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COURT OF APPEALS  
DIVISION II

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STATE OF WASHINGTON

BY AP  
DEPUTY

No 51913-5-II

COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON

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SKIPPER W KUZIOR,

Appellant/Defendant,

Vs

Respondents/Plaintiffs

Henry Reitzug, And his separate property  
Tier one foreign investor dual citizenship Orcas Island  
Mark Hadman, Lisa Hadman /marital community

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RESPONSE TO RESPONDANTS BRIEF

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Pro Sea

Attorney for Appellant

Dianne Conway

Attorney for Apelles's

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**TABLE OF AUTHORITIES.....**

Allstate Ins. Co v. Raynor, 143 Wn.2d 469, 475, 21 P.3d 707 (2001)

Binder v Binder, 50 Wn.2d 142,148-149, 309 P.2d 1050 (1957)

Cuillier v. Coffin, 57 Wn.2d 624, 627 (1961)

Drake v Smersh, 122 Wn. App. 147,153-4, 89P.3d726(2004)

Gamboa v Clark, 180 Wn. App. 256, 321 P.3 d1236 2014

McPhee v. Nida, 60 Wash. 619, 621, 111 P.1049 (1910)

Lisa Hadman v. Steve Larson Wn (1987)

Roediger v Cullen, 26 Wn.2d 690

State v Adams,107 Wn.2d 611, 620, 732 P.2d 149 (1987)

Wels v Hippie 269 Or. App785, 787(2015)

**STATUTES.....**

RCW 61.24.050

RCW 4.24.630

RCW 4.96.010

**Corresponding RAP Rules.....**

13.1 a

RAP 2.3 (b) (1) (2) (3)

RPC 1.9 9 (a) (b) (1) (2)(c)(1) (2)

**CONSTITUTIONAL AUTHORITY.....**

**Tribal Trust Property The independent Country/Nation**

Of Puget Sound pg4

6<sup>th</sup> Amendment of US Constitution “Just Compensation”  
for a State or government agency acquiring land.

Us constitution Right to a fair Trial

1964 Civil Rights Act right to government services such as  
equal treatment in courts and equal Treatment for disability

Executive Document No. 41 34<sup>th</sup> Congress 3<sup>rd</sup> Sess. 1857

Ratified By President Franklin Pierce, The Judicial

Branch Edward Lander, And the US 34<sup>th</sup> Congress our

Indigenous rights to our homestead land claims cert 617

and our survey lines 1102’ wide

Executive Document No. 1 34<sup>th</sup> Congress 3<sup>rd</sup> Sess. 1855

Survey Map with Puget Sound Guide Meridian and 4<sup>th</sup>

standard parallel Credit to Puget Sound Agriculture

Plagiarized by James Tilton Adj. General Territorial

Militia

**I..Statement of Petitioner.....**

I am, Skipper William Kuzior I am the proud executor of the John McLeod Homestead (Tribal Trust Property). Our beautiful Nation / The Country of Puget Sound has been forced from history and nearly forgotten for almost two centuries. I legally own subdivision 2303 AKA Lot 1 of Rainier Ranches in its entirety (**The Property**) Larry Tibbett's acquired lot 19 of Rainier Ranches from my Uncles best friend when he passed in 2011. Larry Tibbett the Petitioners cousin then illegally Re-recorded a Map 2303 done by **Slieviens** for my family adding 3 out of four of my legal descriptions we recorded with a title company that no longer exists **Land Title** they got gobbled up by one of the larger title companies over time the recording number of my title is **2834150** parcels ABC and D (**THE TITLE**)Larry Tidbits' gave himself a 100' road Easement formerly State Route 5 abandoned in the late 1890s when Ezra Meeker tried unsuccessfully to get title of the Puget sound Guide Meridian for a highway he had planned. Pg6

The family thought it was funny that Larry would so boldly commit such an act of fraud to steal something so intrinsically worthless he can never do anything with it except pay taxes

I am trying to understand where Conway thinks her clients have any Legal Right or Title to my Property. They transferred it to themselves via **Quit Claim Dead** when we accepted their offer for 280k in 2012. We pulled their offer and returned their earnest money when they tried to do a timber survey using Anderson Surveys based out of a Storage unit in Federal Way.

The family listed the old growth property as valuable Timber to weed out investors or people that may try to destroy our primeval Bog Forest the rarest Ecosystem in Washington State. They threatened to sue us said they bought a log skidder to log our property also claiming we owed them 70k for the timber Survey. After reading the contract it was iron clad they knew they had absolutely no legal recourse. Pg7

## II. Statement of the Case Procedural History Response

Fact: This case is started by Henry Reitzug and his separate Estate

Henry Reitzug is not a Titled Owner of 6214 260<sup>th</sup> Parcel Number 041830405. Henry and his brother in law transferred this property **Via Quit Claim Deed** in 2012. Simply put quit claim deed transfers interest I real property since neither Reitzug or his brother Mark Hadman have or will ever have interest in these properties this act constitutes Felony Fraud.

Quit Claim Deeds are often used by family to transfer property. This instrument put them as tax payers with the county and Assessors maps it is not Title simply put when they tried to get title via the quit title claim they made against me the first step is to get a Subdivision Guarantee and Title Insurance. Chicago Title would not give them either and they were told by their long time friend Rob Rainy “They can never get title insurance they would have to get a bond if they ever wanted to transfer or sell” pg8

I have both a **Subdivision Guarantee for Lot 1 2303** as well as a two separate title insurance policies. I obtained these documents thru transnational land Title Company.

All of my witnesses at trial were certified surveyors the original surveyor's son Matt Sliven's Appex Engineering Title conveyance officers and county workers.

My land title to my subdivision I both inherited from direct blood family and paid for is the only valid title to any of these properties involved this Lawsuit

I have provided documents proving the original parent parcels are mine alone dated January 31, 1977 HBJA-31

The plaintiffs claim seems to involve some sort of adverse possession on boundary line fences that are centuries old and some Quit claim fraud.

The plaintiffs Claims were so weak they did not even file any evidence at trial instead tried to cancel the trial to stick me with the fees for their attorneys fees involving drones flown dangerously close to me and my family, repeated calls to code enforcement by the plaintiffs. Pg9

Mark Hadman's Machete attack when he blocked me and my minor children using his John Deer Gator Utility Vehicle. Mark Hadman was committing a multitude of class A felonies violated his full order of protection order stopping me from going to court to testify against his family in a separate matter as an eye witness involving other crimes on July 20 2018. see Conway's declaration in second Summary Judgment. I was asked as Mark was detained by Sheriffs if I wanted to press charges on the Trespass and violation of restraining order I declined when he promised he would never come around anymore. He was told by Sheriffs he would be arrested if he ever came back and bothered us.

### **III.....Response to Trespass Claims**

Conway's Claims of Trespass have no material proof not even one photo no witnesses other than plaintiffs allegations' in their attempt to acquire my segregated wetlands. My title puts it best pg10

**Exhibit A 7.** Any Prohibition or limitation of use, occupancy or improvements of the Land resulting from the rights of the **public or riparian owners** to use any portion which s now or was formerly covered by water.

Plaintiffs' are trying to exert ownership of federally protected wetlands via adverse possession absolutely no legal merit and their inferior Quit Claim title has no merit whatsoever

### **III. SUMMARY OF ARGUMENT.....**

Was trial courts first summary judgment appropriate?

**NO** absolutely not

The burden of proof is on the Petitioner the maps the penciled location of the century old fence all point to the south side of the property look at the way the direction arrow faces on the maps they provided a half mile away from my animals and structures. Pg11

The Arial photo I supplied in response shows Trees and old growth forest Wetlands. The hay story is a complete fabrication.

When the plaintiffs Surveyors Anderson Surveyors came out they came to the same conclusion Larson and Associates did. The buildings and duck pen were all located within the Boundaries of TPN 0418303015

**Plaintiffs'** then forced their surveyors to come out a second time and blasé a path to the creek thru heavily brushed and forested segregated wetlands. Mark Hadman did not even agree with his own surveyors he attempted to dig up the bar and cap placed by Sliven's in an attempt to move it

**Conway on appeal tries to claim we moved the decades old Goat Barn on Appeal** This large two story structure sets on a concrete foundation it is made out of Centuries old Ship Lap. Pg12

The Structure would crumble to dust if we tried to relocate it and the concrete foundation would remain the duck pen is attached we have no chickens and we did not have to move anything everything including our brand new fencing was completely on our property U can see the structure on our Arial photo from 2012 That I provided for reference at trial I also brought another with no lines or fences separating my building parcel from my segregated wetlands

This entire lawsuit is frivolous and meant to Harass the plaintiffs have not even shown up for court one time yet they ask for 50k

Should the money Conway has taken out of my bank accounts be returned or held by the clerk of the court YES

Conway purposely emptied out my bank accounts so that I could not hire Dickson and associates on Appeal I have been forced to go it alone pg13

Should the 50k Judgment be dismissed Yes

Conway tries to lump all of her failed district court motions that she lost such as the one to declare me Vexatious. District court Judge Buttroff dismissed these claims and sanctions

Should the Plaintiffs' reimburse me for my Attorney fees to Attorneys Dana Ryan, Attorney Daniel Murphy and Larson and Associates Engineers **YES**

#### **IV. LEGAL ARGUMENT**

On Appeal Conway asks for Quit Title and money for title Slander. Yet she claims to have won these things already.

**Fact** she was not the prevailing party on either of these issues.

This entire case was to subdue and harass my familyPg14

This entire case was started to make us pay for her failed campaign of terror and slander look at all my fruit trees her client have destroyed the photos I provided these valuable crops under **4.24.630** where destroyed by mark Hadman with his John Deer Gator in the center of our property July 2018. He was physically detained and transported off of my property by **Sheriffs Deputies** I want to see some receipts for hay sold pictures of them harvesting this smoking hay from under the canopy of old growth wetlands forest bordering Lincoln tree farm 2000 feet away from my home and residence. Burdon of proof is on petitioner

I am accused of a Crime Trespass no evidence against me under the **United States Constitution I have a right to a fair trial on these alleged criminal actions**

Does this constitute **government taking under the US constitution** Yes This is not the first time these clients intercepted title and rewarded the Schools for allowing their criminal title transfer to themselves. Pg15

Lincoln Tree farm is a beneficiary of my entire building parcel to the south east as described in 2303

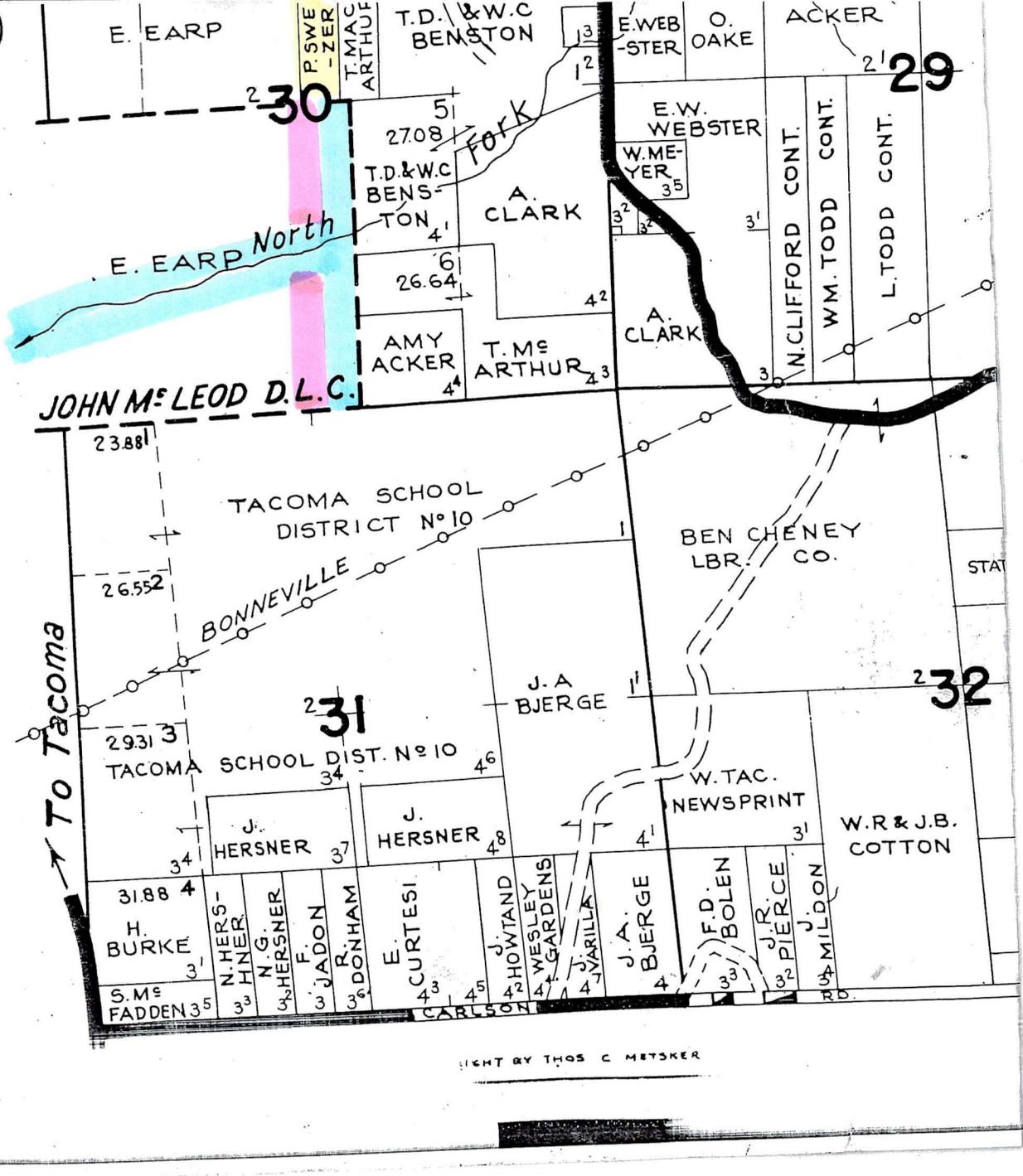
Bethel Schools built Rocky ridge off of a map found at Assessors' office I presented this in my trial Documents giving Norrine Tibbits 26 acres of our families homestead

## VII. CONCLUSION

If cases like these are allowed to conclude rewarding Vexatious Litigants with loads of money for multiple Harassing cases that they lost. No evidence No crime no Title 90 percent of Conway's Legal papers are illegally obtained medical Records. **Yes** I do have a disability **Question** do I not have the right to Title of my own real property The right to build a house on it and Relax ad Rest without Harassment

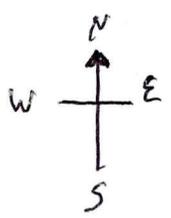
**Picture on Last Page to Help with Spelling pg 16**

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Dated this 10 day of February 2020

P SWELTZER



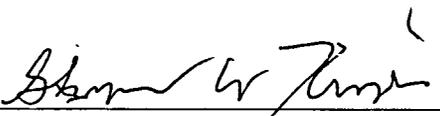
*Skinner*  
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Skipper W Kuzior

KUZIOR

95 Acre Wetlands Segregation  
Segregation

Dated this 0 day of February 2020

A handwritten signature in cursive script, appearing to read "Skipper W Kuzior", written over a horizontal line.

Skipper W Kuzior

