

FILED
Court of Appeals
Division III
State of Washington
7/27/2018 8:00 AM

NO. 351394 -III

COURT OF APPEALS
DIVISION III
OF THE STATE OF WASHINGTON

IN RE THE MARRIAGE OF

ANGELA M. STACY,
nka Angel Base,

Appellant,

vs.

JOHN C. STACY,

Respondent.

REPLY BRIEF OF APPELLANT

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I. SUMMARY OF ARGUMENT

The trial court abused its discretion in several ways. The court exceeds its authority in using discretion in inclusion or exclusion of income of the father, and all sources of the father's income should have been included in the court's calculations in order to determine proportional shares and in a determination to exceed the presumptive 45% cap on obligations of the father. The court must consider and compare caselaw in decisions regarding postsecondary support in order to fulfill the legislative intent to increase the equity of child support orders by providing for comparable orders in cases with similar circumstances. In addition to the nonexhaustive list of statutory considerations for postsecondary support, the court must consider special circumstances in awarding support for a child's attendance at a private school and the court must consider an increased award based on an obligor parent's noninvolvement with the children. The trial court erred here in limiting the father's contributions without a showing of substantial hardship for him and in light of his choice to voluntarily support other non-dependent adults in his household, and in ordering disparate contributions which work a hardship to the mother and the child while allowing windfall to the father.

II. ARGUMENT

A. The Court May Broaden or Limit an Award of Child Support, Including Postsecondary Educational Support, but Must Do So Based on Washington Laws and on the Facts of the Case.

Washington State established a child support schedule with the express intent of insuring that "...child support orders are adequate to meet a child's basic needs and to provide additional child support commensurate with the parents' income, resources, and standard of living." RCW 26.19.001. In addition to providing direction to the courts to look at the ability and standard of living of the parents in child support matters, the legislature intended to "Increas[e] the equity of child support orders by providing for comparable orders in cases with similar circumstances." RCW 26.19.001(2). In this manner, the court is relieved of the burden of deciding cases based on the court's own potentially limited history or experience in determining cases for which to order additional support or decreased support for a child.

In matters for postsecondary support the court allows for broader considerations by the court than the simple child support worksheet calculations in evaluating the needs of the child and the abilities of the parents, stated as follows: "The child support schedule shall be advisory and not mandatory for postsecondary educational support." RCW 26.19.090(1). However, because the child support worksheets are advisory

even if not mandatory, in determinations of postsecondary support the court must first consider the child support schedule and must follow the laws in consideration of all income for purposes of calculating the child support worksheets. The court is mandated to consider all income from any source including but not limited to salaries, wages, contract-related benefits, bonuses, and income from second jobs (unless specifically excluded by statute under special circumstances which are not applicable here). RCW 26.19.071(3),(4). Contrary to the assertions of Mr. Stacy, the court exceeds its authority and abuses its discretion here when excluding income of the father from consideration in income calculations without statutory basis. The correct calculation of Mr. Stacy's income is central to the determination of his proportional income share and thus his presumed proportional share of support, and the calculation of net income is also key in the determination of the presumed cap of 45% of his net income and in whether or not that cap could or should be exceeded.

The statute provides several non-exclusive factors for the court to evaluate in awards for postsecondary support. RCW 26.19.090(2). No part of the statute specifying considerations for postsecondary support allows the court to overlook the intent of legislature for "Increasing the equity of

child support orders by providing for comparable orders in cases with similar circumstances.” RCW 26.19.001(2), 26.19.090.

The court must consider and compare caselaw in decisions regarding postsecondary support. Caselaw is even more important in cases involving postsecondary support than in child support cases involving only issues of basic support for a minor child, because the statute itself provides no directives other than the intent for the court to provide comparable orders in cases with similar circumstances. *See* RCW 26.19.001(2), 26.19.090. Thus the court must look to what has been done in other cases with similar facts, while focusing on the facts unique to the instant case.

We know that postsecondary support is child support. “Postsecondary educational support is granted to support an otherwise adult child while pursuing education beyond high school; it is money paid to support a dependent child, therefore it is child support.” *In re Schneider*, 173 Wn2d 353, 368 (2011). “The court explained that postsecondary educational support “fits within the structure of the child support statute in general” and in some situations “can function just like ordinary child support.”” *In re Marriage of Cota*, 177 WnApp. 527, 541 (2013), *citing Schneider* at 368. In making a determination of postsecondary support, the court must look to cases with similar circumstances and provide a comparable order,

in consideration also of the history of the instant case itself. RCW

26.19.001(2), 26.19.090.

B. Using Washington Statute and Caselaw History, the Court May Order Only One or Both Parents to Pay Postsecondary Educational Support and May Consider an Order for the Child to Contribute to Their Own Education.

Mr. Stacy relies on three cases to support his contention that the court should have limited postsecondary support in this case and rightfully ordered a disproportionate obligation for the child's contribution, as Mr. Stacy contends the amount ordered by the court was already excessive without granting the amount requested for his share of the obligation.

In *Cota*, the first case Mr. Stacy relies upon to support his contentions, the "[father]'s net monthly income at the time the trial court ordered him to pay postsecondary support was \$2,169.88. The trial court ordered him to pay \$433.66 per month in support for his younger daughter and \$8,135.07 for [the older daughter] Annamarie's college expenses. The college expense reimbursement amounts to approximately \$677.92 per month if divided over a full year. Therefore, under the trial court's order Anthony's child support obligation [for both dependent children] totaled \$1,111.58 per month, or 51 percent of his net monthly income." *In re Marriage of Cota*, 177 WnApp. 527, 542 (2013).

Comparing the father's income in Cota to today's numbers, "\$2,169.88 in 2013 is equivalent in purchasing power to \$2,347.15 in 2018."

<http://www.in2013dollars.com/2013-dollars-in-2018?amount=2169.88>. If the court in the instant case finds good cause order Mr. Stacy to pay 50% of his net income of \$7333.00 (or greater with evidence of additional income) in support for both children herein, Mr. Stacy will still have a greater amount of monthly income for his own personal use *after paying support* than did the father *before paying support* in the *Cota* case on which Mr. Stacy relies.

The Court of Appeals, Division II, did not find the amount ordered in *Cota* to be excessive, but remanded the case for the trial court to either limit Mr. Cota's obligation to 45% of his net monthly income *or to enter findings consistent with an order that good cause exists to exceed the presumptive 45% cap*. *Cota*, at 542 [*emphasis added*]. The *Cota* court additionally directed the court to consider good cause to exceed the 45% cap, stating, "However, RCW 26.19.065(1) allows the trial court to exceed the 45 percent cap "for good cause shown", which includes "educational need"." *Cota* at 542. We know from further analysis of the caselaw as below that "educational need" will necessarily require the court to consider factors for private school education; additionally, the statute

allows the court to exceed the cap for “psychological need” and the court below previously found the children’s private school system to be a psychological benefit and “nurturing” to them especially in light of the abandonment of the children by the father. The lower court erred in denying the request to exceed the 45% cap under the special circumstances of this case, especially in light of the *Cota* case where the special circumstances herein did not exist and the court still suggested that the 45% limitation could be exceeded for the educational need therein.

In *Kelly*, the second case Mr. Stacy relies on, the father’s monthly income can be determined by computing the facts stated in the Court of Appeals Division I decision: the father’s basic support obligation using his income at the time that the postsecondary award was made was \$462.95 per month at his proportional share of income of 57.3 percent. *In re Marriage of Kelly*, 85 WnApp. 785, 789-90, 794-96 (1997). A monthly basic support obligation for a child of those two parents would thus be \$808 (using a basic algebraic calculation as follows: $57.3/100 = 462.95/x$; $46295 = 57.3x$; $x = \$807.94$). Miranda was the couple’s only child, so the one-child column would be used on the child support economic table to

find a combined monthly income for the parties of about \$4300¹. *Kelly* at 789; RCW 26.19.020.

The father in *Kelly* would thus have had a net monthly income of about \$2463.90 (using a basic calculation of $4300 \times .573 = \$2463.90$, where 4300 is the combined monthly net income and where .573 is the father's proportion of that combined monthly net). In yet the second case relied upon by Mr. Stacy, Division I did not find the trial court's order excessive when the trial court ordered the father in *Kelly* to "...pay 57.3% of tuition, room & board, class fees, lab fees, books, transportation, health fees, hall dues, health insurance, lobby fees, copy costs, and school supplies."² *Kelly* at 789-93. Notably, the *Kelly* court ordered the basic support obligation for the child to continue in the summer months through August though she was not attending summer school, and the court did not require the child to attend summer school or work but instead to try to find a summer job to apply those earnings to her educational costs (implying that a basic support obligation again continue in the summer months), and the court limited the child's contributions to 10% to include scholarships, loans, and earnings.

¹ The child support economic table has been adjusted since the *Kelly* case was determined in 1997, so the incomes may've differed slightly from incomes the current table suggests.

² The *Kelly* court also ordered proportional reimbursement "...for Miranda's tuition, fees, deposits, summer orientation, room and board, linens, and books." *Kelly* at 791. Such reimbursement was denied herein, as the court below continuously used the school's generic estimate of expenses without allowing any accounting for actual similar expenses

Id. at 798-90. The court should likewise order a basic support obligation herein for summer and other school breaks, especially considering Mr. Stacy's abdication of parental duties which increases the burden on Ms. Base and the child while allowing windfall to Mr. Stacy. The court should also likewise limit the child's contributions herein, in consideration of his institutional academic scholarships which far exceed the 10% cap in *Kelly*.

Of special note, the father in *Kelly* urged the court to cap his obligation but the appellate court affirmed no cap on the father's obligation was necessary because his proportional share was directly related to the child's needs; the court reasoned, "If Hannan's ability to pay diminishes in the future, "modification of the award can be easily attained.""*Kelly* at 791-92, citing *Edwards v. Edwards*, 99 Wn2d 913, 919 (1983). "When the obligor parent's obligation is directly related to the child's needs, the rationale of the *Edwards* ceiling requirement is inapplicable. We thus hold that the lower court acted within its discretion by ordering Hannan to pay a percentage of Miranda's college expenses without imposing a maximum dollar amount." *Kelly* at 792.

Herein, the lower court artificially capped Mr. Stacy's obligation at a portion of the school's generic estimate of expenses, after first reducing

or necessities of life herein, effectively placing an even larger disproportionate burden on the mother and child while relieving the father despite his greater share of the income.

the total allowed expenses by Jonathen's institutional academic scholarship and the ordering a one third obligation to Jonathen on top of that reduction, and without allowing for additional documented actual expenses as incidentally related to school expenses and necessary for his life and success in school. The *Kelly* decision on which Mr. Stacy relies allowed all such expenses incidental to education and provided no cap on the expenses as "directly related to the child's needs" as should this court allow in providing for similar orders of support for similar cases.

Comparing the father's income in *Kelly* to today's numbers, "\$2,463.9 in 1997 is equivalent in purchasing power to \$3,868.38 in 2018."

<http://www.in2013dollars.com/1997-dollars-in-2018?amount=2463.90>. If the court in the instant case finds good cause order Mr. Stacy to pay 50% of his net income of \$7333.00 (or greater with evidence of additional income) in support for both children herein, Mr. Stacy will still have an equivalent amount of monthly income for personal use *after paying support* as did the father *before paying support* in the *Kelly* case on which Mr. Stacy relies.

In *Shellenberger*, another Division 1 case and the third case Mr. Stacy relies upon to support his position, the father was receiving monthly disability pay of \$1800, and declared his monthly income to be \$2500 per

month including an average of \$700 per month from odd jobs. *In re Marriage of Shellenberger*, 80 WnApp. 71, 76-77 (1995). The mother presented evidence in support of her position that the father's earning capacity was greater than he stated, and the trial court found the parents to have a "virtually equal... ability to contribute to the post-secondary education" with their incomes both "...equivalent to approximately \$3400 a month net..." *Shellenberger* at 77.

In addition to the adult dependent in *Shellenberger*, the father was the primary parent of and sole support for an eight year old child. *Id.* at 73. The Division I Court of Appeals remanded *Shellenberger* with instruction to enter realistic findings of the father's earning abilities, and to make determinations regarding debt reasonably or not voluntarily incurred, and for findings with respect to the father's ability to support his minor child at home who was solely reliant on his support. *Id.* at 82-86. The court reasoned, "Where the trial court must choose between the higher education needs of an adult child and the support needs of a minor child, the needs of the minor child should weigh more heavily." *Id.* at 84 and 87.

One relevant comparison to *Shellenberger* of the instant case herein is the implied notion that the court must also weigh the support needs of the adult dependent children more heavily than the other non-dependent adults

the father voluntarily chooses to support in his household. Mr. Stacy should not be condoned in diverting funds from the support of his dependent children to voluntary support of other non-dependent adults in his household.

Also in the context of the facts unique to or similar to *Shellenberger*, “The court also should consider the adult children’s ability to contribute to their own educations through grants, scholarships, student loans and summer and/or part-time employment during the school term[.]” *Id.* at 85. The father herein avers that the court below properly required the child to take out student loans, but the *Shellenberger* court reiterates the issues in context of parents with far less income than those herein³ (and without a history of private school education and without Mr. Stacy’s abandonment of the children and voluntary abdication of parental duties), stating:

A trial court should not require objecting parents of modest means to pay for private college where the child can obtain a degree in his or her chosen field at a publicly subsidized institution.[*] ... **This is especially true where, as here, none of the factors discussed in *Stern and Vander Veen* appear, and *Shellenberger*, at least, is in economic distress as a result of the order imposed upon him. In the instant case, the trial court required *Shellenberger* to pay one-half of \$4500 per quarter in private tuition without making specific findings that no less expensive but academically acceptable option existed. *Shellenberger* at 85-86 (footnote**

³ The father in *Shellenberger* earned a net income somewhere between \$2500 and \$3400, while the father herein enjoys more than twice that income even without the evidence of additional income as improperly excluded by the court below.

omitted, emphasis added), citing *Cf. Stern*, 57 WnApp. 707, 719–20 (1990).

Notably,* the *Cota* court distinguished the rule of *Shellenberger* regarding the cost comparison by stating, “We note that this rule may draw an arbitrary distinction between private and public schooling when a more appropriate analysis would be on the actual cost of the school as compared to other reasonable alternatives.” *Cota* at 542. Additionally, when a parent hasn’t raised the cost comparison issue on appeal (as here), the court “need not address the propriety of the rule or whether the trial court properly complied with it in this case.” *Cota* at 542. Also, notably similar to Mr. Stacy herein and opposite of the father in economic distress in *Shellenberger*, the father in *Cota*, “... other than showing that his expenses exceeded his income, ... did not demonstrate sufficient financial hardship to trump the trial court’s discretionary ruling that postsecondary educational support was appropriate for [the child to attend a private school].” *Cota* at 539.

If the court in the instant case finds good cause order Mr. Stacy to pay 50% of his net income of \$7333.00 (or greater with evidence of additional income) in support for both children herein, Mr. Stacy will still have an equivalent amount of monthly income for personal use *after paying*

support as did the father *before paying support* in the *Shellenberger* case on which Mr. Stacy relies.

Mr. Stacy's citation to the *Shellenberger* case is important for some rules of law but is only somewhat factually analogous, and in fact this case is different in several important ways.

The *Shellenberger* father was the sole support for an 8 year old minor who lived at home with him, while Mr. Stacy has no minor children or other dependents who rely on him for support and in fact Mr. Stacy diverts funds from the support of his dependent children to voluntarily support 1-3 other adults who are not otherwise dependent upon him.

The father in *Shellenberger* was in economic distress while Mr. Stacy has enough money to voluntarily support other non-dependent adults and voluntarily relocate to commute over an hour to work while choosing to live in a ski resort with voluntarily increased rental housing expenses, and, as similar to the father in *Cota*, "... other than showing that his expenses exceeded his income, ... did not demonstrate sufficient financial hardship to trump the trial court's discretionary ruling that postsecondary educational support was appropriate for [the child to attend a private school]." *Cota* at 539.

In *Shellenberger*, “...none of the factors discussed in *Stern* and *Vander Veen* appear...” while here all of those factors⁴ appear as well as the circumstances regarding abdication of parental duties as discussed in *Selley*⁵. See *Shellenberger* at 85; see also *In re Marriage of Stern*, 57 WnApp 707, review denied, 115 Wn2d 1013 (1990), and *In re Marriage of VanderVeen*, 62 WnApp 861 (1991), and *In re Marriage of Selley*, 189 WnApp. 957 (2015).

The *Shellenberger* court does mention that “there is ample evidence in the record that *Shellenberger* is totally estranged from [the mother and children]” but that estrangement appears to be a two-way street as the court noted that “motions filed during the pendency of the appeal reflect that these adult children may have refused to provide *Shellenberger* with copies of their grades, despite the court order that they do so.”

Shellenberger at 86-87. There are elements of estrangement herein but the

⁴ “Factors such as family tradition, religion, and past attendance at a private school, among others, may present legitimate reasons to award private school tuition expenses in favor of the custodial parent.” *In re Marriage of Stern*, 57 WnApp. 707, 720, review denied, 115 Wn2d 1013 (1990), affirmed by *In re Marriage of VanderVeen*, 62 WnApp 861 (1991).

⁵ “Because RCW 26.19.075(1)’s list of reasons to deviate is nonexclusive, because RCW 26.19.001 states that one purpose of the child support calculation is to equitably apportion child support between the parents, and because an obligee parent pays a higher portion of child expenses when the obligor parent chooses to abdicate most or all visitation, we hold that in such a situation, the trial court has the authority to deviate upward from the standard calculation when an upward deviation would better achieve an equitable apportionment. Here, the trial court abused its discretion when it concluded that it had no legal authority to deviate from the child support schedule based on the obligor parent’s

record here reflects that estrangement is wholly a result of Mr. Stacy's voluntary abdication of parental duties and also due to his refusal to communicate or engage in basic co-parenting cooperation herein. *See Statement of the Case of Appellant's Brief* (for numerous references thereof). Mr. Stacy even refused to make himself available for service of process of the underlying action herein on any other date or location prior to the date and location of Jonathon's graduation ceremony, necessitating that he be discretely served at the graduation ceremony itself so that service could be accomplished before the expiration of Jonathon's support. CP 528-29, 571-72. Mr. Stacy even lacked sympathy for Jonathon's serious health issues for which he was undergoing ongoing treatment at the time of his graduation, and Mr. Stacy refused to agree to continue carrying Jonathon on his health insurance policy until Ms. Base brought the matter to court on emergency motion.⁶ The record is replete with efforts and overtures of the mother and the children in attempts to include the father in the lives of the children, but Mr. Stacy simply doesn't care. It would be inequitable for the court to infer similar to *Shellenberger* any fault of the

noninvolvement with the children." *In re Marriage of Selley*, 189 WnApp. 957, 962 (2015).

⁶ The order regarding health insurance continuation was granted; a request to restrain the father from removing the child from his health insurance policy was the only subject for the motion for restraining order, so the motion itself was denied because Mr. Stacy agreed on the record to entry of an order for him to continue providing the health insurance. The

mother or the children herein for the estrangement of the father by his own design, especially given the longstanding findings of the court that the father has abandoned the children and given the ongoing issues created by the father and his refusal to engage as a parent even as the mother and children have continued to reach out to him. CP 57, 211-14.

Relevant to the comparisons for caselaw cited by Mr. Stacy, both parties herein live in Division III, not King County or the “west side” of the Cascade mountains, or the Seattle area, and not in Divisions I or II. CP 332, 362, 376. The trial court herein incorrectly referred to the father as living in King County and inferred a higher cost of living using “judicial notice” because of such reference. RP 20-21, CP 50-51. If the court herein would take judicial notice of the “west side” or the “Seattle area” with Divisions I and II being a higher cost of living, then the court should also take notice that the options for lower costs of living are more abundant in Division III where everyone in this case actually lives. Additionally, the father’s income herein exceeds the incomes of the fathers in the three cases he relies upon from Divisions I and II, by twice as much or more, even if relying upon the maximum incomes of the fathers in those three cases and accounting for inflation. Divisions I and II left the fathers in the

court noted, “communication between the parties is not the greatest, otherwise this could have resolved without court participation.” CP 366-67, 576-77.

cited cases with personal incomes at amounts vastly reduced from the income of Mr. Stacy who enjoys a much greater income in a less expensive Division.

Mr. Stacy now claims erroneously on appeal that Jonathen could have his entire school paid for at another college with the amount of support ordered herein. Mr. Stacy makes no citation to the record for his assertion on appeal; the only citation Mr. Stacy could make to that assertion would be a citation to the court's erroneous sua sponte assumptions because Mr. Stacy submitted no information for cost comparison with alternate schools and in fact did not dispute Jonathen's attendance at his chosen university. Mr. Stacy simply rides the coattails of the trial court which incorrectly referred to state schools as being less expensive than the request herein. Neither party submitted information on state schools, but the court stated its erroneous assumption sua sponte (without evidence or reference to evidence) that, "Here, interestingly enough, \$25,000 is greater than the entire year of what it costs to go to an in-state school like WSU, greater than room and board, fees, and all of that; greater than that." RP 17-18.

If the court properly took judicial notice of the tuition and fees with room and board for state schools in Washington, the court should rather find that the amount requested in the instant case is quite comparable to

WSU and less than UW, after the child's documented institutional financial aid is applied.

That cost comparison is still without taking the availability of the chosen fields into consideration, however. Here, the student is taking a major in mechanical engineering and a minor in aviation, which is a unique combination not readily available at most universities in the nation (with this court taking judicial notice that there is no such combination of programs at any state school in Washington). Mr. Stacy did not dispute attendance at Jonathen's chosen private university nor submit any competing evidence regarding the availability of the programs with fees elsewhere. Because the issue of Jonathen's private schooling as compared to other schools was not in dispute as between the parties, and the court alone made erroneous assumptions sua sponte in its ruling, there was no opportunity to submit evidence to refute the court's erroneous sua sponte findings at the trial court level. The rules do not allow for supplementation of the record with a motion for revision, and when the court makes a finding sua sponte in its ruling after the opportunity for argument is passed, there is no opportunity to correct the erroneous sua sponte assumption with further argument. LAR 0.7(e), RCW 2.24.050.

When a parent hasn't raised the cost comparison issue on appeal, the court "need not address the propriety of the rule or whether the trial court properly complied with it in this case." *Cota* at 542. However, where a court raises the issue sua sponte and then makes erroneous findings without citation to any evidence and indeed without basis in fact, and then a parent rides the coattails of those erroneous findings into appeal, the appellate court must take a look at the issue in light of the actual facts available and in light of the particular circumstances of the case. Upon the appellate court entertaining any such questions which might be raised in that regard, the court should note that cases cited by the father do not comport with the special considerations herein of the history of this family for private schooling, the father's voluntary abdication of his parental duties and abandonment of the children, and the financial abilities of these parents combined with the statutory factors of expectations during the marriage for private secondary and postsecondary education. The court must also consider the fact that the father has not demonstrated that the amount requested would cause substantial hardship to him while he voluntarily supports other adults instead of devoting those funds to his dependent children.

C. Fees

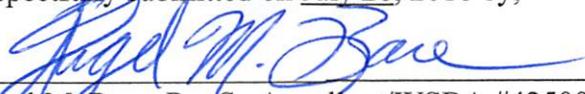
Ms. Base renews her request for fees and costs on appeal. Pursuant to CR 60 (b), RAP 18.1, and RCW 26.26.140, in the event that the court grants the relief as requested by Ms. Base, an award of costs and fees on appeal is appropriate. *In re Marriage of T*, 68 WnApp. 329, 338-39 (1993). Mr. Stacy is unjustly enriched by the order as it stands. Ms. Base should be awarded reasonable fees or lost wages and costs on appeal as assessed against Mr. Stacy.

III. CONCLUSION

Both parents are required to support their dependent children. Ms. Base seeks a fair and equitable order regarding child support including postsecondary support for the dependent adult child(ren), and requests the court to consider the intent of the legislature to provide similar orders of support in cases with similar facts. The court erred in failing to properly account for the financial circumstances of Mr. Stacy and prioritize the needs of the children as required by statute as well as by published caselaw with similar or comparative facts. The court should defer to the history of private school education for the children and the reasons therefore, as well as the ongoing history of the father's voluntary abdication of his parental duties. The court committed error in clear disdain for orders of postsecondary support contrary to law and placed an arbitrary cap on

expenses while issuing an order that was inequitable in allocation of responsibility without proper proportional sharing. The court failed to independently examine the income information of the parties with new information demonstrating Mr. Stacy's misconduct in concealment of income. The trial court failed to require Mr. Stacy to demonstrate any substantial hardship that would result in the granting of Ms. Base's request to exceed the 45% presumptive limitation for child support on income; the evidence and Mr. Stacy's own testimony shows that he voluntarily supports 1-3 other adults instead of devoting those funds to the children herein. Mr. Stacy is unjustly enriched by the trial court's order which allows him to pay even less on an order of postsecondary support than he did for child support during the child's minority and which orders the child and the mother to pay more than Mr. Stacy despite his income being at least twice that of the Ms. Base and 100% more than the dependent adult child. Ms. Base rests on her briefs and motions and pleads for the relief requested therein. All cited errors constitute abuse of discretion and warrant reversal; the orders should be reversed and the matter remanded for entry of an order of child support consistent with the facts herein, with fees or lost wages and costs awarded to Ms. Base.

Respectfully submitted on July 26, 2018 by,



Angel M. Base, Pro Se Appellant/WSBA #42500

ANGEL M. BASE

July 26, 2018 - 6:19 PM

Transmittal Information

Filed with Court: Court of Appeals Division III
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Superior Court Case Number: 08-3-02507-0

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