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**TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK**

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2023 SEP 13 P 4: 54

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SPOKANE COUNTY CLERK**

Superior Court of Washington, County of Spokane

In re: Surina v Surina

Petitioner:

Sirinya Surina

And Respondent:

Aaron Surina

No. 17-3-01817-0

Request to take Judicial Notice

Request to take Judicial Notice case 17-3-01817-0

**TO: Clerk of the Court,
Superior Court of the State of Washington, Spokane County
AND TO: All Parties in this Case**

Pursuant to the Washington Rules of Evidence, Rule 201, Aaron Surina, the Respondent in the above-entitled matter, hereby requests the court to take judicial notice of the following facts, which are not subject to reasonable dispute:

School District:

1. Both minor children, David and Andrew Surina, are students in the Spokane School District. Andrew attends Jefferson Elementary School, and David attends Sacajawea Middle School.

Case No. 17-3-01817-0

**Request to take Judicial Notice
p. 1 of 5**

**Aaron Surina
legal@surina.org
PO BOX 30123, Spokane, WA, 9922**

2. Spokane School District is their established school district and has been for their entire public school tenure.

Relocation Statutes:

3. Washington State's relocation statutes apply to this case. Washington is the home state for the purposes of UCCJEA and this should be reflected in a parenting plan for custody purposes.

Financial Responsibility as Relates to 42 USC 1301(10)(d):

4. Aaron Surina (the father) will assume complete financial responsibility for the minor children, David and Andrew Surina as their custodian.

Residential Addresses:

5. The residence for the petitioner is 227 E. 22nd Ave, Spokane, WA for the last few years. Now the address temporarily located to for Sirinya Surina (the mother) is : 9120 Silver Ct, Cheney, WA according to recent filings with the court.

6. The residence for Aaron Surina (the father) is on Bernard Ave, Spokane, WA

Pick Up:

7 As of today's date September 13, 2023; Pick Ups and exchanges are ordered to occur at the respective schools in Spokane School District or at the parties residences if school is not in session in Spokane School District.

Truancy

8. On 5 separate days since the hearing, **September 5th, 2023, September 6th, 2023, September 7th, 2023, September 12, 2023, September 13th, 2023** The Petitioner knowingly withheld our children from school in their established school district in direct contempt of the current court's order, the current parenting plan and the relocation statutes of Washington RCW 26.09.480.

9. On Thursday, September 7th, 2023, the petitioner intentionally withheld the minor children from the respondent in violation of 9A.40.060 by not having them in school and thus making the exchange inaccessible or unknown or outside of the court's order in direct defiance of the order / parenting plan established in December of 2019 in Spokane, WA.

Potential Criminal Conduct:

10. Petitioner with intent to deprive the respondent and the Spokane School District of lawful court ordered time and physical custody, intentionally withheld both children from school and from the exchange after school in direct violation of a court's order and RCW 9A.40.060.

Correspondence

11. The Petitioner advised Spokane school district authorities at Hutton Elementary on May 30th 2023 in an email that she had moved to Cheney and that the parties oldest son would be going to Westwood middle school.

12. The petitioner did pick up the children on September 11, 2023 following the court order, from their schools in Spokane School district on her first day of picking them up for the school year. She picked up Andrew from Jefferson at 3pm and David from Sacajawea at 3:30pm as the parenting plan states. She did not return them to school September 12th or September 13th in direct defiance of the law and the parenting plan.

13. The petitioner now has caused a petition for truancy to be sent to the court for unexcused absences. Today marks the 5th absence within 10 days which activates a petition sent to the court on behalf of the children by the school district for truancy under the Becca Law.

14. The petitioner was a stay at home mother with imputed income in December 2019 when the parenting plan was drafted.

15. The petitioner is no longer a stay at home mother without a job.

16. The petitioner's purchase of the residence at 9120 Silver in Cheney was for 565,000.00 according to online public records and escrow closed on May 23, 2023.

17. The house located at 227 E. 22nd ave, Spokane, WA was listed for rent exactly 30 days after escrow closed. On Zillow.com it shows listed for rent on 6/23/2023.

18. After the email of petitioner telling school authorities that she had moved, she told the court that she had not moved and was not moving yet.

19. Snowden Elementary School and Westwood Middle School are both in Cheney School District.

The Respondent respectfully requests that these matters be judicially noted as they are not subject to reasonable dispute and can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.

Dated this thirteenth day of September, 2023.

Aaron Surina (Father)



Date September 13, 2023

Please let the record show that this Request for Judicial Notice has been served upon all parties in the case in accordance with Washington Court Rules.

Person writing this request:

I declare under penalty of perjury under the laws of the state of Washington that the facts I have provided on this form are true.

Signed at (city and state): Spokane, Washington

Date: 9/13/2023


Aaron Surina

PO BOX 30123, SPOKANE, WA 99223

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