

FILED
SUPREME COURT
STATE OF WASHINGTON
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CLERK

Supreme Court Cause Number 1040776

SUPREME COURT OF THE STATE OF WASHINGTON

DOROTHY HELM

Appellant,

V.

KRISTYAN CALHOUN, THOMAS PARKER, ET AL.,

Respondents.

**RESPONDENT CALHOUN'S ANSWER TO PETITION
FOR REVIEW**

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I. IDENTITY OF RESPONDING PARTY

Kristyan Calhoun, James Calhoun, and Senior Avenues LLC (collectively, “Calhoun”), were defendants in a Kitsap County Superior Court case brought by Dorothy Helm O’Dell (“Helm”). Having prevailed before a jury and again at the Court of Appeals, Calhoun now urges this Court to deny further review.

II. COUNTERSTATEMENT OF THE ISSUES

A. Did the trial and appellate courts err in ruling that the fiduciary duties of an Attorney-in-Fact, a Certified Professional Guardian, and a Trustee are distinct and separately governed under the law? No.

B. Did the trial and appellate courts err in determining that the Consumer Protection Act (CPA) did not apply to the allegations in this case? No.

C. Did the trial and appellate courts err in declining to say “fair market value” when instructing the jury? No.

D. Did the trial and appellate courts err in excluding evidence? No.

E. Is Calhoun entitled to an award of attorneys' fees and costs incurred in responding to this Petition for Review? Yes.

III. COUNTERSTATEMENT OF THE CASE

It is undisputed in the record that Calhoun sold Helm's Rhapsody Dr property for \$28K in early 2017.

In 2005, Helm purchased two investment properties located on Feigley Road and Rhapsody Drive in Kitsap County for \$177,500 and \$117,000, respectively. CP 598, 603.

In 2015, while living in South Dakota, Helm was involuntarily committed the South Dakota Human Services Center (SDHSC). Helm was diagnosed with schizoaffective bipolar disorder, hypothyroidism, hyperlipemia, a history of transient ischemic attack, and essential tremor. RP 1263. Due to these conditions, Helm was advised by her treatment team to live in a facility that would provide medication management,

transportation, and financial management. RP 1260. This is ultimately what Helm chose to do, but wished to do so in the State of Washington, where she had family. CP 93-99.

In late 2016, social worker Jennifer Luke-Anderson from Helm's SDHSC care team reached out to facilities across Washington in hopes that Helm could return to her family there. CP 93. Luke-Anderson, after her research, determined that Calhoun was knowledgeable regarding the area's facilities, and reached out to her about being a fiduciary and acting POA for Helm. Id. Calhoun owned Senior Avenues and was a fiduciary in Yakima. CP 4; 92-93. After meeting with the rest of Helm's care team, a collective decision was reached that Calhoun and Senior Avenues would provide the best avenue for Helm's needs to be met. RP 684; CP 92.

Throughout discussions of discharge, Luke-Anderson stated that the POA was not required nor a stipulation of discharge. RP 1108-09. Their planning included, in what they believed to be in accordance with Helm's best interests, moving

her from South Dakota back to Washington with her car and belongings and selling off her remaining properties. CP 108, 111. When Helm ultimately opted for a POA, Luke-Anderson contacted Heather LaCroix, a South Dakota attorney, to assist in drafting and executing it. RP 568-69. Helm signed the POA on 16 December 2016. CP 177-182. The POA granted Calhoun the power to “sell, either at private sale or public auction, any and all property, real or personal” Helm owned. CP at 29. LaCroix faxed a signed copy of the POA to Calhoun the same day. Ex 9; RP 1906.

On 3 January 2017, Calhoun faxed a Geriatric Care Management Service Agreement she drafted for signature to Helm. CP 184-185. The agreement contained the following provision:

“Kristyan Calhoun will act as power of attorney for Ms. Helm O’Dell. Kristyan will coordinate the transfer of Ms. Helm O’Dell’s vehicle being moved to Yakima Washington. Kristyan and her staff at Senior Avenues

will coordinate a move from South Dakota to Yakima.

Kristyan will address the properties being liquidated to find Ms. Helm O'Dell's care costs as the least restrictive alternative possible. Kristyan will coordinate with staff to meet Ms. O'Dell in S. Dakota and facilitate the move."

CP at 35, 185 (emphasis added). Helm signed the agreement, but Calhoun was not involved in Helm's execution of the agreement. RP 677.

Both properties in Calhoun's care as POA were significantly run-down and nearly unlivable at the time of purchase in 2017 due to poor conditions, including problems with the septic system and the "trashed", "rough" state it was in. CP 112. Calhoun later sold one of the properties (the Rhapsody property) to her friend, a realtor named Thomas Parker. CP 125. Calhoun had a working relationship with Mr. Parker, along with other licensed real estate brokers in Yakima. CP 143-145, CP 158. Mr. Parker invests in real estate. CP 259. He often worked with Calhoun's company as a real estate

broker. CP 160. Calhoun had sold investment property to Mr. Parker on behalf of clients previously. CP 146-148.

Prior to the sale, Parker, being unfamiliar with the current market in that location, referred Calhoun to Kitsap County broker Beth Allen. CP 116-117. Allen conducted a comparative market analysis report on the property and ultimately valued the property at between \$40,000 and \$50,000. CP 127. Allen noted that at that time, she had no knowledge of anyone, including Parker, having an interest in purchasing the property. Calhoun told Allen not to list the property.

Around 19 January 2017, Parker emailed Calhoun inquiring about the property, and made an offer of \$26,000. CP 170. Calhoun declined, stating that the offer was too low. Id. Parker came back with an offer of \$28,000, standing by the price on the grounds that it was to be purchased as an investment property and in its current sub-optimal state. CP 255 at 79. Calhoun accepted Parker's \$28,000 offer. CP 125. She

accepted this offer because Parker was agreeing to buy the property “as is”. CP 138.

On 20 January 2017, Calhoun and Helm spoke again about the move to Yakima. The same day, Calhoun signed the purchase and sale agreement as attorney-in-fact, accepting Parker’s \$28,000 offer. CP 239, [PARAGRAPH] 6. Calhoun expressed that she was happy with the offer, given the state of the property and its role as an investment. At the time it sold, the property had as a Section 8 tenant who was less than regular with rent payments. Parker kept him as a tenant, under Calhoun’s direction, as Calhoun wanted to keep Helm from potential liability. CO 164-168.

Three months prior to the Rhapsody sale, Parker was the buyer in the court-approved transfer of another property in Yakima (the Sorenson property). CP 245 at 29. However, the Trial Court in this case barred evidence of the Sorenson transaction, finding it irrelevant and prejudicial, with ER 406 inapplicable and no exceptions under ER 404. RP 628, 631,

633. Factors that were considered included that Calhoun was serving as a court-appointed personal representative of the Estate, the Department of Social and Health Services (DSHS) approved the sale, and the court oversaw settlement of the Estate. Helm sought to introduce evidence that Calhoun lied to obtain court approval of the Sorenson transaction, but as that had never been brought before the Yakima Court, it was excluded here.

SDHSC discharged Helm in August 2017 and, with Calhoun's help and funds from the property sales, Helm moved to a facility in Yakima – at that time, Helm expressed no regrets over the sale of her properties. RP 1105.

On 19 November 2018, Helm filed a lawsuit in Kitsap County against Calhoun. CP 1. In this lawsuit, she alleged among other things, that Calhoun and Parker had breached fiduciary duty and violated Washington Consumer Protection Act in the sale of the Rhapsody Drive property to Parker. *Id.*

The Consumer Protection Act claims were dismissed on summary judgment. CP 71-87, 302-303. The Parkers were moved as a party prior to trial. After three weeks of trial, the jury found no breach of fiduciary duty. The Court of Appeals affirmed the Trial Court in all aspects, and declined to amend its ruling after reconsideration.

IV. REASONS WHY REVIEW SHOULD BE DENIED

This Court must decide whether to accept review of the unpublished opinion issued by Division II. A petition for review will be accepted by this Court only upon a showing of one of four prongs set forth in RAP 13.4(b). In her Petition for Review, Helm focuses solely the fourth prong – an issue of substantial public interest. Accordingly, it will be the only prong addressed in this brief.

A decision that has the potential to significantly affect proceedings in the lower courts may warrant review as an issue of substantial public interest if review will avoid unnecessary

litigation and confusion on a common issue. *State v. Watson*, 155 Wn.2d 574, 577, 122 P.3d 903 (2005).

There is no substantial public interest to any of the issues raised by Helm in her Petition.

A. Attorneys-in-Fact, Certified Professional Guardians, and Trustees are Legally Distinct and Separately Governed

Helm assigned Calhoun as her Attorney in Fact pursuant to a Power of Attorney (POA) document. Later, Helm sued Calhoun for breach of fiduciary duty.

No evidence was introduced that Calhoun was appointed POA because of her experience as a Certified Professional Guardian (CPG) or her experience as a Trustee. When Calhoun registered her initial objection to the introduction of CPG standards, it was based on the lack of evidence that the CPG license factored into the selection of Calhoun as POA. RP 686

et seq. At no point did any witness offer the CPG license as a reason why Calhoun was selected.

Helm assign error to the failure of the trial court to allow the jury to consider the CPG Standards of Practice, and that the jury should be instructed pursuant to this Court's dealt solely with the duties of trustees.

Trustees have long been governed by statutory law in Washington. The Court in *Allard* analyzed duties under RCW 30.24, which was shortly after (circa. 1985) recodified as RCW 11.100. Multiple chapters of Title 11 are devoted to governing Trusts and the actions of Trustees, particularly RCW 11.97 through 11.118.

In 2016, Washington State codified the Uniform Power of Attorney Act (UPOAA) into law as RCW 11.125. This chapter specifically governs the appointment and actions of an agent for a principal as appointed by a Power of Attorney document. Notably, the legislature did not choose to make the UPAA a part of the statutory scheme governing Trusts.

The license of a CPG is, similar to that of attorneys, the creation of this Court through General Rule 23. First adopted in 2000, and amended substantially over the years, this Rule creates and governs the CPG license, and also creates and governs the CPG Board – the ultimate body that adopts and implements the Standards of Practice (SOPs) pursuant to GR 23(c)(3)(ii).

Helm argues again to this Court, as she has to every prior court, that (1) because Calhoun held a CPG license, therefore this case should be subject to the guidelines from the CPG SOPs; and (2) that because she was selling real estate for Helm, therefore this case should be subject to the guidelines in *Allard* regarding a Trustee selling real estate.

Helm offers no authority for this proposition other than that RCW 11.125.210-230 do not limit the applicability of other laws. That the UPOAA does not limit other laws does not logically translate to mean that any other law may apply – even if Trustee or CPG governance has some similarity.

In particular, the request to abrogate longstanding comprehensive statutory schemes and court rules into one blended homogenous fiduciary duty would, if adopted, be a significant deterioration of the Separation of Powers. This is a long-standing principle of Washington jurisprudence.

“[A]rguments from... history or analogy for the purpose of searching out and justifying the interpolation into the statute of new terms, and for the accomplishment of purposes which the lawmaking power did not express, are worse than futile. They serve only to raise doubt and uncertainty where none exist, to confuse and mislead the judgment, and to pervert the statute.” *State ex rel. Ronald v. Clausen*, 114 Wn. 520, 523, 195 P. 1018 (1921). The Court continued this ruling by noting that “[courts] cannot read into a statute something that is not within the manifest intention of the legislature as gathered from the statute itself. To depart from the meaning expressed by the words is to alter the statute, to legislate and not to interpret.” *Id.*, at 524.

This is precisely what Helm is trying to do: to request that the Trial Court, the Court of Appeals, and now this Court expand the scope of the UPOAA to include other duties or standards applied in Trustees or CPGs. The legislature chose to adopt Power of Attorney legislation separate and distinct from other statutes on Trustees or other court rules regarding CPGs. The legislature could have added these additional duties and standards, and did not do so. It would be error to subvert this law-making power of the legislature.

There is no reversible error in applying only POA law to the actions of a POA.

B. The CPA Does Not Apply To Matters of Professional Judgment

Firstly, Helm's Petition for Review offers zero analysis of why the dismissal of the CPA claim on Summary Judgment is an issue of substantial public interest pursuant to RAP 13.4(b). Calhoun specifically objects to Helm offering any such

elaboration being done for the first time before this Court on Reply, as Calhoun will have no opportunity to respond.

In addition, Calhoun offers the following:

Helm included in her lawsuit a claim against Calhoun under the CPA (RCW 19.86). Both at summary judgment (where the CPA claim was dismissed on Calhoun's motion) and also at trial, Helm did not offer evidence disputing that she signed the POA document and the subsequent service agreement. Both documents granted the power to Calhoun to sell Helm's real estate.

For this assignment of error in her Petition for Review, Helm relies on the requirement in RCW 11.125.140(1)(a) that the fiduciary must act in the principal's best interest. Helm then continues to opine that selling the property "for a fraction of its value cannot... be in the principal's best interest."

Petition, p. 14.

At trial, the jury was given Jury Instruction No. 9 (CP 1665-1666; attached hereto as Appendix A), which included the

requirement to act in the principal's best interest. Jury Instruction No. 11 (CP 1668-1669; Appendix B) set forth that not acting in the principal's best interests was one of five ways in which the jury could find that Calhoun had breached her fiduciary duty.

After hearing all of the evidence, the Jury deliberated and filled out the verdict form (CP 1675-1676; Appendix C). On that form, they were asked if Calhoun breached her fiduciary duty, and the answer was "No." Helm offers no analysis of, if a Jury has found that no breach of fiduciary duty occurred, how a violation of the CPA could occur.

In addition to the Court of Appeals' finding that Helm failed to meet the first element under the CPA (unfair or deceptive act or practice), Helm cannot meet the second prong: occurring in trade or commerce.

Although "learned professions" are not exempt from the CPA, this Court has established that the CPA only applies to "entrepreneurial or commercial aspects of professional services,

not the substantive quality of services provided.” *Michael v. Mosquera-Lacy*, 165 Wn.2d 595 at 602 citing *Ramos v. Arnold*, 141 Wn.App. 11, 20 (2007). “Claims directed at the competence of and strategies employed by a professional amount to allegations of negligence and are exempt from the Consumer Protection Act.” *Id.* The distinction seems to be less one of who is or isn’t licensed, but rather whether the action is based on the entrepreneurial aspect of the activity versus the professional judgment of the practitioner whose work is being challenged.

There is no error in prior rulings on the CPA.

C. The Method of Valuing Property Does Not Create a Significant Public Interest

Firstly, Helm’s Petition for Review offers zero analysis of why the dismissal of the CPA claim on Summary Judgment is an issue of substantial public interest pursuant to RAP 13.4(b). Calhoun specifically objects to Helm offering any such

elaboration being done for the first time before this Court on Reply, as Calhoun will have no opportunity to respond.

In addition, Calhoun offers the following:

Helm asserts that fair market value is frequently used as a measure of damages or value, citing to cases regarding conversion, probate, and eminent domain. *Petition*, p. 23.

However, while this is true, Helm offers no authority for why it is the standard that should apply in this case – apart from Helm’s own argument for it. This does not rise to the level of substantial public interest.

In addition, Helm’s focus on “fair market value” seems to be on her alleged lack of direction to the jury in how to calculate damages. This fails to be error, as the jury didn’t reach the need to calculate damages – they found no breach by Calhoun. (Verdict form, at CP 1675-1676; Appendix C.)

There is no reversible error related to valuation of Helm’s property.

D. Fact-Specific Evidentiary Rulings Are Best Left
To The Court's Discretion

Helm asserts error in the exclusion of evidence, which exclusion was based on lack of habit, of an unrelated event (the Sorenson transaction), asserting that the Trial Court should have analyzed admissibility under ER 404(b). *Petition*, p. 31-32.

Helm's argument on this issue offers zero analysis of why it is an issue of substantial public interest pursuant to RAP 13.4(b). Calhoun specifically objects to Helm offering any such elaboration being done for the first time before this Court on Reply, as Calhoun will have no opportunity to respond.

In addition, while Helm restates in detail the same arguments made to the Trial Court and the Court of Appeals, she offers no legal authority why the Court of Appeals was incorrect in its ruling. Conversely, the Slip Opinion cites to several other cases supporting the trial court's decision.

Absent authority for her arguments, Helm's assertions merely underscore and reinforce that the decision made by the Trial Court was situational and fact-specific – and thus within its discretion – not a broad legal issue with substantial public interest implications.

There is no reversible evidentiary ruling related to the Sorenson transaction.

V. ATTORNEYS' FEES SHOULD BE AWARDED

If this Court denies the Petition for Review, Calhoun respectfully requests an award of her reasonable and necessary fees and costs pursuant to RAP 18.1(j) for the time spent preparing a Response to the Petition. Fees and costs were awarded to Calhoun by the Trial Court (CP 1931-1939), and were subsequently awarded by the Court of Appeals (*Petition for Review*, Appendix at A-39 – A-42). Accordingly, this Court also has discretionary authority to award fees and costs pursuant to RCW 11.96A.150(1).

If this Petition for Review is denied, then Helm will have made the same ineffective arguments to the Trial Court, Court of Appeals, Court of Appeals on reconsideration, and now this Court. Calhoun contends that equity is strongly in her favor for an award of fees for having to Respond to these same arguments yet again.

V. CONCLUSION

Helm does not demonstrate any issue of substantial public interest. Indeed, she barely even analyzes this in her brief, and offers no authority therefore.

She has not established that there is a substantial public interest in this case related to maintaining separate and distinct fiduciary laws, applying the CPA, choosing a valuation method, or excluding evidence of a similar transaction. On each of these issues, the trial and appellate courts ruled within the normal and ordinary scope of applicable law, and while Helm clearly disagrees strongly with those rulings, she has not demonstrated any substantial public interest to justify further review.

Review should be denied, and fees awarded.

RESPECTFULLY SUBMITTED this 9th day of June,
2025.

I certify the presentation portion of this document, not
including cover page, tables, and this certification, contains
3,572 words in compliance with RAP 18.17(b).

RICHMOND HILL, PLLC



RON RICHMOND WSBA 42438

APPENDIX A

JURY INSTRUCTION 9

A Washington Statute provides that an agent under a Power of Attorney has the following duties:

- (a) Act in accordance with the principal's (Ms. Helm's) reasonable expectations to the extent actually known by the agent (Ms. Calhoun and Senior Avenues) and, otherwise, in the principal's best interest;
- (b) Act in good faith;
- (c) Act only within the scope of authority granted in the power of attorney;
- (d) Act loyally for the principal's benefit;
- (e) Act so as not to create a conflict of interest that impairs the agent's ability to act impartially in the principal's best interest;
- (f) Act with the care, competence, and diligence ordinarily exercised by agents in similar circumstances;
- (g) Keep a record of all receipts, disbursements, and transactions made on behalf of the principal; and
- (h) Attempt to preserve the principal's estate plan, to the extent actually known by the agent, if preserving the plan is consistent with the principal's best interest based on all relevant factors, including:

- (i) The value and nature of the principal's property;
- (ii) The principal's foreseeable obligations and need for maintenance;
- (iii) Minimization of taxes, including income, estate, inheritance, generation-skipping transfer, and gift taxes; and
- (iv) Eligibility for a benefit, a program, or assistance under a statute or rule.

APPENDIX B

JURY INSTRUCTION 11

Plaintiff has the burden of proving each of the following propositions on her claims of breach of fiduciary duty:

(1) That Ms. Calhoun or Senior Avenues owed a fiduciary duty to Ms.

Helm at the time of the acts in question (this element is not disputed by the Defendants);

(2) That Ms. Calhoun or Senior Avenues failed to comply with the fiduciary duty by one or more of the following acts:

a. By acting contrary to Ms. Helm's instructions or best interests, or

b. By not acting in good faith; or

c. By acting beyond the scope of her authority; or

d. By having a conflict of interest; or

e. By not exercising the care, competence, and diligence ordinarily exercised by agents in similar transactions;

(3) That Ms. Helm was damaged; and

(4) That the violation of the fiduciary duty was a proximate cause of Ms. Helm's damage.

If you find from your consideration of all the evidence that each of

these propositions has been proved, your verdict should be for Ms. Helm.

On the other hand, if any of these propositions has not been proved, your verdict should be for Ms. Calhoun and Senior Avenues as to this claim.

APPENDIX C

FILED

SEP 26 2022

KITSAP COUNTY CLERK
DAVID T. LEWIS III

Dorothy Helm

VS.

Kristyan Calhoun

18-2-03124-18

Verdict

We, the jury, make the following answers to the questions submitted by the court:

Question No. 1: Did either Kristyan Calhoun and Senior Avenues or both breach their fiduciary duty toward Plaintiff with regard to the Rhapsody Drive Property?

Answer: Kristyan Calhoun NO (Yes or No)

Senior Avenues NO (Yes or No)

If your answer is yes to either of the above, then answer Question No. 2. If your answer is no to both, then proceed to Question No. 3.

Question No. 2: If either Kristyan Calhoun and Senior Avenues breached their fiduciary duty to Plaintiff with regard to the Rhapsody Drive Property, what amount of damage, if any, did Plaintiff suffer?

Answer: \$

18-2-03124-18
VRD 441
Verdict Form
13224505



Question No. 3: Did either Kristyan Calhoun and Senior Avenues or both breach their fiduciary duty toward Plaintiff with regard to the Feigley Road Property?

Answer: Kristyan Calhoun NO (Yes or No)


Senior Avenues NO (Yes or No)

If your answer is yes to either of the above, then answer Question No. 4. If your answer is no to both, then sign this verdict form and notify the bailiff.

Question No. 4: If either Kristyan Calhoun or Senior Avenues breached a fiduciary duty to Plaintiff with regard to the Feigley Road property, what amount of damage, if any, did Plaintiff suffer?

Answer: \$ /

(DIRECTION: Sign this verdict form and notify the bailiff.)


Presiding Juror

RICHMOND|HILL PLLC

June 10, 2025 - 4:10 PM

Transmittal Information

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