Supreme Court No. 92562-3

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

AARON L. LOWE,

Petitioner;

v.

LONNIE D. LOWE, Individually and as Personal Representative of the Estate of Betty L. Lowe, Deceased,

Respondent.

ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

Petitioner Aaron Lowe ("Aaron")[1] relies solely on conclusory assertions, "common sense," and facts he deems "clear"" and "proven" to pursue this appeal, however, the Petition is largely based on factual disputes on which the trier of fact sided with Lonnie Lowe ("Lonnie"). It is also based on issues not even addressed by the Court of Appeals below, such as discovery disputes which Aaron claims "would be a blight on the supervisory power of the courts on probate matters and change over 100 years of probate law in this state", if not reversed. (Petition, pp. 10-11)

However, the Petition presents no decision by the Court of Appeals in conflict with a decision of the Supreme Court, nor does the Petition involve any issue of substantial public interest. Instead, Aaron is simply using this appeal as another chance to re-litigate issues of fact, and issues that Aaron admits were not addressed by the Court of Appeals. There being no basis under RAP 13.4(b), this Court should deny Aaron's Petition for Review. If granted, however, Lonnie requests this Court also reverse the Court of Appeals' erroneous ruling that Lonnie should be denied attorney's fees on appeal because of his ability to pay.

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[1] Aaron Lowe is referred to as "Aaron" throughout this brief for clarity; no disrespect is intended.

II. ADDITIONAL ISSUE ON APPEAL

Washington's Trust and Estate Dispute Resolution Act (TEDRA, codified at chapter 11.96A RCW) grants the appellate court discretion to award a prevailing party his or her attorney's fees on appeal. The Court of Appeals recognized Lonnie was the prevailing party and yet denied him fees on appeal, solely because "[his] treasure ably allows him to afford the expenses of this appeal." Did the Court of Appeals abuse its discretion in denying fees based on Lonnie's financial ability?

III. RESPONDENT'S STATEMENT OF THE CASE

A. Procedural Background.

Aaron initiated this action on February 22, 2012, by filing a "Verified Petition for a Will Contest," asserting that his mother Betty Lowe lacked capacity to execute her will and/or subsequent written instructions distributing personal property; that Betty was subject to the undue influence of her son Lonnie in the will and instructions; that Lonnie tortiously interfered with Aaron's right to inherit; that Lonnie engaged in misconduct in failing to properly account for and inventory Betty's assets; and seeking Lonnie's removal as Personal Representative. (CP 416-430)

On November 2, 2012, Aaron filed an "Amended and Supplemental Petition" which similarly claimed that Lonnie breached fiduciary duties in his inventory and accounting obligations; exerted undue

influence relating to his mother's written instructions for the distribution of personal property, which he also claimed she lacked capacity to execute; that Lonnie tortiously interfered with Aaron's right to inherit; and that Lonnie be removed as Personal Representative. (CP 11-23)

On August 23, 2013, less than three weeks from the start of trial, Aaron moved the court to file a "Second Amended and Supplemental Petition," which now also claimed that the assets in the estate of Donald Lowe, whose probate was completed in 2004, were distributed in error to Betty, and should instead be traced and paid to Aaron; and that Lonnie "financially abused" his mother in violation of the Vulnerable Adult Act, which would preclude any inheritance under the "Inheritance Rights of Slayers or Abusers" Act. (CP 168-171, 37-53) The Respondents opposed that motion. (Respondents' Supp. CP 431-440; Superior Court Docket #78) The court denied this motion and the matter proceeded to trial. (CP 54-55) After trial, but before the court ruled, Aaron sought discretionary review with the Washington State Court of Appeals, Division Three, which was denied on October 17, 2013; the Commissioner ruled that Aaron failed to allege or establish proof the trial court committed obvious or probable error necessitating review under RAP 2.3(b).

After a 4 day bench trial, the trial court issued a Memorandum Opinion and then executed Findings of Fact and Conclusions of Law, denying Aaron all relief sought. (CP 151-164, 318-327) Aaron appealed that final ruling and the Court of Appeals heard the case without oral argument, affirming the trial court's judgment. However, the Court declined to award Lonnie attorney's fees on appeal, solely on the basis of Lonnie's ability to pay. Aaron then sought review in this Court by filing a Petition for Review.

B. Factual Background.

Betty Lowe died testate on October 1, 2011. (CP 1) She had executed her will on September 15, 2003, naming her son Lonnie as Personal Representative. (CP 1) Lonnie was not present when his mother signed the will, which was drafted by long time estate planning attorney Robert Lamp. (VRP 385) She also executed a Power of Attorney naming Lonnie at the same time. (VRP 386) As was Mr. Lamp's practice, he verified that Ms. Lowe had sufficient capacity to execute the documents. (VRP 383-390) He found her to be competent; she was "totally appropriate," knew what her assets were, and where she wanted them to go. (VRP 389-390) Betty's will left 20% of her estate to her grandchildren, and 80% divided among her three sons, Aaron, Larry, and Lonnie. (VRP 157-158)

On September 3, 2007, Betty wrote out written instructions for the distribution of some of her personal property; she gave them to Lonnie, who referred her to her attorney Robert Lamp to insure they were properly executed. (VRP 246-249) Mr. Lamp formalized the instructions, and on September 11, 2007, Betty signed them. (VRP 439-432) Lonnie was not present. (VRP 442) Those instructions left "any and all silver coins and bars" to Lonnie to distribute or retain for himself. (Trial Exs. R-102, R-103) Mr. Lamp again verified she had the capacity to execute the written instructions. (VRP 441-443) No evidence was presented that Lonnie drafted, encouraged or influenced Betty in the execution of this document; in fact, Lonnie testified that he did not influence her in any way in relation to this document. (VRP 101-104)

A nurse practitioner who saw Betty for some medical issues from 2002 to 2011 also testified that she was alert, oriented, well groomed, and not displaying any confusion during the time she saw her. (VRP 416-418) Betty worked cleaning houses for most of her life, drove up until the time of her death, cared for grandchildren 2-3 days a week, and lived independently in her own home. (VRP 176-177, 242, 250-251, 295-296) While Aaron testified generally that his mother had abused prescription pills and drank alcohol in the 60's, (but was not an alcoholic), Aaron was

not present when Betty signed her will or the written instructions for personal property. (VRP 132-134, 177-178)

Betty Lowe's husband Donald had predeceased her in 2003. (Trial Ex. R-118) His will did not leave his residuary estate (other than specific bequests) to any named individual, but instead to his "Personal Representative"; the first Personal Representative named was Aaron, with his ex-wife Denise being the first alternate, and Lonnie being the last alternate. (Trial Ex. P-31) All three filed declinations to serve as Personal Representative, and Aaron filed an Affidavit nominating his mother Betty to serve as personal representative. (Trial Exs. P-118, R-119, R-120) As a result of the lack of a named individual to inherit the residuary estate, it passed via the laws of intestacy; Attorney Robert Lamp filed the petition to administer Donald's estate with Betty Lowe as Administrator. (Trial Ex. P-118, VRP 396-397, 437-438. All property was community, and thus was distributed entirely to Betty by law. (Trial Ex. R-122, VRP 397, 435) Donald Lowe's probate was completed and closed without objection in 2004. (VRP 400-401, 438)

Testimony at trial established that Donald Lowe had collected a variety of metals in the form of silver bars, silver coins and other collectable coins and currency. (VRP 117) Aaron testified he had seen over 20 silver bars in Donald's possession when Aaron was 14 or 15 years

old. (VRP 117) Another witness, Donald Poindexter, also testified that he helped move 22 silver bars and bags of coins to the fireplace flume in the Lowe home approximately 35-40 years ago, possibly in the early '80s. (VRP 217-218) Mr. Poindexter was not in the house again, except during that two week period when he helped move the silver and other coins. (VRP 219-220) Neither Aaron nor Mr. Poindexter testified they had seen any of the silver bars since that time; Aaron speculated that his father did not dispose of any of them, but admitted he did not know where they all were, or whether his father had accessed the silver in the many years before he died. (VRP 174-175) These metals were not specifically listed in the probate of Donald's estate, but it is undisputed the entirety of the estate went to Betty as community property. (VRP 438)

Lonnie, at his mother's direction and in her presence, removed silver bars and bags of silver coins from her home on three or four occasions between 2004 and 2007. (VRP 68-69, 253-261) One silver bar weighed approximately 1000 ounces. (VRP 94) Betty directed that it be sold, and the money was utilized for various expenses Betty incurred, including a new roof, other work on her house, and the purchase of an automobile. (VRP 94-95, 261-262, 265-267) The silver was stored at Lonnie's home, again at his mother's direction. (VRP 263-264) Lonnie did not inventory or account for the silver his mother directed him to

remove while she was living, nor did he keep track of what she sold or spent. (VRP 97-98)

Over the course of his mother's life, Betty gifted cash to Lonnie at various times, but he did not exercise any powers under the Power of Attorney to obtain any of his mother's assets during her life. (VRP 95, 263-264) He did not gift himself any of her property, either proceeds from the sale of the silver, the silver itself, or from her bank accounts, on which he was a signator. (VRP 245-246, 263-264, 267) No contrary evidence was presented, and Aaron admitted he had no documentary evidence to establish any of his claims. (VRP 155) Similarly, no evidence was presented that Lonnie improperly influenced or controlled Betty in her decisions on the distribution of her assets in her will or the written instructions.

After his mother's death, in accordance with the written instructions, Lonnie sold some of the silver coins and retained the money for himself. (VRP 80-85) He inventoried the silver and other assets of the estate in the necessary pleadings in the probate, including the silver he had sold for himself. (CP 5-10, VRP 279)

Based on this evidence, the trial court issued a Memorandum Opinion and then Findings of Fact and Conclusions of Law finding no basis for Aaron's myriad of claims. (CP 134-147, CP 182-189)

Aaron appealed to the Court of Appeals, which affirmed the trial court, including the trial court's grant of attorney's fees. However, the Court of Appeals declined to award attorney's fees to Lonnie on appeal.

Aaron filed a Petition for Review with this Court, listing five Issues Presented for Review.[2] Many of Aaron's arguments appear to be interrelated, and based largely on unsupported allegations regarding the existence of undiscovered assets, and the claims that the property was usurped by Lonnie and should have gone to Aaron via his father's wishes. However, it is undisputed Aaron's father's estate had been long since distributed to Betty and no challenge to it was properly made here. The evidence and law instead established that Betty's estate was properly distributed, and no basis existed to find that Lonnie engaged in any misconduct in relation to his mother while she was alive, nor in his relation to her estate after she died.

Most importantly, as Aaron is seeking review by the highest court in Washington, Aaron fails to identify any error by the Court of Appeals that should now be reversed. As a result, no basis exists to reverse the Court of Appeals.

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[2] Aaron's statement of Issues Presented for Review does not align with some of the Argument section of his Petition for Review. In an effort to best make sense of and distill Aaron's arguments, Lonnie has chosen to structure his brief around the Issues Presented for Review.

IV. ARGUMENT

A. The *Jones* case is inapplicable here, and presents no basis for review.

Aaron relies heavily on the case of In re Estate of Jones, 152 Wn.2d 1, 93 P.3d 147 (2004), to argue a conflict with the Court of Appeals' decision, but in reality, Jones is inapplicable, as the Court of Appeals correctly identified. Jones presented a fact scenario where a personal representative misappropriated estate funds to himself and was unable to trace or account for the estate's property once commingled with his own assets.

Here, unlike in Jones, Aaron has failed to meet his burden of proving any inability by Lonnie to account for the Estate's assets. Although Aaron made repeated accusations at trial, the Court of Appeals properly found that "he failed to establish that there was any estate property unaccounted for or that Lonnie breached any of his duties as personal representative." (App. A at p. 13)[3] Substantial testimony was offered at the trial court to dispute Aaron's underlying claim that Lonnie "secreted" assets of the estate, and no basis existed for the Court of Appeals to overturn those findings; Jones is thus immaterial to this case.

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[3] The references to the Court of Appeals decision cite the pages of the Appendix attached to Appellant's brief.

Aaron appears to rely on the use of his mother's assets at her direction before she died, but again, neither the facts supported by substantial evidence, or the Jones decision renders such use improper.[4] Aaron points to Jones to create an illusion of conflict, but fails to point to any established facts that would prove error by the Court of Appeals.

B. Washington has not recognized the tort of interference with an inheritance expectancy, and the creation of such a new claim when the facts do not support it here is not a sufficient basis under RAP 13.4(b)(4).

Aaron has repeatedly and erroneously argued that Washington recognizes a cause of action for tortious interference with an inheritance expectancy. Aaron cites no Washington authority recognizing such a tort, and the creation of new law is not necessarily a matter of substantial public interest.

Even if this Court were inclined to recognize the tort of interference with an inheritance expectancy, this would not be appropriate case in which to establish such a remedy. The Court of Appeals found that even if such a claim were available to Aaron, the elements of the tort would not be met in this case. The Court of Appeals looked to the general elements of a claim for tortious interference with a business relationship,

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[4] Aaron's discussion of a violation of discovery rules was not an issue preserved nor addressed in the appeal below, and does not create a basis for review here. (See, Appellant's Brief, pp. 10-11)

which requires (1) the existence of a valid contractual relationship or business expectancy; (2) defendants had knowledge of that relationship; (3) intentional interference inducing or causing a breach or termination of the relationship or expectancy; (4) defendants interfered for an improper purpose or used improper means; and (5) resultant damage. (App. p. 22) The Court of Appeals determined that, even if a claim were available to Aaron, "Aaron has not proved that his brother acted with an improper purpose or used improper means." (App. p. 23) Aaron's claim that Lonnie acted improperly when he referred Betty to attorney Lamp to execute instructions on disposition of personal property is belied by the evidence of her competence to execute the document, and the independent counsel she obtained. (VRP 246-249, 441-443) Moreover, as properly found by the Court of Appeals, Aaron's reliance on a claim that Lonnie "wrongfully converted" assets which his father Don wanted to be distributed elsewhere ignores the substantial and undisputed evidence of the concluded probate of Don's estate, the inheritance by Betty of those assets, and her appropriate use and distribution of those assets during her lifetime. (Trial Ex. R-118 – 122, P-31, P-118; VRP 396-397, 435-438, 400-401, 438, 94-95, 261-262, 265-267) Without proof of wrongdoing, there is no basis for this court to create a tortious interference with inheritance cause of action which will not apply to the facts here.

C. The Court of Appeals did not put the burden on Aaron to disprove a gift, but rather found that the trial court's findings were supported by substantial evidence.

Aaron misreads the Court of Appeals' decision to portray an issue of improper burden shifting. But Aaron is looking at the wrong court and the wrong standard. At the trial level, the court weighed competing evidence and found that Lonnie did not improperly accept or retain gifts under his power of attorney. (App. pp. 6-7; VRP 95, 155, 245-246, 263-264, 267) The Court of Appeals merely affirmed, finding that the trial court's finding was supported by substantial evidence – that is, Lonnie's testimony that he did not make any transfers to himself under Betty's power of attorney and that Betty made gifts to him. (App. pp. 19-20) The trial court found, and the Court of Appeals affirmed, that Aaron was unable to produce any direct evidence to overcome Lonnie's testimony. Id.

The Court of Appeals cannot reverse a finder of fact's determination of whether a gift occurred so long as substantial evidence supports the decision. See, Buckerfield's Ltd. v. B.C. Goose & Duck Farm Ltd., 9 Wn.App. 220, 224, 511 P.2d 1360 (1973) (whether donative intent exists is an evidentiary issue to be resolved by the finder of fact, which will not be overturned on appeal if the finding is supported by

substantial evidence); In re Pappuleas' Estate, 5 Wn.App. 826, 490 P.2d 1340 (1971).

There is thus no error by the Court of Appeals in analyzing the proper evidentiary standard of the trial court, and certainly no basis for review here.

D. Appellant identifies no error with the Court of Appeals' application of RCW 11.12.260 to the coinage in this case.

Aaron argues that a separate writing concerning tangible personal property cannot direct the disposition of coinage, since the statute excludes "money that is normal currency or normal legal tender." The Court of Appeals determined, relying on rules of statutory construction and Aaron's own testimony, that the coins in this case "are best classified as precious coins rather than normal currency for purposes of RCW 11.12.260." (App. p. 18)

The Court of Appeals made no error in applying the plain statutory language and rules of statutory construction to the facts in this case. Nor does Aaron identify a reason why this is an issue of substantial public importance. The Court of Appeals relied on the plain language of the statute, illuminated by the dictionary definition of "currency" and "legal tender", concluding that the coins at issue were appropriately identified by the trial court as being akin to precious metals, such as bullion or coins,

kept either for sentimental value or for investment purposes, not as a medium of exchange. Aaron has identified no error for appellate review.

E. Appellant's protests regarding RCW 11.84.010 present no issue for appeal.

Aaron appears to argue that the Supreme Court of Washington should take it upon itself to fact-find and identify Lonnie as a financial abuser of a vulnerable adult. Aaron is once again using this Petition for Review to make conclusory statements and baseless allegations to re-litigate factual issues, without identifying any error by the courts below. Moreover, Aaron incorrectly claims that the Court of Appeals failed to address the issue; the Court of Appeals did find that the trial court properly exercised its discretion in denying Aaron's motion to amend to add the Vulnerable Adult claim. (App. pp. 9-10) Thus, the appellate court simply refused to consider the merits of a claim not properly raised. Id. Because denial of a motion to amend is reversible only upon an abuse of discretion, the Court of Appeals' decision was not in error and presents no issues for review here. See, Herron v. Tribune Pub. Co., 108 Wn.2d 162, 169, 736 P.2d 249 (1987).

F. The Court of Appeals abused its discretion in denying Lonnie attorney's fees on appeal based solely upon his ability to pay.

In the unlikely event this matter is accepted for review, the Supreme Court should reverse the failure to award Lonnie fees on appeal.

Even while recognizing Lonnie fully prevailed on appeal and affirming the trial court's award of attorney's fees to Lonnie, two judges from the Court of Appeals panel determined that Lonnie's ability to pay was sufficient in itself to deny fees on appeal, deciding:

> We exercise our discretion and deny Lonnie an award of attorney fees. **Lonnie acted within his legal rights to keep all the silver treasure, but this treasure ably allows him to afford the expense of this appeal.**

(App. p. 26, emphasis added) Judge Siddoway dissented from the majority solely on this issue. (App. p. 27)

While RCW 11.96A.150 gives the court discretion in awarding attorney's fees, that discretion is not unfettered. The court's discretion can be overturned when "there are facts and circumstances clearly showing an abuse of the trial court's discretion." In re Estate of Black, 153 Wn.2d 152, 173, 102 P.3d 796 (2004). A trial court abuses its discretion when its decision to award fees under TEDRA turns on a party's ability to pay. In re Guardianship of McKean, 136 Wn.App. 906, 920, 151 P.3d 223 (2007).

It was a manifest abuse of discretion to deny Lonnie fees solely because "his treasure ably allows him to afford the expense of this appeal." Aaron has relentlessly pursued this litigation without any benefit to the Estate; a personal representative should not have to bear the weighty cost of litigation, even if he is able to afford it. Lonnie prevailed in all

respects on appeal, and substantially prevailed at trial. Aaron's lawsuit has done nothing to benefit the Estate. If this Court accepts review of Aaron's Petition, then this Court should also reverse the Court of Appeals' denial of Lonnie's request for fees on appeal. Review is proper under RAP 13.4(b)(2) since the decision of the Division III Court of Appeals is in conflict with the Division II Court of Appeals' McKean decision, and under RAP 13.4(b)(4) since the issue of whether other prevailing personal representatives could be responsible for their attorney's fees solely because of their ability to pay has a potentially far reaching impact.

V. CONCLUSION

For the foregoing reasons, Aaron's Petition for Review should be denied.

DATED this 6 day of January, 2016.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the State of Washington that on the 6th day of January, 2016, at Spokane, Washington, the foregoing was caused to be served on the following person(s) in the manner indicated:

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Dear Clerk of the Court:
Attached please find Respondent's Answer to Petition for Review in the referenced matter.
If you have any questions, please contact the undersigned or attorney Greg Devlin at gmd@winstoncashatt.com.
Thank you.

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