

RECEIVED BY E-MAIL

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In re the Custody of:

B.M.H., CHILD

MICHAEL HOLT

Respondent,

and

LAURIE HOLT

Petitioner.

No. 86895-6

MICHAEL HOLT'S ANSWER TO
LAURIE HOLT'S FINANCIAL
DECLARATION (RAP 18.1)

Michael Holt makes the following statements in the belief that they are true and accurate.

1. I am over twenty-one (21) years of age and competent, willing, and able to testify to the following, which is based upon my personal knowledge.

2. Laurie uses the opportunity to file another (virtually identical) financial declaration merely to repeat the false claims she has made before. I am going to try not to repeat again what I have already submitted to the court. I attach those submissions here. Neither of our financial circumstances has changed in any significant ways, from what I can tell. We also did a child support modification for our son Chandler in 2011, with financial affidavits and disclosures.

Going over this same ground again seems needlessly expensive, so I will respond very briefly here.

3. Laurie claims I have the ability to pay her fees. In fact, I can hardly pay my own fees, as my previously filed financial declarations demonstrate. Since these proceedings began in 2009, my financial circumstances have steadily worsened, both because of this litigation and because of a real estate investment I made which has become a financial hardship. I currently have a judgment against me of approximately \$200,000.00, plus interest, bringing it close to \$300,000 (attached) and I am doing everything I can to avoid bankruptcy at this time (i.e., attempting to negotiate with my creditors). I have additional debt of about \$500,000, mostly related to this real estate venture. I was prepared to do bankruptcy until I received a refund from the IRS, which is in savings currently as I continue with my negotiations with creditors. I no longer own any real property; everything is gone to foreclosure. I've had no rental income for about the past two years. I live in my mother's home and pay her mortgage as rent. Basically, all I have is my job.

4. **Incomes:** As previously mentioned in my financial declaration in June, 2011, I still make a base salary of \$125,000 annually, with the opportunity to possibly make an annual bonus. The bonus is not guaranteed and I have not received any bonus this year. This is not predictable in any way. Also, I do not indicate as income the child support Laurie pays me for Chandler, which is based

on him residing in her home part-time, which he does not do. She wasn't paying that at first and now it comes direct from her salary. So I am getting that every month now, though Laurie is still a little bit in arrears.

5. **Expenses:** I try to keep expenses under control, given all my obligations. I would note Laurie's expenses are much higher. For example, she pays a \$250 monthly cell phone expense, a \$110 cable expense, and very high utilities otherwise. I don't know why her expenses are so high when it is only her in the house full-time and Benjamin about 65% of the time, unless she is claiming expenses also for her new boyfriend, who lives with her. (Chandler never spends the night at his mom's, contrary to Laurie's claim that Chandler "resides with [her] part of the time." Chandler spends most every night in my home and visits Laurie only occasionally and briefly.)

6. **Child Support:** Laurie claims again that I have not provided financially for Benjamin. That remains as false a claim as ever, as my earlier submissions describe. I would point that when Laurie made this claim in the trial court, the court did not believe her and found, instead, that I have paid child support for Benjamin (CP 24, 75, 218, 222-223, 243), on top of paying for all the other expenses when he is with me (regular visitation, summer – week on/off, vacations, holidays). Laurie is aware that I provide for Benjamin and that he rarely has to pack clothing, shoes, coat, etc. because these things are available for him at his home with me as well as his home with his mom. Benjamin is also

fully covered and has been since birth, on my medical, dental & vision insurance coverage. I also have Benjamin listed as a beneficiary on my life insurance policy as I do with all of my children.

7. **Litigation Expense:** As for Laurie's attorney fees, though she says she has "paid" for her trial attorney's fees, she says only that she has "incurred" fees for her appellate attorney. It is my understanding, from things Laurie said in deposition, that her last boyfriend paid for Laurie's attorney fees (at least \$45,000). CP 358. I have paid my fees and that has definitely affected my monthly expenses (averaging about \$3000 a month).

8. **Litigation:** Laurie continues to claim that I entered litigation hoping that I could outspend her or because I didn't like her boyfriend or wanted to force her to stay in Vancouver. These claims are pretty ridiculous and there is no evidence to support them.

Repeatedly, in this and the litigation involving Chandler, I tried to sit down and discuss with Laurie what would be in the best interest of our children, only to be met with negative responses, lies and accusations. There is evidence of my efforts in the record. Litigation was an absolutely last resort, the only option available to me to protect my children. I would much rather spend this money on helping to send the boys to college, as I have with my older children.

Concerns I had and others had about Laurie bouncing the children from place to place, as she continued her pattern of short-term relationships, have

now been proven correct. The idea that I am the reason for her relationship with Spencer Partridge ending is crazy. This is Laurie's pattern, which she continues despite the harm it does to her children. (It seems just as likely that Mr. Partridge didn't like what Laurie was doing to our kids. Their relationship ended not long after Mr. Partridge's false accusation that I had assaulted him was dismissed at the prosecutor's request.) I wish she would get into a healthy, stable relationship, but, once again, now she's back in Vancouver, she's quickly gotten involved with someone else and moved him in with her. None of this is my doing, that's for sure.

Not only did I not want to litigate, I never thought I'd be able to outspend Laurie. I just didn't have any choice, because what Laurie was doing put the boys at risk. Already, in fact, Laurie has outspent me, with most of that being paid by her ex-boyfriend. Again, Laurie makes this accusation without even a shred of evidence for it.

9. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENTS ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Dated this _____ day of September 2012, at Vancouver, Washington.

MICHAEL HOLT

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Not only did I not want to litigate, I never thought I'd be able to outspend Laurie. I just didn't have any choice, because what Laurie was doing put the boys at risk. Already, in fact, Laurie has outspent me, with most of that being paid by her ex-boyfriend. Again, Laurie makes this accusation without even a shred of evidence for it.

9. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENTS ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Dated this 24th day of September 2012, at Vancouver, Washington.



MICHAEL HOLT

DECLARATION OF MICHAEL HOLT
IN ANSWER TO FINANCIAL DECLARATION
Page 5 of 5

Attachment:

Michael Holt's Answer to Laurie Holt's Financial Declaration

April 2012

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

In re the Custody of:

B.M.H., CHILD

MICHAEL HOLT

Respondent,

and

LAURIE HOLT

Petitioner.

No. 86895-6

MICHAEL HOLT'S ANSWER TO
LAURIE HOLT'S FINANCIAL
DECLARATION (RAP 18.1)

Michael Holt makes the following statements in the belief that they are true and accurate.

1. I am over twenty-one (21) years of age and competent, willing, and able to testify to the following, which is based upon my personal knowledge.

2. **Child Support:** Laurie claims I have not paid child support for Benjamin and have paid too little for Chandler. This is false and also contradicts the trial court record.

First, Chandler now resides almost exclusively with me, and has since 2009, which has increased my expenses. Laurie states that Chandler resides

with her part of the time. In fact, Chandler hardly ever spends a night with Laurie and visits her only occasionally, which has been true for when she lived in Castle Rock and since she moved back to Vancouver (upon separating from her former fiancé, Spencer Partridge) in December, 2011, approximately. Laurie was ordered to pay child support to me in April 2011, but Laurie has not paid in full the amount ordered her (though she lists \$408 as a monthly expense in her affidavit).

Second, though not required by court order, I have paid child support for Benjamin in an amount equal to what I paid for Chandler, as the trial court repeatedly found. CP 24, 75, 218, 222-223, 243. I also provide insurance coverage since 2000, both medical and life, and I also pay for numerous other expenses (e.g., food, clothing, activity costs, vacations), including, of course, paying for everything for Benjamin when he resides with me. CP 20-21. (My provision of medical coverage to my children does cost me something, but it does not cost any more to include Benjamin, who is the youngest of my four children I have covered through my employment.) I also purchase life insurance, and Benjamin is a beneficiary. Laurie's claim that I provide no financial support for Benjamin is simply not true.

It is also simply false that I avoided entry of a new child support order for Chandler to avoid disclosing my income. Laurie has always known I have a good income because she has depended on my financial support for all the time I have known her. With Laurie, as with my first wife, Patty, we worked out child support

without having to go to court. (Patty and I did our own divorce.) Sometime when my two oldest children were teenagers, maybe in 2005, as I recall, Patty and I went through a child support review. Based on that, my child support for those two children was set at \$1050, total. I disclosed all my income for that process and I talked with Laurie about it. Based on what was calculated for my two other children, Laurie and I decided to increase the amount I was paying for Chandler and Benjamin, for a total of \$700 (the boys being younger). At the time, Laurie was completely in agreement and grateful.

Laurie is also completely wrong that my child support payment for Chandler would have been \$1400, if we had gone to court. My attorney tells me that even if her calculation is correct for today, and I don't know that it is, Laurie is talking about a change in the child support formula that went into effect in October 2009, by which time Chandler had moved in with me.

3. **Laurie's Income:** Laurie complains that I haven't disclosed my income. That's not true, as I describe above. Actually, it has been hard to get a true picture of Laurie's income, because she keeps reporting different amounts in different court proceedings, though this recent declaration is more forthcoming. When we were doing the child support for Chandler last year, she reported a monthly income without including all the money she was receiving for Benjamin. Now she reports she receives \$2800 a month for Benjamin's support. When she was living in Castle Rock, being supported by her former fiancé, she chose not to

work, so the court imputed income to her for purposes of child support for Chandler. Now that she is back in Vancouver, without Mr. Partridge, she is working again.

4. **My Income and Expenses:** Laurie misrepresents my financial circumstances. Most significantly, I have started the process to declare bankruptcy.

I have worked my way up in my job, and, beginning just over four years ago, I was given a lot more responsibility and a substantial increase in salary. Now I am general manager of the Last Frontier and New Phoenix Casinos and I now earn a base gross salary of \$125,000 per year. I also sometimes receive bonuses, but they are not guaranteed. Over the last three years the average bonus has been approximately \$25,000. In addition to bonuses I also receive paid time off benefits that are included in my gross income. Last year, when we did the child support for Chandler, my **net** monthly income was determined to be \$9100.78. This amount barely covers my expenses, which are \$8343 monthly, not including attorney fees, which have averaged \$3300 a month since March 2010. This calculation of my expenses also does not reflect all the financial support I provide to my adult children. Until August, 2010, when my oldest son, Michael, graduated from Brigham Young University, I contributed substantially to his tuition, room, and board and other expenses, because I had made a commitment to him to do this. This was a voluntary contribution. I would also

like to help him through his masters degree program, but I don't know that I can. My daughter is also now an adult and living and working in Vancouver. (She works with me at the casino.)

I also incurred considerable financial liabilities from a business I operate called Team Money, LLC, which involved real estate development. The recession of the past several years has hit this business hard and crippled me financially. I anticipate soon there will be a judgment entered against me personally for approximately \$300,000. My liabilities greatly outweigh my assets, which is why I am forced to declare bankruptcy.

5. **Litigation:** Laurie claims I have entered into litigation hoping I could outspend her. This could not be further from the truth. Before and throughout the litigation process I have consistently offered to sit down and negotiate parenting plans for the children that serve their best interests. We always managed to work it out in the past. I've done that with my first wife, the mother of my two adult children; we have been able to focus on what is best for the kids. With Laurie, I did everything I could to avoid litigation, short of ignoring the welfare of my sons. We did not have to go to court at all if Laurie would have agreed just to keep Benjamin's life the same as it has been for his whole life, so that he could continue in the same schedule with me and his brother as always. Instead, Laurie has refused this option every time it was presented to her. She chose, instead, to move to Castle Rock with yet another new boyfriend, disrupting

Ben's life completely and despite that her relationships never last long. Now, just as I feared, and told the court when we began these proceedings, that relationship has ended, Laurie has moved back to Vancouver, and now she has yet another new boyfriend. I began these proceedings out of love and concern for Benjamin, not because I could afford them.

Laurie is not being accurate either when she claims to have agreed to a modification of our parenting plan for Chandler so he could attend school in Vancouver. She agreed, but only after litigating for two years and after it became clear she would lose if she went to trial on the modification. (The court granted adequate cause and the guardian ad litem report favored modification; also, Chandler pretty much refused to live with Laurie in Castle Rock.) With Chandler, too, Laurie chose to litigate, not cooperate.

Laurie also does not mention that she has repeatedly failed to comply with the trial court's orders in Benjamin's case, which has required me to return to court a number of times to get her to comply. Repeatedly, the court has ruled in my favor and made Laurie do as the court ordered in the first place. Also, I incurred litigation expense when her last boyfriend (Spencer Partridge, in Castle Rock) wrongly accused me of fourth degree assault. That charge has been dismissed at the prosecutor's request, but it cost me time and money. On every front, Laurie has run up the litigation costs for no reason.

I cannot afford this litigation. I am facing financial ruin. But nothing is more important to me than my children.

6. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENTS ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

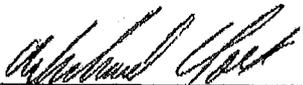
Dated this _____ day of April 20112, at Vancouver, Washington.

MICHAEL HOLT

I cannot afford this litigation. I am facing financial ruin. But nothing is more important to me than my children.

6. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENTS ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Dated this 20 day of April 20112, at Vancouver, Washington.



MICHAEL HOLT

Attachment:

Michael Holt's Answer to Laurie Holt's Financial Declaration

June 2011

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

In re the Custody of:

BENJAMIN HOLT, CHILD

MICHAEL HOLT

Respondent,

and

LAURIE HOLT

Petitioner.

No. 41211-0-II

MICHAEL HOLT'S ANSWER TO
LAURIE HOLT'S FINANCIAL
DECLARATION (RAP 18.1)

Michael Holt makes the following statements in the belief that they are true and accurate.

1. I am over twenty-one (21) years of age and competent, willing, and able to testify to the following, which is based upon my personal knowledge.

2. **Child Support:** Laurie claims I have not paid child support for Benjamin and have paid too little for Chandler. This is false. Laurie has always had my full financial support in regards to Benjamin and Chandler. Not only did I voluntarily increase my child supports payments over time, I also paid for clothing,

school supplies, sporting activity fees, vacations, co-payments for medical and dental checkups and normal daily expenditures for the children such as vacations, birthday parties, special events, etc. The list could continue, but it is clear that I have not neglected either Chandler or Benjamin financially, as Laurie asserts in her declaration. In addition to what I have already submitted to the trial court, I can further document the financial support I have provided Benjamin. I know the trial court made a finding that I have financially supported Benjamin and that is correct.

It is also simply false that I avoided entry of a new child support order to avoid disclosing my income. Laurie has always known I have a good income because she has depended on my financial support for all the time I have known her. With Laurie, as with my first wife, Patty, we worked out child support without having to go to court. (Patty and I did our own divorce.) Sometime when my two oldest children were teenagers, maybe in 2005, Patty and I went through a child support review. (I have not had time to dig up the paperwork on this, but base this on my recollection.) Based on that, my child support for those two children was set at \$1050, total. I disclosed all my income for that process and I talked with Laurie about it. Based on what was calculated for my two other children, Laurie and I decided to increase the amount I was paying for Chandler and Benjamin, for a total of \$700 (the boys being younger). At the time, Laurie was completely in agreement and grateful.

DECLARATION OF MICHAEL HOLT
IN ANSWER TO FINANCIAL DECLARATION
OF LAURIE HOLT
Page 2 of 7

Laurie is also completely wrong that my child support payment for Chandler would have been \$1400, if we had gone to court. My attorney tells me that even if her calculation is correct for today, and I don't know that it is, Laurie is talking about a change in the child support formula that went into effect in October 2009, by which time Chandler had moved in with me.

My child expenses have increased since Chandler has been in my home almost exclusively for two years now. I have yet to receive even a penny from Laurie for Chandler. Also, I have incurred a great deal of expenses going back and forth to Castle Rock to transport Benjamin and to continue my involvement in his activities.

3. **Laurie's Income:** Laurie complains that I haven't disclosed my income. Actually, it has been hard to get a true picture of Laurie's income, because she keeps reporting different amounts in different court proceedings. When we were doing the child support for Chandler recently, she reported a monthly income without including all the money she was receiving for Benjamin. Now, according to her declaration for the appeal, she receives almost \$4200 a month without working outside of homemaking. For Chandler's child support matter, because she has chosen not to work, the court imputed income to her (of \$2800, as I recall).

When Laurie talks about her expenses, she makes it sound like moving to Castle Rock caused financial problems for her. If that's true, she didn't have to

move. She complains, too, about the transportation cost of going back and forth between Castle Rock and Vancouver because the court ordered Benjamin to continue in his same residential schedule with me and Chandler, despite that Laurie moved to Castle Rock. She forgets that she would make the same trip to see Chandler, so there is no extra transportation expense for Benjamin, unless Laurie chooses not to see Chandler (which she sometimes does). She also doesn't mention that the cost of transportation is high for her because she drives a Chevrolet Tahoe, which is really expensive given the rise in gas prices and may explain some of that large expense. I go back and forth to Castle Rock all the time so that I can attend Benjamin's baseball games, practices, plays (for band), social occasions, etc. I want Benjamin to know nothing has changed between us.

4. **My Income and Expenses:** Laurie misrepresents my financial circumstances. I have worked my way up in my job, and, beginning about four years ago, I was given a lot more responsibility and a substantial increase in salary. Now I am general manager of the Last Frontier and New Phoenix Casinos and I now earn a base gross salary of \$125,000 per year. I also sometimes receive bonuses, but they are not guaranteed. Over the last three years the average bonus has been approximately \$25,000. In addition to bonuses I also receive paid time off benefits that are included in my gross income. I recently went through a Child Support order for my son, Chandler Holt,

and from this my **net** monthly income was determined to be \$9100.78. This amount barely covers my expenses, which are \$8343 monthly, not including attorney fees, which have averaged \$3300 a month since March 2010. This calculation of my expenses also does not reflect all the financial support I provide to my adult children. Untill August, 2010, when my oldest son, Michael, graduated from Brigham Young University, I contributed substantially to his tuition, room, and board and other expenses, because I had made a commitment to him to do this. This was a voluntary contribution. I would also like to help him through his masters degree program, but I don't know that I can. My daughter is also now an adult and living and working in Vancouver. (She works with me at the casino.)

I also incurred considerable financial liabilities from a business I operate called Team Money, LLC, which involved real estate development. The recession of the past several years has hit this business hard and crippled me financially. My liabilities greatly outweigh my assets. I do not see how I will be able to avoid bankruptcy.

5. **Litigation:** Laurie claims I have entered into litigation hoping I could outspend her. This could not be further from the truth. Before and throughout the litigation process I have consistently offered to sit down and negotiate parenting plans for the children that serve their best interests. We always managed to work it out in the past. I've done that with my first wife, the

mother of my two adult children; we have been able to focus on what is best for the kids. With Laurie, I did everything I could to avoid litigation, short of ignoring the welfare of my sons. We did not have to go to court at all if Laurie would have agreed just to keep Benjamin's life the same as it has been for his whole life, so that he could continue in the same schedule with me and his brother as always. Instead, Laurie has refused this option every time it was presented to her.

With Chandler, for example, Laurie claims to have agreed to a modification of our parenting plan so he could attend school in Vancouver. If this was true, we could have just done that and saved a year and a half of litigation expense. Instead, we went to court, went to an adequate cause hearing, etc. Finally, after the guardian ad litem report favoring modification, and with Chandler pretty much refusing to live with Laurie in Castle Rock, Laurie "agreed" to a new parenting plan. Now she complains about having to pay child support, though I kept paying support to her for Chandler, as well as Benjamin, even though Chandler had moved in with me (in 2009). She has yet to actually pay any child support for Chandler.

Laurie also does not mention that her failure to comply with the trial court's orders in Benjamin's case have required me to return to court a number of times to get her to comply. Repeatedly, the court has ruled in my favor and made Laurie do as the court ordered in the first place. Laurie has run up the litigation costs for no reason.

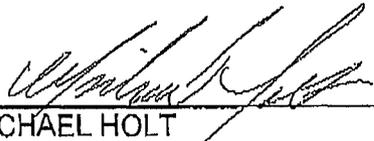
DECLARATION OF MICHAEL HOLT
IN ANSWER TO FINANCIAL DECLARATION
OF LAURIE HOLT
Page 6 of 7

I cannot afford this litigation. Along with the recession and its impact on my private business, I am facing financial ruin. And I do not have someone else (with a vintage sports car) who can help me pay this expense. But nothing is more important to me than my children.

I do not know how much of a burden this litigation has been on Mr. Partridge's family, as Laurie claims, but I have learned the family has a prominent business in the Longview area, called PNE Corporation, which claims to do business throughout the United States. <http://www.pnecorp.com/>.

6. I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING STATEMENTS ARE TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Dated this 28th day of June 2011, at Vancouver, Washington.


MICHAEL HOLT

Attachment:

Michael Holt's Financial Declaration

June 2011

COURT OF APPEALS, DIVISION TWO
STATE OF WASHINGTON

In re the Custody of B.M.H., child

MICHAEL HOLT

Respondent

and

LAURIE HOLT

Appellant

NO. 41211-0-II

FINANCIAL DECLARATION

APPELLANT

RESPONDENT

(FNDCLR)

Name: Michael J. Holt

Date of Birth: June 29, 1966

I. SUMMARY OF BASIC INFORMATION

Declarant's Total Monthly Net Income (from § 3.3 below) \$ 9100.78

Declarant's Total Monthly Household Expenses (from § 5.9 below) \$ 4975

Declarant's Total Monthly Debt Expenses (from § 5.11 below) \$ 3368

Declarant's Total Monthly Expenses (from § 5.12 below) \$ 8343

Estimate of the other party's gross monthly income (from § 3.1f below) \$ 4181.65

unknown

II. PERSONAL INFORMATION

2.1 Occupation: General Manager

2.2 The highest year of education completed: High School

2.3 Are you presently employed? Yes No

a. If yes: (1) Where do you work. Employer's name and address must be listed on the Confidential Information Form.

New Phoenix and Last Frontier Casinos, P.O. Box 1990, La Center, WA 98629

- (2) When did you start work there (month/year)? 10/1996
- b. If no: (1) When did you last work (month/year)?
- (2) What were your gross monthly earnings? \$ _____
- (3) Why are you presently unemployed?

III. INCOME INFORMATION

If child support is at issue, complete the Washington State Child Support Worksheet(s), skip Paragraphs 3.1 and 3.2. If maintenance, fees, costs or debts are at issue and child support is NOT an issue this entire section should be completed. (Estimate of other party's income information is optional.)

3.1 GROSS MONTHLY INCOME.

If you are paid on a weekly basis, multiply your weekly gross pay by 4.3 to determine your monthly wages and salaries. If you are paid every two weeks, multiply your gross pay by 2.15. If you are paid twice monthly, multiply your gross pay by 2. If you are paid once a month, list that amount below.

	Name <u>Michael J. Holt</u>	Name _____
a. Wages and Salaries	\$ <u>10335.05</u>	\$ _____
b. Interest and Dividend Income	\$ _____	\$ _____
c. Business Income	\$ _____	\$ _____
d. Spousal Maintenance Received		
From _____	\$ _____	\$ _____
e. Other Income	\$ _____	\$ _____
f. Total Gross Monthly Income (add lines 3.1a through 3.1e)	\$ _____	\$ _____
g. Actual Gross Income (Year-to-date)	\$ <u>10335.05</u>	\$ _____

3.2 MONTHLY DEDUCTIONS FROM GROSS INCOME.

a. Income Taxes	\$ <u>1883.64</u>	\$ _____
b. FICA/Self-employment Taxes	\$ <u>584.03</u>	\$ _____
c. State Industrial Insurance Deductions	\$ <u>10.79</u>	\$ _____
d. MANDATORY Union/Professional Dues	\$ _____	\$ _____
e. Pension Plan Payments	\$ <u>1550.47</u>	\$ _____
f. Spousal Maintenance Paid	\$ _____	\$ _____
g. Normal Business Expenses	\$ _____	\$ _____
h. Total Deductions from Gross Income (add lines 3.2a through 3.2g)	\$ <u>4028.93</u>	\$ _____

3.3 MONTHLY NET INCOME. (Line 3.1f minus line 3.2h or line 3 from the Child Support Worksheet(s).) \$ 9100.78 \$ _____

3.4 MISCELLANEOUS INCOME.

a.	Child support received from other relationships	\$ 0	\$
b.	Other miscellaneous income (list source and amounts)		
	_____	\$	\$
	_____	\$	\$
	_____	\$	\$
	_____	\$	\$
c.	Total Miscellaneous Income (add lines 3.4a through 3.4b)	\$ 0	\$

3.5 Income of Other Adults in Household \$ _____ \$ _____

3.6 If the income of either party is disputed, state monthly income you believe is correct and explain below:

IV. AVAILABLE ASSETS

4.1	Cash on hand	\$ 1000
4.2	On deposit in banks	\$ 6600
4.3	Stocks and bonds, cash value of life insurance	\$ 148,000
4.4	Other liquid assets:	\$ 0

V. MONTHLY EXPENSE INFORMATION

Monthly expenses for myself and 1 dependent(s) are: (Expenses should be calculated for the future, after separation, based on the anticipated residential schedule for the children.)

5.1 HOUSING.

Rent, 1st mortgage or contract payments	\$ 1500
Installment payments for other mortgages or encumbrances	\$
Taxes & insurance (if not in monthly payment)	\$
Total Housing	\$ 1500

5.2 UTILITIES.

Heat (gas & oil)	\$
Electricity	\$ 200

	Water, sewer, garbage	\$ 100
	Telephone	\$ 75
	Cable	\$ 25
	Other	\$ _____
	Total Utilities	\$ 400
5.3	FOOD AND SUPPLIES.	
	Food for 2 persons	\$ 500
	Supplies (paper, tobacco, pets)	\$ 50
	Meals eaten out	\$ 200
	Other	\$ 100
	Total Food Supplies	\$ 850
5.4	CHILDREN.	
	Day Care/Babysitting	\$ _____
	Clothing	\$ 50
	Tuition (if any)	\$ _____
	Other child-related expenses	\$ 160
	Total Expenses Children	\$ 210
5.5	TRANSPORTATION.	
	Vehicle payments or leases	\$ _____
	Vehicle insurance & license	\$ 175
	Vehicle gas, oil, ordinary maintenance	\$ 550
	Parking	\$ _____
	Other transportation expenses	\$ _____
	Total Transportation	\$ 725
5.6	HEALTH CARE. (Omit if fully covered)	
	Insurance	\$ 0
	Uninsured dental, orthodontic, medical, eye care expenses	\$ 100
	Other uninsured health expenses	\$ _____
	Total Health Care	\$ 100
5.7	PERSONAL EXPENSES (Not including children)	
	Clothing	\$ 100
	Hair care/personal care expenses	\$ 40

Clubs and recreation \$ 175
 Education \$ 100
 Books, newspapers, magazines, photos \$ 25
 Gifts \$ 350
 Other: Tithing/Donation \$ 100
 Total Personal Expenses \$ 890

5.7 MISCELLANEOUS EXPENSES.

Life insurance (if not deducted from income) \$ 50
 Other Michael Ryan University Expenses \$ 250
 Other _____ \$ _____
 Total Miscellaneous Expenses \$ 300

5.9 TOTAL HOUSEHOLD EXPENSES (The total of Paragraphs 5.1 through 5.8) \$ 4975

5.10 INSTALLMENT DEBTS INCLUDED IN PARAGRAPHS 5.1 THROUGH 5.8.

<u>Creditor</u>	<u>Description of Debt</u>	<u>Balance</u>	<u>Month of Last Payment</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5.11 OTHER DEBTS AND MONTHLY EXPENSES NOT INCLUDED IN PARAGRAPHS 5.1 THROUGH 5.8.

<u>Creditor</u>	<u>Description of Debt</u>	<u>Balance</u>	<u>Month of Last Payment</u>	<u>Amount of Monthly Payment</u>
<u>Chase Bank</u>	<u>Mortgage</u>	<u>\$268,078</u>	<u>02/2010</u>	<u>\$ 1768</u>
<u>National City Bank</u>	<u>2nd Mortgage</u>	<u>\$69,000</u>	<u>02/2010</u>	<u>\$ 275</u>
<u>Bank of America</u>	<u>Credit Card (Alaska)</u>	<u>\$13,732.88</u>	<u>02/2010</u>	<u>\$ 330</u>
<u>FIA Card Services</u>	<u>Credit Card</u>	<u>\$7989.33</u>	<u>02/2010</u>	<u>\$ 190</u>
<u>Columbia Credit Union</u>	<u>Line of Credit</u>	<u>\$6403</u>	<u>06/2011</u>	<u>\$ 180</u>
<u>Gary Abraham</u>	<u>Real Estate Loan</u>	<u>\$150,000</u>	<u>05/2011</u>	<u>\$ 625</u>
_____	_____	_____	_____	<u>\$ _____</u>
Total Monthly Payments for Other Debts and Monthly Expenses				<u>\$ 3368</u>

5.12 TOTAL EXPENSES (Add Paragraphs 5.9 and 5.11) \$ 8343

VI. ATTORNEY FEES

- 6.1 Amount paid for attorney fees and costs to date: \$ 49281
(\$30,000 in trial court, \$19,281 in appellate fees)
- 6.2 The source of this money was: personal salary and wages, cashed in part of 401K
- 6.3 Fees and costs incurred to date: \$ _____
- 6.4 Arrangements for attorney fees and costs are:
- 6.5 Other:

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

Signed at Vancouver, [City] WA [State] on 6/20/11
[Date].

Michael J. Holz
Signature of Declarant

Michael J. Holz
Print or Type Name

The following financial records are being provided to the other party and filed separately with the court.

Financial records pertaining to myself:

~~_____ Individual Partnership or Corporate Income Tax returns for the years _____ including all W-2s and schedules;~~

~~Pay stubs for the dates of _____~~

~~Other: _____~~

~~DO NOT ATTACH THESE FINANCIAL RECORDS TO THE FINANCIAL DECLARATION. THESE FINANCIAL RECORDS SHOULD BE SERVED ON THE OTHER PARTY AND FILED WITH THE COURT SEPARATELY USING THE SEALED FINANCIAL SOURCE DOCUMENTS COVER SHEET (WPF DRPSCU 09.0220). IF FILED SEPARATELY USING THE COVER SHEET, THE RECORDS WILL BE SEALED TO PROTECT YOUR PRIVACY (ALTHOUGH~~