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Case No. ~~912913-1~~

IN THE SUPREME COURT FOR THE STATE OF WASHINGTON
DIVISION ONE

ELISIA MARIE DALLUGE EKLUND,

Appellant,

v.

BRUCE EKLUND,

Respondent.

FILED
MAR 7 2016
WASHINGTON STATE
SUPREME COURT

Washington State Supreme Court Case No. 912913-1
Court of Appeals Division I Case No. 72927-6-1
King County Superior Court Case No. 06-3-01385-2 SEA

2016 FEB 25 AM 10:51
FILED
COURT OF APPEALS DIV I
SUPERIOR COURT
WASHINGTON

PETITION FOR REVIEW

ELISIA MARIE DALLUGE EKLUND
PRO SE

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Cases:

State ex rel. Carroll v. Junker, 79 Wn2d 12, 482 P.2d 775 (1971).

Chuong Van Pham v. City of Seattle, 159 Wn.2d 527, 538, 151 P.3d 976 (2007).

State v. Rundquist, 79 Wn. App. 786, 793, 905 P.2d 922 (1995).

Illinois v. Sommerville, 410 U.S. at 469.

Trop v. Dulles, 356 U.S. 86 (1958).

Snarr v Commonwealth 131 Va. 814, 109 S.E. 590 (1921).

In the Interest of R.J.T. a minor Appeal of R.T. (natural mother), No. 18 WAP 9A.3d 1179 (2010).

Gideon v. Wainwright 372 US 335 (1963).

In re Marriage of King, 77978-4 SC (2006).

State v. Gleaton 172 SCC 309, 311, 174, SE 12, 14 (1934).

Molloy v. Molloy, 247 Mich. App. 348, 637 N.W.2d 803, 806 (2001).

TABLE OF AUTHORITIES (Continued)

United States Constitution:

4th Amendment

6th Amendment

5th Amendment

8th Amendment

14th Amendment

Other Authorities:

Wex Legal Dictionary
Substantive Due Process

Cornell University Law School

IDENTITY OF PETITIONER/APPELANT

Elisia Marie Dalluge-Eklund is the mother and
Petitioner/Appellant.

CITATION TO COURT OF APPEALS DECISION

Mother, Elisia Dalluge seeks review of the Court of Appeals' unpublished opinion which affirmed the King County Superior Court's opinion. On January 29, 2016 the Court of Appeals issued an order denying mother's motion for reconsideration and publication.

ISSUES PRESENTED FOR REVIEW

King County Superior Court Judge Middaugh, in her wide discretionary powers engaged in a blatant disregard for our Supreme laws by violating numerous US Const & WA Const laws, while demonstrating an appearance of bias, and engaging in an "Abuse of Discretion." There are no laws to support her discretion and personal opinion, but contrary, a plethora of laws forbid such acts. The only Right she gives mother is the right to pay child support, humiliating bonds, unusual long Restraining Order active

until 2022, failed to uphold family reunification, and completely one sided case based on her personal opinion. Under the fathers control, he maximizes such opportunity granted to him. Mother and children haven't seen each other in almost 3 years, if we are lucky he lets us talk up to 3 times a year, and mother has had to continually file contempts because he won't even provide pictures or other extremely minimal requirements outlined in Parenting Plan. The damage the children have endured due to the extremely controlled environment and alienation the father has been allowed to exercise towards the mother and children, is irreconcilable. The harm is done! The years have passed, the memories don't exist, and the emotional damage and hindered growth is blatantly apparent. The trial judge retained exclusive jurisdiction to exercise her complete control & wide discretionary powers. In such acts, reassured father, she would make sure mother didn't get children. The trial judge refused to allow for a narrative report of proceedings. The COA Div I allowed for appeal to go forward with out narrative report of proceedings. On 1-11-16 COA Div I affirmed trial judge in part because of lack of report of proceedings.

The primary issues presented are:

(1). Because the mother has cleared her name, and the father doesn't have to based solely on the judges personal opinion, in serving the best interest of the children is Immediate family reunification between mother and children and evidence that the father is not a Domestic Violence Perputrator, is not doing drugs/alcohol and findings from a Psychological Evaluation under this courts discretionary powers?

(2). Does this court have the discretion to read the Appellant/Respondents COA Div I trial briefs?

(3). Because this family law case involved both contempts and a Restraining Order, whereas *In re Gideon* establishes the right to an attorney and court costs waived for indigents based on the premise "liberty interest at stake" furthermore meaning the possibility of jail time, and both a contempt and restraining order in the State of Washington pose that same premise already established in the good of the order *In re Gideon*. does the mother have the Right to an attorney and related costs waived thereof?

STATEMENT OF THE CASE

A. Mother seeks immediate relief where the trial court disregarded Supreme Laws, appears to be biased and engaged in multiple forms of "abuse of discretion."

B. Mother respectfully requests Supreme Court review trial briefs.

C. The lower courts failed to ensure fairness and requesting indigent party the right to an attorney and waiver of all costs related thereof; resulting in a prejudice the administration of justice.

ARGUMENT

I REQUIRING SUPREME COURT TO INTERVENE FOR THE BEST INTEREST OF CHILDREN.

This petition raises important questions of law and policy regarding the best interest of children and the lower courts failure to protect from harm due to extreme needs to control. Here the trial court was more focused on protecting the father then ensuring the children's best interest prevailed.

II REQUESTING SUPREME COURT TO EFFECUATE DISCRETIONARY POWERS.

In serving the best interest of children, review of the COA trial brief to understand the trial judges discretionary powers and abuse thereof should be considered. Also review of the COA Div I's own decisions that are not consistent within themselves.

III
**REQUIRING SUPREME COURT TO IMPLEMENT FAMILY
LAW CIVIL GIDEON AND ALL COSTS RELATED
THEREOF THROUGH PRECEDENCE OR STATUTE**

In re King, attempted implementation of Civil Gideon. The discernment in *King* focused on *Gideon* based on “liberty interest at stake” from the loss of mother & child relationship. While any mother would agree, with that rationale, in keeping the exact rationale found in *Gideon*, “liberty interest at stake” has to do with the possibility of jail time. Family law contempts and Restraining orders pose the same threat the USSC and our US Const specifically command protection of thereof. This court found under the *King* rationale to be an issue for the Legislation. As so evident in *Gideon*, this court has the authority to set precedence, because *Gideon* was established through precedence. As so evident in the *McCleary* case this court also exercise’s the authority to mandate statute through Legislation. In the Spirit of the Law an indigent mothers right to an attorney and costs related thereof is prevalent.

CONCLUSION

Mother respectfully requests that this Court grant this Petition for Review and utilize its discretionary powers to immediately serve in my children`s best interest.

DATED: February 20, 2016

Respectfully Submitted,



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APPENDIX

P1 COA Div I, Letter on allowing appeal to go forward without Narrative Report, August 7, 2015.

PP2-4 COA Div I “Affirmed” January 11, 2016

P5 COA Div I Order Denying Motion for Reconsideration & Publication.

P6 RAP 13.4

P7 6th Amendment

PP8-9 Gideon v. Wainwright

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RICHARD D. JOHNSON,
Court Administrator/Clerk

The Court of Appeals
of the
State of Washington

DIVISION I
One Union Square
600 University Street
Seattle, WA
98101-4170
(206) 464-7750
TDD: (206) 587-5505

August 7, 2015

Bruce Edward Eklund
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FEDERAL WAY, WA 98023

Elisia Marie Dalluge Eklund
211 E 7TH AVE 18-B
MOSES LAKE, WA 98837

CASE #: 72927-6-1

Bruce Eklund, Respondent v. Elisia Marie Dalluge Eklund, Appellant

Counsel:

The following notation ruling by Richard D. Johnson, Court Administrator/Clerk of the Court was entered on August 5, 2015, regarding respondent's motion on the merits to affirm:

"By General Order Division I has suspended the provisions of RAP 18.14, therefore the motion is denied. The brief of respondent is due by September 1, 2015."

Sincerely,



Richard D. Johnson
Court Administrator/Clerk

ssd

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

In the Matter of the Marriage of)
) No. 72927-6-1
BRUCE EDWARD EKLUND,)
) DIVISION ONE
 Respondent,)
)
 and)
) UNPUBLISHED OPINION
ELISIA MARIE DALLUGE EKLUND,)
) FILED: January 11, 2016
 Appellant.)
_____)

BECKER, J. — Because the appellant has not provided an adequate record for review, she is not entitled to relief on appeal. We therefore affirm.

Elisia Dalluge Eklund is the mother of two children for whom the trial court ordered a parenting plan some years ago. Acting pro se, the mother is appealing an order denying her petition to modify the parenting plan and an order denying reconsideration. A commissioner of this court determined by ruling entered on March 16, 2015, that her appeal is timely as to those orders, but not as to other orders mentioned in her appeal.

The mother took steps to file a narrative report of proceedings rather than a verbatim report. A commissioner of this court determined that the narrative report did not appear to be fair and accurate and ruled that it would not be

included in the record unless approved by the trial court. Because the mother did not obtain the trial court's approval of the narrative report of proceedings, the commissioner determined by ruling entered June 15, 2015, that the appeal would go forward with the clerk's papers supplying the only record for review.

The clerk's papers show that on November 21, 2014, the court considered the mother's petition to modify the parenting plan. In an order entered on that date, the court found that the mother had not shown adequate cause for an evidentiary hearing. The record does not include the mother's petition to the trial court, the father's responsive materials, or the mother's reply. The order itemizes the materials presented to and considered by the trial court. Those materials have not been provided for our review.

The mother's opening brief does not contain assignments of error. It presents arguments that the mother summarizes as follows:

1. The trial court engaged in an abuse of discretion by lack of evidence.
2. The trial court violated Supreme Laws when issuing an inappropriate Protection Order.
3. The trial court violated Supreme Laws when issuing an inappropriate bond.
4. The trial court violated Supreme Laws when allowing the mothers Due Process Rights to be disregarded.
5. The trial court did not keep their word for family reunification after all requirements were met and there is no reason why.
6. According to Gideon I should have been given an attorney and other costs at public expense.

The party seeking review has the burden of perfecting the record so that this court has before it all of the evidence relevant to the issues raised. Olmsted v. Mulder, 72 Wn. App. 169, 183, 863 P.2d 1355 (1993), review denied, 123 Wn.2d 1025 (1994). We cannot reach the merits of appellant's arguments

No. 72927-6-1/3

because she has failed to provide us with a sufficient record from the trial court.

Indeed, it is not even clear that these arguments were raised in the trial court.

See In re Marriage of Haugh, 58 Wn. App. 1, 6, 790 P.2d 1266 (1990).

Affirmed.

WE CONCUR:

Schindler

Becker, J.

Cox, J.

CLERK OF SUPERIOR COURT
STATE OF WASHINGTON

2016 JAN 11 AM 9:27

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

In the Matter of the Marriage of)
BRUCE EDWARD EKLUND,) No. 72927-6-1
Respondent,) ORDER DENYING MOTION
and) FOR RECONSIDERATION AND
ELISIA MARIE DALLUGE EKLUND,) FOR PUBLICATION OF OPINION
Appellant.)

Appellant, Elisia Maria Dalluge Eklund, has filed a motion for reconsideration and for publication of the opinion filed on January 11, 2016. The court has determined that said motion should be denied. Now, therefore, it is hereby

ORDERED that appellant's motion for reconsideration and for publication of the opinion filed on January 11, 2016, is denied.

DATED this 21st day of JANUARY, 2016.

FOR THE COURT:

Becker, J.
Judge

2016 JUL 27 10:33:55
CLERK OF COURT
JULIE H. ANDERSON

RAP 13.4
DISCRETIONARY REVIEW OF DECISION TERMINATING REVIEW

(a) How to Seek Review. A party seeking discretionary review by the Supreme Court of a Court of Appeals decision terminating review must serve on all other parties and file a petition for review or an answer to the petition that raises new issues. A petition for review should be filed in the Court of Appeals. If no motion to publish or motion to reconsider all or part of the Court of Appeals decision is timely made, a petition for review must be filed within 30 days after the decision is filed. If such a motion is made, the petition for review must be filed within 30 days after an order is filed denying a timely motion for reconsideration or determining a timely motion to publish. If the petition for review is filed prior to the Court of Appeals determination on the motion to reconsider or on a motion to publish, the petition will not be forwarded to the Supreme Court until the Court of Appeals files an order on all such motions. The first party to file a petition for review must, at the time the petition is filed, pay the statutory filing fee to the clerk of the Court of Appeals in which the petition is filed. Failure to serve a party with the petition for review or file proof of service does not prejudice the rights of the party seeking review, but may subject the party to a motion by the Clerk of the Supreme Court to dismiss the petition for review if not cured in a timely manner. A party prejudiced by the failure to serve the petition for review or to file proof of service may move in the Supreme Court for appropriate relief.

(b) Considerations Governing Acceptance of Review. A petition for review will be accepted by the Supreme Court only:

- (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
- (2) If the decision of the Court of Appeals is in conflict with another decision of the Court of Appeals; or
- (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
- (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

(c) Content and Style of Petition. The petition for review should contain under appropriate headings and in the order here indicated:

- (1) Cover. A title page, which is the cover.
- (2) Tables. A table of contents, with page references, and a table of cases (alphabetically arranged), statutes, and other authorities cited, with reference to the pages of the brief where cited.
- (3) Identity of Petitioner. A statement of the name and designation of the person filing the petition.
- (4) Citation to Court of Appeals Decision. A reference to the Court of Appeals decision which petitioner wants reviewed, the date of filing the decision, and the date of any order granting or denying a motion for reconsideration.
- (5) Issues Presented for Review. A concise statement of the issues presented for review.
- (6) Statement of the Case. A statement of the facts and procedures relevant to the issues presented for review, with appropriate references to the record.
- (7) Argument. A direct and concise statement of the reason why review should be accepted under one or more of the tests established in section (b), with argument.
- (8) Conclusion. A short conclusion stating the precise relief sought.
- (9) Appendix. An appendix containing a copy of the Court of Appeals decision, any order granting or denying a motion for reconsideration of the decision, and copies of statutes and constitutional provisions relevant to the issues presented for review.

(d) Answer and Reply. A party may file an answer to a petition for review. A party filing an answer to a petition for review must serve the answer on all other parties. If the party wants to seek review of any issue that is not raised in the petition for review, including any issues that were raised but not decided in the Court of Appeals, the party must raise those new issues in an answer. Any answer should be filed within 30 days after the service on the party of the petition. A party may file a reply to an answer only if the answering party seeks review of issues not raised in the petition for review. A reply to an answer should be limited to addressing only the new issues raised in the answer. A party filing any reply to an answer must serve the reply to the answer on all other parties. A reply to an answer should be filed within 15 days after the service on the party of the answer. An answer or reply should be filed in the Supreme Court. The Supreme Court may call for an answer or a reply to an answer.

(e) Form of Petition, Answer, and Reply. The petition, answer, and reply should comply with the requirements as to form for a brief as provided in rules 10.3 and 10.4, except as otherwise provided in this rule.

(f) Length. The petition for review, answer, or reply should not exceed 20 pages double spaced, excluding appendices, title sheet, table of contents, and table of authorities.

(g) Reproduction of Petition, Answer, and Reply. The clerk will arrange for the reproduction of copies of a petition for review, an answer, or a reply, and bill the appropriate party for the copies as provided in rule 10.5.

(h) Amicus Curiae Memoranda. The Supreme Court may grant permission to file an amicus curiae memorandum in support of or opposition to a pending petition for review. Absent a showing of particular justification, an amicus curiae memorandum should be received by the court and counsel of record for the parties and other amicus curiae not later than 60 days from the date the petition for review is filed. Rules 10.4 and 10.6 should govern generally disposition of a motion to file an amicus curiae memorandum. An amicus curiae memorandum or answer thereto should not exceed 10 pages.

(i) No Oral Argument. The Supreme Court will decide the petition without oral argument.



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[U.S. Constitution \(/constitution/overview\)](/constitution/overview)

Sixth Amendment

The Sixth Amendment guarantees the rights of criminal defendants, including the right to a public trial without unnecessary delay (http://www.law.cornell.edu/wex/speedy_trial), the right to a lawyer (http://www.law.cornell.edu/wex/right_to_counsel), the right to an impartial jury (http://www.law.cornell.edu/anncon/html/amdt6frag3_user.html), and the right to know who your accusers are (http://www.law.cornell.edu/wex/Right_to_confront_witness) and the nature of the charges and evidence against you. It has been most visibly tested in a series of cases involving terrorism (<http://www.law.cornell.edu/supct/html/03-1027.ZS.html>), but much more often figures in cases that involve (for example) jury selection or the protection of witnesses, including victims of sex crimes as well as witnesses in need of protection from retaliation.



Learn more... (http://www.law.cornell.edu/anncon/html/amdt6frag1_user.html#amdt6_hd4)

Amendment VI

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

[< Forum Selection Clause \(/wex/forum_selection_clause\)](/wex/forum_selection_clause)

[up \(/constitution/overview\)](/constitution/overview) [Seventh Amendment > \(/constitution/seventh_amendment\)](/constitution/seventh_amendment)

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Facts and Case Summary - Gideon v. Wainwright

Facts and Case Summary: Gideon v. Wainwright 372 U.S. 335 (1963)

Facts:

Clarence Earl Gideon was an unlikely hero. He was a man with an eighth-grade education who ran away from home when he was in middle school. He spent much of his early adult life as a drifter, spending time in and out of prisons for nonviolent crimes.

Gideon was charged with breaking and entering with the intent to commit a misdemeanor, which is a felony under Florida law. At trial, Gideon appeared in court without an attorney. In open court, he asked the judge to appoint counsel for him because he could not afford an attorney. The trial judge denied Gideon's request because Florida law only permitted appointment of counsel for poor defendants charged with capital offenses.

At trial, Gideon represented himself – he made an opening statement to the jury, cross-examined the prosecution's witnesses, presented witnesses in his own defense, declined to testify himself, and made arguments emphasizing his innocence. Despite his efforts, the jury found Gideon guilty and he was sentenced to five years imprisonment.

Gideon sought relief from his conviction by filing a petition for writ of habeas corpus in the Florida Supreme Court. In his petition, Gideon challenged his conviction and sentence on the ground that the trial judge's refusal to appoint counsel violated Gideon's constitutional rights. The Florida Supreme Court denied Gideon's petition.

Gideon next filed a handwritten petition in the Supreme Court of the United States. The Court agreed to hear the case to resolve the question of whether the right to counsel guaranteed under the Sixth Amendment of the Constitution applies to defendants in state court.

Procedure:

Lower Courts: Bay County Circuit Court, Fourteenth Judicial Circuit of Florida

Lower Court Ruling: The trial judge denied Gideon's request for a court-appointed attorney

because, under Florida law, counsel could only be appointed for a poor defendant charged with a capital offense. The Florida Supreme Court agreed with the trial court and denied all relief.

Issue:

A prior decision of the Court's, *Betts v. Brady*, 316 U.S. 455 (1942), held that the refusal to appoint counsel for an indigent defendant charged with a felony in state court did not necessarily violate the Due Process Clause of the Fourteenth Amendment. The Court granted Gideon's petition for a writ of certiorari – that is, agreed to hear Gideon's case and review the decision of the lower court – in order to determine whether *Betts* should be reconsidered.

Ruling:

Reversed and remanded. In its opinion, the Court unanimously overruled *Betts v. Brady*.

Argued: January 15, 1963

Decided: March 18, 1963

Unanimous Decision: Justice Black (who dissented in *Betts*) wrote the opinion of the court. Justices Douglas, Clark, and Harlan each wrote concurring opinions.

Reasoning:

The Court held that the Sixth Amendment's guarantee of counsel is a fundamental right essential to a fair trial and, as such, applies the states through the Due Process Clause of the Fourteenth Amendment. In overturning *Betts*, Justice Black stated that "reason and reflection require us to recognize that in our adversary system of criminal justice, any person haled into court, who is too poor to hire a lawyer, cannot be assured a fair trial unless counsel is provided for him." He further wrote that the "noble ideal" of "fair trials before impartial tribunals in which ever defendant stands equal before the law . . . cannot be realized if the poor man charged with crime has to face his accusers without a lawyer to assist him."

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SUPREME COURT FOR THE STATE OF WASHINGTON

In re: Children,)	Supreme Court No. 912913-1
)	COA I Case No. 72927-6-1
BRUCE EKLUND)	Superior Ct. Case No. 06-3-01385-2 SEA
)	
Respondent.)	DECLARATION OF PROOF OF
)	SERVICE VIA MAILING
vs.)	
)	
ELISIA MARIE DALLUGE (EKLUND),)	
)	
Appellant)	

I, ELISIA MARIE DALLUGE, declare under penalty pursuant to the laws of the State of Washington, that the following statements are true and correct, and that this declaration was executed at the place and on the date indicated near my signature:

1. On the ²²21st day of February, 2016, or earlier, I mailed the original and a copy of the **MOTION TO PROCEED INFORMA PAUPARIS & PETITION FOR REVIEW** to the following:

A. SUPREME COURT OF WASHINGTON
TEMPLE OF JUSTICE
415 12TH AVE SW CLERKS OFFICE
PO Box 40929
OLYMPIA WA 98504-0929

B. COURT OF APPEALS DIVISION I
ONE UNION SQUARE CLERKS OFFICE
600 UNIVERSITY STREET
SEATTLE WA 98101-4170

C. BRUCE EKLUND
30049 10th AVE SW
KENT, WA 98023

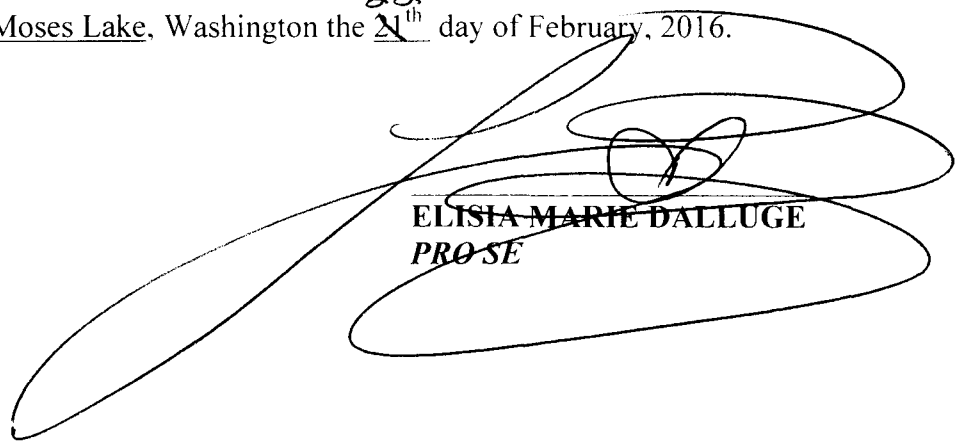
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2. That I performed the mailing by depositing the above mentioned documents in an envelope and addressing the envelope to the address above given, postage prepaid, thereon, and mailing the same in the United States Post Office at Moses Lake, Washington, or hand delivered them personally, or properly fax filed them.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

SIGNED in Moses Lake, Washington the ²²21th day of February, 2016.



**ELISIA MARIE DALLUGE
PRO SE**