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Division II  
State of Washington  
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No. 51642-0-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION TWO

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In re the Tort lawsuit of:

TATYANA MASON,

Appellant *pro-se*,

and

JOHN MASON & MS. ROBERSON,

Defendants.

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ON APPEAL FROM THE SUPERIOR COURT OF THE  
STATE OF WASHINGTON FOR THURSTON COUNTY,

The Honorable Judge Dixon

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REPLY BRIEF OF APPELLANT

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## I. SUMMARY OF THE REPLY ARGUMENT

In the both **poorly written** Responsive briefs, Defendants repeat the same general and erroneous position over many pages, and ignored both: the record facts, evidence and the applicable law in Washington – especially when the lower court did not rule on the doctrines or found it inapplicable in this case and, thus it is improper to argue, on appeal, the issues which were not included within the Orders appealed from. In this Reply, the Appellant has briefly addressed the applications of these doctrines lest either the Defendant complains that the Appellant waived any argument thereto. Both Defendants built their arguments based on fabricated, unsupported facts contradicted to the record. The Appellant redressed Defendants’ misstatements in this Reply.

### **This Appeal Concerns The Specific Orders Appealed From Dismissed The Action Below On The Basis Of Claim Preclusion:**

(1) Difficulties to understand plaintiff’s English and her complaint in English; (2) Failure to state the claim in violation of RCW 4.84.185 and CR11 (b); (3) Status of limitation; (4) Absolute immunity to Ms. Roberson – not to John. The Orders appealed from should be reversed based on the arguments in this Reply Brief and Appellant’s Opening Brief.



## II. REPLY ARGUMENT.

### A. DEFENDANTS RE- ARGUES ON THE APPEAL, THE ISSUES WHICH WERE NOT INCLUDED WITHIN THE ORDER APPEALED FROM --- SHOULD BE STRICKEN. IT IS IMPOPER TO ARGUE ON APPEAL, THE ISSUES WHICH WERE NOT INCLUDED WITHIN THE ORDERS APPEALED FROM:

Defendants ignored both: the record facts, evidence and the applicable law in Washington as to the improper re-application of res judicata, collateral estoppels, and absolute immunity to John –when the lower court did not rule on these doctrines or found it inapplicable in this case. Below, the Appellant has briefly addressed the applications of these doctrines:

(1) **Res-Judicata.** The Appellant has four other cases pending in the Washington State Courts against the same Defendants:

Pending case No. 49839-1-II:

Defendant John Mason brought an appeal challenging Tatyana’s successful Motion to Vacate an Order of Child Support, a grant of expert fees, and imposition of CR 11(a)(1)(2)(3) sanctions. *See* CP 86-9; CP 126-7. One of the factual issues reviewed in that case was: Whether John failed to remove conditions from Tatyana’s green card due to his abuse toward her; Has signed an Affidavit of Support (Form I-864) on behalf of her; and Whether the I-864 is sill enforceable. CP 60; 87-8; 127-8. The Family Court Judge suggested that Tatyana should bring a separate action in a different court to collect damages from John and Ms. Roberson. CP 150. **Collecting monetary damages were not considered in this case.**

Pending case 50009-4-II:

Tatyana has brought an appeal challenging her and her husband John's 2013 Parenting Plan. Acting as *pro-se* Tatyana is argues that her success in the 2016 trial court' proceedings should be extended to the 2013 Parenting Plan. **Monetary Damages were not considered in this case.**

Pending case 52959-9-II:

Arises from the case 49839-1-II brought by Tatyana regarding the issue on the clerical mistakes in the written order on CR 11(a) mandated by this Court. Tatyana argues that **RAP 7.2(e)** and case *State v. Vailencour*, 81 Wn. App. 372, 278, 914 P.2d 767 (1996) ruled: "The failure of a trial court to enter necessary findings of fact and conclusions of law has been deemed a clerical mistake that can be corrected pending appeal without permission of the appellate court". **Monetary Damages for abuse of process, emotional distress and other tort claims were not considered in this case.**

Pending case C17-5289 in the Federal Court:

Is regarding enforcement of I-864 Affidavit of Support where Judge Leighton found John breached the I-864 contract with the US Government. **Collecting Damages from John abuse of process, and other tort claims were not considered in this case.**

This tort claim case 51642-0-II: Tatyana has brought against Defendants seeking **monetary damages** related to claims of abuse of process, emotional depress, outrageous tort in her historical legal proceedings. While this tort claims under case 51642-0-II asserted here, arising as they do out of the divorce case transactions entirely separate and apart from

the claim adjudicated in cases: 49839-1-II; 52959-9-II; 50009-4-II and C17-5289 were not involved in that adjudication and are not barred under the doctrine of res judicata. “The rule is universal that a judgment upon one cause of action does not bar suit upon another cause which is independent of the cause which was adjudicated. *C.J.S. Judgments* § 668 (1947); 46 Am.Jur.2d *Judgments* § 404 (1969). “A judgment is res judicata as to every question which was properly a part of the matter in controversy, but it does not bar litigation of claims which were not in fact adjudicated”. Especially, the both low court’s Orders appealed from, **do not** ruled on res judicata; collateral estoppels, or on absolute immunity to John, or found it inapplicable in this case. (CP 40-3; CP 70-2; CP 97-9). It is improper to argue, on appeal, the issues which were not included within the Orders appealed from. Defendants’ argument on this doctrine should be stricken.

**(2) Collateral Estoppels:**

**Does the Doctrine of Collateral Estoppels Foreclose the Assertion of These Claims? The Answer is that it is NOT.**

Not only were the damages tort claims not adjudicated, but they and the evidence concerning them formed no essential part of the claim at issue in that action, but were introduced as facts from which the existence of one of the elements of the cause of action could be inferred. They

constituted what is commonly termed "evidentiary facts. The fact regarding damages that it was not adjudicated, in itself, **renders the doctrine of equitable estoppels inapplicable in this case.** *King v. Seattle*, 84 Wn.2d 239, 525 P.2d 228 (1974); 46 Am.Jur.2d *Judgments* § 415 (1969); *Restatement of Judgments* § 68 (1942). Especially, when in the both low court's Orders appealed from do not ruled on collateral estoppels. (CP 40-3; CP 70-2; CP 97-9) Defendants' arguments on this doctrine should be stricken.

**(3) Absolute Immunity to John Mason.**

John is not a witness, not an attorney, not government – John is a party with a domestic violence history RCW 26.50.060. *See* CP 119-24 who consistently provides false information in the court in violation of CR 11. *See* Order for CR11 sanctions CP 126-7 129-30. Since the 2008final divorce to now, John brings many private lawsuits for his private relief to harass his ex-spouse Tatyana and her children in the manner of witch it was not design by improperly using the court system. John was not seeking official governmental action, but rather redress from the court. *See Reid v. Dalton*, 124 Wn. App. 113, 126, 100 P.3d 349 (2004) “litigation that does not involve a bona fide grievance does not fall under anti-SLAPP statutes” (citing *Bill Johnson's Rests., Inc. v. Nat'l Labor Relations Bd.*, 461 U.S. 731, 743, 103 S. Ct. 2161, 76 L. Ed. 2d 277 (1983)), review denied, 155

Wn.2d 1005 (2005). Here, Defendant John improperly arguing that even he misleads the court in bad faith- his actions are covered by absolute immunity (Defendant's brief page 16). **Since John Mason is a private litigant seeking private relief in family law court, John is not the class of persons who can claim protection from liability.** Especially when the lower court did not rule on it, or found John's defensive argument as inapplicable in this case. Defendants' baseless arguments should be stricken.

**B. DEFENDANTS' ARGUMENTS FAILS  
AS A MATTER OF LAW:**

**(1) Statue of Limitation:**

Defendants are arguing that a three year statute of limitation applies in this case because between the USCIS letter decision dated February 27, 2015 regarding Tatyana's damaged green card by John *See* (CP 157); the family court's recommendation made on November 2, 2016 (CP 150) and March 13, 2017 tort claim (CP 30-1) went more than 3 years. Defendants are wrong. Tatyana's claim is based on the 2016 family court's recommendation. CP 150. Furthermore, to fit their argument, the Defendant Ms. Robertson changed in bad faith a date of the USCIS letter of decision of denying Tatyana the US Citizenship from May 5, 2014 to September 2013 when Tatyana only filed her application on line to the

USCIS Department. *See* (Defendant's brief at page 12). **In fact, only after February 27, 2015 Tatyana discovered that John failed removed conditions from her green card required by law and that 2013 order prevented her removing these conditions. CP 157.** Even the USCIS letter decision on May 5, 2014 regarding the denial Tatyana in the US Citizen, did not mention any of problems with Tatyana's damaged green card- May 5, 2014 is still does not bar March 13, 2017 (CP 30-31) lawsuit with the statute of limitation. Defendants' argument on the statute of limitation is baseless and is fails as a matter of law.

**(2) Failed to State a Claim:**

Defendants argues that the Appellant failed to state a claim and the sparing application of dismissals based on CR 12(b)(6). In the Amended Complaint CP 1-21 and the Opening Brief to this Court, Tatyana presented her basis theories, either of which she contends support her claim for relief --- warranting reversal of the Orders appealed from. The Appellant very well redressed this issues in her Opening Brief on (pages 21-33) and "whether it can be said that there is not state of facts which she could prove entitling her to relief under her claim" *Barnum v. State*, 72 Wn. 2d 928, 435 P. 2d 678 (1967). *See* (the Appellant Brief at pages 21-33).

**(3) RCW 4.84.185:**

“An action is frivolous under RCW 4.84.185 if when considered in its entirety; it “cannot be supported by any rational argument based in fact or law”. *Biggs v. Vail*, 119 Wn. 2d 129, 136, 830 p. 2D 350 (1992). It is enough that the action is not supported by any rational argument and is advanced without reasonable cause. *Eller v. East Sprague Motors & R.V. 's, INC.*, 159 Wn.App. 180, 192, 244 P. 3d 447 (2010). In another case, **this Court ruled on the similar issue** *Hofto v. Blumer*, 74 Wn 2d 321, 444 P.2d 657 (1968) that **“the factual allegations of the complaint must be accepted as true for the purpose of the motion”**. “The Appellant’s action is to be interpreted as a whole” *Biggs v. Vail*, 119 Wn. 2d 129, 136, 830 P. 2d 350 (1992) were three of four claims are judged to be frivolous but the forth claim is not, as a whole is not frivolous and it is improper to grant attorney fees under RCW 4.84.185. The lower court’s orders of dismissal Tatyana’s claim CP 40-3; 70-2; 97-9 should be reversed.

**(4) Defendants’ always “Joined” Arguments; Two identical “joined” motion to dismiss and two difference amount of attorney fees**

Ms. Roberson and John admitted that it **always “joined”** in the arguments of both Respondents. Although, John Mason who has a long history of a domestic violent under **RCW 26.50.060** and a protection

order was issued against him by judge Schaller was awarded with attorney fees in the amount of \$22, 321.49 and Ms. Roberson in the amount of \$3,500 on the identical “joined” motion to dismiss. CP 42; 70; 97-9. In fact Both Motions made for August 18, 2017 and January 19, 2018 are identical, the only names were changed from Ms. Robertson to John Mason.

**(5) CR 11 sanction authorizes ONLY the award of reasonable attorney fees**. Lower court judge should determine the income of both parties before awarding the attorney fees. **Tatyana is on DSHS food stamps See CP 116; 30-1**. Here, lower court’s judge refused to acknowledge that Tatyana has no income, because her green card is damaged by John due to his domestic abuser toward her CP 156. Lower court judge granted unreasonable attorney fees to a low quality attorney in the amount of \$23,000 to John and \$ 3,500 to Ms. Robertson, simply because he was not able to understand Tatyana’s English. The lower court abused its discretion by unreasonably ordering to Tatyana pay to the abuser unreasonable fees. CP 30-1. Judgment against Tatyana should be reversed.

**(6) Absolute Immunity to Ms. Robertson:**

All of the cases cited by Ms. Robertson in her Responsive Brief relate to claims of defamation. While RCW 4.24.510 absolute immunity

is justified in the context of a defamation claim by the need to protect attorneys and witnesses from liability **for statements** that might be considered libelous by an offended person, no such justification exists for abuse of process claims. *Skimming v. Boxer*, 119 Wn. App. 748, 758, 82 P.3d 707 (citing *Right-Price Recreation, LLC v. Connells Prairie Cmty. Council*, 146 Wn.2d 370, 382, 46 P.3d 789 (2002), cert. denied sub. nom. *Gain v. Washington*, 540 U.S. 1149 (2004)), review denied, 152 Wn.2d 1016 (2004). Abuse of process claims focus on a party's conduct during litigation. **Did Ms. Robertson was using the power of the courts to accomplish a legitimate purpose since 2008 to now, and some other improper end? The answer is YES.**

There is no offsetting benefit to a grant of immunity from claims of abuse of process. The only possible result of such immunity would be to encourage abusive litigants to continue to abuse the power of the courts, having been freed from any consequence. Abuse of process claims protects not only the injured Plaintiff (like Tatyana), but also the integrity of the courts. **If Defendants (like Ms. Robertson) were absolutely immune from the future claims of abuse of process arising from her participation in the court process, no abuse of process claim could be ever succeed. Abuse of process would be always be barred by absolute immunity.** This would be an unjust result. To the contrary, a

lawyer can be held liable for abuse of process. *Fite v. Lee*, 11 Wn App 21, 29, 521 P2d 964 (1974); *Reid v. Dalton*, 124 Wn. App. 113, 126, 100 P.3d 349 (2004) (litigation that does not involve a bona fide grievance does not fall under anti-SLAPP statutes) (citing *Bill Johnson's Rests., Inc. v. Nat'l Labor Relations Bd.*, 461 U.S. 731, 743, 103 S. Ct. 2161, 76 L. Ed. 2d 277 (1983)), review denied, 155 Wn.2d 1005 (2005). In this case Defendant Ms. Robertson ceased to be among the class of persons who can claim protection from liability under RCW 4.24.510. This court also ruled in the previous similar case *Saldivar v. Momah* No. 34891-8-II (Wash. Ct. App. Aug. 26, 2008) “Accordingly, we reject the attorney’s argument that RCW 4.24.510 immunizes her from liability for a civil suit”. This court should reverse the lower court’s order and hold that Tatyana’s claims are not barred by absolute immunity to Ms. Robertson.

**C. DEFENDENTS ARE CONCEALING THE IMPORTANT FACTS AND EVEDENCE; PROMOTING FABRICATED STATEMENTS AND IMPOPERLY CHANGING THE DATES OF THE USCIS LETTERS.**

**(1) Defendants knowingly Concealing the Facts:**

Both Defendants concealing a DV protection order RCW 26.50.060 against John issued by Judge Schaller. (CP 119-24); Concealing the CR11 (a)(1)(2)(3) sanctions for aggressively promoting false information in court (Orders (CP 126-7) Defendants lied that CR11

sanctions was vacated by this court- which is not, it was remand the lower court for correcting clerical mistakes and cooperate findings into written order *See* (07/31/18 Opinion at 17-18); Concealing that John refused to remove condition from Tatyana's green card and prevented her from legal work authorization (CP 157); Concealing that John intentionally harass Tatyana since 2008 to now for purpose of harassment and continue his abuse toward Tatyana; Concealing a forensic investigative report- which clearly stated that John is a perpetrator who is couching the children and improperly used financial, language and cultural disadvantages against Tatyana and her children. (CP 172).

**(2) Defendants Improperly Changed the USCIS dates:**

Defendant Ms. Robertson improperly changed the dates of the USCIS letters decision from February 2015 to September 2013. USCIS written decision dated February 2015 informing that conditions were not removed by John from Tatyana's green card and the 2013 orders preventing fixing this problem CP 156. In September 2013 Tatyana only file her application for the US Citizenship, because she did not know at that time that she her green card was damaged. Both Defendants knowingly misstated the facts to confuse the court in bad faith just to fit their argument for a statue of limitation. This court should not promote abuse of Defendants and reverse the lower court orders.

**(3) RAP 18.9 Sanctions Requires Against Defendants:**

RAP 18.9 insures that all attorneys, as officers of the court, must honestly inform the tribunal of material facts and laws which may affect the outcome of the controversy presented for judicial review. *See Miller v. Badgley*, 51 Wn. App. 285, 303, 753 P.2d 530 (1988)(attorneys may not avoid CR 11's requirement that they make a reasonable inquiry as to the factual basis for a motion "merely by claiming good faith conduct or personal ignorance of the groundless nature of a claim."), *review denied*, 111 Wn.2d 1007 (1988). Defendants' attorneys violated the rule 8.4 Professional conduct.

**(4) Case 45835-7-II: Defendants Improperly Promoted the 2014 case when in the 2016 three day trial courts this decision was found as "fundamentally wrong and unjust"**

In the 2016 three day trial court Judge Wickham found that the 2013 and this court of appeal decision in the case 45835-7-II were "fundamentally wrong and unjust". CP 188-90. Judge Wickham also sanction both John Mason and Ms. Robertson for promoting false information in the court in violation of CR11 (a)(1)(2)(3). CP 126-7. This court agreed with Judge Wickham but because the written order has clerical mistakes, this court mandated it to the lower court to correct this err. (Opinion of 07/31/18 at 17 -8) Defendants and including this court's judges in 2014 **refused** to acknowledge a forensic investigative Report of

Dr. Rybicki who specifically wrote in his forensic report “the abusive John Mason’s coaching and external influence which seems to have been neglected by the trial court in 2013 and in the court of appeals in 2014. This information lost in the court process when the children clearly said to him (**Our Mom never hits us; our dad and Ms. Hurt forced us to say this to CPS**)”. CP 172 Yet, sadly in 2014, this court **improperly relied** on the abuser John Mason’s fabricated evidence because Tatyana was pro-se and John was represented by unethical Ms. Robertson. Next, due to negligent of the judges in 2014 case 45835-7-II this court **refused** to acknowledge the facts that even Judge Hirsch of the 2013 trial court said:

“I want to say, that when I read the Court of Appeals decision in the case 45835-7-II, what is strike me: it didn't speak of the credibility findings that the court made in 2013. Frankly, I was very bothered by John and therapist' Ms. Hurd's false testimonies that is why I removed Ms. Hurd from the case. Yet, the court of appeal division II relied on Ms. Hurd's false testimony” CP 177

The 45835-7-II decision is pending under the case 50009-4-II and it is improper for the Defendants rely on this case.

(5) Pending case 49839-1-II John Mason’s appellant brief in 2018 was fall of fabricated evidence, contradicted the record. This court again

relied on the fundamentally wrong fabricated evidence in 45835-7-II to promote domestic violence John Mason's false statements and discriminate immigrant women and their children in bad faith. Tatyana lost faith in this court's judges. She gave up of fighting with the negligence and corruption of this court.

**(6) Defendants' improper request to strike the list of evidence which were included into Plaintiff's Amended Complaint dated June 30, 2017** See (CP 20, 21) and in the Response to Defendants' motions to dismiss which were properly filed in the court and properly served to the both Defendants. This court should ignore Defendants' manipulation if this court at least has a little true justice and respect for pro-se litigants.

Defenders' requested to strike all factual evidence which do not fit into their bad faith argument. In fact all evidence were attached to the amended complaint and in response to Defendants motions to dismiss and properly and timely served. This court cannot strike factual evidence supporting Tatyana's claim. This Court ruled on the similar issue that **"the factual allegations of the complaint must be accepted as true for the purpose of the motion"**. *Hofto v. Blumer*, 74 Wn 2d 321, 444 P.2d 657 (1968)

### **III. FACTS AND REASONS WARRANTING REVERSAL OF THE ORDERS APPEALED FROM**

(1) Both Defendants built their arguments based on fabricated, unsupported facts contradicted to the record.

(2) Defendants' re-argues on the appeal the issues as to the improper re-application of res judicata, collateral estoppels, and absolute immunity to John –when the lower court did not rule on these doctrines or found it inapplicable in this case – these doctrines were not included within the order appealed from- and thus it is improper to argue on the appeal the issues which were not included within the orders appealed from. Defendants' argument should be stricken.

(3) Defendants manipulate with the facts by improperly changing a date of the USCIS letter of decision of denying Tatyana the US Citizenship from May 5, 2014 to September 2013 when in September, 2013 Tatyana only filed her application on line to the USCIS Department. Defendants are doing this in improper purpose of fitting their argument into statute of limitation.

(4) Three year statue of limitation does not apply in this case, even if considered the early USCIS letter May 5, 2014 which was regarding denial of the US citizen. In May 2014 letter,

nothing was mentioned regarding damaged green card. The Appellant's claims March 13, 2017 are not barred by the statutes of limitation.

(5) Denial of the US citizen and not removing conditions from the green card and not having legal work authorization are two different things. If people can live without the US citizen, but cannot live and earn income without green card. Defendants' baseless argument should be stricken.

(6) In the amended complaint, and in her Appellant brief to this Court at pages 21-33- Tatyana clearly stated her claim, presented basis theories, either of which she contends support her claim for relief --- warranting reversal of the Orders appealed from.

(7) RCW 4.84.185 is improper in this case. Previously this court ruled in the similar case: "The Appellant's action is to be interpreted as a whole" *Biggs v. Vail*, 119 Wn. 2d 129, 136, 830 P. 2d 350 (1992) were three of four claims are judged to be frivolous but the forth claim is not, as a whole is not frivolous and it is improper to grant attorney fees under RCW 4.84.185. The lower court's orders of dismissal Tatyana's claim CP 40-3; 70-2; 97-9 should be reversed.

(8) Both Defendants admitted that it always “joined” in the arguments against Tatyana. Although, John Mason who has a long history of a domestic violent under RCW 26.50.060 and a protection order was issued against him by judge Schaller was awarded with attorney fees in the amount of \$22, 321.49 and Ms. Robertson in the amount of \$3,500 on the identical “joined” motion to dismiss.

(9) “Defendant Ms. Robertson’s bad faith’ litigations against Tatyana do not involve a bona fide grievance and she does not fall under anti-SLAPP statutes” Reid v. Dalton, 124 Wn. App. 113, 126, 100 P.3d 349 (2004) (citing Bill Johnson's Rests., Inc. v. Nat'l Labor Relations Bd., 461 U.S. 731, 743, 103 S. Ct. 2161, 76 L. Ed. 2d 277 (1983)), review denied, 155 Wn.2d 1005 (2005). In this case Ms. Robertson ceased to be among the class of persons who can claim protection from liability under RCW 4.24.510.

(10) Both Defendants are knowingly concealing factual evidence from the Courts in purpose of manipulation and gain improper control. This court should notice many legal and serious factual errors present in the Defendants’ statements of facts and it is undermined all their arguments in this case.

(11) **RAP 18.9 Sanction against the Defendants**

insures: that all attorneys, as officers of the court, must honestly inform the tribunal of material facts and laws which may affect the outcome of the controversy presented for judicial review. *See Miller v. Badgley*, 51 Wn. App. 285, 303, 753 P.2d 530 (1988).

**IV. CONCLUSION**

Defendants re-argue on the appeals the issues which were not included within the orders appealed from. Defendants built their arguments based on fabricated, unsupported facts contradicted to the record. Defendants' low quality briefs ignore the record facts below, rely on inapplicable legal arguments, and provide no basis for affirmance of the Order appealed from. There is nothing on the face of Appellant's Amended Complaint which precludes relief, and the "identity" elements of statute of limitation; RCW 4.84.185; CR 11(b) and CR 12 (b)(6) were not satisfied. The Order appealed from must be reversed.

**V. REQUEST AND MOTION FOR RAP 18.9 SANCTIONS**

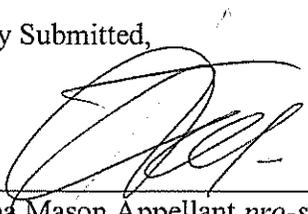
Appellant requests RAP 18.9 sanctions against both Defendants for misstatements and manipulation with facts and change the USCIS dates in bad faith. *Miller v. Badgley*, 51 Wn. App. 285, 303, 753 P.2d 530 (1988)(attorneys may not avoid CR 11's requirement that they make a reasonable inquiry as to the factual basis for a motion "merely by claiming

good faith conduct or personal ignorance of the groundless nature of a claim."), *review denied*, 111 Wn.2d 1007 (1988).

If Appellant is the prevailing party in this appeal, that this Court enter an Order of entitlement for RAP 18.9 Sanctions as this Court has inherent jurisdiction on appeal when allowable by contract and may remand to the trial court to take evidence as to the amount and reasonableness of fees, *Brandt v. Impero*, 463 P.2d 197, 1 Wn.App. 678, 683 (Wash.App. 1969); *Granite Equipment Leasing Corp. v. Hutton*, 525 P.2d 223, 84 Wn.2d 320, (Wash. 1974, citing Brandt, supra), and as the loan documents the subject of this appeal provide for an award of RAP 18.9 sanctions because Defendants knowingly fabricated and misrepresented facts in bad faith to delay justice.

DATED THIS 11<sup>th</sup> DAY of October, 2019

Respectfully Submitted,



Tatyana Mason Appellant *pro-se*

**It would be improper for this Court to strike designated Exhibits evidence supporting Plaintiff's Amended Complaint which properly and timely served to both Defendants on June 30, 2017 and authorized by the lower court based on the motion. *See* list of filing documents on CP 20-21.**

# **APPENDIX A**

TATYANA MASON  
vs  
JOHN MASON et al

COURT OF APPEALS NO. 51642-0-II  
SUPERIOR COURT NO. 17-2-01121-34

PAGES 1 – 29

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EXPEDITE:  
JUDGE JAMES J. DIXON



FILED  
SUPERIOR COURT  
THURSTON COUNTY, WASH.

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE THURSTON COUNTY

JUN 30 PM 4: 08

IN RE: TORT LAW CIVIL ACTION

No. 17-2-01121-34

Linda Myhre Enlow  
Thurston County Clerk

TATYANA MASON

PLAINTIFF COMPLAINT  
(AMMENDED)

PLAINTIFF,

vs.

JOHN MASON;  
LAURIE ROBERTSON

[(Clerks Action Required)]

DEFENDERS

I. IDENTIFY PARTIES AND RELIEF REQUESTED

1.1 COMES NOW, the above named Tatyana Mason *Plaintiff Pro-Se* in this new case action filing a civil lawsuit, in good faith, against John Mason and his former counsel Laurie Robertson WSBA (#32521)-*Defenders* in this action for **ONGOING: Abuse of Process** See (page.5); Alienation of Affection See (page.8); Malicious Prosecutions See (p.9); Intentional Infliction of Emotional Distress; Loses See (page.11); Fraud See (page.6); and Ms. Robertson's Misconduct RPC8.4(a)(c)(d) (e)(g); RPC3.3(a)(1)(2)(3)(b); RPC1.5(d) See (page.11). **Defendants' are using divorce to accomplish their purpose for which the process was not designed.** Tatyana is seeking for monetarily recovery from these damages. **The Defendants' abuse of process is ongoing and they are continuing using it to extort and coerce to this day since the 2008 divorce.** Due to Tatyana's limited understanding in English, Tatyana was not aware at the time of the abuses that she is now seeking to redress for See (page 4).

1.2 Due to *Defendants'* ongoing misconduct, malicious abuse of process in the manner for which the legal system was not designed: Tatyana's children have been alienated for her; Tatyana's immigrations status is significantly damaged; Tatyana does not have legal authorization to work; has zero income; literally become homeless; lost [her] car; suffering severe economically and emotional distress. Tatyana do her best but, still have difficulties communicate in English; does not have legal training to professionally & fully address the issues in this case action that is the reason Tatyana is requesting a potential attorney fees (page.5); (page.9). Inability to speak English well-overcomes understanding of the laws by *pro-se* litigant United States ex Rel. Negron v. State of N.Y., 434 F.2d 386, 389 (2nd Cir.1970) See also, Pate v. Robinson, 383 U.S. 375, 384, 86 S. Ct. 836, 15 L. Ed. 2d 815 (1966) See (page.3) of this complaint.

## II. INTRODUCTION:

2.1 John Mason- (*U.S citizen*) brought Tatyana- (*Ukrainian and Moldavian Citizen*) from Odessa, Ukraine in June 1999 and legally married on August 19, 1999. Tatyana did not speak and understand English and still have difficulties communicate in English (Ex1). The couple have two children (G)&(D) from this marriage. Right from the beginning of marriage, John become physically, financially and verbally abusive to Tatyana (Ex2; Ex3; Ex4). Tatyana did not want to stay in an abusive marriage. In 2007, John petitioned divorce; kidnapped the children. Tatyana was able to find the children 10 days later with help from Police Department.

The 2007 Court finds that John committed Domestic Violence, Acts of control by John. Tatyana is disadvantage spouse; John committed **perjuries** under oath in the court in bad faith” (Ex5)

2.2 In June 2007 the parties legally separated and in July 2008 divorced.

In March 2008 John Domestic Violence Evaluation stated that John had been arrested for Felonies, DUIs, Drug Abuse; Domestic Violence. John has high risk Alcohol Dependency and his polygraph test regarding physical and financial abuse toward Tatyana and her children is **inconclusive**. (Ex6).

2.3 From June, 2007 to this day, John is represented by Ms. Robertson WSBA #32521 English speaking attorney in the family court. *Since 2008 Final Divorce to this day - John with help of Ms. Robertson are using Divorce and the Legal System against Tatyana in a manner which the System was not designed.* Through use of abuse of process and malicious prosecution, John and Ms. Robertson created a procedural mechanism to intimidate, harass and punish Tatyana because [she] does not want to live with the Perpetrator and for [their] other inappropriate purposes *See* (details below of this complaint).

2.4 John with help of Ms. Robertson’s systematically committing fraud, misconduct RPC 8.4(a)(b)(c)(d)(g); RPC 3.3(a)(1)(2)(3)(b); RPC 1.5(d): 1) alienated the children from Tatyana. Since March 2011 there is no relationship between Tatyana and her children; 2) intentionally damaged Tatyana’s immigration statues that [she] cannot legally work and physically survive. 3) in the same time **DAMANDING** money from Tatyana by using legal enforcement; 4) John took the car from Tatyana- [she] paid with her school loan; 5) forced Tatyana become homeless; 6) placed Tatyana into a deep economic hardship; 7) Tatyana’s credit score is destroyed; 8) Tatyana suffers severe Emotional Destress. Tatyana does not have relatives who can help [her] Tatyana’s parents past away long time

ago. Tatyana has no choice as to couching surfing at [her] American friends' and strangers houses who are temporary helping Tatyana with [her] *very basic needs*. Tatyana will not be able to rent a house or get a bank loan for a long time due to her damaged credit score. Tatyana cannot live this horrible life style anymore. Due to Tatyana inability to speak English, *Tatyana was not aware of the time of the abuse that she is now seeking to re-address for.*

### III. INABILITY TO SPEAK ENGLISH WELL OVERCOMES UNDERSTANDING OF THE LAWS BY PRO-SE LITIGANT:

3.1 Tatyana did not speak and understand English well. Tatyana is still have difficulties communicate in English. Prior to 2016 Trial, no evidence that Tatyana have interpreter service Ex1. Based on Tatyana's Limited English Proficiency (LEP), **Tatyana was not aware of the time of the abuses that Tatyana is now seeking to redress for.** *United States ex rel. Negron v. State of N.Y.*, 434 F.2d 386, 389 (2nd Cir.1970) "an inability to speak and understand English rendered the defendant as unable to participate intelligently in his own defense" *Pate v. Robinson*, 383 U.S. 375, 384, 86 S. Ct. 836, 15 L. Ed. 2d 815 (1966) that "it is contradictory to argue that a person who has limited English and yet, knowingly or intelligently waive [his] right to have the court determine [his] capacity to stand English speaking Trial. It is axiomatic that the Sixth Amendment's guarantee of a right to be confronted with adverse witnesses, now also applicable to the states through the Fourteenth Amendment, *Pointer v. Texas*, 380 U.S. 400, 85S.Ct.1065, 13 L.E.s.2.d 923 (1965), includes the right to cross-examine those witnesses as "an essential and fundamental requirement for the kind of fair trial which is this country's constitutional goal." *Id.* at 405, 85 S.Ct.at 1068. *See also, Bruton v. United States*, 391 U.S.123, 128, 88S.Ct 1620, 20 L. Ed.2d 476 (1968); *Barber v. Page*, 390 U.S 719, 725, 88 S. Ct. 1318, 20 Led.2d.255 (1968). But the right that was previously and before 2016 Trial denied Tatyana seems even more consequential than the right of confrontation. Considerations of fairness, the integrity of the fact-finding process, and the potency of American adversary system of justice forbid that the state should prosecute a defendant who is not present at his own trial, *see, e.g., Lewis v. United States*, 146 U.S 370, 372, 13 S.Ct.136, 36 Led.1011 (1892) *See also, People v. Atsilis*, 60 Mich. App. 738, 231 N.W.2d 534 (1975) "whenever it appears that a person is incapable of understanding nature of, or of defending himself in, proceedings against him because he is unable to clearly understand the English language, an interpreter should be appointed in his behalf".

#### IV. FACTS RELAVENT TO THIS COMPLAINT

4.1 **Immigration:** John Mason- (U.S citizen) brought Tatyana- (Ukrainian and Moldavian citizen) from Odessa, Ukraine in June 1999 and married on August 19, 1999. On October 28, 1999, John signed I-864 “affidavit of support” because the Immigration and Nationality Act (INA) forbids admission to the United states of any alien who (“*is likely at any time to become a public charge*”) 8U.S.C§1182(a)(4); 8C.F.R§213(a)2(a). (“*Person who would be inadmissible for this reason may become admissible if a sponsor executes the affidavit of support*”). 8U.S.C§1183(a)(a)(1); 8U.S.C.§1182(a)(4)(c)(ii); 8U.F.R§213A(2). *See Ex16 Divorce does not end the sponsor’s financial obligation 8U.F.R§213A See also (Ex16)*

4.2 **Marriage:** The couple has two children (G)&(D) from this marriage. Right from the beginning of marriage, John becomes physically, financially and verbally abusive to Tatyana and her children (Ex2; Ex3; Ex4; Ex5). Due to John’s consistent Domestic Violence toward Tatyana, John intentionally *refused* to remove the conditions from Tatyana’s green card, during the marriage, which is legally required by USCIS. Tatyana was unaware of this process and that her immigration status got in danger (Ex1). In 2007 the parties legally separated. Tatyana got primary custody and John had visitation and financial obligation and child support. John *refused* to support Tatyana and pay child support. *John with help of his counsel Ms. Robertson, prejudicing himself under oath stated that “[he] does not have financial obligation to Tatyana”.* John was using Tatyana’s inability to speak and understand English and legal system against Tatyana; John released himself from Domestic Violence arrest, forced Tatyana for 50/50 child custody and decreased [his] financial obligation and child support from \$2,500 to \$200 per month.

#### V. TATYANA WAS NOT AWARE AT THE TIME OF THE ABUSES TIAT [SHE] IS NOW SEEKING REDRESS FOR--- (ENGLISH COMPREHANSION):

5.1 On June 24, 2008 the parties divorced. At the time of the divorce and 2013 Trial, Tatyana could not speak and understand English well and could not sufficiently communicate with English speaking attorneys, to address the issues, due to [her] Limited English Proficiency (LEP). *See Campbell v. Vaughn*, 209 F.3d 280, 285 (3<sup>rd</sup> Cir.2000) (quoting *Cardwell v. Greene*, 152 F.3d 331, 337 (4<sup>th</sup> Cir.1998)) John got everything and Tatyana got nothing but \$200 per month child support. Tatyana moved to a rental house with her children. Tatyana had no choice as to pay for her rent and other expenses with her school loan. Tatyana’s allegations of ineffective assistance of divorce counsel

were not factually explored in the state proceedings. Because they are sufficient on their face to state an ineffective assistance of counsel claim under the two pronged standard of Strickland v. Washington, 466 U.S. 668, 687-88, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984), this is an additional, alternative reason to hold an evidentiary hearing in the present case. See Kimmelman v. Morrison, 477 U.S. 365, 106 S. Ct. 2574, 91 L. Ed. 2d 305 (1986) (factual inquiry by divorce court necessary on ineffective assistance claim in habeas petition to determine “prejudice”, where defense counsel’s performance in state proceeding was unreasonable deficient)

## VI. ABUSE OF PROCESS:

A legal procedure set in motion in proper form, even with probable cause and ultimate success.

6.1 John With Help of His Counsel Ms. Robertson are using Divorce to abuse the Legal System Against Tatyana In A Manner For Which the System was NOT Designed: After John released from Domestic Violence arrest in June 2008: In November, 2008 John, started a legal **abuse of process**, to take from Tatyana the only car she had and which Tatyana was paying with her school loan and credit cards since the beginning of 2007, because Tatyana was not able to refinance the car in 30 days after divorce on her name, due to unemployment and [her] immigration status intentionally damaged by John, even though John knows that he has a financial obligation to Tatyana and he owes to Tatyana significant amount \$\$\$ (Ex 15).

6.2 From December, 2008 to March 2011- John Mason was systematically contacted CPS and Police Department with his allegations against Tatyana to continue his harassment, control and to cause Tatyana **emotional distress** by using the children as a tool (Ex21; Ex24). After John’s numerous times contacting Police Department- the police department placed a block against John because of John’s **improper purposes to harass**. However, John continued systematically contacting CPS: on 12/12/08; 02/20/08; 03/12/08; 05/08/09; 06/12/09; 07/10/09; 08/18/09; 09/04/09 11/09/09 12/20/09 even on Tatyana’s birthday 02/11/10; 03/05/10; 06/10/10; and finally on 03/11/11. (Ex12)

6.4 In 2009 Tatyana as *pro-se*, was trying to place Protection Order against John, but due to Tatyana’s limited English, and not ability to hire attorney due to Tatyana’s financial disadvantages. the court did not understand Tatyana and what Tatyana wants from the court. It was denied because Tatyana did not match legal points correctly.

6.5 On February 10, 2010, John Mason with help of his counsel Ms. Robertson brought Tatyana to the court **again to change** Dr. Wilson a child psychologist who worked with the children for almost

3 years every second week to a new *marriage counselor*- Sandra Hurd, because **Dr. Wilson found John as an abuser** toward the children (Ex13).

6.6 From March 2010 to October 2010 Sandra Hurd and Tatyana did not get along well. Due to Ms. Hurd's improper behavior, Tatyana served Ms. Hurd with a formal letter on October 14, 2010 (Ex14). Sandra Hurd refused to work with Tatyana. Tatyana had no choice as to quit sessions with Ms. Hurd. John continues the sessions with Hurd (Ex15).

6.7 Since the 2008 final Divorce, John and his counsel Ms. Robertson were systematically committed **the willful acts of perpetration in the use of process which is not proper in the regular conduct of the proceeding.** In March 2011, through false allegation, conspiracy between Ms. Robertson, Sandra Hurd and John Mason alienate the children from their mother by using Tatyana's financial and legal and English disadvantages- demand from Tatyana money, increasing cost of litigation, through fraud place a financial barrier, by knowing that Tatyana would not be able to pay and by knowing that John has financial obligation to Tatyana. John with help of Ms. Robertson perpetrates Tatyana to cruelty. *S. Ark Petrol. Co. v. Schiesser*, 343 Ark.492, 36 S.W.3d 317 (2001). John and Ms. Robertson are using a judicial process to extort or coerce Tatyana. *Rough Wrecker Serv., Inc. v. Washington*, 335 Ark.232, 980 S.W 2d 240 (1998). The key for John and his counsel Ms. Robertson is to improper use of process after its issuance in order to accomplish [their] inappropriate purposes for which the process was not designed. *Id.*; see also *Harmon v. Carso Carriage Corp.*, 320 Ark.322, 895 S.W 2d 938 (1995); *Cordes v. Outdoor Living Ctr, Inc.*, 301 Ark.26, 781 S.W.2d 31 (1989).

## VII. FRAUD COMMITTED BY JOHN AND MS. ROBERTSON

7.1 Since 2008 final divorce, John with help of his counsel Ms. Robertson (1) made false representations; (2) systematically mispresenting material facts; (3) Fraud was made intentionally and knowingly; (4) with intent to mislead the Divorce Court to this day, (5) with a reasonable reliance to misled, and (6) resulting damage to him. See *Winn v. Aleda Constr. Co.*, 227 Va. 304, 308, 315 S.E.2d 193, 195 (1984).

7.2 (1)-Due to **false representation-FRAUD** committed by John and his counsel Ms. Robertson--2013 Trial erred under finding of facts that:*"Tatyana is voluntarily unemployed"* and that *"it is Tatyana's owns choice to not paying \$10,000 for family physiological evaluation and \$300 for reunification with her children and other court bills"*. When *"Tatyana does not have legal authorization to work and earn income due to her current status damaged by John due to his Domestic*

*Violence since 2001*” (Ex1; page 2 (E)(H)(G) 11/23/16 Trial). (2) John knows that [he] damaged Tatyana’s immigration status and Tatyana cannot legally work and earn income. John knows that Tatyana does not have working experience; John knows that Tatyana does not have relatives in the U.S who could help her and **YET John and Ms. Robertson are still aggressively damaging money from Tatyana through enforcement by using legal system in the manner which was not designed to continue their harassment and abuse.** John with help of Ms. Robertson systematically misrepresented the facts in their several declarations: *“Respondent claimed she has no money to pay her part to Dr. McCollum’s evaluation but when the court refused to continue the trial further, she “magically” found the money to pay for the evaluation respondent truly needs to pay off these arrears to maintain her immigration, she would find the funds”* When Tatyana signed a promissory note with McCollum, because she cannot afford to pay any amount (Ex18). (3) John and Ms. Robertson know that John is a financial sponsor for Tatyana, because [he] had requirement to signed I-864 “Affidavit of Support” *See* INA §213(a) and yet, John and Ms. Robertson are continuing intentionally misrepresenting the facts- by filing frivolous appeal to unnecessary increase the cost of litigation even more. John intentionally lies because [he] knows he has financial obligation to support Tatyana, but [he] does not want to pay (Ex9); (4) Reasonable reliance Tatyana is litigating to release from John Mason and his attorney Ms. Robertson abuse and harassment; to have immigration status and ability to work and physically survive; to be with [her] children. John litigating to continue his abuse and cause harm to Tatyana. (5) **Tatyana is suffering significant damages, Personal Injuries; Emotional Distress; Economical Loses as a result of the John and his counsel consistent false statements and fraud:** John and his counsel Ms. Robertson placed a financial barrier between Tatyana and her children; by using abuse of process-- alienated Tatyana with her children since 2011in bad faith *See* Matter of Goodfriend v. Devletsah-Goodfriend,<sup>29</sup> as 3d.1041, 1042(2006); *See also, Reichenberger v. Skalski*, 24 Ad 3d 1101, 1102(2005); Forced Tatyana to become homeless with zero income; Intentionally damaged Immigration status; destroyed Tatyana’s credit score; Tatyana would not be able to rent or get a loan for a long time. (6) Yet, John is continuing misstating the facts in bad faith.

#### **VIII. ALIENATION OF AFFECTION BY PULLING THE CHILDREN AWAY:**

8.1 The children and Tatyana had **loving and affection relationship always until**, The wrongful and malicious behavior of John Mason with help of his unethical counsel Ms. Robertson completely **DISTROYED** a relationship between the children and Tatyana. John **ALIENATED** Tatyana from her

children since March 2011 to this day. **The wrongful and malicious behavior of John** occurred prior to the separation (Ex2; Ex3;Ex4;Ex5;Ex13;Ex21;Ex24) See also, KEETON ET AL., *supra note 18*, at 60

8.2 On March 4, 2011 through committed fraud and misrepresentation of facts and by using Tatyana's disadvantage in English and legal knowledge and by using an abuse of process- John Mason, Ms. Robertson and Sandra Hurd's organized a conspiracy against Tatyana to intentionally destroy a relationship between Tatyana and her children. On 03/04/11 Ms. Robertson, by using her typical technique ambushed Tatyana (**ER403**), aggressively threw the court papers into Tatyana's face 2 minutes before the court hearing. Tatyana was not able to view the paper 2 minutes before the hearing and secondly, Tatyana was not able to understand and read English well. As a *pro-se* with inability to communicate in English—the court granted Ms. Robertson with the adequate cause of hearing. Douglas v. Alabama, 380 U.S 415, 418, 85 S.Ct.1074, 13 L.Ed.2d 934 (1965); Mattox v. United States, 156 U.S 237 242-243, 15 S. Ct. 337, 39 Led.409 (1895). Tatyana *pro-se* with limited English litigant most of the hearing had been a **babble of voices**. Garcia v. State, 151 tex.Cr.R.593, 210 SW.2d 574 (1948); State v. Vasquez, 101 Utah 444, 121 p.2d 903(1942) defendant spoke “broken English). Through use of process and malicious prosecution-- English speaking attorney Ms. Robertson was taking advances against Tatyana in many ways through [her] unethical behavior and **misconduct**. RPC 8.4 (c)(d)RPC 3.3(a)(1)(2)(3). Since March 2011 -Tatyana is completely *cut off* from [her] children through a financial burden which [she] would *never* be able to afford. **John and his counsel Ms. Robertson through fraud and misstating the facts RPC 3.3 (a)(1) - demanded that Tatyana must financially provide for John**. The Alienation with [her] children cause Tatyana **deep depression and emotional distress**. Tatyana will never recover from these damages and Tatyana's relationship with [her] children will permanently suffer in many ways because of our time separated. See Marriage of Flannagan, 709 P. 2d 1247 - Wash: Court of Appeals, 2nd Div. (1985) See also, Lindgren v. Lindgren, 794 P. 2d 526 - Wash: Court of Appeals, 1st Div. 1990.

#### IX. MALITIOUS PROCESUTION:

9.1 Ms. Robertson and her client John Mason without PROBABLE CAUSE are continuing litigating for [their] inappropriate purposes to harass, intimidate and economically harm Tatyana increasing the cost of litigation.

9.2 In 2016 Ms. Robertson unnecessary enforced 2016 three days Trial by maliciously arguing whether the I-864 Affidavit of Support does not exist. After three days 2016 Trial, Judge Wickham

stated that Ms. Robertson unnecessary took the court's time by bringing frivolous litigation on 07/08/16 which was unnecessary (Ex11); RP12/09/16 (pages 17-20).

9.3 However, Ms. Robertson did not stop her abuse and malicious process. On January 5, 2017 Ms. Robertson filed an appeal on the same issue she was inappropriately argued at 2016 Trial already. Even more, Ms. Robertson retained the most expansive appellant attorney Ken Masters. **Ms. Robertson mislead Ken Masters of facts of the divorce case and 2016 Trial.** In the same time through fraud, Ms. Robertson prevented Tatyana from fair response on this appeal *See* (details below)

9.4 On January 25, 2017 and February 24, 2017 Ms. Robertson **misquoted** RAP 8.1(c)(1) and RAP 8.1(g) and **misinterpreted** the law in the divorce court AND by using Tatyana's disadvantage to communicate English well (LEP) which is violation of RPC 3.3(a) *See* (more details below).

9.5 In 2015, Tatyana accidently found out that John and 2013 Order damaged Tatyana's immigration status and Tatyana cannot legally work in the US and \$\$\$ amount which John enforced from Tatyana is accumulate quickly. In 2015 Tatyana addressed this matter in the Divorce Court. Divorce Judges Schaller and Wickham found that Tatyana brought this matter **in good faith.** *However*, from 09/01/15 to 12/23/16 Ms. Robertson continued this matter **34 times** through misconduct RPC 8.4 and RPC 3.3 **in bad faith.**

9.6 On December 15, 2015 Ms. Robertson **misquoted** the law **RCW 2.24.050** by stating that the copies of Motion to reconsideration have to be served to Ms. Robertson 25 days before court hearing when it is 5 business days before court hearing (Ex7). Ms. Robertson inappropriately influenced commissioner Lack. On January 15, 2016 Judge Schaller Granted Tatyana's reconsideration by stating that Com. Lack was wrong. After Ms. Robertson's several continuance—this matter moved to judge Wickham.

9.7 On April 29, 2016 Judge Wickham ordered to both parties to submit I-864 "Affidavit" from Freedom of Information Act (FOIA). John **refused** to follow court order and instead of I-864 marital contract- John requested I-129 fiancé visa which was valued for 90 days only before marriage August 19, 1999. Of-Course (FOIA) denied his request (Ex 8).

9.8 On July 6, 2016 Ms. Robertson filed John Mason's declaration full of false statements signed under oath by saying that: *"John never signed I-864" "Respondent's representation that I have to have filed the I-864 form is simply not true" "I believe the I-864 was a document I may have started to complete, but it was not what I was required to file and so I did not complete of file the document"*

When the USCIS laws is required John signed I-864; in 1999 John was 40 years old and English is his native language; On October 28,1999 John notarized his signature and USCIS had 3 hours appointment with John regarding I-864 (Ex9).

9.9 On July 7, 2016 Ms. Robertson filed another false statement of Lisa Siefert signed under oath Lisa Siefert claimed herself as an immigration law expert for 27 years. *But who does not know the history of Immigration laws and does not know the year that I-864 was enforced.*

In Lisa Seifert's declaration, she wrote: "...[I]n my experience, the immigration department (CIS) **never** places such a stamp on any document. . . . I have never seen any kind of circular stamp from CIS or the Department of Homeland Security. Finally, if the document actually came from an immigration file (from CIS), any stamp would be from the relevant agency which is not Department of Justice, but Department of Homeland Security. I believe the stamps are a very bad fake of a government stamp." (Ex10)

9.10 On 07/08/16 based on Ms. Robertson's argument Judge Wickham scheduled trial to review the facts. During 2016 Trial in the front of Judge Wickham, Tatyana was able to vacate 2013 Order of Child Support based on CR60(b)(11) and I-864 "*Affidavit of Support*" and sanctioned Ms. Robertson and [her] client for unethical behavior and ongoing abuse of CR11(a)(1)(2)(3)(4) committed during THREE DAYS Trial only. Tatyana would NOT be able to succeed at 2016 Trial-- if 2016 Trial would NOT have: (1) English/Russian interpreter service; (2) Mr. Garison- immigration expert witness; (3) Marry Pontorollo-Executive Director of Domestic Violence Organization; and (4) American friend witness of Tatyana's living situation. These people testified at 2016 Trial in total amount of \$15,500.

9.11 Tatyana must recovered from damages and personal injuries and ongoing abuse intentionally created by John and his former counsel Ms. Robertson since 2008 final divorce to this day. *Hodaes v. Gibson Products Co. Hodges v. Gibson Products Co.,* S11 P.2d 151 (Utah 1991). "*The plaintiff in an action for mulicious prosecution can recover money from the defendants for the harms suffered. If the plaintiff suffered an economic loss directly related to the original action, the plaintiff can also recover over the amount lost. This amount includes attorneys' fees and court costs incurred by the plaintiff in defending the original case. Finally, the Plaintiff may recover Punitive Damages. Punitive damages are imposed by judges and juries to punish misconduct by a party*".

#### X. ECONOMICAL LOSES:

10.1 John and his counsel Ms. Robertson *intentionally* willfully through their fraud; and other

inappropriate purposes used abuse of process to destroy Tatyana economically. **Due to limited understanding English, Tatyana was not aware of the time of the abuses that [she] is now seeking to redress for.** Soon after John and his counsel abuse of process and intentional alienation, Tatyana become **literally homeless without any chance of physically survive.** Tatyana does not have relatives in this world. Tatyana was *unaware* what John intentionally damaged [her] immigration status that Tatyana would not be able to work in the US *See* (11/23/16 Order page 2 (E)(G)(H)). Tatyana was **unaware** that John is a financial sponsor for Tatyana and that the divorce does not end [his] obligation 8C.F.R§213(a) (Ex16). Before March 2011, Tatyana was living on her school loan a work study and \$200 child support John once in a while paid to Tatyana. After March, 2011- Tatyana graduated from school accounting degree and has *zero* income. Tatyana was trying to find employment- but it was unsuccessful. Since 2011 Tatyana is couch surfing at the American Friend's houses and 100% depending on these friends who are helping Tatyana with [her] very basic needs due to their goodness of their heart. Due to no ability to pay Tatyana's car was repossessed RP10/17/16 Simpson. John and his counsel cause to Tatyana a **HUGE Intentional Inflection of Emotional Destress (IIED).** In the second part of 2015 year, Tatyana accidentally found that [her] immigration status damaged by John and 2013 Court Order.

**XI. SINCE 2008 DIVORCE, MS.ROBERTSON'S MISCUNDUCT RPC 8.4(c)(d); RPC 3.3(a)(1)(2)(3)(b) AND UNETHICAL BEHAVIOUR:**

11.1Ms. Robertson represents John in the family court since June 2007 to this day. Since 2007 and continuing to this day, Ms. Robertson has made **many** misrepresentations that were not grounded in facts. Many evidence were not disclosed to the court by Ms. Robertson. Ms. Robertson often offered to divorce court material evidence by knowing that material is false. Ms. Robertson violated RPC 3.3 all points.

RPC 3.3(a)(1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material facts or law previously made to the tribunal by the lawyer.

RPC 3.3(a)(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel:

RPC 3.3(a)(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness called by the lawyer, has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter that the lawyer reasonably believes is false.

RPC 3.3(b) A lawyer who represents a client in an adjudicative proceeding and who knows that a person intends to engage. is engaging or has engaged in criminal or

fraudulent conduct related to the proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.

**Factual Misrepresentations and Knowingly Presenting False Information:**

**11.1 (1) Under Rules of Professional Conduct 3.3 (a)(1)(2)(3)** On August 11, 2009 Court Hearing, Ms. Robertson misstated the facts in the court through committing fraud. At that hearing, Ms. Robertson illegally obtained \$2,500 against Tatyana. **Later the court reversed the judgment.** It cost Tatyana \$500 to help write a legal motion from the Morgan law. Prior to August 11, 2009, Ms. Robertson had been properly advised that Tatyana cannot be at the court of 08/11/09. Ms. Robertson had been served and in timely matter due to Tatyana's conflict schedule. However, on August 11, 2009 Ms. Robertson appeared to the court anyway and presented [her] argument by stating that Tatyana "*refused to be in the court*". Because of Ms. Robertson misstating the facts and she was granted with \$2,500 attorney's fees on August 11, 2009. Later Tatyana was able to prove that Ms. Robertson misstated the facts and the judgment of \$2,500 had been removed (Ex17).

**11.1(2)** Ms. Robertson was trying to bring an argument that this marriage was a fraud marriage, when Tatyana and John have two children from the marriage. Marriage Fraud in immigration is defined under INA §275(c) and 8. USC § 1325(c). For a case to be marriage fraud three things must be shown: (1) the person knowingly entered into a marriage; (2) the marriage was entered into for the purpose of evading a provision of the immigration laws; and (3) the person knew or had reason to know of the immigration laws. U.S. v. Islam, 418 F.3d 1125, 1128 (10<sup>th</sup> Cir. 2005).

**11.1(3)** Through Fraud committed by Ms. Robertson and intentionally misstating the facts in this case- Ms. Robertson *deceived* new pointed 2013 Trial Judge by stating that "Tatyana has a large income and has ability to pay", *even though Ms. Robertson was clearly aware that Tatyana cannot legally work and earn income and at that time was literally homeless*. **Due to this fraud committed by Ms. Robertson--** 2013 Trial judge made major errors by stating that "*Tatyana is voluntarily unemployed*" and ordered to Tatyana pay large amount of bill and reunification with the children- when Tatyana's immigrations status had been damaged by John due to his Domestic Violence. This lead to permit ALIENATION Tatyana and her children.

**11.1(4)** On July 7, 2016-Ms Robertson filed Lisa Seifert's declaration who failed to acknowledge the existence of DOJ before DHS. Lisa Seifert who claimed herself as an expert in Immigration for 27 years does not know the history of Immigration and does not know the year that I-864 was enforced.

**11.1(5)** On July 6, 2016 Mr. Robertson filed on behalf John untrue declaration under oath that John never signed I-864 affidavit of Support" when the law are required to sign it and she saw the document with John's signature. And yet, Ms. Robertson- English speaking attorney- aggressively provided false information to the court. See RP12/09/16 page 17-20.

**11.1(6)** On April 29, 2016, Divorce court directed both parties to request I-864 from the (FOIA)— John decided to trick this court instead of I-864 John requested I-129 Fiancé Visa which had value only for 90 days and it was expired before marriage in August 1999. (Of-course FOIA denied his request).

**11.1(7)** John perjures himself under oath by stating that he does not have criminal history when John has Felonies, DUIs, Prison, Domestic Violence charges, Drug abuse, Alcohol dependency. John's polygraph test regarding Domestic Violence and physical abuse toward Tatyana and [her] children found **inconclusive**.

**11.1(8)** During 2008 divorce. Ms. Robertson misstated the facts under oath to other authorities that John never charged with Domestic Violence (Ex5). In the result John's DV arrest was discharged in the divorce case. The GALs and other authorities were unaware of John's behaviors. Domestic Violence Evaluation was done inappropriately and without collaborative contact. *Since 2007 to this day, there are many intentional misrepresentations of facts were done by Ms. Robertson. Ms. Robertson's allegations were systematically very wrong on both facts and laws and it violated of RPC 3.3 Ms. Robertson's duty of candor to the tribunal.*

**11.2 Under Rules of Professional Conduct 3.3 (a) Ms. Robertson made many unwarranted and in bad faith arguments. Ms. Robertson shows a lack of competences before the Divorce Court since 2007.**

**11.2(1) On January 25, 2017** Ms. Robertson misinterpreted the law RAP 8.1(c)(1) and misstated the facts in the front of a judge who was not aware of Ms. Robertson's misconduct during 2016 Trial. Ms. Robertson filed her appeal on 01/05/17, served Tatyana on 01/17/17 placed 2016 judgment under [her] appeal by stating that Tatyana does not have rights to object the supersedes bond because

Tatyana failed to object it in 7 business days from January 5, 2017. When Tatyana objected Robertson's bond in 6 business days from being served. Next, Ms. Robertson stated that [she] does not have obligation to follow RAP 8.1 (c)(1) and prevented Tatyana from fairly respond on Ms. Robertson's appeal.

**11.2(2) On February 24, 2017 Ms. Robertson misinterpreted the law** in bad faith, by stating that under RAP 8.1(g) the lower court has no jurisdiction for second superseades bond. By using Tatyana's Limited English Proficiency clearly communicate in English and presenting the law. Divorce judge did not check the law and relied on Ms. Robertson's credibility.

**11.2(3) On February 24, 2017 Ms. Robertson misquoted** the case I cited Ibew Health & Welfare Trust of Sw. Wash. v. Rutherford, 48627-0-11 Wash Ct. App. Aug., 30 (2016) and misleads the court by stating that this case does not apply, by using Tatyana's difficulties communicate in English. This case is specifically apply to Tatyana's situation.

**11.2(4) Ms. Robertson misleads this court by misquoted** Posner in Liu v. Mund, 686 F.3d 418, 420 (7<sup>th</sup> Cir. 2012) A sponsor cannot mitigate I-864—but Ms. Robertson said the other way around. Probably [she] was hoping that the court and I would not read the case.

**11.2(5) Ms. Robertson misleads** the lower court on Davis v. Davis, 970 N.E.2d 1151 Ohio Ct. App. (2012). In this case, the couple was separated but still married. In my case, John and I divorced in 2008. Davis case does not apply to this case at all.

**11.2(5) Ms. Robertson was wrong** on Shumye v. Felleke, 555 F.Supp.2d 1020 (N.D. Cal. 2008) again, Ms. Robertson was trying to add income to me, which does not apply. (This case is not about my qualifying quarters but toward how much John can reduce his payments for each year).

**11.2(6) Ms. Robertson intentionally misquoted** U.S. v. Darif, 446 F.3d 701, 709-11 (7<sup>th</sup> Cir. 2006) (the reality of this case is to no need to establish that parties did not intend to have a life together because defendant could have so intended but still entered the marriage to evade immigration laws).

**11.2(7) Ms. Robertson was trying to mislead** the lower court on Erler vs. Erler case No.14-15362 Appl. opinion pp12.

**11.2(8) Ms. Robertson misquoted** Younis v. Farooqi, 597FSupp.2d 552, 554 (D.Md.2009)

**11.2(9)** *Ms. Robertson seems to read many cases wrong. Is Ms. Robertson doing this on purpose or because she has a lack of competence in law? Since 2007, Ms. Robertson has been wrong on the laws, misquoted and misrepresented the cases and facts, in this case, many times. Ms. Robertson violated the rule 8.4 Professional Conduct. "An attorney may not avoid the placing misconduct requirement that they make a reasonable inquiry as to the factual basis for a motion "merely by claiming good faith conduct or personal ignorance of the groundless nature of a claimed See Miller v. Badgley, 51 Wn. App. 285, 303, 753 P.2d 530 (1988) (attorneys may not avoid placing **Misconduct** that they make a reasonable inquiry as to the factual basis for a motion "merely by claiming good faith conduct or personal ignorance of the groundless nature of a claim."), review denied, 111 Wn.2d 1007 (1988).* Ms. Robertson violated the rule 8.4 Professional Conduct.

**11.2(10)** Due to Tatyana's Limited English Proficiency during the abuse between 2008 to 2016 years —Tatyana was not able to address the issues and misconduct of Ms. Robertson and her client in the divorce court. Tatyana is doing it now.

*Ms. Robertson's failure to understand and follow the law in this facts and cases either done in bad faith or through gross incompetence as shown by her use of the argument that is not warranted by existing law.*

**11.3 Under the Rules of Professional Conduct 3.3(a) (3).** Many of Ms. Robertson's tactics, in this case, were done to increase my cost, and put me, even more, deeper economic hardships; to unnecessary delay Justus, to purposely harass me and for her other improper purposes.

**11.3(1)** On March 4, 2011, Ms. Robertson grossly ambushed Tatyana by serving Tatyana with the allegation against Tatyana about child abuse, **2 minutes before the court hearing**, Ms. Robertson perfectly was aware that Tatyana could not speak or understand English well and could not read due to Limited English Proficiency (LEP). Being Pro-Se and not understand English.

**11.3(2)** On October 17, 2016 Ms. Robertson ambushed Tatyana pro-se by serving Tatyana with her Trial Brief 5 minutes before the trial ER403 (a) prejudices.to intentionally prevent Tatyana from preparing counter-arguments.

**11.3 (3)** The Trial Brief was very deferent from what Ms. Robertson filed with the Divorce Court.

**11.3 (4)** Since 2008 to 2016 Trial Ms. Robertson **refused** to properly serve Tatyana with many of her motions or replies and other court documents, by leaving Tatyana unaware of what Ms. Robertson

doing in the court to take an advantage of Pro-se who cannot speak English and not training in law. EVEN though Ms. Robertson knew Tatyana's email and Po. Box address.

**11.3 (5)** Since 2008 to 2016 it was **Ok** for Ms. Robertson to serve Tatyana with false legal documents through email whenever Ms. Robertson want it to, but Ms. Robertson does not want to accept any legal document from Tatyana through the email. Ms. Robertson was demanding that Tatyana will serve Ms. Robertson through a priority mail which is cost from \$7.00 to \$20. Ms. Robertson was perfectly aware that Tatyana does not have income. Ms. Robertson's intense was to palace Tatyana into economic hardship and unnecessary increase the cost of litigation.

**11.3 (6)** Since 2008, It is Ok for Ms. Robertson to not following the court rules and filing the motions after deadline —but ignoring this fact and continues talking over Tatyana's objection and aggressively presenting [her] argument anyway.

**11.3 (7)** Since 2008 It is Ok for Ms. Robertson asking to dismiss Tatyana's motions and the documents because Ms. Robertson demands 20 to 25 days for her respond on a simple motion For example: Ms. Robertson intentionally tricked Commissioner Lack in the divorce court on 12/15/15 with her argument supporting with LR-52 which has not been valid for 4 years... when CRW 2.24.050 said it is 5 business days dead line.

**11.4 Ms. Robertson is continuing to deny the facts without evidence to support her denial.**

**11.4 (1)** Calling me "*Ukrainian Thug*", "*Ukrainian Prostitute*" aggressively pulling my hair at the Trial 2013. Since 2007 to this day the techniques Ms. Robertson is using are identical: First was Bartholomew in 2008, next Sandra Hurd during the custody battle who had been found by the trial 2013 judge unprofessional and in 2016 Lisa Seifert-who falsely testified on every aspect of Immigration law and facts in 2017 Ken Masters who is misstating and misrepresenting the facts in the appeal case, based on misleading or limited information provided by Ms. Robertson and John. Now, it seems that Ms. John is continue mislead and present limited or false information to Michael Morgan and Ms. Robertson mislead Andrew Mazzeo.

**11.4 (2)** On (page 2of 10) **Michael Morgan** of his motion on May 4, 2017 stated under the facts that "*Tatyana Mason, who claimed to be Ukrainian citizen, but who was in fact Moldovan citizen*" John was perfectly aware that Tatyana all her life lived in Odessa, Ukraine. John was visited Odessa

and not Moldova. John was perfectly aware that Tatyana has two citizenships and YET, John continued lie to Michel Morgan and mislead as usual.

11.4 (3) Ms. Robertson and John Mason find people whom to they provide limited and misleading information and get them testify without adequate information. The credibility and quality of evidence presented by their witnesses are very questionable with bad qualities and ethics.

11.4 (4) since 2001, there are several records from the USCIS, Safe Place USCIS and Divorce court of Domestic Violence and abuse committed by John. John's abuse was started from the beginning of marriage and continuing through all these years to this day with the help of Ms. Robertson who is using her attorney's licenses for the wrong reasons.

11.4 (5) John with help of his counsel Ms. Robertson is still continuously perjures himself under oath by not showing his true income. John is showing his one bank account WESCU, However, John is still represented by an expansive attorney Ms. Robertson and actually was able to retain TWO attorneys Ms. Robertson and Ms. Siefert at 2016 Trial who were fighting me on Issues of Law and interpretation of facts in bad faith — I had no other choice as to hire Immigration Expert Jay Gairson —because I know the unethical style of Ms. Robertson since 2007. Now, Ms. Robertson and John retained the most expansive appellant attorney Ken Masters and intentionally prevent Tatyana from fairly and professionally respond on their frivolous appeal. Ms. Robertson committed fraud misinterpreted the law to take advantage of Tatyana not only Tatyana's Limited English Proficiency but even through committing misconduct on regular basis. Now Ms. Robertson and John were able to retain Michel Morgan and Andrew Mazzeo.

11.4 (6) The credibility and quality of evidence presented by Ms. Robertson's witnesses are very questionable: Since 2008 Divorce-the techniques Ms. Robertson is using are identical: First was Bartholomew, who called Tatyana "gold digger" and later [he] had been found unprofessional; In 2013 Trial, Sandra Hurd during the custody battle and who called Tatyana "Ukrainian Thug" and "Ukrainian Prostitute" and judge found [her] none credible and prejudice and removed from the case. In 2016 Trial- Lisa Seifert- immigration attorney for 27 years and who was falsely testified on every aspect of Immigration law and facts; In 2017 Ken Masters who is misstating the facts in this case already and Now-- Michel Morgan and Andrew Mazzeo misstating the facts already. Ms. Robertson's

*tactics, in a divorce court, were done to intentionally increase Tatyana's cost of litigation and put Tatyana, even deeper into economic hardships and cause [her] emotional distress; to intentionally harass Tatyana to the cruelty and for their other improper purposes after final 2008 divorce.*

#### RULES OF PROFESSIONAL CONDUCT 8.4:

(a) Violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another: Through Sandra Hurd, Lisa Siefert, Ken Masters- All these people falsely testified on every aspect of law and facts (Ex 25).

(b) Commit a criminal act that reflects adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects: Ms. Robertson is English speaking attorney who knows this case since 2007 and yet, Ms. Robertson choose to intentionally provide false information to court (Ex 17 Robertson's 2009 Misconduct; Ex25; Ex26).

(c) Engage in conduct involving dishonesty, fraud, deceit or misrepresentation 100% applies to Ms. Robertson since 2007 to this day.

(e) State or imply an ability to influence improperly a government agency or official or to achieve results by means that violate the Rules of Professional Conduct or other law (Influence CPS and Court, GALs, Lisa Siefert, Ken Masters and others including Mr. Mazzeo and Mr. Morgan)

(g) Engage in conduct that the lawyer knows or reasonably should know is harassment or discrimination on the basis of race, sex, religion, national origin, ethnicity, disability, age, sexual orientation, gender identity, marital status or socioeconomic status in conduct related to the practice of law. This paragraph does not limit the ability of a lawyer to accept, decline or withdraw from a representation in accordance with Rule 1.16. This paragraph does not preclude legitimate advice or advocacy consistent with these Rules. (Calling Tatyana "Ukrainian Prostitute" and "Ukrainian thug" and Pulling Tatyana's hair in 2013 Trial, demanding physical address when Ms. Robertson had PoBox since 2014, refused to serve Tatyana with the copies of her Motions and responses).

RPC 1.5(d) Ms. Robertson as family law attorney has personal interest in this case, because the only way she gets paid if she would win the case. Family law attorneys cannot work on contingency level as it is considering unethical and violate 1.5 (d).

Ms. Robertson's illegal acts are perfectly fit Under Act, 18 U.S.C. §§ 1961-1968 Washington state Court recognizes the Racketeer Influenced and Corrupt Organizations Act, commonly known as "RICO" and this applies to Washington State's civil lawyers such as Ms. Robertson and her co-defendant who attempt and commit illegal acts since 2008 final divorce and they have *See Corporation v. Steven R. Donziger, et al.* "RICO" specifically allows either private parties or the government to bring civil cases in different contexts. As Justice Brennan stated for the Court in the 1989 case *H.J., Inc. v. Northwestern Bell Telephone Company*, "limiting RICO to organized crime "finds no support

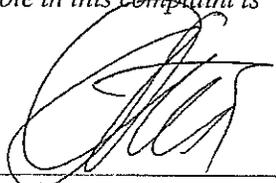
in the Act's text, and is at odds with the tenor of its legislative history." This is similar to the federal antitrust laws, upon which RICO was modeled, which permits criminal and civil cases along with similar remedies, such as injunctions, triple damages, costs, and attorneys' fees."

## XII. CONCLUSION:

12.1 Tatyana's Complaint must be **GRANTED**. Tatyana's Complaint provided detailed, factual information that since 2008 final divorce John with help of Ms. Robertson are using the judicial process for an illegitimate, improper purposes such as harassment, economic hardship, alienation, emotional distress, extortion, delay by filing malicious appeal in 2017 and continuing preventing Tatyana from fair response, by coming fraud and misconduct. Tatyana is subject to the abuse and suffers severe harms, as does the judicial system in general. Alienation of Affection by pulling Tatyana's children away, abuse and malicious process, tort makes the Process abuser, John Mason and his counsel Ms. Robertson, liable to Tatyana for the harms caused by their consistent the abuse of process since the 2008 final divorce to this day. Due to Tatyana's limited English Proficiency (LEP) Tatyana was not aware of the time of the abuses that Tatyana is now seeking to redress for. Inability to Speak English Well, Overcomes Understanding of the Law by a Pro-Se Litigant. United States ex rel. Negron v. State of N.Y., 434 F.2d 386, 389 (2nd Cir.1970) It is axiomatic that the Sixth Amendment's guarantee of a right to be confronted with adverse witnesses, now also applicable to the states through the Fourteenth Amendment, Pointer v. Texas, 380 U.S. 400, 85S.Ct.1065, 13 L.E.s.2.d 923 (1965), includes the right to cross-examine those witnesses as "an essential and fundamental requirement for the kind of fair trial which is this country's constitutional goal." *Id.* at 405, 85 S.Ct.at 1068. *See also*, Bruton v. United States, 391 U.S.123, 128, 88S.Ct 1620, 20 L. Ed.2d 476 (1968); Barber v. Page, 390 U.S 719, 725, 88 S. Ct. 1318, 20 Led.2d.255 (1968). Recovery *Res Judicata* grounds must be granted. Nickerson v. California Stage Co., id Cal. 520 (1858).

*Under Penalty of perjuries Under Law of Washington State, Everything I wrote in this complaint is true and correct.*

**DATED** this 30 day of June 2017

  
\_\_\_\_\_  
Tatyana Mason Plaintiff Pro-Se

EXPEDITE:  
JUDGE JAMES J. DIXON

SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE THURSTON COUNTY

IN RE: TORT LAW CIVIL ACTION

No. 17-2-01121-34

TATYANA MASON

*PLAINTIFF,*

**LIST OF EXHIBITS FOR  
PLAINTIFF COMPLAINT  
(AMMENDED)**

vs.

JOHN MASON;  
LAURIE ROBERTSON

*DEFENDERS*

*[(Clerks Action Required)]*

- Exhibits 1 ... 11/23/16 Order
- Exhibit 2 ... Declaration of Soon Lee
- Exhibit 3 ... Declaration of Alejandra Walker
- Exhibit 4 ... Letter of Trisha Smith SafePlace
- Exhibit 5 ... 08/07/07/ DV Order against John Mason
- Exhibit 6 ... John's DV evaluation
- Exhibit 7 ... RCW2.24.050
- Exhibit 8 ... I-129 John Requested from FOIA
- Exhibit 9 ... 07/06/16 John Mason's Declaration of Perjuries
- Exhibit 10 ... Declaration of Lisa Siefert
- Exhibit 11 ... RP12/09/16 (pages 17-20)
- Exhibit 12 ... Declaration of Marry Pontorollo
- Exhibit 13 ... Declaration of Dr. Rybiki
- Exhibit 14 ... Letter to Sandra Hurd
- Exhibit 15 ... Diana Borden's Declaration
- Exhibit 15(a) ... Diana Borden's Declaration
- Exhibit 16 ... Declaration of Louis Horn
- Exhibit 17 ... 08/11/09 Motion regarding Ms. Robertson's misconduct
- Exhibit 18 ... Promissory Notes and John Mason's false statements
- Exhibit 19 ... NORTH WEST IMMIGRATION RIGHTS PROJECT DECLARATION
- Exhibit 20 ... Jay Gairson's Declaration
- Exhibit 21 ... Effect of parental Alienation on Children

Exhibit 22;23 ... .. Declaration of Stacy Simpson witness of Defendants Systematic Perjuries

Exhibit 24 ... ..Defenders are Using Abuse of Process to intentionally harass and cause emotional distress to Tatyana

Exhibit 25 ... .. Ms. Robertson misquoted the cases, misinterpreted the law and misstated the Facts.

Exhibit 26 ... .. Ms. Robertson is under investigation from WSBA  
WSBA deferral of Tatyana's grievance because the allegations are related to pending civil litigation

**PRO-SE**

**October 10, 2019 - 2:52 PM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division II  
**Appellate Court Case Number:** 51642-0  
**Appellate Court Case Title:** Tatyana Mason, Appellant v John Mason and Laurie Robertson, Respondents  
**Superior Court Case Number:** 17-2-01121-2

**The following documents have been uploaded:**

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