

**CASE NUMBER**  
**201703018170**  
**SN:510.0 PC:18**

FILED  
7/21/2023  
Timothy W Fitzgerald  
Spokane County Clerk

**SUPERIOR COURT OF WASHINGTON, COUNTY OF SPOKANE**

In re:

Sirinya Surina

Petitioner

And

Aaron Surina

Respondent

No. 17-3-01817-0

**RESPONSE DECLARATION OF  
SIRINYA SURINA**

SIRINYA SURINA first being duly sworn upon oath deposes and says: I write this declaration in response to specific points Aaron raises in his declaration.

**Affordability of my Home**

The affordability and quality of life I discuss in support of my relocation is not limited to what my monthly mortgage payments are. With a home, we are building equity and will not face the annual rent increases that almost all properties experience. On page three of my declaration, I did not say I was actively looking for a home and I do not know what Aaron is referencing. I told the court I closed on a home on May 23<sup>rd</sup> but had not relocated at the time of our contempt hearing. I am in no way attempting to mislead the court.

I do not deny that I moved as of July 9<sup>th</sup>. I did not move until Aaron's deadline to file his motion to restrain the move had passed. I do want to address my email to Kim Yahne that Aaron filed in which I said that we moved to Cheney. English is not my first language. The intention behind what I said was that by the time the next school year had started we would be living in Cheney. For the court's reference, this email was sent on May 30<sup>th</sup> at 7:26 PM which was the day

DECLARATION OF SIRINYA SURINA- 1

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1 we received keys to the house. I had not relocated at this time. Attached hereto as **Exhibit A**  
2 is a screenshot of an Amazon order I placed on June 7 showing the shipping address as the 22<sup>nd</sup>  
3 Avenue home. Attached hereto as **Exhibit B** are true and correct copies of my Avista bills for  
4 May, and June showing I was still residing in the home. The bill due July 27 is lower because we  
5 had moved out by that point which accounts for lower monthly energy consumption. Attached  
6 hereto as **Exhibit C** are true and correct copies of stills from our camera system showing us  
7 entering and exiting where we were renting. I removed the camera from the home shortly  
8 thereafter so I could patch the holes on the exterior and do not have recordings past these dates.  
9

10 Aaron picked our children up from the house I was renting on the 25<sup>th</sup> of June. Attached  
11 hereto as **Exhibit D** is a true and correct copy of a photo showing the same. This was two days  
12 after the contempt hearing where Aaron argued that I was no longer living in this home.  
13

#### 14 **Decision-Making**

15 I do not claim to have sole decision-making authority. I do have sole decision-making  
16 authority per our final parenting plan. Aaron seems to think that I am obligated to give him what  
17 he wants, or I am otherwise, "escalating the matter unnecessarily..." Medical and dental  
18 appointments have not historically been handled by Aaron, they have been arranged by me.  
19 Aaron even states in his declaration that I schedule medical and dental appointments. He claims  
20 I schedule them during his time which I have done before, accidentally. When I am scheduling  
21 appointments far in advance, it is hard to know whose time it will be. If I realize it will be his  
22 time, I will reschedule the appointment.  
23

24 I keep Aaron alerted to medical appointments even with sole decision-making for  
25 medical decisions. I have attached as **Exhibit E** a true and correct copy of a message I sent to  
26  
27

DECLARATION OF SIRINYA SURINA- 2

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1 Aaron regarding David's upcoming dental appointments and need for him to help David with  
2 his dental hygiene.

3 **Our Children's Wellbeing**

4 Our children could absolutely maintain their current friendships. Our move was eleven  
5 minutes from where we were previously living. Their medical care will remain the same since we  
6 are, again, in such close proximity that there is no need to change their primary doctor or dentist.

7 I truly have no idea what Aaron is talking about when he claims I said he should not have  
8 the children because he is not their mother. I do believe that he abuses conflict to our children's  
9 detriment, but I never said that he should not have our children because he is not a mother. I  
10 actually said the opposite in my original response indicating that our children are bonded with  
11 him and love him.

12 Our children already have friends that go to the schools they will be attending in Cheney.  
13 There is already an existing network of friends so they can start the new school year off with  
14 familiar faces. This, again, does not limit their ability to continue seeing friends from their school  
15 in Spokane. Just as it is for exchanges, the drive time for the boys to continue seeing their friends  
16 is minimally longer.

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

19 Signed at Spokane, WA on Jul 21, 2023.

20  
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22  
23   
24 Sirinya Surina (Jul 21, 2023 09:20 PDF)  
25 Sirinya Surina  
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DECLARATION OF SIRINYA SURINA- 3

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# EXHIBIT A

EXHIBIT - 1

KSB LITIGATION, P.S.  
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7/13/23, 11:13 AM

Amazon.com - Order: 111-2928568-2297054

amazon.com

## Final Details for Order #111-2928568-2297054

Print this page for your records.

**Order Placed:** June 7, 2023  
**Amazon.com order number:** 111-2928568-2297054  
**Order Total:** \$13.07

**Shipped on June 8, 2023**

### Items Ordered

1 of: *Monster Go Magnetic 3x3 Speed Cube, 48 Magnets Magic Cube Stickerless Puzzle Toy 3D for Kids Beginners Practices Educational MG EDU 56mm*

Sold by: GAN Cube ([seller profile](#))

Supplied by: GAN Cube ([seller profile](#))

Condition: New

### Price

\$11.99

### Shipping Address:

SIRINYA SURINA  
227 E 22ND AVE  
SPOKANE, WA 99203-2327  
United States

### Shipping Speed:

Standard Shipping

## Payment information

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# EXHIBIT B

EXHIBIT - 1

KSB LITIGATION, P.S.  
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Sirinya Surina

myavista.com  
1 (800) 227-9187

Account Number: 6142689210  
Statement Date: 05/16/2023  
Service Address: 227 E 22ND AVE

| Total Amount Due | Due Date                                      |
|------------------|-----------------------------------------------|
| \$368.50         | Jun 05, 2023<br>(Applies to new charges only) |

### Bill at a Glance

|                                        |               |
|----------------------------------------|---------------|
| Previous Balance Due                   | \$210.15      |
| Payment(s) Received through 05/16/2023 | 0.00          |
| <b>Subtotal</b>                        | <b>210.15</b> |

|               |        |
|---------------|--------|
| New Charge(s) |        |
| Electric      | 148.24 |
| Natural Gas   | 10.11  |

|                                               |                     |
|-----------------------------------------------|---------------------|
| <b>Total Amount Due This Month</b>            | <b>\$368.50</b>     |
| <b>Due Date (Applies to new charges only)</b> | <b>Jun 05, 2023</b> |

### Your Message Center

We're here to help! These can be challenging times, so if you're facing financial difficulties, please reach out to us at (800) 227-9187 or email us at [ask@myavista.com](mailto:ask@myavista.com).

Get the facts on solar. See if rooftop solar makes sense for you by visiting [myavista.com/solarassistance](http://myavista.com/solarassistance).

Your electric bill includes Federal Columbia River benefits supplied by the Bonneville Power Administration.

### Contact Us

Customer Service: 1 (800) 227-9187  
Monday through Friday 7 a.m. to 7 p.m.  
Saturday 9 a.m. to 5 p.m.

TTY Service - Our service numbers for the hearing impaired are:  
Washington 7-1-1 or 1 (800) 833-6388

After Hours Emergencies: 1 (800) 227-9187

Send payments only to:  
Avista  
1411 E. Mission Ave.  
Spokane WA 99252-0001

Send correspondence to:  
Avista Customer Service MSC-34  
PO Box 3727  
Spokane WA 99220-3727

website: [myavista.com](http://myavista.com)

e-mail: [ask@myavista.com](mailto:ask@myavista.com)

Please detach and return the bottom portion with your payment

TRAS D 00000000011 V2GKA

Account Number: 6142689210

**AVISTA**

1411 E. Mission Ave.  
Spokane WA 99252-0001

☐ Please check here and fill out reverse if you would like to establish Automatic Payment Service (APS).

004171/000000/008631 000 002 V2GKA  
KEITH LANDRUS  
SIRINYA SURINA  
SIRINYAANDREW@GMAIL.COM



|                                        |              |
|----------------------------------------|--------------|
| Total Amount Due                       | \$368.50     |
| Due Date (Applies to new charges only) | Jun 05, 2023 |

Project Share Contribution ☐ \$2 ☐ \$5 ☐ \$10 ☐ Other \_\_\_\_\_  
(Add to Total Amount Due)

Amount Enclosed \$

Thank you for your payment.

AVISTA  
1411 E MISSION AVE  
SPOKANE WA 99252-0001

614268921070000021015000001583500000368509



Sirinya Surina

myavista.com  
1 (800) 227-9187Account Number: 6142689210  
Statement Date: 07/07/2023

## Monthly Statement

| Total Amount Due              | Due Date     |
|-------------------------------|--------------|
| \$198.43                      | Jul 27, 2023 |
| (Applies to new charges only) |              |

## Bill at a Glance

|                                               |                     |
|-----------------------------------------------|---------------------|
| Previous Balance Due                          | \$112.08            |
| Payment(s) Received through 07/07/2023        | 0.00                |
| <b>Subtotal</b>                               | <b>112.08</b>       |
| <b>New Charge(s)</b>                          |                     |
| Electric                                      | 35.49               |
| Natural Gas                                   | 50.86               |
| <b>Total Amount Due This Month</b>            | <b>\$198.43</b>     |
| <b>Due Date (Applies to new charges only)</b> | <b>Jul 27, 2023</b> |

## Your Message Center

Need help with your energy bill? You may be eligible for assistance. Call (800) 227-9187 or visit us at myavista.com/assistance.

Save money on your next home project. To learn more, visit us at myavista.com/getrebates.

Need a trusted HVAC, electric or solar contractor? Visit myavista.com/findacontractor to learn more.

Your electric bill includes Federal Columbia River benefits supplied by the Bonneville Power Administration.

## Contact Us

**Customer Service:** 1 (800) 227-9187  
Monday through Friday 7 a.m. to 7 p.m.  
Saturday 9 a.m. to 5 p.m.

**After Hours Emergencies:** 1 (800) 227-9187

**Send payments only to:**  
Avista  
1411 E. Mission Ave.  
Spokane WA 99252-0001

website: myavista.com

**TTY Service:** Our service numbers for the hearing impaired are:  
Washington: 7-1-1 or 1 (800) 833-6388

**Send correspondence to:**  
Avista Customer Service MSC-34  
PO Box 3727  
Spokane WA 99220-3727

e-mail: ask@myavista.com

Please detach and return the bottom portion with your payment.

TRAIL 0000000923 V2NKI

Account Number: 6142689210



1411 E. Mission Ave.  
Spokane WA 99252-0001



Please check here and fill out reverse if you would like to establish Automatic Payment Service (APS).

004656/000000/009523 000 003 V2NKI  
SIRINYA SURINA  
SIRINYAANDREW@GMAIL.COM



**Total Amount Due** \$198.43  
**Due Date (Applies to new charges only)** Jul 27, 2023

Project Share Contribution ☐ \$2 ☐ \$5 ☐ \$10 ☐ Other \_\_\_\_\_  
(Add to Total Amount Due)

**Amount Enclosed** \$

Thank you for your payment.

AVISTA  
1411 E MISSION AVE  
SPOKANE WA 99252-0001

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# EXHIBIT C

EXHIBIT - 1

KSB LITIGATION, P.S.  
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Front Door

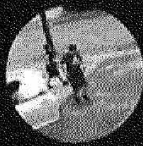
2023/06/14 03:09:24 PM



00:08 / 01:54



Detected by *Local AI*



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Share



Donate



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# Front Door

2023/06/15 09:54:40 AM



Detected by *Local AI*



Download



Share



Donate



Delete

Front Door

2023/06/16 02:19:14 PM



00:08 / 00:53



Detected by **Local AI**



Download



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# EXHIBIT D

EXHIBIT - 1

KSB LITIGATION, P.S.  
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Spokane, WA 99201  
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**June 25, 2023 6:03 PM**

**Edit**

20230625\_180327.jpg

/Internal storage/DCIM/Camera

**Samsung SM-G998U** Motion photo

6.58 MB | 4000x1800 | 7MP

F2.2 | 0.0ev | 1/60 s | 13mm | ISO 80

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# EXHIBIT E

EXHIBIT - 1

KSB LITIGATION, P.S.  
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Spokane, WA 99201  
T 509 624 8988 F 509 474 0358



**Sirinya Surina**

Sent May 05, 2022 at 6:18 PM

To: **Aaron Sur...** (viewed May 06, 2022 at 6:22 AM)

Dentist for David said he needs to brush his teeth twice a day as he has cavities I help him here but when he is there please help him brush his teeth twice a day.

Next appointment for David is may 31 @2PM and another appointment for David and Andrew is Nov 21 @ 3PM.

I will pick up the boys Sunday at 9AM  
Thank you.

---

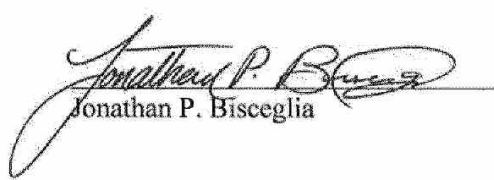
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of July, 2023, I caused to be served a true and correct copy of the foregoing document, by the method indicated below and addressed as follows:

Aaron Surina  
PO Box 30123  
Spokane, WA 99223  
aaron@surina.org

|              |                |
|--------------|----------------|
| _____        | U.S. MAIL      |
| _____        | OVERNIGHT MAIL |
| _____        | DELIVERED      |
| _____        | FACSIMILE      |
| <u>  X  </u> | E-MAIL         |

  
Jonathan P. Bisceglia

# 23.7.21 Updated declaration Sirinya Surina

Final Audit Report

2023-07-21

|                 |                                              |
|-----------------|----------------------------------------------|
| Created:        | 2023-07-21                                   |
| By:             | Jonathan Bisceglia (jbisceglia@ksblit.legal) |
| Status:         | Signed                                       |
| Transaction ID: | CBJCHBCAABAAJzHYg5oZ8YaoyzUq5uxgy_Xfdjm77pfU |

## "23.7.21 Updated declaration Sirinya Surina" History

-  Document created by Jonathan Bisceglia (jbisceglia@ksblit.legal)  
2023-07-21 - 4:03:08 PM GMT
-  Document emailed to sirinyaandrew@gmail.com for signature  
2023-07-21 - 4:03:22 PM GMT
-  Email viewed by sirinyaandrew@gmail.com  
2023-07-21 - 4:21:06 PM GMT
-  Signer sirinyaandrew@gmail.com entered name at signing as Sirinya Surina  
2023-07-21 - 4:29:17 PM GMT
-  Document e-signed by Sirinya Surina (sirinyaandrew@gmail.com)  
Signature Date: 2023-07-21 - 4:29:19 PM GMT - Time Source: server
-  Agreement completed.  
2023-07-21 - 4:29:19 PM GMT