In CITY OF BELLEVUE v. JACKE 96 Wn. App. 209 the court recognized that one spouse's possession of property may be superior to that of the other spouse. Jennifer Wiley herself indicates that the possibility of intrusion into the bedroom she shared with their son was a cause of Domestic Violence but inequitably denies that her admitted intrusion in David Wiley's solely

occupied bedroom can be one. No reasonable person can hold this view without a violation of U.S. 14th Amendment equal protection under the law. Even landlord-tenant law (RCW 59.18 et. Seq.) holds as its basis that property does not eliminate or supersede the right to privacy granted established by inhabitation. How then can joint ownership of a property supersede the right to privacy established by inhabitation? One who intentionally intrudes, physically or otherwise, upon the solitude or seclusion of another or his private affairs or concerns, is subject to liability for invasion of privacy, if the intrusion would be highly offensive to a reasonable person. A reasonable person would conclude that Jennifer's admission on appeal that she entered David's bedroom constitutes a violation of Restatement of the Law, Second, Torts, § 652(b).

Again Attorney Martin seems to imply that a factual finding of Jennifer being in fear alone qualifies Domestic Violence and ignores that the statute requires this fear must be **inflicted** by David on Jennifer. The clear intent of the statute is not that possession of a frightening object constitutes Domestic Violence. This standard could make everyone guilty of Domestic Violence for private possessions of works of art which cause someone to react in fear. Furthermore if the paper targets were displayed in a way to cause harm, what reasonable person could conclude that

manipulation of evidence was needed to take better photographs? The trial court abuses its discretion by depending on unsupported facts and adopts a conclusion on the evidence no reasonable person could come to.

4. THERE WAS NOT SUBSTANTIAL EVIDENCE OF DOMESTIC VIOLENCE.

Attorney Martin appears to be attempting to retry the case without the findings Commissioner Stewart relied upon. Commissioner Stewart did not find any evidence of Domestic Violence regarding the lock on Jennifer's door. "He did that for the child's safety, not insisting that the lock come down, so he reports" (RP 2-1-16, pg 9-10). Jennifer's testimony is refuted not just by David's testimony but also a copy of the email conversation itself as well as the documented hazardous conditions their son Tristan was exposed to (CP 374-421, particularly attachment 3). In the email conversation David does not ever insist the lock be removed but asks to repair the bed for their son (in the house they jointly own & occupy) or move him into his own bedroom. There is no imminent harm presented here except by Jennifer to their son Tristan. The court in proceedings did not issue any finding of imminent harm in this allegation (RP 2-1-16).

5. SEPARATE LEGAL ACTION DOES NOT CHANGE THE FACTS OF THE CASE.

That rules of evidence **need** not apply does not mean they **should** not apply. Commissioner Stewart gave no reason (RP 2-1-16) why the departure from standard rules of evidence should be accepted. This constitutes an abuse of discretion as no evidence was given for why this departure of standard court procedure was necessary or warranted. When the Petitioning party has representation, time to prepare and a dissolution action was ongoing. Conclusion in Gourley, 158 Wn.2d. 476 P.3d 11835 (2006) accepted suspension of the rules of evidence due to the hurdles many Petitioners face in bringing an urgent Pro Se matter to the court. None of those reasons are present here and the Commissioner abused his discretion by not even providing a rationale for suspension of the rules of evidence. The Court has also stressed the dignitary importance of procedural rights, the worth of being able to defend one's interests even if one cannot change the result. Carey v. Piphus, 435 U.S. 247, 266-67 (1978); Marshall v. Jerrico, Inc., 446 U.S. 238, 242 (1980); Nelson v. Adams, 120 S. Ct. 1579 (2000).

However, admission of hearsay evidence regarding David's 911 call on behalf of his children colored this incident as harassment. It is

possible this contributed to the clearly erroneous finding that David was responsible for the injuries to the Wiley children. The opposing party has made no argument to how suspension of the rule of evidence furthered the cause of Justice.

6. DUE PROCESS INCLUDES THE RIGHT TO CONFRONT YOUR ACCUSER & EQUAL PROTECTION OF THE LAWS.

The essence of due process is that a party in jeopardy of losing a constitutionally protected interest be given a meaningful opportunity to be heard. Mathews v. Eldridge, 424 U.S. 319, 333, 348, 96 S. Ct. 893, 47 L. Ed. 2D 18 (1976). Also, State v. CPC Fairfax Hosp., 129 Wn. 2d 439, 452-53, 918 P.2d 497 (1996) (the deprivation of a statutory right in the context of proceedings potentially abridging a liberty interest "also constitutes a deprivation of that process due under the Fourteenth Amendment to the United States Constitution because the deprivation is without lawful authority"). Jennifer Wiley was unfairly afforded additional access to the evidence in the house in this case due to Ex Parte action. Ex Parte hearings were intended for emergency purposes. Jennifer testified (CP 444) in Petition that harm would come to her if David had notice of a hearing. Yet, the parties had just had a hearing mere weeks previous. Furthermore Jennifer had already asked for nearly identical relief in her

filing for dissolution. No harm or threats came to Jennifer as a result and the one allegation in the intervening time was regarding a lock on Tristan's bedroom door. When the trial court failed to issue a finding of Domestic Violence on this allegation then it deprived David of the equal Due Process right of access to the documents and evidence. Furthermore it put David at a disadvantage by adding rendering him homeless with additional time and financial burdens to make his case while Jennifer had time to prepare. Neither Jennifer Wiley nor either Commissioner are able to name the act(s) of violence they are seeking to prevent from occurring by Ex Parte intervention of the court and order for protection.

Every adverse party will abuse Ex Parte hearings for advantage if they can do so without repercussion for making baseless claims of emergency. It is in the Public Interest that Ex Parte hearings should be reserved for preventing imminent acts of actual violence. Full hearings based on Ex Parte action should be settled on the stated change(s) of circumstance (RP 1-6-16). The required elements of due process are those that "minimize substantively unfair or mistaken deprivations" by enabling persons to contest the basis upon which a State proposes to deprive them of protected interests. Fuentes v. Shevin, 407 U.S. 67, 81 (1972). The Court violated David Wiley's due process right to equal protection under

the law by issuing Ex Parte orders and deciding the case on matters which did not necessitate Ex Parte action. Furthermore Attorney Martin fails to recognize that the Constitution is an authority for our rights let alone the central authority.

7. EQUAL PROTECTION APPLIES TO THE RULES OF THE COURT.

The 14th Amendment added to the 5th Amendment that Due Process must be give equal protection. The matter in question is not whether the court can set aside local rules in pursuit of Justice – it can. What **the 14th Amendment prohibits is the Court modifying the rule unequally**. This unequal hearing time is a clear violation of what any reasonable person would consider equal protection under the law. Prejudice need not have occurred for this to be a violation of David Wiley's 14th Amendment equal due process right. The 14th Amendment makes unlawful any statute, rule or enforcement action intended to apply unequally to the citizens of the United States. If the Appeal's court accepts this departure from the normal course of proceedings, then what reasonable limit could the court set to prevent future injustice? How can a Commissioner uphold and promote impartiality of the court when it arbitrarily applies the court rules to only one side in a party? CJC 1, CJC

2.2. I ask the Court of Appeals to find that when rules are set aside it must be done reasonably equally and without partiality.

8. DAVID WILEY ASSIGNED OBVIOUS ERROR, NOT DUE PROCESS VIOLATION TO THE FINDING OF INJURY TO THE CHILDREN.

There was no accusation in any of Jennifer's pleadings that alleged abuse had caused injury to the children. Jennifer makes an uncounted number of allegations of domestic violence and abuse towards the Wiley children. However, the record contains not a single allegation where any of these incidents lead to injury. Additionally, no findings warranting restrictions were made on review by the Honorable Richard Okrent (CP 493-494). Responding party has failed to make even a basic argument in defense of this finding by Commissioner Stewart (RP 2-1-16 pg. 31).

Neither is or was a defense made of the bodily injuries and endangerment that have occurred to the children by being left alone with their Mother (CP 374-421, 589-692). Incidents after being restrained from the family home have even led to the Father having to call 911 to check on the safety & well being of the children (CP 566-582). Jennifer characterized this fear and concern by David for the children's safety as harassment. This alone is clearly erroneous reversible error by which the

Appellate Court should grant the relief requested. Where the Trial Court has weighed the evidence, review is limited to ascertaining whether the findings of fact are supported by substantial evidence, and if so, whether the findings support the conclusions of law and the judgment. Morgan v. Prudential Ins. Co. of Am., 86 Wn. 2d 432, 545 P.2d 1193 (1976).

Substantial evidence is evidence sufficient to persuade a fair-minded and rational person of the truth of the declared premise. In re Welfare of T.B., 150 Wn. App. 599, 607, 209 P.3d 497 (2009).

The United States Supreme Court has said that de novo review occurs when a “reviewing court makes an original appraisal of all the evidence to decide whether or not it believes the conclusions of the trial court. Bose Corp. v. Consumers Union of United States, Inc. 466 U.S. 485, 514 n.31 (1984). As all relevant evidence is in written pleadings and evidence, the Appellate Court should be able to substitute its judgment for that of the Trial Court about facts as well as application. Southwest Wash. Prod. Credit Ass'n. v. Seattle-First Nat'l Bank, 19 Wash. App. 397, 406, 577 P.2d 589, 594 (1978), rev'd on other grounds, 92 Wash. 2D 30, 593 P.2d 167 (1979). Giving substantial weight to the lower court's decision is not in accord with strict de novo review. Giving deference to the lower tribunal and reviewing de novo are, in fact, contradictory.

9. THE CONTRADICTION STATEMENTS BY JENNIFER WILEY IN OPENING EACH CASE DOES VIOLATE JUDICIAL ESTOPPEL.

My claim of Judicial Estoppel is not based on Jennifer's failure to bring a Protection Order when filing for dissolution but rather her completely contradictory statements regarding David's behavior around the children and reason for staying in the house. In David's pleadings he objected to the contradictions in Jennifer's pleadings (CP 374-421, CP 589-692). Jennifer's initial pleading in filing for dissolution was that David was abusive for spanking the children. Judicial Estoppel "is an equitable doctrine that precludes a party from asserting one position in a court proceeding and later seeking an advantage by taking a clearly inconsistent position". The advantage in both cases was sole possession of the family home and financial injury to David through awards of maintenance to Jennifer. The trial court erred in not reconciling these positions in its findings (RP 2-1-16) and violated Judicial Estoppel. Judicial Estoppel prohibits a new case from being brought unless contradictory statements can be reconciled. It prohibits the court from even considering the merits of Jennifer's claims if they are contradictory with prior claims. Judicial

Estoppel protects the courts' reputation as finders of fact rather than arbitrators of disputes.

Attorney Martin again appears to be trying to retry the original case on new grounds rather than address Jennifer's contradictory claims. Claiming David was "initiating constant arguments". Arguing and disagreement are not cause for protection orders. Otherwise opposing attorneys would need to walk out of every trial court room with a restraining order on the other party. In deciding this issue the court needs to look to the record (RP 1-6-16, RP 2-1-16) to determine if the Trial Court reconciled the contradictions between both cases.

10. JENNIFER'S CONTRADICTORY RIGHTS ASSERTED TO THE TWO PARTIES BEDROOMS VIOLATED EQUITTABLE ESTOPPEL.

Jennifer through pleadings to this court has now admitted (Respondent's Brief pages 13-14) to entering David's bedroom without permission. At the same time Jennifer's position is that mere discussion of entering Jennifer's bedroom shared with their son Tristan was Domestic Violence. In David's pleadings he testified that he had tried to stay out of Jennifer's shared bedroom except at the express invitation of their six year old son Tristan (CP 374-421). Jennifer's position expects David and the

court to inequitably uphold that Jennifer can intrude upon David's seclusion without inflicting fear while mere discussion of equitably entering her room given safety concerns amounts to Domestic Violence. As Attorney Martin states Equitable estoppel is based on the position that "a party should be held to a representation made or position assumed where inequitable consequences would otherwise result to another party who has justifiably and in good faith relied thereon." Norcon Builders, LLC v. GMP Homes VG, LLC, 161 Wn. App. 474, 484, 254 P.3d 835 (2011) (quoting Lybbert v. Grant County, 141 Wn.2d 29, 35, 1 P.3d 1124 (2000)).

11. DAVID WILEY ALREADY SUBSTANTIALLY ADDRESSED HIS EQUAL PROTECTION CLAIM.

Further argument withheld.

12. PROCEEDINGS WERE COLORED BY THE APPEARANCE OF BIAS.

The question before the court does not rely on the rules of evidence, but rather on CJC Rules 2.2, 2.3 and Wa. Article 1, Section 11. The Respondent's brief brings no defense of Commissioner Stewart's inappropriate line of questions from the bench. Questions of a religious nature are not relevant to a hearing where neither party has brought forth

an argument based on religious freedoms. Again, Wa. Const. section XI clearly states “No religious qualification shall be required for any public office or employment, nor shall any person be incompetent as a witness or juror, in consequence of his opinion on matters of religion, **nor be questioned in any court of justice touching his religious belief to affect the weight of his testimony.**” (bold mine) The court uses a de novo review in matters of constitutional rights.

CJC rule 2.15(c) states that “a judge who receives credible information indicating a substantial likelihood that another judge has committed a violation of this Code should take appropriate action.” Upon conclusion of the Appellate courts review the Petitioner moves the court to take appropriate action to protect justice, future litigants and the integrity of the court. I believe a proper investigation by the appropriate authorities will show additional cause for a finding of bias which is not under review in this case.

E. Conclusion

It is clear the opposing party would like this case decided on a different set of facts. The evidence clearly shows Jennifer neglected the kids to repeated harm and David suffered restraint and financial loss for it.

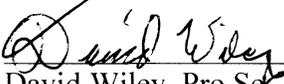
Jennifer's exhibited documents (CP 441-484, 904-905, 354-359) shows she was willfully monitoring David on social media against the 8-31-15 agreed temporary orders (CP 934-936). Additionally she was going through David's private documents in his room without permission. Combined with Jennifer's admission of entering David's room this amounts to aggressive stalking per RCW 9a.46.110.

While there are other significant issues which need to be addressed, the Respondent's brief failed to make a defense of the trial court's obvious error in finding David Wiley injured the Wiley children. The record on review clearly shows Jennifer Wiley was responsible for injurious harm to the minor children.

A simple finding that Commissioner Stewart gave the appearance of bias or may have colored proceedings with inappropriate questions regarding David Wiley's religious beliefs is sufficient. Events in a dissolution case are active & ongoing. A reversal is urgently needed to protect David Wiley and the Wiley children from continuing injury & stalking. Reversal & a temporary restraining order will allow new and additional evidence to be heard before an unbiased court. David Wiley should be awarded the request in Appellant's Brief

Signed August 30th, 2016

Respectfully submitted,


David Wiley, Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I served by email per electronic service agreement one copy of the foregoing brief to Jennifer Wiley via her Attorney of Record at the following address:

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September 1st, 2016
Date

David Wiley
David Wiley

2016 AUG 31 PM 2:09
STATE OF WASHINGTON
SUPERIOR COURT