Most everything that Sonya states in her declaration is prior history, or as she states, “background”.

DVPO should be dismissed or at least moved to family court independently from Jason civil case. They are trying to litigate all the issues of the family court case as a defense for Jason.

Her restraining order on me is purely retaliation upon me, an abusive use of litigation in an attempt to gain an edge by costing me a huge amount of money, which is substantive in order to figure out how to respond to Sonya’s massive declaration that has about 40 different points with other points contained in those points. Normally, you file a petition and supporting declaration. Next, the other side responds. Last, the petitioning party replies. However, Jason and his attorney did not like the way that worked, so Sonya files a 15 page declaration in a separate civil protection order for his wife and want them heard at the same time (to gain an unfair and outside the civil rules edge).

Sonya’s protection order should not be in front of the same commissioner, in fact, it should be in front of a family court commissioner separately. The only reason Sonya has filed this DVPO is to help Jason fight his because we called them on the abusive use of litigation accusation with our reply. I have not used any abusive use of litigation, but Sonya’s DVPO is a massive abuse of litigation against me. There repeated filings against me are well documented, see my supplemental reply,

**Abusive use of litigation.** It is ludicrous to accuse me of it when it is overwhelming Sonya and her attorney’s filings. I filed this past year that resulted in a few hearings. However, what caused me to file is of importance. I did not agree with the proposed orders of Anne’s, they had too many things added in them that were NOT part of the CR2A or from the prior parenting plan.

As another example of what caused filings was the special master’s free run on my business and finances, and then Sonya accuses me trying to control her finances? Some of what was in Sonya’s declaration back on 5/18/2022 (sub 488) is correct, but most is completely false with consequences that terrified me. They claimed I sold way more shares than I had, they claimed I pocketed money I did not, they claimed she was owed an additional quarter million dollars by using the incorrect exhibits of canceled sales because the company had made a typo error. Their totals on the shares and money owed exceeded what had even been there to start with. They would not communicate at all and hid behind the fact that I was supposed to communicate with a coordinator, which is also NOT true.

I was forbid to communicate anything about those topics with the coordinator by court order. The orders, which I had to pay somebody to painstakingly (investigate) go back through every single possible order entered where the word coordinator might listed. And I verified that the coordinator is for communicating parenting issues only as I remembered. And it should be noted that Sonya’s attorney has refused to give me tax documents I need to file my back taxes, which at this point if I had a refund, I will not be able to get it. Not to mention penalties for years where I owed. Again, Sonya and her attorney hide behind a order appointing a coordinator for those type of issues that does not exist. My then attorney Michael Lang contacted Sonya’s attorney Anne to discuss the tax document issue. Anne told Mr. Lang that first, he has not filed a notice of appearance on the Sonya DVPO case, and second, that I had to communicate it through the coordinator, which is a flat lie. This is also another example of Sonya and her attorney hurting me financially, really badly. And now she wants a coordinator for this? At my expense? I asked for something very simple from her attorney, and they want to cripple me further with an expensive coordinator? And more special masters?

**Abusive use of conflict.** Sonya’s constant filing of restraining orders has become an issue. To recap, she filed a DVPO in Snohomish County in 2018, see exhibit 1, Sonya’s Declaration. As you can see, nothing but made up allegations with not a single supporting exhibit. And Sonya claims how “shocked” she was and still is. Of course it was denied, she made it up and that is why no exhibits. Later she files another in King County. Then later she has her boyfriend now husband harass me until such time I explode and do something really stupid (the video thing). But ever since then, more filings, more ex parte restraining orders, unfair evaluation by the GAL to say the least, and keep using the same video thing now years later to warrant getting another DVPO on me when I have not done a single thing to Sonya, not even spoke to her in years. In all since the 2 videos incident, Sonya has filed how many restraining orders? Here is a summary on that:

9/17/2018, Snohomish County restraining order temp, and the order of denial. Restrained from children. Her Declaration was unsubstantiated allegations only.

12/03/2019, temp, sub 79. Restrained from children. Basis: Jason's Declaration, my notes on it. But did Michael send them the videos or did they record them? It matters. This is what started the restraining orders that followed and stuck.

12/17/2019, vacate temp restraining order, sub 105. Parenting plan is reinstated.

12/23/2019, Temporary Family Law Order/restrain, sub 107. Supervised visitation and other restraining order elements written into the Temp family law order, no actual restraining order filed.

COVID LOCKDOWN BEGINS.

11/06/2020 temp, sub 167. Restrained from children.

11/10/2020 Temp Restrain Order, sub 169. Extending Order, seems to be the exact same thing as sub 167. Restrained from children.

02/02/2021, temp, sub 198. extends the last one sub 167. It seems that all of these are the same ones.

02/23/2021, Final Restraining Order, replaces all other restrain orders, sub 217.

And what did I do to warrant all the restraining order filings? The 2 video incidents. I am not trying to minimize the video thing, but am I to be punished for that forever, events they can recycle to the end of time. How long can she use that as an excuse for what she does? Nothing happened between 2019 and now to warrant getting another order restraining me from my children. Yet, here she is again, filing yet another DVPO because I am fighting to not get robbed by a special master, get justice because they sent me proposed orders that are NOT in line with what we agreed upon in the CR2A, they never properly served me, and because I am tired of Jason and his games going on behind my back with ex-girlfriend, friend, and family. Sonya’s only legitimate reason for filing this DVPO was to help defend Jason on his, and to punish me for filing one on him by restricting my children further.

In addition to the restraining orders, there are all the contempt actions stacked as close together as she could get them. She talks about all the attorney fees she has gotten from me. Well, that is a big part of all the filings she has done as I showed in my supplemental declaration (reply) about her abusive litigation claim. Her intent was to cost me as much as possible. I was NOT the one doing all the filings, Sonya was and is. I have only tried to get a little justice. They should have a least mailed me the motion to enforce the CR2A, I would have gotten it then

1. On February 23, 2021, Michael was arrested for battery against his then intimate partner that he lived with in Florida. (Over 2 years ago and has nothing to do with this current DVPO. Charges dropped, there was no physical assault, and it has nothing to do with Sonya, Jason, or my children. In fact, how do they know about this again?)

2. On June 16, 2021, Michael was held in contempt for violating various provisions of the parenting plan and child support order (including canceling the children’s health insurance and refusing to pay spousal and child support). (Has nothing to do with the current DVPO and is almost 2 years ago. Being found in contempt does not equate to her getting a DVPO now. I am still looking into the parenting plan contempt because I do not really see much of anything there)

3. In September 2021, Michael objected to my move to Oregon and the Court temporarily restrained my ability to move. (again, has nothing to do with obtaining a DVPO, nearly 2 years ago, she moved without notice of relocation, so I filed a contempt. See the parenting plan in effect at the time, sub 216)

4. ln October of2021, Michael filed a baseless contempt case against me, and I was not found in contempt. (if you review the reason this was filed, it was not abusive. She was not found in contempt, but that is not a reason to file a DVPO, and see (5) below. Technically, she was in contempt, see sub 216. For her to say she was not found in contempt leaves out the agreement to let her move part)

5. On November 26, 2021, Michael and I executed a CR2A Settlement Agreement so that I would be allowed to move to Oregon and to resolve other outstanding disputes. (the contempt was from the blocking her move without notice of relocation, which in the end I allowed, see 3 above. She moved without notice of relocation, the parenting plan at the time did not allow that, sub 216)

6. On February 15, 2022, the Court entered an Order Enforcing the CR2A Agreement and awarded me attorney’s fees because Michael refused to sign the final orders. (I would not sign because of multiple additions of theirs that were not as agreed in the CR2A. it should be noted I did not have a notice of appearance in, did not know what one was, did not register myself for eservice, and did not know what that was and still do not know now to do that+)

7. On March 28, 2022, the Court appointed a Special Master because Michael refused to comply with the terms of the CR2A Agreement or Final Orders. (I would not sign because of multiple additions of theirs that were not as agreed in the CR2A, this issue is still not resolved and should not be litigated in a civil protection order. Her statement is true, but it is VERY misleading. Anne offered arbitration, then turned right around and had them filed. Anne wants you to believe I simply ignored her service, and I do NOT know how I was put in for electronic service because I do not even know how to. I had never filed a notice of appearance prior to them filing these)

8. In January and February of 2022 Michael repeatedly emailed my husband in an effort to force me to communicate with him and to coerce my husband and I into giving into his demands or else face the consequences of his threats. (I would not sign because of multiple additions of theirs that were not as agreed in the CR2A. Her attorney stopped communicating, has refused to since because she claims I was supposed to communicate everything through the coordinator which is NOT true. The orders are very specific that it is only on issues regarding the current parenting plan, visits, phone calls to kids, etc. I had made an effort to not go to court again because Anne would not respond)

9. On April 9, 2022, Michael sent disparaging messages and made multiple phone calls to my husband for days, and contacted our children inappropriately, in violation of court orders. (I did not say anything to my children that is wrong, I sent a few pictures. And how did I violate orders? I cannot defend where they are not specific)

10. On April 29, 2022, the Court denied Michael's Motion to Vacate the Order Appointing the Special Master. (I was never served really; I did not have a notice of appearance in, never thought I needed one, and at the time did not even know what one was. I had counsel through mediation when we came to the agreement on the CR2A). This just came to my attention.

11. On June 2, 2022, the Court denied Michael's duplicative Motion to Vacate and again awarded me attorneys' fees and costs. (What triggered this litigation that continued through 2022 was sub 488, their response. Their numbers and stories on what I owed them were all wrong. I wanted the correct information in front of the special master, which I have not been able to do to this day. It has never been an abusive use of litigation on my part)

12. Between June 13, 2022- June 17, 2022, Michael contacted Judge Keenan, my attorney, and my husband threatening to file a protection order against my husband. (because of his contacting momo, he was involved heavily, and has a pattern of going out of his way to cause me stress. For example, what started all the hot litigation was 2 videos that do make me look really bad back in 2019, I can’t take that back. However, if the full truth for context is to be known, Jason contacted me while I had the children for Thanksgiving and his phone call is what set me off. It was intended to set me off, see Jason’s declaration, sub 84. This pattern of Jason’s has continued since then, as I laid out in my declaration DVPO case I filed on him. The momo thing was the straw that broke the camel’s back, the final thing that made me file the DVPO. Jason is trying to get me to make a horrible mistake like I did in 2019 again. And Jason has been nothing but enabled to get the last word in on the action I filed on him through his wife’s abusive use of litigation on me.)

13. On August 31, 2022, Michael filed a Motion to Compel, which was again denied as baseless. (special master?, coordinator)

14. (special master?, coordinator) On September 7, 2022, Michael filed another Motion for Contempt, which was again denied as baseless.

15. On September 7, 2022, when Michael did not get the answer he wanted from the Court, he contacted the company directly to threaten a lawsuit if they complied with our court orders. In this month he also contacted my husband Jason again via email. (no exhibit, simply not true. The only thing I told them was to pump the brakes until the issue is resolved. I want that special master dismissed, he has to much power without any input from me, again see sub)

16. In October of 2022, Michael text my husband a kiss emoji and stated he was 'conducting an investigating for my children.' (it has been quite the investigation of this case file, yes)

17. In December of 2022, I was contacted by my nephew because he was concerned for my safety based on Michael's messages that included threats of violence against both me and my husband. (Not even admissible, allegedly obtained illegally, they don’t have the owner of the email as a witness. Michael does not even know if it is a real email)

18. In December of 2022 we had to file to garnish Michael’s accounts for refusal to pay me court awarded attorney fees and I have still not received them.

19. On December 29, 2022, a stranger appeared at my door with a stack of papers for my husband. There were I 80 pages of pleadings, but not the denial order that contained information about the return hearing and most importantly that Michael's request for a temporary order had been denied.

20. My husband appeared at the return hearing in East Bellevue District Court on. January 12th where Michael requested a continuance.

21. My husband appeared at the second return hearing in East Bellevue District Court where the Judge transferred the case to King County Superior Court because Michael was effectively asking East Bellevue District Court to change the parenting plan.

22. On February 15, 2022, the Court awarded me $7,676.50 in attorney's fees and costs. That represented the fees incurred from December 1, 2021, through January 31, 2022. Michael was also ordered to pay another $2,500 in attorney's fees and costs on June 2, 2022, for another bad faith motion filing. From February 1, 2022, to January 31, 2023, I have incurred an additional $28,850.12 in attorney's fees and costs. In total, from December 1, 2021 through January 31, 2023, I have incurred a total of $36,526.62 in attorney's fees and costs and paid $9,210.67 that Michael was ordered to pay and for which I am entitled a judgment pursuant to the order appointing the special master .Of the $36,526.52 in attorney's fees I have incurred (most of which is due to Michael's bad faith actions and desire to reduce my financial resources), I was able to garnish $11 ,321 . Before he moved all of his money out of that account. I am asking the Court award me a judgment in the amount of$40,000, which represents the $25,204.61 in attorney's fees I have incurred, the $9,210.67 for the special master fees and costs I have paid, and an additional $5,584.72 sanction for Michael's repeated violations of the restraining order, violations of the parenting plan, and refusal to follow any of the existing orders. (Inappropriate to award fees for another case, dismiss her motion. None of this over the past year is as she is painting it)

23. I have an existing restraining order against Michael, which has failed to provide adequate protection for me or my family. See Exhibit A – Restraining Order. The restraining order expires in March of 2023, but Michael’s harassing and threatening behavior continues to escalate, and I am concerned about my safety and my family’s safety. (Nothing but more “background information, and there is nothing new that warrants a DVPO”. Then after reading his book of rants, I thought it best to not call him back. Sonya’s DVPO against me is an abusive use of litigation intended to make this really expensive for me and by frivolously including the children is an abusive use of conflict because she is simply trying to cost and hurt me).

 In January of 2021, Judge O’Donnell oversaw our parenting plan modification trial. The testimony and evidence at trial was the basis for the existing restraining order. Part of this restraining order "prohibits Michael from contacting me by any means, whether directly or indirectly." See again, Exhibit A. Prior to Judge O'Donnell's ruling, Dr. William Singe (the appointed Guardian Ad Litem) filed a 2nd Amended Report recommending that Michael obtain a domestic violence assessment from a State Certified DVIT provider. This report was filed with the Court on February I, 2021. See Sealed Confidential Report filed on February 1, 2021. (Again, this is not about litigating the past, I never got served, I am only trying to get a little justice here, I have only filed a few times over a period of a year)

I believe the background information in this case is important for the Court to know and supports entry of a Domestic Violence Protection Order, and the requirement for Michael to obtain a State-Certified DVIT Assessment. (There is nothing current that they are using to suggest this is necessary, she has filed this entirely in retaliation to what I filed on Jason. Jason needs to stop contacting my ex-girlfriends and family, and me, for good)

25. As part of the Modified Final Parenting Plan entered on February 15, 2022, Michael was to pay the retainer to the new Guardian Ad Litem that he selected, Julia Jensine. Michael still has not done so and the GAL has not been able to begin her appointment or make any recommendations. In addition, Section 14.4 of the Parenting Plan contains non-disparagement clause preventing parties from making threatening, damaging, or detrimental remarks. See Exhibit F- Order Appointing Guardian Ad Litem and Exhibit G- Modified Final Parenting Plan.

26. When my husband refused to speak with him any further and blocked Michael from his phone, Michael then sent a group text to Jason and our children in an effort to escalate the situation by frightening and creating anxiety in the children by involving them yet again. This is the tactic he used back in December of 2019 to harass and torment me and that originally Jed to issuance of an immediate restraining order. See Exhibit J- Correspondence from Michael to Jason and Presley. This is a violation of the restraining order, a violation of our Parenting Plan and greatly triggered the children, and caused more emotional distress to Ella who has been diagnosed with PTSD from Michael’s actions. Ella has been in consistent therapy for trauma and PTSD (again caused by Michael) for years now. See Sealed Health Record- Letter from Ella's Therapist. I reported the messages to the police, but they told me it was a civil matter and took no action. (There is nothing in the text exhibit that is bad, I simply sent my son photos/fond memory type when he was younger. They claim Ella’s PTSD is caused from me, but the exhibit does not state that. This was at the end of 2020, coming up on a year of lockdowns, children not in school, not allowed to visit children in other homes, media fear frenzied, 40% increase in young girl suicides, really messed children up overall. Totally dishonest to blame me for this, and there is nothing I did during 2020 that would elevate her anxiety to a PTSD level, but Covid and the lock downs is a very probable cause. This is no more that part of her ongoing abusive use of litigation and conflict projected on me. I did something really wrong in 2019 with the video thing. However, everything since that act has been them trying to bleed me dry of money in litigation, and again they project their acts on me as though I did them)

27. On October 20, 2022, Michael texted our children Presley and Ella saying “I miss you. Not my choice,” and “when you’re ready for me I’m there.” On October 24, 2022, he texted Presley saying: “I am working every day to get you and your sister on our terms as you are a DeLance.” On October 31, 2022, Michael texted Presley saying you can see me. All you have to do is ask.” He previously stated to Presley and Ella that “it will be fixed very soon: and he “is doing everything he can to be with them again.” Michael has repeatedly stated directly to the children that “if they want to see him, all they have to do is ask.: That is not true. Michael has not taken the first required step to reinstate visits with the children. See Exhibit S -Text messages from Michael to Presley and Ella. This is a clear violation of the parenting plan and detrimental to the children. (Should be under family law case, I am simply not trying to force anything on them, especially after Jason stating they don’t want to see me)

28. Michael has even made this clear with his own words when he messaged me years ago stating things such as "We will be at war forever." "I will never stop. You Rejected me." "Jason will never be accepted by me so get ready for a difficult life." "That is my life promise if you marry him." Exhibit T- Text Messages from Michael to Me. (recycled from 2018-19 during the beginning of a divorce, the heated moments, has nothing to do with now, for example, the 2 contempt actions against them)

29. I am also in the Address Confidentiality Program. (The address was on their paperwork, did not know she was in this program) As part of our CR2A agreement, I agreed to inform Michael of the school district in which the kids reside, but I did not agree to give him my home address. See Exhibit W - Address Confidentiality Program. It was scary and surprising that Michael had my husband served at our home address. I am sure Michael wanted us to believe that the court had granted some type of restriction in an effort to disturb our peace, as we spent the holiday weekend worrying about this case and what it meant for our family. For almost one week, we had to worry that a police officer might show up at our house and ask my husband to leave in front of the children, causing further emotional distress to my children and to Jason 's. J believe this is Michael's ultimate goal and, again, shows a consistent pattern of harassment exhibited by Michael, and a deliberate attempt to consistently harass us and disrupt our peace.

30. One of the most frightening things about Michael's frivolous petition against Jason is that he asked for the children to be included in the order and somehow believes that the East Bellevue District Court can ' help him get his children back.' There are very clear requirements laid out in our parenting plan about what Michael must do to reunite with the children - he just refuses to do them. For example, paying the GAL. However, because of his lack of effort toward this, I don’t believe his goal is to become reacquainted with the. DV children. I believe it is to use coercive methods to control and harass us until we drain our assessments9cr2afinancial resources and give into his demands. It is simply a method of revenge for him .Even though we have final orders that are supposed to prevent this continue harassment and disturbance of our peace, it has not deterred Michael from doing so in the slightest. Every time one door is shut, he finds another one to try and open. He will not stop in his efforts until his demands are met. Michael continues to use the Court systems, my husband and members of my extended family to find new ways to harass me without taking any accountability for his actions, working on his issues or simply complying with court orders so that he can see his children. This is harmful to me, my husband and our children. I would also like the Court to be aware that I asked for a protection order against Michael in 2018. I thought the evidence I provided was sufficient for a protection order to issue, but kept some evidence from my testimony because I was still deathly afraid of what Michael would do to me by bringing these things to light. The Court denied my request. I have since felt strong enough to bring forward more of this evidence including his own admittance of substance abuse issues, attending rehab, and even providing a card I have from Michael that he wrote me during our marriage where he apologizes for "laying a hand on me." See Exhibit X- Card. from Michael. Michael admitted to physically abusing me during our marriage, and this evidence, combined with the interviews and observance of Michael's behavior from our then GAL Dr. Singer, is what lead Dr. Singer to recommend Michael complete a State Certified DVJT Assessment. For years now, while having to constantly protect and defend myself against Michael, I have suffered from severe depressive episodes that led me to acquiesce to a settlement offer last year so Jason, my children and I could move to Oregon, and because I was terrified of facing him in Court.

(family law issue, 2 contempt actions pending, they need to stop using her as a defense shield to his actions, she cannot simply keep using what she has tried to use years ago, nothing she alleges is recent. They state I continue to use the court system, as though there is a long history of it. They have a long history of filing documents/starting actions, I had really none prior to 2022) other than a contempt of he parenting plan for Sonya not filing a notice of relocation.

To summarize for the court, these are the actions that have occurred since Dr. Singer recommended Michael obtain a State Certified DVTT Assessment:

31. (Allegations are still connected to pending litigation in a family law case, 2 contempt actions. There has been no harassment, no abusive use of litigation, and I have no financial control over her, there is no proof supplied either) I am asking that the Court find that Michael has engaged in tactics such as harassment, abusive use of litigation, and financial control and that Michael must obtain a State Certified DVJT Assessment and comply with all recommendations from this assessment.

32. (Allegations are still connected to pending litigation in a family law case. She should not be asking for relief for a family law case under a civil DVPO. The abusive use of litigation has been Sonya) I ask that the Court appoint a Litigation Special Master to approve any further filings by Michael against me, my husband, or any relief involving our children. In addition, our Guardian Ad Litem cannot investigate issues or make recommendations involving Michael and the children because Michael has not paid her

33. I ask that Michael be required to pay the retainer for the GAL and Communication Coordinator immediately. I also ask that Michael be ordered to comply with any and all treatment recommendations of the State Certified DVJT Assessor. (There has never been any domestic violence against my children or Sonya, only her allegations that are years old. I have not had any contact at all with Sonya in nearly 3 years. This is abusive use of litigation on her part to run my expenses up. I have not committed any acts towards Sonya. There is literally nothing that has happened the past 2 years between us other than a couple of failed actions of mine I filed on her. However, the last one was not totally fail, it simply says to pay the special master and that he be discharged)

(I do not have a problem with the GAL, but given the coordinator games they have played, I am not OK with a coordinator that incurs expenses as well as a special master with more expenses. The intent here as it has been all along is to bleed me dry of money).