

**CASE NUMBER**  
**201703018170**  
**SN:511.0 PC:12**

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

**Superior Court of Washington, County of Spokane**

In re:

Sirinya Surina

Petitioner

No. 17-3-01817-0

And

Aaron Surina

Respondent

**DECLARATION OF COUNSEL**

JONATHAN P. BISCEGLIA first being duly sworn upon oath deposes and states:

I am attorney of record for the Petitioner in the above captioned cause. I am over the age of eighteen and am competent to testify to the facts herein from my own personal knowledge.

Attached hereto and incorporated herein as **Exhibit A** are true and correct copies of email correspondence between myself and Aaron Surina on June 26, 2023.

On June 27, 2023, I traveled to Tacoma in the morning for a funeral and returned the same evening.

Attached hereto and incorporated herein as **Exhibit B** are true and correct copies of email correspondence between myself and Aaron Surina on June 28, 2023.

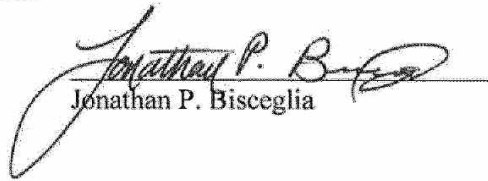
Attached hereto and incorporated herein as **Exhibit C** is a true and correct copy of an Adobe Signature request I received from Aaron Surina on July 18, 2023 at 4:06 PM.

DECLARATION OF COUNSEL- 1

KSB LITIGATION, P.S.  
510 W. Riverside Ave. #300  
Spokane, WA 99201  
T 509 624 8988 F 509 474 0358

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

3 Signed at Spokane, WA on July 19, 2023.

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Jonathan P. Bisceglia

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DECLARATION OF COUNSEL- 2

**KSB LITIGATION, P.S.**  
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# EXHIBIT A

EXHIBIT - 1

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

## Jonathan Bisceglia

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**From:** Aaron Surina <aaron@surina.org>  
**Sent:** Monday, June 26, 2023 11:40 AM  
**To:** Jonathan Bisceglia  
**Subject:** Re: Form 8332  
**Attachments:** PDFfiller - form 8332.pdf

Thanks for your reply;  
Here's the details:

Form 8332

Years 2020 : 1 form 8332 for each child signed

Year 2021 : Judge Dixon gave her Andrew so I need 1 form 8332 for David signed

Year 2022 : 1 form 8332 for each child signed

I had hoped to get them on Friday but I'm sure you're not sitting around with nothing to do.

Let me know if you have any further questions..

Get [Outlook for Android](#)

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**From:** Jonathan Bisceglia <JBisceglia@ksblit.legal>  
**Sent:** Monday, June 26, 2023 11:24:26 AM  
**To:** Aaron Surina <aaron@surina.org>  
**Cc:** Angela Lunden <alunden@ksblit.legal>  
**Subject:** RE: Form 8332

Hi Aaron –

The IRS can certainly be picky with their forms. Let me get in touch with Sirinya. Is this for a 1040 for 2022, or a 1040-X for another year?

**JONATHAN BISCEGLIA**  
KSB LITIGATION, P.S. | TRIAL ATTORNEYS  
510 W. Riverside Ave. #300 Spokane, WA 99201  
T 509 624 8988 F 509 474 0358 / [jbisceglia@ksblit.legal](mailto:jbisceglia@ksblit.legal) / [ksblit.com](http://ksblit.com)

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**From:** Aaron Surina <aaron@surina.org>  
**Sent:** Monday, June 26, 2023 11:22 AM  
**To:** Jonathan Bisceglia <JBisceglia@ksblit.legal>  
**Subject:** Form 8332

I have a meeting with my accountant this afternoon and I am hoping to get the 8332 forms properly filled out.

We can only use a form for a single year so I believe Judge Dicon gave me 2020 and 2022 Friday for Andrew giving Sirinya 2021 which I am not going to complain about -

I have 2019 for both boys from her previous counsel but I need 2020 for both which is two 8332 forms, One for David 2021 and both Andrew and David for 2022.

They can not have multiple years on a single 8332 unfortunately. Sirinya and I have discussed that in the past -

I hope to hear from you soon, let me know if you have any questions and thank you Sir. I appreciate it

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## EXHIBIT B

EXHIBIT - 1

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

## Jonathan Bisceglia

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**From:** Jonathan Bisceglia  
**Sent:** Wednesday, June 28, 2023 9:27 AM  
**To:** Aaron Surina  
**Cc:** Angela Lunden  
**Subject:** RE: Form 8332

Reviewing past tax returns, Sirinya has only claimed Andrew for filing years 2020, 2021, and 2022. If your accountant needs new 8332 forms, please have them contact me.

I also am not understanding what you're referencing when you say i26.

If you are completing filings for 2020, 2021, and 2022, a claim for David has already been waived by Sirinya.

JONATHAN BISCEGLIA  
KSB LITIGATION, P.S. | TRIAL ATTORNEYS  
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**From:** Aaron Surina <aaron@surina.org>  
**Sent:** Wednesday, June 28, 2023 8:43 AM  
**To:** Jonathan Bisceglia <JBisceglia@ksblit.legal>  
**Cc:** Angela Lunden <alunden@ksblit.legal>  
**Subject:** Re: Form 8332

I'm going to assume your client is in contempt of the court's orders on the 23rd. I have attempted to get the basics worked out via this i26.

I have not received any of the tax forms that were ordered on the 23rd.

I need to get my taxes done and the deadline for stimulus cash is 2 weeks away. I don't think your client is going to listen to the advice you're providing in this matter and as such this i26 has failed to resolve the issues around your client being in contempt of the court's orders on the 23rd.

2020 and 2022 tax form 8332 signed for Andrew Surina - the judge has been fair and gave her 2021.

### Get Outlook for Android

**From:** Jonathan Bisceglia <JBisceglia@ksblit.legal>  
**Sent:** Monday, June 26, 2023 11:24:16 AM  
**To:** Aaron Surina <aaron@surina.org>

**Cc:** Angela Lunden <[alunden@ksblit.legal](mailto:alunden@ksblit.legal)>

**Subject:** RE: Form 8332

Hi Aaron –

The IRS can certainly be picky with their forms. Let me get in touch with Sirinya. Is this for a 1040 for 2022, or a 1040-X for another year?

JONATHAN BISCEGLIA  
KSB LITIGATION, P.S. | TRIAL ATTORNEYS  
510 W. Riverside Ave. #300 Sookane, WA 99201  
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**From:** Aaron Surina <[aaron@surina.org](mailto:aaron@surina.org)>  
**Sent:** Monday, June 26, 2023 11:22 AM  
**To:** Jonathan Bisceglia <[JBisceglia@ksblit.legal](mailto:JBisceglia@ksblit.legal)>  
**Subject:** Form 8332

I have a meeting with my accountant this afternoon and I am hoping to get the 8332 forms properly filled out.

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They can not have multiple years on a single 8332 unfortunately. Sirinya and I have discussed that in the past -

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# EXHIBIT C

EXHIBIT - 1

KSB LITIGATION, P.S.  
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Spokane, WA 99201  
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## Jonathan Bisceglia

---

**From:** Adobe Sign on behalf of AARON SURINA <adobesign@adobesign.com>  
**Sent:** Tuesday, July 18, 2023 4:06 PM  
**To:** Jonathan Bisceglia  
**Subject:** Signature requested on "Ex-Parte - Motion for Contempt & revised 50/50 parenting plan with safety measures"



AARON SURINA requests your signature on  
**Ex-Parte - Motion for Contempt & revised 50/50 parenting  
plan with safety measures**

### Review and sign

---

Please review the signed documents which are filed with the court on  
7/18/2023.

Also the hearing has been noted for 7/28 but it shows the old commissioner  
who is no longer able to sit on this case and I believe even self recused.

**AARON SURINA**  
adobe.acrobat@invincibledomains.com

---

After you sign **Ex-Parte - Motion for Contempt & revised 50/50 parenting plan with  
safety measures**, the agreement will be sent to [kkilham@spokanecounty.org](mailto:kkilham@spokanecounty.org). Then, all parties  
will receive a final PDF copy by email.

**Don't forward this email:** If you don't want to sign, you can **delegate** to someone else.



By proceeding, you agree that this agreement may be signed using electronic or handwritten signatures.

To ensure that you continue receiving our emails, please add [adobesign@adobesign.com](mailto:adobesign@adobesign.com) to your address book or safe list.

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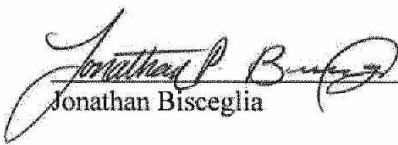
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**CERTIFICATE OF SERVICE**

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

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

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

  
Jonathan Bisceglia

DECLARATION OF COUNSEL- 3

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