CN: 201703018170 1 SN: 299 2 FILED PC: 7 JUN 1 7 2019 3 Timothy W. Fitzgerald SPOKANE COUNTY CLERK 4 5 6 7 SUPERIOR COURT OF WASHINGTON **COUNTY OF SPOKANE** 8 9 In re the Marriage of: No. 17-3-01817-0 **SIRINYA SURINA** 10 RESPONSE DECLARATION OF SIRINYA Petitioner, **SURINA** 11 RE: RESPONDENT'S 6/12/19 MOTION FOR And CONTEMPT, MOTION FOR SANCTIONS 12 **AARON MICHAEL SURINA** ON COUNSEL, MOTION FOR TEMPORARY FAMILY LAW ORDER AND PARENTING Respondent. 13 PLAN MODIFICATION 14 15 Sirinya Surina Declares: 16 1. International Abduction: Respondent has a paranoid obsession with international abduction. He has, for no reason, pursued "preventing" it since 2013. See Exhibit A, 17 which is a true and correct copy of an Exhibit submitted in Spokane County Superior Court 18 Cause No. 19-3-00129-32, an email accusing me of flying "every tell tail redflag" that I am 19 planning to abduct our son David. His latest emergency motion on the eve of trial seems frivolous and a way to disrupt meaningful trial preparation and cause more expense for 20 which he will blame my attorney. We continue to have very unequal standing in this 21 litigation as he tries one trick after another to erode away the support, I have to get a fair 22 resolution in this matter. His stated goal is a 50/50 parenting plan and he will pursue "his rights" whatever the cost --even if it is not in our children's best interest. 23

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- It's my attorney and support group's fault. Respondent continues to attack and blame my attorney for representing me to the best of his ability. Exhibit B; True and correct letter from WSBA re: Attorney Complaint. My attorney shows me Aaron's pleadings and accusations and I tell him what I want and he prepares my wishes in writing. Respondent, at every opportunity berates my attorney and support group and tells me they are screwing me over like I don't see his various tactics keep his promise to me that he would make sure I was penniless and out on the street without my kids. Whenever there are hallway discussions, it is inevitable that declarations are filed describing how it is my attorney's fault and if Respondent could just talk sense to me, we could get along. When Respondent told me I had signed a Power of Attorney over to Carl Wilson to control my life, I asked my attorney about it. Respondent was wrong about it. My attorney explained to me that it was probably the Deed of Trust I willingly sign to secure the loan On and Carl Wilson gave me to pay my legal costs. When it looked like me securing the loan for attorney fees would cause additional uncertain litigation, On and Carl willingly changed the security on the money I owed. The court has not yet to decided how these fees will be divided up between me and Respondent. My attorney has not done anything that I haven't approved first, including the parenting plan I am proposing to the court at trial. I DO NOT and have not supported a 50/50 parenting plan because I do not believe it is good for David and Andrew to be bounced back and forth between our houses every 48 hours as Respondent proposes.
- 3. Advised to NOT move out. We had 5 buyers under contract to buy our house since September 2018. Respondent interfered so much, the court ordered me to act as representative of our marriage to sell the house. I ordered Uhaul trailers twice to move out, but the sale fell through because of Respondent. I wanted to stay in the house in which I claimed ownership interest instead of starting to pay rent until I had to. I waited until the deed to the house transferred because I was afraid if I didn't that Respondent would occupy the house and refuse to sell it as ordered by the court.
- 4. Silverwood. Our son David's school has a day at Silverwood each year. In May 2018 my mom, Benjamus and I took the boys to Silverwood for the school event at approximately 10:00 a.m. Since Respondent was living in Idaho we had planned for him to come to

Silverwood and spend his Wednesday residential time with the boys at the park and then In re the Marriage of Surina KEITH A. GLANZER, P.S. Reply Declaration of Petitioner, Sirinya Surina 2024 W. Northwest Blvd. Spokane, WA 99205

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return them to Spokane. As it turned out I was still at the park when it got close to the return time for the boys –around 7:00 p.m. Respondent asked me to hang around and save him the two-hour trip to Spokane and I agreed. We met up at McDonald's to feed the boys. This year, the Silverwood day was on Thursday, May 23rd. The school sends out notice and all parents are invited to go to the event. I took them to the Silverwood at approximately 10:00 a.m. My mom couldn't come because of a knee injury so I gave the ticket to Respondent when he came to see the kids in the early afternoon. We were in a public place and were cordial to one another and I didn't talk about our case in front of the boys. I left around 4:30 p.m. Respondent wanted to show David the motorcycle show. I followed Respondent to the show where he fed David and showed him the motorcycles while I waited in the car with Andrew. I then returned to Spokane. These were not family outings as Ms. Colby describes in her declaration. It was a school event where we both attended for the benefit of our boys in a public place where I did not worry about Respondent acting out and I could easily get away from him if I had to.

- 5. Communication with Respondent and Sister: While I do exchange the children with Respondent and his Sister has been present, I do not remember having lengthy conversations with them about how I didn't know what was going on with my case. I have always been fully and truthfully informed by my attorney. He has cleared up the misinformation I hear from Respondent. For example, I never signed a power of attorney to Carl Wilson, the insurance claim Respondent refused to pursue cost us \$5,000.00 and we mediated in good faith with Jim Hatch 3 times.
- 6. <u>Housing.</u> I have paid a non-refundable deposit on a house at 227 E. 22nd, Spokane, WA 99203. This house is near David's school. I will be signing the lease on Monday and moving during the week, except for the times I will be preparing my trial testimony.
- 7. <u>Conclusion.</u> My attorney is not the reason this litigation has gone on and on. I feel Respondent through his constant litigation in the District Court, Thailand Court and his complaints to the police have kept this case going. This completely unnecessary motion without notice to me and a request to modify the parenting plan days before trial is shocking to me. I am asking for relief from the trial court to stop Respondent from this constant barrage of questionable court hearing. It costs him a filing fee, but it costs me

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hundreds and thousands of dollars. Not because of my attorney trying to run up my fees, but because Respondent causes me to have to defend myself. I am hopeful the court can stop him from continuing to do this. Our marriage is completely and permanently broken. My attorney did not write a parenting plan alleging domestic violence without my specific directions to do so because it's true.

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

Signed at Spokane, Washington, June 15, 2019.

Sirinya Surina Petitioner, Declarant

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Spokane, WA 99205 Telephone: 509-326-4526 Facsimile: 509-324-0405

Services User <aaron.surina@gmail.com>

Requesting Emergency EX-Parte Restriction on international Travel for my son

Kristin Kinsley <KKinsley@co.kitsap.wa.us>
To: "a-reply@surina.org" <a-reply@surina.org>

Wed, Sep 25, 2013 at 11:01 AM

Yes, you will have to file a divorce case to obtain a Court Order. You may seek legal counsel to verify that. If you prefer to proceed on your own you can go on line to www.courts.wa.gov/forms to obtain all the forms you will need.

To start a case you need: Summons, Petition for dissolution, Proposed Parenting Plan, Health form and a Confidential Information form. You will also need a Motion for ex parte restraining order and the Ex parte restraining Order. The filing fee is \$290 cash. Again you will need to go to court for the Ex parte order.

From: Aaron Surina [mailto:aaron@surina.org]
Sent: Wednesday, September 25, 2013 10:36 AM

To: <a-reply@surina.org>

Cc: Kristin Kinsley

Subject: RE: Requesting Emergency EX-Parte Restriction on international Travel for my son

Do I have to divorce my wife to have law enforcement assist the state dept on a recovery of my son? My wife has every tell tail redflag flying right now. The state dept has requested the exparte because my wife is not a US citizen but my son is. Please advise details on my next steps to provide the state dept with their requirements to keep my son safe from abduction to a country that is not signed onto the international Hague convention, preventing human trafficking.

On Sep 25, 2013 10:31 AM, "Aaron Surina" <aaron@surina.org> wrote:

What kind of case do I need to have to restrict Intl travel of my son if like the state dept advised, she obtains a passport via forgery? Please tell me what the case is called.

On Sep 25, 2013 9:35 AM, "Kristin Kinsley" <KKinsley@co.kitsap.wa.us> wrote:

Aaron,

As long as you have a case in our court, you can come to court with a Motion for ex parte restraints & Ex parte restraining Order. The court times are 8:30 am or 3:30 pm Monday-Friday. If by chance you do not have a case filed in our court, you will need to file one to get any Orders signed.

From: Aaron Surina [mailto:aaron@surina.org]
Sent: Wednesday, September 25, 2013 8:51 AM

To: Kristin Kinsley; Heldi A Clark

Subject: Requesting Emergency EX-Parte Restriction on international Travel for my son

EPHIBIT A

I am writing to request an emergency ex-parte order restricting interanational travel with my son to Thailand or any other country.

I was instructed by the state department to contact the clerks office and ask for an emergency ex-parte order or temporary ex-parte restricting the international travel of our son David Michael Surina. Please contact me with the next steps necessary to complete this so my son is safe from abduction.

The agent with the state department is:

Dan Githens

Direct line: 202-485-6276

Child abductions Preventions Center with the state dept can be reached at:

888-407-4747

http://travel.state.gov

Please contact me soon. Thank you so much for your help.

Thanks,

Aaron Surina

aaron@surina.org

http://www.linkedin.com/in/voipdesign

T: (360) 525-3483

W: (360) 744-7777

WASHINGTON STATE BAR ASSOCIATION

Office of Disciplinary Counsel

Felice P. Congalton Managing Disciplinary Counsel

April 12, 2019

Aaron Surina POB 30123 Spokane, WA 99212

Re:

ODC File: 19-00495

Your grievance against lawyer Keith A. Glanzer

Dear Mr. Surina:

We received your grievance (complaint) against a lawyer and assigned the file number indicated above. The Washington Supreme Court's Rules for Enforcement of Lawyer Conduct (ELC) govern the grievance process. The WSBA's Office of Disciplinary Counsel, under delegated authority from the Washington Supreme Court, must review and may investigate a grievance against a lawyer to determine if the lawyer's conduct should affect his or her license to practice law. We are not a substitute for protecting your legal rights. We cannot represent you or give you legal advice. Time deadlines for civil and criminal cases are not affected by filing a grievance.

We reviewed your grievance and it appears you are concerned with conduct by a lawyer for the opposing party in a dispute. A lawyer is not generally responsible for the conduct of his or her client. As a general rule, a lawyer may rely upon his or her client's version of the facts and may state facts in a light favorable to the client. Under our adversary system, a lawyer's primary duty is to protect the rights and interests of his or her client. While there are professional limits upon what lawyers may do, it does not appear that these limits were exceeded or that the court found any impropriety.

Based on the information we reviewed, we are dismissing your grievance under ELC 5.7(a). We will take no further action. If you do not mail or deliver to us a written request for review of this dismissal within forty-five (45) days of the date of this letter, the decision to dismiss your grievance will be final. Should there be a judicial finding of impropriety, you may request that we reopen this matter.

Sincerely.

For Felice P. Congalton

Managing Disciplinary Counsel

cc: Keith A. Glanzer (with copy of grievance)

DO NOT SEND ORIGINALS. We will scan and then destroy the documents you submit.

EXHIBIT B

