

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Case Number 726005

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

---

**MARCUS ROSS, Appellant/Father**

**v.**

**SHAWNA HUBBARD, Appellee/Mother**

---

**Appeal from the Superior Court of King County State of Washington**

**BRIEF OF APPELLANT**

---

Marcus Ross  
1800 Grant, Ave. S. A-4  
Renton, WA 98057  
Phone 206-551-4578

*[Handwritten signature]*  
FILED  
FEB 23 11 0:37  
CLERK OF COURT  
KING COUNTY, WA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

TABLE OF CONTENTS

I. ASSIGNMENTS OF ERROR.....pages 5, 6 and 7.

II. INTRODUCTION.....page 7, 8 and 9.

III. STATEMENT OF THE CASE..... page 9.

    A. The July 29, 2014 Pre-Trial Conference .....page 9 and 10.

    B. The September 2, 2014 trial.....page 10 and 11.

IV. ARGUMENT.....pages 12-26.

    A. The Trial Court Erred Moving Forward With Trial Without Proper Service on The Appellant.....page 12-15.

    B. The Trial Court Abused its Discretion in entering RCW 26.09.191 restrictions against the Father.....page 15-17.

    C. The Trial Court Abused its Discretion in Entering Restrictions in Joint Custody and Joint Decision Making.....pages 18-27.

    D. The RCW 26.09.191 Restrictions are Used as Means of Parental Alienation, Abusive Use of Conflict and Harassment.....pages 20-22.

    E. The Court Abused its Discretion in Failing To consider the Conduct of The Father Since the Entry of the Agreed Final Parenting Plan in May 2009.....pages 22-23.

    F. The Court Erred in Entering an Order of Child Support Without a Petition for Modification and Which Included Day Care Cost Not Actually Incurred.....23-26.

1  
2 V. CONCLUSION.....page 26-27.  
3  
4

5  
6  
7 TABLE OF AUTHORITIES

8 CASES

9 State v. Berty, 136 Wash. App. 74, 83-84, 147 P. 3d 1004 (2006) .....page 21,  
10 23.

11 Carroll v. Junker 79 Wn.2d 12, 26, 482 P.2d 775 (1971).....pages 12 and 9 and  
12 23.

13 Counsel House, ic. V. Hawk 136 Wash. App. 153. 147 P.3d 1305 Wash. App. Div 1,  
14 2006,  
15 .....page 21.

16 ORANGE THEATRE CORP. v. RAYHERSTZ AMUSEMENT CORP., 139 F.2d 871, 874  
17 (3d Cir. 1944.....page 14.

18 Knight, 75 Wn. App. At 729 .....pages 12 and  
19 9.

20 Streeter-Dvbdahl v. Huvnh, 157 Wn. App. 408, 412, 236 P.3d 986 (2010), review  
21 denied. 170 Wn.2d 1026  
22 (2011).....page 14.

23 Marriage of James, 79 Wn. App. 436, 441, 903 P.2d 470 1995 ...pages 17, 14,15 and  
24 16.

25 State v. Jordan 146 Wash. App. 395, 190 P.3d 516 Wash App. Div . 2, 2008.....page  
17.

Haberman v. Washington Public Power Supply System, 109 Wn.2d 107, 177, 744 P.2d  
1032 (1987) .....page 14 and  
15.

Ryan v. State 112 Wash. App. 896, 51 P.3d 175 Wash App. Div. 1, 2002....pages 17,

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

22

In re Luscier, 84 Wash.2d 135, 524 P.2d 906 (1974).....page  
19.

In re Snyder, 85 Wash.2d 182, 532 P.2d 278 (1975).....page  
19.

STATUTES

RCW 26.09.191.....pages 8, 9, 11,12, 14,15, 16,18, 20, 21, 26 and 27.

RCW 26.09 440.....page 5 and 13.

RCW Chap.  
26.09.....*passim*

RCW 4.28.080.....page 5 and 13

COURT RULES

RAP 9.11.....page  
25.

RAP 18.1..... page  
18.

CR 4.....page 5 and  
13.

CR 12.....page 5 and  
13.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**I. ASSIGNMENTS OF ERROR**

**Assignment of Error No. 1**

The trial court erred by proceeding forward with trial over appellant's objections that he had not been properly served under CR4, RCW 26.09.440, RCW 4.28.080 and Civil Rule 12.

**Issues Pertaining to Assignment of Error No 1**

1. Whether the trial court abused its discretion in entering findings after trial when service of process was never made.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

2. Whether the trial court abused its discretion in entering findings after trial when the court did not have personal jurisdiction over the appellant.
  
3. Whether the trial court abused its discretion in entering an order of child support without personal jurisdiction over the appellant.
  
4. Whether the trial court abused its discretion in entering a final parenting plan without personal jurisdiction over the appellant.
  
5. Whether the trial court abused its discretion in entering an order on relocation without personal jurisdiction over the appellant.

**Assignment of Error No. 2**

The trial court erred in entering RCW 26.09.191 restrictions against the defendant for alleged acts which occurred 10 to 8 years prior to trial.

**Issue Pertaining to Assignment of Error No 2**

1. Whether the trial court abused its discretion by failing to consider the length of time passed from any alleged acts of domestic violence.

- 1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25
2. Whether the trial court abused its discretion in failing to consider the appellees confession to creating domestic violence claims to further her position in the divorce.
3. Whether the trial court abused its discretion in failing to consider that the appellee had been the subject of two anti-harassment orders protecting the appellant.
4. Whether the trial court abused its discretion in refusing to consider declarations and affidavits from witness regarding the appellee's harassment of the appellant.
5. Whether the trial court abused its discretion in refusing to consider the appellants successful completion of a 2 year domestic violence program in 2009.
6. Whether the trial court abused its discretion in refusing to consider the appellants successful completion of a respectful parenting class.
7. Whether the trial court abused its discretion in refusing to consider the multiple instances of perjury during the trial by the appellee.

**Assignment of Error No. 3**

The trial court erred in entering an order of child support that included daycare cost that were not actually paid.

1  
2  
3 **II. INTRODUCTION**

4 This case arises out of the Appellant's September 02, 2014, trial on appellees relocation.  
5 The parties were involved in a highly contested divorce and custody battle from 2006-  
6 2009. The mother alleged a history of domestic violence which the father denied. The  
7 final **agreed** orders were entered in May of 2009 providing 191 restrictions against the  
8 father and sole decision making to the mother. The parties were involved in several  
9 subsequent proceedings over the years including a relocation action to Arizona in 2012  
10 which was abandoned by the mother.  
11

12  
13 On April 7, 2014, the mother filed a notice of relocation to Skykomish Washington. The  
14 father was never served but filed a response and petition for modification of the parenting  
15 plan and objection to the relocation. An order restraining the mother from relocation was  
16 entered May 7, 2014. On July 14, 2014, the mother filed an amended notice of relocation  
17 without service on the father nor leave of the Court to amend.  
18

19 On July 29, 2014, the parties appeared before the Honorable Lori K. Smith on a pretrial  
20 conference. During the pretrial conference the father objected because service of process  
21 was never made. The Court acknowledged that service was not made and that the mother  
22 was supposed to move the court with a motion to amend then serve. Nevertheless the  
23 Court proceeded to trial. The Court also ruled that the issues in trial would be limited to  
24 those dating from the time of the entry of the last parenting plan to date.  
25

1  
2  
3 On the day of the trial September 2, 2014, the parties appeared and the father objected  
4 and moved to strike the mother's exhibits which consisted of documents used prior to the  
5 final parenting plan in 2009. The father pointed out that the Court ordered at the last  
6 hearing on July 29, 2014 that it was concerned with with the events that occurred prior to  
7 the entry of the final parenting plan. The father argued that these exhibits have been  
8 investigated by the Guardian ad Litem, submitted to the Court and ruled upon prior to the  
9 entry of the May 2009, final parenting plan. The father argued that re-litigating the same  
10 issues was prevented by collateral estoppel and res judicata.

11  
12 The Court reversed from its previous ruling now ordering that information prior to the entry  
13 of the final documents could be considered. The Court however, again acknowledged  
14 that the period from the entry of the final parenting plan to date was the most relevant.  
15 After a 3 day trial the Court entered an order allowing relocation, with statements  
16 regarding the mother's credibility and referencing an allegation from 2004 as a basis in  
17 imposing 191 restrictions, an incident alleged to have occurred 10 years before the trial  
18 date. The Court entered a revised parenting plan with 191 restrictions against the father  
19 a revised order of child support and an order granting relocation.  
20

21  
22 **III. STATEMENT OF THE CASE**  
23

24 Appellant is the respondent/Father in the dissolution action under King County Superior  
25 Court Case Number 06-3-09200-1. Shawna Hubbard is the Appellee petitioner/mother  
Brief of Appellant 9 of 28

Marcus Ross, Pro-Se  
1800 Grant Ave. S. A-4  
Renton, WA 98055  
ph 206-551-4578

1 in the King County Action. The Court entered findings without proper service, without  
2 personal jurisdiction, entered contradictory orders that left the father unable to provide  
3 appropriate rebuttal and defenses to allegations made 8 to 10 years prior. The Court  
4 entered RCW 26.09.191 restrictions solely on alleged evidence which was previously  
5 ruled upon prior to the entry of the final documents in May of 2009. The father appeals  
6 the entry of the final parenting plan, the final order of child support and the order of  
7 relocation as abuse of discretion.  
8

9  
10 **A. The July 29, 2014 Pre-Trial Conference**  
11

12 At the hearing the father objected to personal jurisdiction for improper service. Page 5,  
13 line 4 of transcripts from July 29, 2014. The Court acknowledged this by stating the  
14 mother was supposed to file a motion to amend and then serve the father. See page 5  
15 line 20, through page 6 line 5. However, the Court proceeded without proper service.  
16 The father was forced to trial over his objection of improper service.  
17

18  
19 The Court went on to state that previous issues would not be re-litigated. And that the  
20 pertinent factors stem from the date of the entry of the final parenting plan to current.  
21 Page 14 line 11 to line 22. The father relied on the Courts orders in preparing for trial.  
22 Including trial notebooks and witnesses.  
23

24 **B. The September 2, 2014 Trial Date.**  
25

1 The parties appeared before Judge Lori K Smith on September 2, 2014. The Appellant  
2 made a preliminary objection to numerous documents submitted as evidence by the  
3 mother. The Appellant argued that these documents were investigated by the Guardian  
4 ad Litem, submitted to the Court and ruled upon prior to the entry of the final parenting  
5 plan in May 2009. Appellant argued that considering these exhibits again amounted to  
6 Collateral Estoppel and Res Judicata. See page 3, line 5 through page 4, line 12.  
7 Throughout the trial the Court allowed the majority of these exhibits into evidence over  
8 the appellants objection. Despite the Courts rulings that the Court would be considering  
9 only new information and that the time from the entry of the final parenting plan to date  
10 was the most relevant. See July 29, 2014 transcripts Page 14 line 11 to line 22 and  
11 September 2, 2014 transcripts page 4, line 12 through 14.  
12  
13

14  
15  
16 In the Order on relocation, section 2.3.4a, the Court stated:

17  
18 “The father is subject to restrictions under RCW 26.09.191. The evidence clearly  
19 supports the 191 restrictions. A criminal case has a higher standard of proof than  
20 a civil case, and in this case the standard is by a preponderance of the evidence.  
21 The court finds that domestic violence occurred between the parties. The  
22 mother’s testimony is credible. The medical evidence is objective corroborating  
23 evidence and the mother’s testimony about the events surrounding the medical  
24 evidence is credible. The emotionality of a witness is not a determining factor of  
25 credibility. The court did not find that that mother’s testimony was inconsistent.”

1  
2  
3 The fact that a statement such as this entered into the order without any specific  
4 reasoning why is itself a manifest injustice. The Medical evidence referenced is from  
5 2004, 10 years prior to trial. Since there were no new convictions for any alleged acts of  
6 domestic violence, the Court entered these findings based solely on allegations which if  
7 happened occurred well before the May 2009 entry of the final parenting plan. The  
8 Court failed to consider the numerous exhibits and testimony regarding the mothers  
9 harassment of the father including two anti-harassment orders against the mother,  
10 attempts to have the father arrested, attempts to withhold and alienate the children from  
11 the father and several instances of abusive use of conflict by the mother. All the while  
12 the Court focused on allegations made eight to 10 years previously, none of which were  
13 proven against the father prior to the entry of the final parenting plan. The Courts ruling  
14 is manifestly unjust and made upon unintelligible grounds for unintelligible reasons.  
15

#### 16 17 **IV. ARGUMENT**

18 This appeal presents questions of law regarding the Courts authority to enter findings  
19 without personal jurisdiction and whether RCW 26.09.191 restrictions were appropriate  
20 regarding allegations that are alleged to have occurred eight to ten years prior to trial  
21 and six years after the entry of the final parenting plan.  
22

23  
24 The Appellant argues that the Court Abused its discretion in moving forward with trial  
25 without proper service upon the appellant and for entering RCW 26.09.191 restrictions

1 for alleged acts investigated and ruled upon prior to the entry of the parties final parenting  
2 plan in May of 2009. In addition, the trial Court abused its discretion by ordering the father  
3 to pay daycare expenses that were not actually accrued by the mother. Abuse of  
4 discretion occurs when the trial court's decision rests on untenable grounds or untenable  
5 reasons. State ex rel. Carroll v. Junker, 79 Wn.2d 12, 26, 482 P.2d 775 (1971). The trial  
6 court exercised its discretion in a way that was 'clearly untenable or manifestly  
7 unreasonable. Knight, 75 Wn.App. at 729.

9  
10 **A. The trial Court erred when it moved forward with Trial without proper service on**  
11 **the Appellant.**

12  
13 At the hearing the father objected to personal jurisdiction for improper service. Page 5,  
14 line 4 of transcripts from July 29, 2014. The Court acknowledged this by stating the  
15 mother was supposed to file a motion to amend and then serve the father. See page 5  
16 line 20, through page 6 line 5. However, the Court proceeded without proper service.

17 The father was forced to trial over his objection of improper service.

18  
19 Under CR4 and RCW 26.09.440 service must be made personally upon the opposing  
20 party or by leaving the Summons and complaint with a person of suitable age and  
21 discretion at the persons last known address. The initial Notice of Relocation was never  
22 properly served. The Mother simply left documents on the father's mother's doorstep. See  
23 Declaration of Service document 494 and 511. The amended Notice of relocation was  
24  
25

1 never served as well. Though the father filed a notice of appearance and objection this  
2 does not forgo the requirement for personal service.  
3

4  
5 The statutory requirements for service provide that "summons shall be served by  
6 delivering a copy thereof... to the defendant personally, or by leaving a copy of the  
7 summons at the house of his or her usual abode with some person of suitable age and  
8 discretion then resident therein." RCW 4.28.080(15).

9  
10 A voluntary appearance of a defendant does not preclude his right to challenge lack of  
11 jurisdiction over his person, insufficiency of process, or insufficiency of service of process  
12 pursuant to Rule 12(b).

13  
14 An untimely service of process is necessarily insufficient; thus the rule is applicable. The  
15 notice of appearance entered by defendants does not preclude them from challenging the  
16 insufficient service of process.

17  
18 To hold otherwise would require us to ignore our civil rules as well as reestablish a long-  
19 abolished distinction between special and general appearances. Former practice in  
20 federal courts required a defendant to specially appear in order to attack a court's  
21 jurisdiction over him. If he entered a general appearance, he was deemed to have  
22 submitted fully to the court's jurisdiction. That practice, criticized as an "ancient  
23 abracadabra of the law," ORANGE THEATRE CORP. v. RAYHERSTZ AMUSEMENT  
24 CORP., 139 F.2d 871, 874 (3d Cir. 1944), was abolished by the adoption of Federal Rule  
25 of Civil Procedure 12. A voluntary appearance does not waive any objection to the court's

1 jurisdiction. 2A J. Moore, FEDERAL PRACTICE 12.12 (2d ed. 1982). CR 12 is patterned  
2 after Federal Rule of Civil Procedure 12 and thus there is no distinction between special  
3 and general appearances under our rules of procedure. In addition, our rule CR 4(d)(5)  
4 by its very terms does not preclude a defendant who files a voluntary appearance from  
5 challenging the court's jurisdiction, insufficiency of process, or the insufficiency of the  
6 service of process. 99Wn.2d 206, 660 P.2d 756

8  
9 Proper service of the summons and complaint is a prerequisite to the trial court obtaining  
10 personal jurisdiction over a party. Streeter-Dvbdahl v. Huvnh, 157 Wn. App. 408, 412,  
11 236 P.3d 986 (2010), review denied. 170 Wn.2d 1026 (2011). Whether service of process  
12 was proper is a question of law this court reviews de novo. Streeter-Dvbdahl. 157 Wn.  
13 App. at 412.

14  
15 Under Washington law, "[mere receipt of process and actual notice alone do not  
16 establish valid service of process." Haberman v. Washington Public Power Supply  
17 System, 109 Wn.2d 107, 177, 744 P.2d 1032 (1987). Notice without proper service is  
18 not enough to confer jurisdiction. In re Marriage of Lon 74 Wn.App. 78 1, 875 P.2d 647  
19 1994). A trial court does not have personal jurisdiction over a party that is not lawfully  
20 served with process. Dobbins v. Mendoza, 88 Wn. App. 5 862, 871,947 P.2d 1229 (1  
21 997). Washington case law further mandates proper service under statutory  
22 requirements. "[In order to be sufficient, service of process must satisfy both due  
23 process and statutory requirements." Weiss v. Glemp, 127 Wn.2d 726, 734,903 P.2d  
24 455 (1995) (emphasis added).

1  
2  
3 In this instance service was never accomplished and the appellant/ father has been  
4 diligent in asserting this defense in pleadings (Documents 530, 531, and 533) as well as  
5 verbal objections at the July 29, 2014 hearing on pre-trial conference. . Page 5, line 4 of  
6 transcripts from July 29, 2014.

7  
8 **B. The trial court erred in entering RCW 26.09.191 restrictions against the father**  
9 **and for failing to allow a joint residential schedule and joint decision making.**

10  
11 RCW 26.09.191 limits parenting functions only if there has been:

- 12 1. Willful abandonment that continues for an extended period of time or  
13 substantial refusal to perform parenting functions;  
14 2. Physical, sexual, or a pattern of emotional abuse of a child;  
15 3. A history of acts of domestic violence as defined in RCW 26.50.010(1) or  
16 an assault or sexual assault which causes grievous bodily harm or the fear  
17 of  
18 such harm; or  
19 4. The parent has been convicted as an adult of a sex offense.

20  
21 Here father does not meet a single limiting factor in the statute. At trial the mother  
22 claimed that there were instances of domestic violence within the parties' relationship.  
23 The parties separated in 2006 and there have been no new findings of domestic  
24 violence. None of the allegations have been substantiated. All of the mother's  
25 allegations were prior to December 21<sup>st</sup>, 2006, the date the parties separated well

1 before the May 2009 entry of the final parenting plan. In fact, the father has provided to  
2 the court numerous letters in which the mother continually praises him as a loving  
3 husband and father, hardly fitting with her current statements of ongoing abuse during  
4 their relationship. In addition, the father provided the court with declarations from  
5 numerous family members who all have stated that the mother had not ever made a  
6 claim of domestic violence and that she continually praised father.  
7

8  
9 *“Mere accusations of domestic violence, without proof, are not sufficient to constitute*  
10 *statutory basis for denying mutual decision making in a permanent parenting plan in*  
11 *connection with marriage dissolution. RCWA 26.09.191(1)(c)”*  
12

13 In addition, an email from the mother evidence presented during trial proved that the  
14 mother agreed to drop the RCW 26.09.191 restrictions if the father would agree to the  
15 relocation. Further, the mother drafted an email confession regarding her allegations of  
16 domestic violence. See appellants exhibit 111.  
17

18  
19 The appellant wishes to illustrate that all of the allegations of domestic violence  
20 occurred prior to December 21, 2006, well before the entry of the agreed May 2009 final  
21 parenting plan. At the July 29, 2014 pre-trial conference the Court instructed that it was  
22 only concerned with the time period from the entry of the final documents to date. See  
23 July 29, 2014, transcripts page 14 line 11, through line 22 and September 2, 2014  
24 transcripts page 4, line 12, through line 20. The father, upon instruction from the Court,  
25 prepared for trial with evidence from the date of the entry of the final parenting plan to

1 date. The father was essentially ambushed at trial and did not have the time to properly  
2 rebut the mother's claims because all of these claims had been ruled upon previously.

3 This amounts to res judicata and collateral estoppel.

4 "A trial court abuses its discretion by exercising it on untenable grounds or for untenable  
5 reasons". James, 79 Wash.App. at 440, 903 P.2d 470.

6 Here, at the July 29, 2014 pre-trial conference the Court instructed that it was only  
7 concerned with the time period from the entry of the final documents to date. See July  
8 29, 2014, transcripts page 14 line 11, through line 22 and September 2, 2014 transcripts  
9 page 4, line 12, through line 20. Though the Court gave these instructions, it based its  
10 decision to enter RCW 26.09.191 restrictions based on allegations which occurred 8 to  
11 10 years prior to the entry of the final parenting plan in opposition of its own instruction.

12 "A court's decision is based on untenable reasons, and thus, constitutes abuse of  
13 discretion, if it is based on an incorrect standard or the facts do not meet the  
14 requirements of the correct standard". Ryan v. State 112 Wash.App. 896, 51 P.3d 175  
15 Wash.App. Div. 1, 2002.

16 "A trial court abuses its discretion, warranting reversal on appeal, when it exercises its  
17 discretion in a manifestly unreasonable manner or bases its decision on untenable  
18 grounds or reasons". State v. Jordan 146 Wash.App. 395, 190 P.3d 516 Wash.App. Div.  
19 2, 2008.

20 The father relied upon the Court's statements that the case would consist of  
21 matters that occurred after the entry of the final parenting plan in May of 2009 and was  
22 not able to offer rebuttal to the mothers previous claims that had been ruled upon.

23 **C. RCW 26.09.191 (3) RESTRICTIONS FROM JOINT CUSTODY AND JOINT**

1 **DECISION MAKING**

2 RCW 26.09.191(3):

3 (3) A parent's involvement or conduct may have an adverse effect on the child's best  
4 interests, and the court may preclude or limit any provisions of the parenting plan, if any  
5 of the following factors exist:  
6

7 (a) A parent's neglect or substantial nonperformance of parenting functions;

8 (b) A long-term emotional or physical impairment which interferes with the parent's  
9 performance of parenting functions as defined in RCW 26.09.004;

10 (c) A long-term impairment resulting from drug, alcohol, or other substance abuse  
11 that interferes with the performance of parenting functions;

12 (d) The absence or substantial impairment of emotional ties between the parent and  
13 the child;

14 (e) The abusive use of conflict by the parent which creates the danger of serious  
15 damage to the child's psychological development;  
16

17 (f) A parent has withheld from the other parent access to the child for a protracted  
18 period without good cause; or  
19

20 (g) Such other factors or conduct as the court expressly finds adverse to the best  
21 interests of the child.  
22

23  
24 Again, the father does not meet a single factor that would prevent him from Joint  
25 Custody or Joint Decision Making.

1 "It is argued that the interest of a parent in the custody and control of a minor child is as  
2 great as the interest in freedom and life itself, In re Luscier, 84 Wash.2d 135, 524 P.2d  
3 906 (1974), and, therefore, the burden of proof which must be met before one's child  
4 can be taken away should be equal to that which must be met in criminal cases. While  
5 we do not minimize the rights of a natural parent, those rights require the discharge of  
6 certain parental responsibilities. Children are not chattels. Parental rights are measured  
7 against the discharge of parental responsibilities; the welfare of the child is always the  
8 primary consideration. See In re Snyder, 85 Wash.2d 182, 532 P.2d 278 (1975). In re  
9 Harney's Welfare 19 Wash.App. 85, 574 P.2d 395 Wash.App. 1978. January 16, 1978.  
10  
11 In addition, the mother never stated what, if any benefit the RCW 26.09.191 restrictions  
12 would add from their imposition. Further, the Court failed to explain its reasoning behind  
13 the entry of the RC 26.09.191 restrictions in both the order of relocation and the final  
14 parenting plan.  
15

16 The father relied upon the Court's statements that the case would consist of matters  
17 that occurred after the entry of the final parenting plan in May of 2009 and was not able  
18 to offer rebuttal to the mother's previous claims that had been ruled upon. The Court  
19 ignored the mother's confession regarding instances of domestic violence, police  
20 reports and the mother's own perjury at trial.  
21

22 **D. THE RCW 26.09.191 RESTRICTIONS ARE USED AS A MEANS OF PARENTAL**  
23 **ALIENATION, ABUSIVE USE OF CONFLICT AND HARRASSMENT**  
24  
25

1 Several exhibits and testimony at trial illustrated the mother's abusive use of conflict,  
2 and parental alienation and using the RCW 26.09.191 restrictions as a means of  
3 harassment.  
4

5  
6 The mother arrived at the daycare in August of 2011 despite being instructed by the  
7 Court not to arrive. The mother reported to the police that the father was not to be  
8 present at the daycare. **See appellants Exhibit 112.**

9  
10 The mother drafted a signed letter to the daycare detailing the respondent was allowed  
11 to pick up the children at daycare. **See appellants Exhibit 113.**

12  
13 It is a fact that when the mother learned the respondent wished to volunteer at the  
14 children's school, she decided to suddenly volunteer in order to thwart the father from  
15 being involved with the children's school. **See appellants Exhibit 115**

16  
17  
18 The mother filed numerous petitions for orders of protection against the father since the  
19 dissolution began. All of these petitions were denied. **See appellant's Exhibits 119,**  
20 **120 and 121.**

21  
22 The mother filed a modification action in 2011 which was defeated and the Court  
23 awarded attorney's fees to the father. **See Appellants' Exhibit 122.**

24 An order of protection was entered against the mother, protecting the father on  
25 September 6, 2011 in Snohomish County Superior Court. **See Appellants Exhibit 118.**

1 An order of protection was entered against the mother, protecting the father on August  
2 27, 2012 in Snohomish County Superior Court.  
3

4  
5 With this evidence it is clear the mother is using the RCW 26.09.191 restrictions as a  
6 means to harass, alienate the children from the father, and create an abusive use of  
7 conflict. Despite this evidence, the mother's email confession, her initial agreement to  
8 remove the RCW 26.09.191 restrictions, the Court entered 191 restrictions, refused a  
9 joint residential schedule and ordered sole decision making to the mother with no real  
10 explanation in the orders.  
11

12 A trial court abuses its discretion when its decision is unreasonable manner or bases its  
13 decision on untenable grounds or reasons". State v. Berty, 136 Wash.App. 74, 83-84,  
14 147 P.3d 1004 (2006) (citing State v. Powell, 126 Wash.2d 244, 258, 893 P.2d 615  
15 (1995))).  
16

17  
18 "A trial court abuses its discretion when its decision or order is manifestly unreasonable,  
19 exercised on untenable grounds, or exercised for untenable reasons; untenable reasons  
20 include errors of law". Council House, Inc. v. Hawk 136 Wash.App. 153, 147 P.3d 1305  
21 Wash.App. Div. 1,2006.  
22

23  
24 A court's decision is manifestly unreasonable if it is outside the range of acceptable  
25 choices, given the facts and the applicable legal standard; it is based on untenable

1 grounds if the factual findings are unsupported by the record; it is based on untenable  
2 reasons if it is based on an incorrect standard or the facts do not meet the requirements  
3 of the correct standard. A decision based on a misapplication of law rests on untenable  
4 grounds. Ryan v. State 112 Wash.App. 896, 51 P.3d 175 Wash.App. Div. 1, 2002.  
5

6  
7 **G. THE APPELLANT'S CONDUCT SINCE THE PARTIES SEPARATION IN**  
8 **DECEMBER OF 2006 AND THE ENTRY OF THE FINAL PARENTING PLAN**

9 During the pre-trial conference on July 29, 2014, the Court stated that it would consider  
10 facts in the father's behavior that was different since the entry of the agreed final  
11 parenting plan. See July 29, 2014 transcript page 14, line 13 through 15. At trial  
12 evidence was introduced that proved that the father had:  
13

- 14  Completed a 2 year domestic violence program in 2009
- 15
- 16  Completed a Drug and Alcohol Assessment in 2009
- 17
- 18  Completed a Respectful Parenting Class in 2009
- 19
- 20  Completed three separate psychological exams, all with a favorable result.
- 21
- 22  Has not been convicted of any crime since his Alford or Newton Plea to assault 4th  
23 degree regarding the petitioner's allegations surrounding December 21, 2006.

24 The Court seemingly ignored these accomplishments and instead entered RCW  
25 26.09.191 Restrictions against the father, refused a joint residential schedule and

1 ordered sole decision making to the mother. The questions posed is how long do RCW  
2 26.09.191 restrictions last? The last alleged act of Domestic Violence was on December  
3 21, 2006 nearly 8 years ago.  
4

5  
6 “A trial court abuses its discretion when it exercises its discretion in a manifestly  
7 unreasonable manner or bases its decision on untenable grounds or reasons”. State v.  
8 Berty, 136 Wash.App. 74, 83-84, 147 P.3d 1004 (2006) (citing State v. Powell, 126  
9 Wash.2d 244, 258, 893 P.2d 615 (1995)).

10  
11 “A trial court abuses its discretion when its decision or order is manifestly unreasonable,  
12 exercised on untenable grounds, or exercised for untenable reasons; untenable reasons  
13 include errors of law”. Council House, Inc. v. Hawk 136 Wash.App. 153, 147 P.3d 1305  
14 Wash.App. Div. 1,2006.  
15

16  
17  
18 **F. THE COURT ERRED IN ENTERING AN ORDER OF CHILD SUPPORT**  
19 **INCLUDING DAYCARE COST**

20 The father nor the mother never filed a petition for modification and the mother never  
21 requested one in her filings. Despite this failure on October 16, 2014 the Court entered a  
22 final order of child support. The Order page 6 section 3:15

23 “The mother shall provide verification from the daycare provider of amounts paid  
24 for daycare to the father on monthly basis. Twice a year the parties will adjust for  
25 any over or underpayment. The first adjustment will be June 30<sup>th</sup> and the second

1 adjustment will be December 30<sup>th</sup>.”

2  
3  
4 During the trial the mother claimed that daycare expenses were over \$300.00 per month  
5 for the parties two children ages 11 and 9. The father already had daycare set up at a  
6 cost of 76.00 per month but the mother claimed that the father did not qualify for daycare  
7 on the days the children were with Mother. The Mother's attorney allegedly called DSHS  
8 and was told that daycare would not be paid when the children were not scheduled with  
9 father. The mother's attorney provided a declaration attached as **Exhibit B**. The intent  
10 was to force the father to pay above the child support amount so that the mother could  
11 receive extra funds. At that time the mother claimed her daycare expenses for the two  
12 children were 222.91 per month. As a result the Court ordered to pay an additional 152.49  
13 per month for daycare that the father already had covered.

14  
15 October and November went by without any proof of the daycare expenses as  
16 required by the Mother. On December 22, 2014 the father sent an email requesting proof  
17 of the daycare cost as order by the order of child support. **See December 22, 2014**  
18 **email attached as Exhibit C**. The Mother sent an email with her claimed daycare  
19 expenses. This email did not have any proof from the YMCA daycare as required by the  
20 Court. The father responded stating that the mother was required to provide proof from  
21 the YMCA daycare. See December 29, 2014 email as **Exhibit D**. The mother responded  
22 by sending sent an email detailing Daycare expenses for the boys of \$75.00 per month  
23 and a note by someone not employed with the Monroe YMCA, who is not licensed as a  
24 daycare provider, who the father has not met, and who does not provide care for the boys.

25 This letter provides o business name, no address, no contact information at all. See  
Brief of Appellant 25 of 28

Marcus Ross, Pro-Se  
1800 Grant Ave. S. A-4  
Renton, WA 98055  
ph 206-551-4578

1 Department of Licensing Check for Cathy Aroyo and Secretary of state business look  
2 collectively as **Exhibit E**.

3  
4 In addition, even if the mother's claim of this mystery daycare provider were true,  
5 she removed the children from the daycare father approved and the daycare the Court  
6 meant in its orders, to move to a different daycare with a greater cost than that of the  
7 YMCA. The only reason to switch to a different daycare to increase the costs is to harass,  
8 annoy, vex, frustrate the Court Orders and drive up the fathers legal cost. The YMCA is  
9 on my youngest child's school campus and the oldest is too old for daycare at all. The  
10 oldest child attends the teen camp at the YMCA less than half a mile from the youngest  
11 son's school. See emails attached from the Monroe YMCA regarding eldest child and his  
12 ability for daycare as **Exhibit F**.

13 The Court, the father, and the mother all knew and understood that the daycare in  
14 question was the YMCA daycare. This is illustrated by the mother's documents during  
15 trial. During the trial the Mother provided documentation from the YMCA daycare to argue  
16 the need for me pay additional funds from the daycare. This is exhibit 13 in Mother's trial  
17 notebook. Attached here as **Exhibit G** to this brief. Also is the Shawna's trial notebook  
18 index showing "after school cost" attached as **Exhibit H**.

19  
20  
21 Generally the Court is limited to review of the record. However, under RAP 9.11 the Court  
22 can consider additional evidence. In this instance it is clear that the mother did not provide  
23 proof of daycare expense from the YMCA daycare as the Court intended. The Mother's  
24 alleged proof of YMCA daycare cost could not be known at trial and are presented here  
25 for the Appellant Court's review.

1  
2  
3 **V. CONCLUSION**

4 The issues raised in this brief are not novel, each assignment of error is entirely based  
5 on existing law.

6 The appellant was not properly served with the Notice of Relocation.

7 The trial Court instructed it would only consider information from the date of the agreed  
8 final parenting plan to date, yet considered evidence well before the entry of the final  
9 documents in 2009.

10 The Court erred in entering RCW 26.09.191 restrictions based on allegations investigated  
11 previously by the guardian ad litem, presented to the Court and ruled upon well before  
12 the May 2009 entry of the final documents. This is tantamount to re-litigation of the  
13 previous action and Res Judicata and Collateral Estoppel.

14 The Court erred in entering RCW 26.09.191 restrictions against the father, granted sole  
15 decision making authority to the mother and denied a joint residential schedule based on  
16 unintelligible grounds and unintelligible reasons.

17 The Court erred by entering a modified Order of Child support without either party filing  
18 a petition to modify child support.

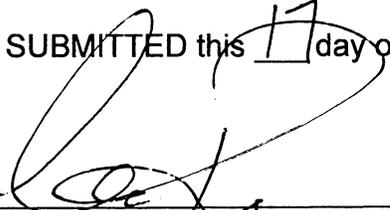
19 The Court erred in entering a finding for daycare expenses that are not actually  
20 incurred.  
21  
22

23  
24  
25 The Appellant should be awarded fees and costs under RCW 26.09.160 and RAP 18.

1  
2 While it is not be necessary to reach all of the legal issues raised by Appellant, at a  
3 minimum this Court must fully reverse and vacate the decisions of the trial court.  
4

5 I declare under Penalty of Perjury under the Laws of the State of Washington that the  
6 foregoing is true and correct to the best of my knowledge.  
7

8 RESPECTFULLY SUBMITTED this 17 day of February, 2014.  
9

10  
11 By:   
Marcus Ross, Pro-Se

at Renton WA

12  
13 CERTIFICATE OF SERVICE  
14

15 The undersigned certifies that on the date written below, a true and correct copy of this  
16 document was served on each of the parties below as follows:

17 Via mail to:

18 Shawna Hubbard  
19 PMB 4000  
P.O. Box 257  
Olympia, WA 98507

20 DATED this 17 day of February, 2014  
21

22 By:   
23  
24  
25

2014 FEB 23 11:03 AM  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
RENTON

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

IN RE:

NO. 06-3-09200-1 UFK

Shawna Hubbard

Petitioner

and

**DECLARATION OF COUNSEL  
REGARDING DSHS CHILD CARE  
ASSISTANCE INFORMATION**

Marcus Ross

Respondent

---

My name is Celeste Miller. I make this declaration from my personal knowledge and, if called to testify, could competently testify to the matters herein.

I am the attorney of record for Shawna Hubbard, the petitioner in this action. I have represented Ms. Hubbard since August 14, 2014.

On September 24, 2014 at 2:43pm I called the DSHS Child Care Assistance phone number 1-877-501-2233 for information regarding eligibility for child care assistance in this two household case. I spoke to Misty Sanchez, a Financial Service Specialist for the Child Care Subsidy Program and our conversation lasted almost 14 minutes (13:53).

I asked Ms. Sanchez how they dealt with a family that has two separate households in terms of the child care assistance. She stated that the family is not allowed to share benefits. She stated that each parent would have to apply separately for assistance on the days that the

B

1  
2 children are in their custody and the parent is working. She stated that it would follow the  
3 parenting plan, or if a family is not following a parenting plan, they would have to sign  
4 something stating which days the children are in their custody.

5 She stated that each parent would be given assistance based on the income and family  
6 size of their individual household, and only for the days that the children were with that  
7 parent. She stated that the easiest way to notify DSHS of this was in the section called "other  
8 comments" in the application form online or on paper.

9 I told her that my client is in college at UW-Bothell full time and Ms. Sanchez stated  
10 that full time students at four-year universities are not eligible for child care assistance.

11 I asked her what would happen if the parents shared the child care assistance. She  
12 stated that if there was an accounting of dates that the children's day care was paid for when  
13 they were not with the father, it would result in an overpayment of benefits to the father and  
14 he would be liable for repaying that to DSHS.

15 I asked her what a half-day according to the DSHS child care award letter meant. She  
16 stated that it was for up to four hours and 59 minutes on a given day. If the child care  
17 provider had the children with them for more than five hours on one day, it would count as  
18 two days of the benefits.

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

Signed at Seattle, Washington, this 24th day of September, 2014.

21 /s/ Celeste Miller  
22 Celeste Miller, WSBA No. 43164  
23 4701 SW Admiral Way #267  
24 Seattle, WA 98116  
25 Phone: 253-234-5785  
Email: celeste.e.miller@gmail.com

DECLARATION OF COUNSEL - 2

B

**Subject:** Re: Verification of amounts paid to daycare  
**From:** Marcus Ross (marcustr72@yahoo.com)  
**To:** slhubbard6@gmail.com;  
**Date:** Monday, December 22, 2014 10:52 AM

Please send soon. Tax purposes

Sent from my iPhone

On Dec 22, 2014, at 10:46 AM, Shawna Hubbard <slhubbard6@gmail.com> wrote:

I will get these to you by the end of this year. I lost track of my paperwork through moving. I can tell you the amounts are between \$250-300.

On Dec 22, 2014 9:06 AM, "Marcus Ross" <marcustr72@yahoo.com> wrote:

The verification for proof of daycare is long overdue. October, November nor December has been provided to me. This will need to show the amount paid for Marcus and Torrell only. It will need to show the date paid and method of payment per section 3.15 of the Order of Child Support. Please send this to me right away.

3.15

The mother shall provide verification from the day care provider of amounts paid for daycare to the father on a monthly basis. Twice a year the parties will adjust for any over or under payment. The first adjustment will be June 30th, and the second adjustment will be December 30th.

For purposes of this child support

C

**Subject:** Re: 2014 Daycare expenses  
**From:** Marcus Ross (marcustr72@yahoo.com)  
**To:** slhubbard6@gmail.com;  
**Date:** Monday, December 29, 2014 11:18 AM

Umm oh no. You are orders to provide proof from the daycare of these costs. You will need to get receipts that show when the payment was made the amount of payment and method of payment. You are way past due on providing this information. I suggest you consult with your attorney

Sent from my iPhone

> On Dec 29, 2014, at 9:36 AM, Shawna Hubbard <slhubbard6@gmail.com> wrote:

>

> I paid childcare amounts based on the following:

>

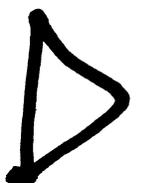
> \$327 for October

> \$282 for November

> \$295 for December

>

> In the future I will do my best to send you the amounts paid for the previous month by the 10th of the month. My apologies for the delay in these last few months.



**Subject:** Re: 2014 Daycare expenses  
**From:** Shawna Hubbard (slhubbard6@gmail.com)  
**To:** marcustr72@yahoo.com;  
**Date:** Sunday, January 4, 2015 3:40 PM

I've attached copies of childcare. I forgot about the ymca expenses and miscalculated Dec. The amounts are as follows:

\$343.75 October  
\$298.75 November  
\$213.75 December

On Dec 30, 2014 12:24 PM, "Marcus Ross" <marcustr72@yahoo.com> wrote:

I'm going to need the proof of daycare expenses for the boys as orders by the court by January 4, 2015.

Marcus

Sent from my iPhone

> On Dec 29, 2014, at 9:36 AM, Shawna Hubbard <slhubbard6@gmail.com> wrote:

>

> I paid childcare amounts based on the following:

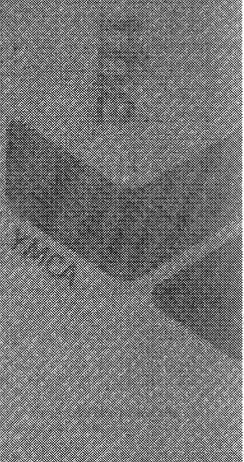
>

> \$327 for October  
> \$282 for November  
> \$295 for December

>

> In the future I will do my best to send you the amounts paid for the previous month by the 10th of the month. My apologies for the delay in these last few months.

E



Monroe/Sky Valley Family YMCA  
 YMCA Of Snohomish County  
 14033 Fryland's Boulevard  
 Monroe, Washington 98272  
 (360) 805-1879

**Member Receipt for:**

Shawna Hubbard  
 13826459-0  
 PMB 4000 PO Box 257  
 Olympia, WA 98507

By: CCREGS At: ADAC1206  
 Receipt Date: 12/15/2014  
 Receipt No: 14400402

Family 1 FA \$-37.50

CCTRANS 12-15-2014 Br:5

xxxx xxxx ~~xxxx~~ Visa 01/17

12 \$-37.50

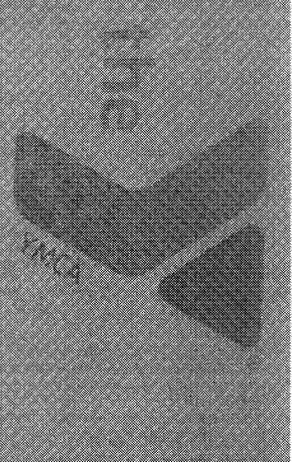
CCTRANS 12-15-2014 Br:5

12 \$75.00

CCTRANS 12-15-2014 Br:5

Member Exp Date 09/15/2015  
 Tax ID #91-0565561

Boys = \$18.75  
 Dec 2014



Monroe/Sky Valley Family YMCA  
 YMCA Of Snohomish County  
 14033 Fryland's Boulevard  
 Monroe, Washington 98272  
 (360)805-1879

**Member Receipt for:**

Shawna Hubbard  
 13826459-0  
 PMB 4000 PO Box 257  
 Olympia, WA 98507

By: CCREGS At: ADAC1206  
 Receipt Date: 11/15/2014  
 Receipt No: 14369478

Family 1 FA \$-37.50

CCTRANS 11-15-2014 Br:5

xxxx xxxx ~~xxxx~~ Visa 01/17

12 \$-37.50

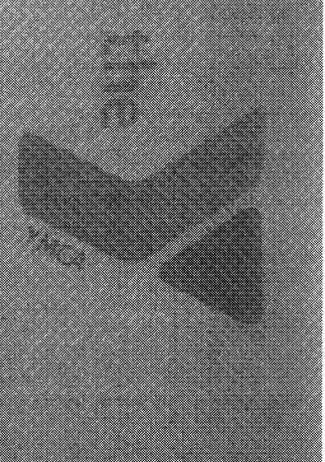
CCTRANS 11-15-2014 Br:5

12 \$75.00

CCTRANS 11-15-2014 Br:5

Member Exp Date 09/15/2015  
 Tax ID #91-0565561

Boys = \$16.75  
 Nov, 2014



Monroe/Sky Valley Family YMCA  
 YMCA Of Snohomish County  
 14033 Fryland's Boulevard  
 Monroe, Washington 98272  
 (360)805-1879

**Member Receipt for:**

Shawna Hubbard  
 13826459-0  
 PMB 4000 PO Box 257  
 Olympia, WA 98507

By: CCREGS At: ADAC1206  
 Receipt Date: 10/15/2014  
 Receipt No: 14335518

Family 1 FA \$-37.50

CCTRANS 10-15-2014 Br:5

xxxx xxxx ~~xxxx~~ Visa 01/17

12 \$-37.50

CCTRANS 10-15-2014 Br:5

12 \$75.00

CCTRANS 10-15-2014 Br:5

Member Exp Date 09/15/2015  
 Tax ID #91-0565561

Boys = \$18.75  
 Oct 2014

E

December 29, 2014

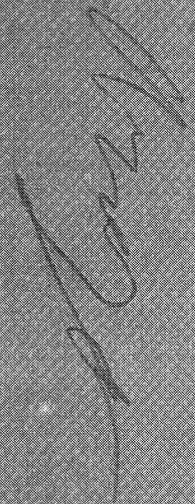
This is a receipt to acknowledge that Shawna Hubbard paid me for childcare for Marcus Ross and Torrell Ross. The following amounts represent the amounts of cash she paid for each month in 2014:

- \$245 for October
- \$200 for November
- \$155 for December

Shawna also paid her daughter, Lydia Hubbard, to take care of Marcus and Torrell while she was at school. I witnessed her pay the following amounts to Lydia, in cash:

- \$80 for October
- \$80 for November
- \$40 for December

  
Cathy Arroyo





# Search

BUSINESS & PROFESSIONAL LICENSES

## Search Results

[Take a quick Survey](#)

### Your Search Criteria:

[New Search](#)

**License Type:** All Professional Licenses  
**Last Name:** aroyo  
**First Name:** C  
**County:** All Counties

**No matches were found for your search.**

Information Current as of 02/16/2015 4:41AM Pacific Time

[New Search](#)

Use of lists of individuals provided on this site for commercial purposes is prohibited under Chapter 42.56 of the Revised Code of Washington.

[Home](#) | [Privacy & Use](#) | [Other Licenses](#) | [Contact Us](#) | [Copyright © 2015 DOL](#)

E

# Search Results

There were no matches for "".

If the results of your Nonprofit Corporation search was unsuccessful, try searching the name using the [Charities database search \(http://sos.wa.gov/charities/\)](http://sos.wa.gov/charities/).

[« Start New Search \(corps\\_search.aspx\)](#)

## Disclaimer

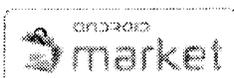
Neither the State of Washington nor any agency, officer, or employee of the State of Washington warrants the accuracy, reliability, or timeliness of any information in the Public Access System and shall not be liable for any losses caused by such reliance on the accuracy, reliability, or timeliness of such information. While every effort is made to ensure the accuracy of this information, portions may be incorrect or not current. Any person or entity who relies on information obtained from the System does so at his or her own risk.

All documents filed with the Corporations Division are considered public record.

## Search Apps on Mobile Devices



<http://itunes.apple.com/us/app/washington-state-corporations/id380001551?mt=8&uo=4>



<https://play.google.com/store/apps/details?id=gov.wa.sos.corporationslookup2>

## All Corporations Data Download

Download the whole Corporations search database ([AllData.aspx](#)) in XML format. Average file size is 70 MB compressed, 750 MB uncompressed.

E

**Subject:** RE: Child Care Freylands Elementary  
**From:** Jennifer Paynter (JPaynter@ymca-snoco.org)  
**To:** marcustr72@yahoo.com;  
**Date:** Thursday, September 11, 2014 9:00 AM

Marcus,

The 360 794 3869 is the correct number. I am not sure why it is not going through. You can also drop the paperwork off at our Member Services desk here at the Branch they are open until 10 pm M-F and 6 pm on Saturday and Sunday.

Are you able to email me the paperwork? I did receive confirmation from our Billing Department of your DSHS award. So will your youngest son being needing care then just in the morning at Fryelands? Our School aged child care is actually at the sites and our child care staff is at Fryelands elementary from 6 am until school starts and then when school gets out until 6:30 pm.

Your oldest son could participate in our Teen programs which are for middle school and high school students. He would take the school bus from Hidden River to Fryelands and then if you are not able to pick him up when that bus arrives at Fryelands he can take our Y teen bus here to the Branch and hang out with the other middle schoolers in the Teen Center. Our Teen Center is open until 7pm.

Because Marcus is in middle school he cannot be enrolled in school aged child care. If you need him to participate in our Teen bus program it is \$20.00 per month or free to those families receiving free or reduced lunch from the school district.

Let me know if there is anything else I can do to help you with registration.

Sincerely,  
Jennifer Paynter  
Business Services Director  
YMCA OF SNOHOMISH COUNTY  
Monroe/Sky Valley Family Branch  
14033 Fryelands Boulevard, Monroe WA 98272  
P 360 804 2173 F 360 794 5160 W ymca-snoco.org  
Connect with us: News, Facebook and more

The Y: We're for youth development, healthy living, and social responsibility.

-----Original Message-----

**From:** Marcus Ross [mailto:marcustr72@yahoo.com]  
**Sent:** Thursday, September 11, 2014 6:58 AM  
**To:** Jennifer Paynter



Honorable Lori Smith

**SUPERIOR COURT OF WASHINGTON FOR KING COUNTY**

In re:	NO. 06-3-09200-1 UFK
Shawna Hubbard,	<b>PETITIONER'S TRIAL NOTEBOOK</b>
Petitioner	
and	
Marcus Ross,	
Respondent	

**TABLE OF CONTENTS**

Tab A	Petitioner's Trial Brief
Tab B	Petitioner's Financial Declaration
Tab C	Petitioner's Witness and Exhibit List
<b>Exhibits</b>	
1	Unemployment Deposit Records March 2014-August 2014
2	Fed. Income Tax Return, 2012
3	Fed. Income Tax Return, 2013
4	BECU Bank Statements (Checking/Saving) Feb-July 2014
5	SSA Notice of Award
6	Sedgwick CMS L&I Letter
7	UW 2013-2014 Financial Aid Letter
8	UW 2014-2015 Financial Aid Letter
9	UW Bothell Tuition and Fees
10	UW Bothell Parking Permit Fee

11	Petitioner Financial Declaration
	<b>CHILD EXPENSES</b>
12	Gmail –Summer Camp Cost <i>No input from Faber</i>
13	YMCA – Torrell after school cost <i>DSHS</i>
14	Mukilteo Youth Soccer 2013-2014
15	SkyRiver Soccer Fall 2014 Registration Form
16	Stevens Pass Youth Fee <i>No input</i>
17	Stevens Pass Rental Fee <i>no input</i>
	<b>RESPONDENT FINANCIAL DOCUMENTS</b>
18	Union Hall Pay Grade Chart for Boeing
19	Boeing CBA pp 51-53 re Health Insurance
	<b>COURT ORDERS</b>
20	Parenting Plan 2009-05-29
21	Temporary Order Allowing Relocation
22	<i>DS</i> 2008-09-08 Statement of Defendant on Plea of Guilty <i>Object Prior to Res Incl. out</i>
23	<i>O</i> 4 Year NCO Pierce Co – protecting Shawna <i>Object</i>
	<b>RELOCATION FACTORS</b>
24	Timeless Woodsmith Tax Registration
25	Monroe Public Schools Schedule
26	Letter from Pediatrician 8.6.14 <i>biased</i>
27	Monroe School District 4 <sup>th</sup> Grade Curriculum
28	Monroe Middle School Planning Guide – Course Description
29	Monroe Student Fees
30	Monroe School Supplies List
	<b>MISC.</b>
31	Power and Control Wheel
32	ASU Acceptance Letter, Oct 2012
33	Medical Records – Herniated Disc
34	Medical Record – Chronic Wrist Pain
	<b>191 RESTRICTIONS</b>
35	CPS Report List –Torrell Interview Transcript <i>? object ?</i>

G.



## MONROE/SKY VALLEY FAMILY YMCA SCHOOL-AGE CHILD CARE 2014-2015 SCHOOL YEAR FEE OPTIONS

### MONROE SCHOOL DISTRICT

- All rates listed are \$ per month and follow the Monroe School District calendar.
- Enrollment is accepted throughout the year, space permitting. A minimum of TWO business days is required for processing new registration paperwork. Paperwork will be kept on file for ONE school year (September to August).
- A fifteen-day written notice is required for all withdrawals or changes in care. Please complete a Child Care Change Form to provide this notice.

**SCHOOL DAYS ONLY PLAN — For care only on school days (first day – last day of school)**

This plan is paid in equal payments over 10 months – September through June. Includes all In-School Days (Early Release Days are included for children registered to attend After School Care on those days). DSHS subsidy accepted for this plan.

4-5 Days/Week	Facility Member* Monthly Rate	Program Member Monthly Rate
Before School Only	\$273	\$348
After School Only	\$294	\$369
Before & After School	\$366	\$441
Kindergarten Enrichment - Before & After School <small>(Care provided for students registered in AM Kindergarten)</small>	\$589	\$664
Kindergarten Enrichment - After School ONLY <small>(Care provided for students registered in AM Kindergarten)</small>	\$464	\$539
Kindergarten Enrichment - Mid-Day until 3:30pm ONLY <small>(Care provided for students registered in AM Kindergarten)</small>	\$269	\$344

3 Days/Week	Facility Member* Monthly Rate	Program Member Monthly Rate
Before School Only	\$201	\$276
After School Only	\$221	\$296
Before & After School	\$289	\$364
Kindergarten Enrichment - Before & After School <small>(Care provided for students registered in AM Kindergarten)</small>	\$402	\$477
Kindergarten Enrichment - After School ONLY <small>(Care provided for students registered in AM Kindergarten)</small>	\$309	\$384
Kindergarten Enrichment - Mid-Day until 3:30pm ONLY <small>(Care provided for students registered in AM Kindergarten)</small>	\$211	\$286

1-2 Days/Week	Facility Member* Monthly Rate	Program Member Monthly Rate
Before School Only	\$170	\$245
After School Only	\$196	\$271
Before & After School	\$232	\$307
Kindergarten Enrichment - Before & After School <small>(Care provided for students registered in AM Kindergarten)</small>	\$319	\$394
Kindergarten Enrichment - After School ONLY <small>(Care provided for students registered in AM Kindergarten)</small>	\$232	\$307
Kindergarten Enrichment - Mid-Day until 3:30pm ONLY <small>(Care provided for students registered in AM Kindergarten)</small>	\$175	\$250

\* Youth facility membership is \$24/month or \$288/year.

H