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6 IN THE SUPERIOR COURT OF WASHINGTON IN AND FOR THURSTON COUNTY

7 GINA BLOOM,

8 Plaintiff,

9 v.

10 STATE OF WASHINGTON, BY AND  
11 THROUGH THE ADMINISTRATIVE  
12 OFFICE OF THE COURTS (AOC),  
13 AND JOHN DOES 1-10,

14 Defendant(s).

No. 25-2-02051-34

COMPLAINT FOR DAMAGES AND  
DECLARATORY RELIEF

15 I. INTRODUCTION

16 1.1 Plaintiff Gina Bloom brings this action against the State of Washington (“State”), the  
17 Washington State Administrative Office of the Courts (AOC) and JOHN DOES 1-10, *et.*  
18 *al.*, for their failure to adequately develop, manage, regulate, oversee and supervise the  
19 work performance, conduct and outcomes of State empowered Guardian ad Litem (GAL)  
20 personnel, which here directly led to the extensive unlawful deprivations of Plaintiff’s  
21 constitutional rights, including, without limitation, her fundamental liberty interest in the  
22 care, custody and control, of her children, resulting in severe long term emotional  
23 distress, and significant physical and psychological harm to herself and her family.<sup>1</sup>

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<sup>1</sup> *Troxel v. Granville*, 530 U.S. 57 (2000).

1.2 The State of Washington has chosen to establish the GAL program whereby GAL's are endowed by the State with vast, largely unchecked, investigatory powers gaining access to private family court matters under RCW 26.12.175, as well as minor representatives under RCW 13.34.100, RCW 13.34.105, and RCW 11.96A.160. In granting the GAL its vast investigatory powers into the family, personal finances, medical information and the like, the most intimate and private aspects of life, Washington State necessarily assumes the duty and responsibility to ensure the GAL adheres to the law, state statute, regulatory law, their pledged and assumed duties, professional responsibilities, and the Washington State Constitution, as beholden to the United States Constitution, and ultimately the fundamental promise of procedural due process (WA Constitution, Art. I, § 3).

1.3 The state of Washington, whether acting in its governmental or proprietary capacity, shall be liable for damages arising out of its tortious conduct to the same extent as if it were a private person or corporation (RCW 4.92.090). Every party should be treated equally as it is contrary to fundamental principles of law that one party be granted a special set of rules not afforded to others (RCW 4.96.010(1)). Without question, where the State assumes a duty to regulate, it can and should be held liable for its failure to act in proper accordance with that duty (*Cummins v. Lewis County*, 156 Wn.2d 844 (2006)).

1.4 There is extensive evidence of Defendants' knowledge of the pervasive problem represented by the mismanagement of the GAL program and individual GALs. Even without consideration of Plaintiff's ongoing but rebuffed efforts to seek redress, the State, and its AOC, were plainly on notice of the constitutionally, ethically and legally problematic outcomes of its GAL program for some time. Beginning at least in 2016, the nationally criticized 'Snohomish County GAL Scandal' revealed a devastating State Family Court case not dissimilar to Plaintiff's (Exhibit A., *In re Dependency of A.E.T.H.*,

1 196 Wn.2d 620 (2020)). Nevertheless, the State and its AOC have taken exactly *no*  
2 *remedial efforts* to correct the phenomenal scope of injustice at the hands of unmonitored  
3 state endowed private actors, the Guardian ad Litem.

4 1.5 This lawsuit seeks damages and declaratory relief to hold the Defendants, the State of  
5 Washington and it's AOC, accountable for their complete and utter failure to develop,  
6 maintain, monitor, administer, regulate and/or enforce GAL program operations, which  
7 facilitated and perpetuated the GAL misconduct that directly led to the constitutional  
8 violations which caused Plaintiff's damages. Moreover, the Defendants have outright  
9 ignored, despite their affirmative duty to the law and our community, monstrous  
10 allegations and ongoing complaints against GALs, showing no intent to even  
11 acknowledge the catastrophic consequences of the issue, let alone pursue remedy.

12 1.6 Plaintiff Ms. Bloom filed Tort Claim Notice against the Defendant's March 24, 2025, in  
13 strict compliance with RCW 4.92.110.

## 14 II. JURISDICTION AND VENUE

15 2.1 Jurisdiction is proper in Thurston County Superior Court as any Superior Court in  
16 Washington State maintains original jurisdiction as to any claim under the laws of the  
17 State of Washington (RCW 2.08.010).

18 2.2 Venue is appropriate for this civil action in Thurston County Superior Court of the state  
19 of Washington because Washington state maintains both its Capital and its AOC  
20 Administrative offices in Thurston County (RCW 4.92.010(5)).

21 2.3 Under Washington State Law Plaintiff seeks injunctive and declaratory relief for  
22 damages arising out of violations of the Washington State Constitution directly  
23 attributable to the acts and omissions of Washington state officials and agencies.  
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1 III. PARTIES

2 3.1 Plaintiff Gina Bloom, by and through her attorney(s), Carnation Legal LLC, and Shannon  
3 M. Draughon, Pharos Law LLC, and Rasham Nassar, as and for her Complaint against  
4 the Defendants: State of Washington (“State”), State of Washington Administrative  
5 Office of the Courts (AOC) and JOHN DOES 1-10 *et. al.*, in each their individual and  
6 professional capacity as and in the roles that may be determined during the course of  
7 discovery and trial, states as follows:

8 3.2 Plaintiff Gina Bloom is an individual United State citizen, and mother of two (2), residing  
9 in King County, Washington, and who was residing in either King County or Snohomish  
10 County, Washington at the time of the acts, events and omissions complained of herein.<sup>2</sup>

11 IV. Defendant State of Washington (“State”) is a state organized under the laws of the United  
12 States, beholden to the United States Constitution and responsible for enacting,  
13 maintaining, and enforcing laws and policies regarding court-appointed Guardians ad  
14 Litem under RCW 26.12.175. By failing to oversee and regulate the GAL system and  
15 individual GALs, the State directly facilitated systemic due process violations.

16 4.1 Defendant Washington State Administrative Office of the Courts (AOC) is the  
17 administrative body legislatively empowered by the State of Washington to maintain the  
18 training, oversight, and regulation of the GAL Program and individual GALs throughout  
19 the State. The AOC was on repeated and substantive notice of misconduct by GALs,  
20 including in Plaintiff’s case, but has failed to take any corrective action, violating its  
21 fundamental and statutory duties allowing for substantial ongoing damages to Plaintiff in  
22 this case.

23  
24 <sup>2</sup> Previously known when married as Olympia Georgiana Yorks



1 4.2 Doe Defendant(s) 1-10 *et. al.*: Plaintiff is presently unsure, or unaware, of the true and  
2 correct names and capacities or roles of those certain individual actors who participated  
3 in, authorized, or failed to prevent, the constitutional and statutory violations alleged  
4 herein. These unnamed Defendants may include employee(s), agent(s), and/or official(s)  
5 of the State and the Washington State Administrative Office of the Courts, or other  
6 governmental subdivisions or agencies responsible for oversight of the Guardian ad  
7 Litem system or complaint processes. Plaintiff will respectfully seek leave to amend this  
8 Complaint to include those Defendant(s) once their identities are entirely ascertained.

1 V. STATUTORY AND REGULATORY BACKGROUND

2 5.1 14th Amendment to the U.S. Constitution, Civil Rights (1868): No State shall make or  
3 enforce any law which shall abridge the privileges or immunities of citizens of the United  
4 States; nor shall any State deprive any person of life, liberty, or property, without due  
5 process of law; nor deny to any person within its jurisdiction the equal protection of the  
6 laws.

7 5.2 WA State Constitution Art I § 3 Personal Rights: No person shall be deprived of life,  
8 liberty, or property, without due process of law.

9 5.3 WA State Constitution Art I § 7 Invasion of Private Affairs or Home Prohibited: No  
10 person shall be disturbed in his private affairs, or his home invaded, without authority of  
11 law.

12 5.4 WA State Constitution Art I § 10 Administration of Justice: Justice in all cases shall be  
13 administered openly, and without unnecessary delay.

14 5.5 WA State Constitution Art I § 12 Special Privileges and Immunities Prohibited: No law  
15 shall be passed granting to any citizen, class of citizens, or corporation other than  
16 municipal, privileges or immunities which upon the same terms shall not equally belong  
17 to all citizens, or corporations.

18 5.6 WA State Constitution Art I § 29 Constitution Mandatory: The provisions of this  
19 Constitution are mandatory, unless by express words they are declared to be otherwise.

20 5.7 WA State Constitution Art I § 32 Fundamental Principles: A frequent recurrence to  
21 fundamental principles is essential to the security of individual right and the perpetuity of  
22 free government.  
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1 5.8 RCW 26.12.175 governs the appointment, training, and oversight of Guardians ad Litem  
2 in Washington family law cases. It mandates that GALs must demonstrate neutrality,  
3 appropriate qualifications, and compliance with standards of practice.

4 5.9 RCW 2.56.030(15) tasks the Administrative Office of the Courts (AOC) with developing  
5 and managing policies and systems related to court operations, including the oversight of  
6 family law personnel and guardians ad litem.

7 5.10 *In re Dependency of A.E.T.H.*, 196 Wn.2d 620 (2020), the Washington Court of  
8 Appeals, Division I explicitly identified and acknowledged systemic failures within GAL  
9 oversight structures and directed courts and supervising bodies, including the AOC, to  
10 ensure compliance with GAL standards and fair procedures.

11 5.11 General Rule 31.1 (GR 31.1) governs access to administrative court records,  
12 including complaints, reports, and documents pertaining to court-appointed GALs. The  
13 AOC is obligated to ensure that county-level GAL programs operate transparently, in  
14 accordance with state rules and constitutional protections.

## 15 VI. RELEVANT FACTUAL BACKGROUND

16 6.1 The State of Washington and AOC have long been aware of systemic Guardian ad Litem  
17 (GAL) misconduct but have failed to act, despite clear duty, authority and responsibility  
18 under RCW 26.12.175 to regulate GALs.

19 6.2 In 2020, Court of Appeals, Division I mandated reforms to the GAL system following  
20 widespread misconduct and litigation in the 2016 Snohomish County case, *In re AETH*  
21 (*Id.*). However, the State failed to implement *any* remediation efforts fostering continued  
22 abuses of the most financially and/or socially vulnerable citizen participants in the  
23 Washington State Family Court system, including those experienced by Plaintiff.  
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1 6.3 When Plaintiff Gina Bloom entered the Snohomish County Superior Family Court  
2 system in February 2020, she was a recently naturalized immigrant mother of two (2)  
3 young children fleeing her abusive husband, Brian Yorks, following an especially violent  
4 marital rape. Given Yorks significant history of domestic violence against Ms. Bloom,  
5 and his contemporaneous arrest for her rape, Ms. Bloom had sole custody and decision  
6 making as well as a protective order for her and the boys' safety (Snohomish County  
7 DVPO #20-2-01235-31). For that moment in time, the State protected Ms. Bloom and her  
8 children from their abuser.

9 6.4 Having been systematically isolated from her community, and forced to stop working,  
10 Ms. Bloom was dependent on Yorks for access to any money or resources. As the  
11 impending protection order hearing and Yorks retaliatory divorce filing proceeded Ms.  
12 Bloom found herself alone and destitute caring for her boys. Yorks on the other hand  
13 appeared equipped with a highly priced highly connected divorce lawyer and  
14 immediately requested a GAL, citing lawyer Canfield's "grave concerns" for Ms.  
15 Bloom's mental health and accounting her allegations of domestic violence as evidence  
16 of her mental infirmity or cruelty. Yorks' attorneys and their GAL buried Yorks' criminal  
17 history in endless pleadings and devastating criminal allegations against Plaintiff. With  
18 the power of the GAL, they would absolutely tear Ms. Bloom's life apart.

19 6.5 Very importantly, Yorks' lawyer, Damon Canfield worked directly with the Snohomish  
20 court to completely sidestep the neutral registry process mandated by Snohomish County  
21 Administrative Order 36-10 and ensure GAL Brian J. Parker of Port Gardner Law Group  
22 was assigned to serve as the GAL. GAL Parker was a known asset and colleague,  
23 solicited into the Snohomish County family law community by lawyer Jennifer Bitner, an  
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1 associate at Canfield Madow Law Group, and the firm routinely facilitated to the point of  
2 assurance, GAL Parker's assignments in their cases (Ex. B, C).

3 6.6 As is common practice among the key family law community of attorneys in Snohomish  
4 County, this appointment was secured outside of the neutral registry process required by  
5 Snohomish County Administrative Order 36-10 but directly facilitated through informal  
6 communications between Canfield Madow and court staff, including Snohomish Superior  
7 Court judicial coordinator Nancy Norris (Ex. B).

8 6.7 GAL Parker was a favorite of Damon's firm, Canfield Madow PLLC. His appointment  
9 was commonly requested and always granted by the court. Brian Parker moved from  
10 Alabama to Clark County, and from Clark County to Snohomish County in 2019, where  
11 he was introduced and elevated by lawyer Jennifer Bitner. Since the inception of his  
12 work, of his twenty-four (24) total GAL case assignments in Snohomish County, twelve  
13 (12) or 50% originated from the direct request of Canfield Madow. Given the court  
14 endorsed, blatant and consistent deviation from the mandated neutral appointment  
15 process under Administrative Order 36-10, this prima facie favoritism – evidence  
16 contrary to neutrality, allowed Canfield Madow to place GAL Parker as the dominant  
17 GAL between 2020 and 2024 (Exhibit C).

18 6.8 As early as Aug. 10, 2020, the State was on notice of the specific GAL problem of  
19 Parker. In fact, in just his third assigned GAL case—and his first case not in answer to  
20 Canfield Madow—attorney J. Michael Gallagher filed a sworn declaration detailing to  
21 the court a warning that Parker had submitted *false statements in his GAL report*.

22 Gallagher cautioned the court of *Parker's misrepresentations and the risk of harm to*  
23  
24

litigants and minor children from his biased reports (Ex. D Atty. Gallagher *Nielsen v. Nielsen* #20-3-00087-31).<sup>3</sup>

6.9 Despite these early and consistent red flags – including allegations and evidence of fraud and perjury, GAL Parker remained on the GAL registry and continued to be appointed in cases where domestic violence and child abuse were evident, and Parker fostered a volatile environment by framing these matters as high-conflict and placing disproportionate scrutiny on the one parent – the financially weaker parent, always the parent with the less connected attorney.

6.10 It was then, in 2021, that GAL Parker having been appointed over Plaintiff's objections, to be paid privately by party opponent Yorks, submitted his first report – and changed everything in Plaintiff's life, forever. The standard tactic was employed, whereby Canfield and his GAL methodically rewrote the story, representing Ms. Bloom as mentally ill and reverse custody.

6.11 August 16, 2021, Plaintiff Ms. Bloom filed a formal complaint regarding GAL Parker with the Washington State Consumer Resource Center (Ex. E AGO Complaint). She was ignored.

6.12 On August 20, 2021, Plaintiff filed a grievance with the Snohomish County GAL Administration, alleging fraud upon the court, bias, misrepresentation, and the unauthorized practice of law, asserting that the GAL's conduct enabled Plaintiff's ex-husband to violate the Domestic Violence Protection Order (DVPO) and remove the minor children from the state of Washington.

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<sup>3</sup> “the GAL focused all of his attention on the Mother's alleged deficits and even made a credibility determination based upon her “shaking” during an interview, concluding that this was evidence of an alcohol problem. It is unknown what training and/or expertise the GAL has in the area of drug and alcohol abuse.” *Nielsen v. Nielsen*, page 4 ¶¶ 9–10.

1       6.13       On October 29, 2021, Canfield and GAL Parker colluded to fraudulently bring an  
2       ex parte “emergency” hearing. Plaintiff was not present and had not been provided proper  
3       notice of the hearing. Despite the fact that everyone, specifically the two officers of the  
4       court, attorney Canfield and his GAL Parker, knew Ms. Bloom was at Seattle Children’s  
5       with her younger son, they led the court to believe she was missing with the child,  
6       location unknown, and a danger to his safety. Commissioner Jacalyn Brudvik accordingly  
7       adopted Parker’s recommendations wholesale, which immediately flipped custody and  
8       decision making to Yorks, effectively abolishing the DVPO and any remnant of  
9       protection available to Ms. Bloom and her children.

10       6.14       That was only the beginning. Over the course of the family court litigation leading  
11       to trial, between June 2021 and November 2021, GAL Parker filed five (5) reports with  
12       the court, each responsive to Ms. Bloom’s allegations of abuse or neglect against her  
13       abuser Mr. Yorks, quickly mounting new and growing allegations against Plaintiff. Each  
14       report further vilified Ms. Bloom, categorically ignoring or misrepresented her conduct,  
15       the results of medical evaluations and her legal and financial circumstances to the court.

16       6.15       To secure a favorable outcome for his colleagues at Canfield Madow, GAL  
17       Parker went so far as to falsely testify, under oath with actual malice, that Dr. Monique  
18       Brown, the psychologist selected and paid for by Yorks, to conduct Ms. Bloom’s  
19       psychological evaluation, determined she (Plaintiff) suffers from a personality disorder  
20       that affects her ability to parent – which is not what the report concluded, rather, Dr.  
21       Brown affirmed that she is the primary parent and a victim of domestic violence – the  
22       report in fact favored Ms. Bloom and criticized the court, nothing that if there “were  
23       fairness and equity in the court,” Ms. Bloom would not have lost her children.

1 6.16 Then, in the most devastating fashion possible, at trial, over Ms. Bloom's  
2 vehement objections, lawyer Bitner as buttressed by her GAL Parker, objected to and  
3 prevented Dr. Brown from testifying, arguing her testimony would be redundant and  
4 cumulative unnecessarily prolonging the trial, given the exhaustive 50+ page evaluation  
5 provided to the court.

6 6.17 Unfortunately, then, Ms. Bitner and GAL Parker wholly misrepresented the  
7 contents and conclusions of the report, which actually favored Ms. Bloom. The court  
8 relied on lawyer Bitner, and GAL Parker's testimony, and pronounced Ms. Bloom  
9 mentally ill, again, despite the fact that Dr. Brown's evaluation, and the prior two (2), for  
10 a total of three (3) mental health evaluations provided to the court, concluded no mental  
11 infirmity that would affect parenting, supporting Ms. Bloom as the primary parent and  
12 substantiating allegations of domestic violence against Plaintiff.

13 6.18 Over the course of the family law litigation, Plaintiff made numerous formal  
14 complaints evidencing GAL Parker's illegal activities. All efforts, *all efforts*, were utterly  
15 ignored or met with lukewarm placation (Ex. H).

16 6.19 Ms. Bloom filed formal complaints regarding GAL Parker with AOC in August  
17 of 2021 and again in January 2023. However, Ms. Bloom's efforts to challenge GAL  
18 Parker's conduct through the grievance process of the court were summarily denied  
19 without due process by Paul Thompson, Chair of the GAL Committee. Neither grievance  
20 received formal adjudication or review.<sup>4</sup> There was no hearing, no investigation, no  
21 appeal allowed under the local GAL Rules. Ms. Bloom was provided with no notice of  
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23 <sup>4</sup> Snohomish County Superior Court Local Rules, Section 7.1(b)(2):  
24 The GAL Committee Chair or Presiding Judge shall review the grievance or complaint and make an initial  
determination regarding its potential merit. If the grievance or complaint is deemed to lack potential merit, it shall  
not be further reviewed, and the complainant shall be notified accordingly.



determination and only became aware of the first review and dismissal during the initial moments of her family law trial in May of 2021.

6.20 The Snohomish County Court Rules GAL Grievance Policy SCLGALR 7.1 states that if a grievance is deemed by the Chair to lack "potential merit," it is dismissed with no further review, appeal, or record entry. Apparently, this is exactly what happened here; following closed door individual review by GAL Committee Chair Thompson, he alone concluded the lack of merit, a process that on its face violates due process under the Washington State Constitution and the Fourteenth Amendment of the United States Constitution, as there is no procedural mechanism to challenge the conduct of a state-licensed and empowered GAL.

6.21 In addition to Plaintiff Bloom's formal complaints, public records and complaint documentation show that by 2022, Parker has accumulated multiple formal complaints (Ex. F Parker's 2022-GAL Registry Application). Despite this, GAL Parker continued to serve on all active cases through 2023 and 2024. Attorney GAL Parker was further engaged as a pro-tem commissioner for Snohomish County. Notably, GAL Parker no longer completed and maintained his yearly GAL application on file, for 2023 and 2024, in violation of registry renewal policies. Nevertheless, despite the complete procedural and substantive due process failures, rubber-stamped by Snohomish County Superior Court, GAL Parker continued to be preferred and assigned to high conflict custody cases.

6.22 In October 2023, by Everett Police Department investigation, it was determined that there was probable cause to charge GAL Parker with first-degree perjury based on his false testimony at Ms. Bloom's family law trial in May 2022.<sup>5</sup> Although the

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<sup>5</sup> Everett Police Department #2022-00096343

1 Snohomish Superior Court temporarily suspended Parker from serving as a pro tem  
2 commissioner for a short time following reports of his criminal conduct, he was allowed  
3 to continue serving as a GAL, even as late as November 2024. Attorney Brian Parker  
4 currently serves as the family court commissioner in Clallam County, Washington.

5 6.23 The Administrative Office of the Courts (AOC), through its statutory duties and  
6 obligations, pronounced by RCW 26.12.175 and RCW 2.56.030, was aware of, or  
7 certainly should have been aware of, Parker's ongoing misconduct. The AOC failed to  
8 intervene, reform, or implement any policy, or policy changes, despite knowledge of  
9 GAL regulatory failures in Snohomish County, even specifically as it relates to especially  
10 problematic GALs like Parker.

11 6.24 GAL's are endowed by the State with a phenomenal scope of power, far  
12 exceeding that of any other attorney or judge. This vast investigatory power, unchecked  
13 by any constitutional and/or due process safeguards, is purchased to leverage by certain  
14 players in the family court system, here for example Canfield Madow and their GAL of  
15 choice Parker, to gain unfair advantage in litigation and/or maintain power and  
16 professional positioning and growth.

17 6.25 Despite mounting evidence—police findings, misconduct complaints, and a well-  
18 documented history of misrepresentation from multiple unconnected sources—the State  
19 has systematically failed to uphold core constitutional guarantees: procedural and  
20 substantive due process, parental rights, and access to an impartial tribunal, and court-  
21 appointed investigators. In doing so, the State has abandoned its duty to Gina Bloom and  
22 her two minor sons.

23 6.26 The court's indifference to Ms. Bloom's constitutional rights, judicial neutrality,  
24 and the safety of her children was laid bare when Parker, still serving as a GAL in active

cases involving Canfield Meadow clients, was repeatedly re-appointed by the court as a pro tem commissioner. While presiding, he judged cases involving attorneys from the same firm—a glaring violation of neutrality principles.

6.27 Even as complaints mounted, knowing the risks Parker’s presence posed to litigants and their children—allegations of bias, ethical conflicts, and an unresolved perjury investigation—Judge Paul Thompson, a State actor, having denied Plaintiff’s two GAL grievances, and following his *sua sponte* recusal in response to the outcome of the criminal investigation of GAL Parker, Judge Thompson continued signing Parker’s judicial appointments into December 2024 (WA Const. Art. IV, § 1; *Keenan v. Allan*, 889 F. Supp. 1320, 1363 (E.D. Wash. 1995) (judges are officers of Washington State); *Duvall v. County of Kitsap*, 260 F. Supp. 3d 1211, 1222 (W.D. Wash. 2017)).<sup>6</sup>

6.28 The AOC’s deliberate indifference to the oversight, discipline, and removal of unfit GALs has rendered its regulatory framework meaningless. Behind the façade of formal oversight lies a vacuum of accountability, where entrenched failures persist unchecked, inflicting vast, devastating systemic harm on litigants like Plaintiff. Lives are being destroyed at the hand of State apathy and the court’s protectionism.

## VII. CAUSES OF ACTION

Plaintiff realleges and incorporates by reference the paragraphs set out above as though fully set forth herein and below.

### **Count I: For Damages Violation of Article, I, Section 3 of the WA Constitution**

(Against the State, the State Administrative Office of the Courts and State Officials in Their Official and Personal Capacities as May be Discovered and Proven at Trial)

Article I, Section 3 of the Washington Constitution provides that:

**“No person shall be deprived of life, liberty, or property without due process of law.”**

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<sup>6</sup> Washington judges are state actors whose authority derives from the state, not the county.

1 7.1 Plaintiff Gina Bloom has a guaranteed fundamental liberty interest under both the  
2 Washington and United States Constitution, in her life, liberty, and the pursuit of  
3 happiness and in the care, custody, and control of her minor children, unencumbered by  
4 the unreasonable interference by the State.

5 7.2 Despite these recognized fundamental liberty interests, and how deeply the GAL affects  
6 them, the process by which GALs are certified, appointed, reviewed, and disciplined  
7 under the authority of the AOC, as prescribed by the State under RCW 26.12.175 and  
8 governed by GR 23, entirely lacks any mechanism for meaningful oversight, public  
9 accountability, or procedural remedy.

10 7.3 Specifically, while GALs are endowed by the State of Washington with broad rights of  
11 intrusion into the personal lives of citizens and their families, there are no corresponding  
12 checks and balances to ensure the protection of individual civil rights. There exists no  
13 independent adjudicative process for review of complaints submitted against GALs, even  
14 where those complaints allege perjury, ethical misconduct, and violations of court orders,  
15 often at the cost of children and domestic violence victims, the most vulnerable members  
16 of our community.

17 7.4 The State AOC's grievance procedures and those implemented at the county level  
18 facilitate closed doors, unilateral private review process, shielded entirely from outside  
19 scrutiny and unavailable legally to the public, even the complaining party, directly  
20 allowing for summary dismissal of complaints without hearing, notice, or right to appeal.  
21 The compliant process is devoid of any transparency whatsoever (Ex. I).

22 7.5 Plaintiff submitted detailed and credible grievances concerning GAL Brian J. Parker,  
23 including reports of dishonesty, bias, and procedural irregularities. Ms. Bloom reported  
24

1 credible evidence of the abuse of her children, and that GAL Parker was assisting in its  
2 cover-up.

3 7.6 However, despite ongoing original corollary evidence of GAL Parker's illegal behavior,  
4 Ms. Bloom's grievances were dismissed without explanation, hearing, or review.  
5 Purportedly all such complaints, for example Attorney Gallagher's declaration of GAL  
6 Parker's deceit, are met with utter ambivalence if not offense.

7 7.7 Even after Everett Police Department substantiated findings of first-degree perjury  
8 committed by Parker under oath, the AOC and Snohomish County Superior Court  
9 permitted him to continue serving as a GAL in pending family law matters, including  
10 those affecting Plaintiff and her children and their guaranteed constitutional rights as  
11 citizens of the United States of America and Washington State.

12 7.8 Ultimately, the administrative failures facilitated the removal of Plaintiff's children from  
13 her care in a staged "emergency" ex parte proceeding, without proper notice, without  
14 Plaintiff's participation, and in express contradiction of the protections afforded by  
15 Article I, Section 3 of the Washington Constitution and her then standing DVPO(s).

16 7.9 Parker's GAL report in that proceeding, which was dispositive in flipping custody and  
17 financial relations between the parties, was later shown by neutral third-party Everett  
18 Police Department to contain knowingly false information, yet no accountability or  
19 remedial procedure was available to Plaintiff.

20 7.10 By establishing and maintaining a statutory and administrative framework for  
21 GAL certification and appointment, empowering them with unparalleled powers of  
22 intrusion and investigation, without incorporating the appropriate, or any affirmative due  
23 process protections, including notice, hearing, and opportunity to confront witnesses  
24 against you, an impartial tribunal, review, and appeal, Defendants allowed for and

effectively endorsed the extensive violation of Plaintiff's rights under Article I, Section 3 of the Washington Constitution and the Fourteenth Amendment of the U.S. Constitution.

7.11 The Administrative Office of the Courts (AOC), as the State agency tasked with oversight of Guardian ad Litem (GAL) programs under RCW 26.12.175, failed to ensure their GALs, here GAL Parker, follow the law, including the constitution, adhere to the Rules of Professional Conduct or development and maintain any form of meaningful grievance system for litigants who are harmed by GAL misconduct.

7.12 The State and its AOC have a clear duty to regulate GALs effectively, ensuring they act in the best interests of the vulnerable individuals to which they are assigned. It is clear, despite the protectionism by the court of its disciplinary records and the proclamation of confidentiality under GR 31.1, that there is systemic failure to properly establish and maintain a legally enforceable GAL program, and that systemic failure leads, and here led, to the massive devastation of individual constitutional rights without due process of law.

7.13 Although Guardians ad Litem are endowed by the State with investigatory authority that in some respects rivals or exceeded that of law enforcement, they operate with little to no external oversight, answerable only to the very judges who appoint them and rely on their reports as a primary source of evidence.<sup>7</sup> The State has utterly failed to address or remediate any of the fundamental problems with the GAL program and its GAL members:

a) NO Neutral adjudication of GAL grievances;

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<sup>7</sup> Snohomish County Superior Court Local Rule 7.1(g): All resolutions of grievances or complaints by the GAL Committee shall be final and not subject to further appeal. Except that a GAL/AGAL who has been removed from a registry may appeal to the Presiding Judge.

- b) NO Public or published findings;
- c) NO Removal of GALs following substantiated misconduct;
- d) NO Oversight of GAL appointment patterns indicating bias or conflicts of interest (Ex. G Email from AOC stating no mechanism of oversight).

7.14 This omission by the AOC allowed Parker, while at all times acting under color of State law, to continue harming Plaintiff, fraudulently removing Ms. Bloom's custodial rights, jeopardizing the wellbeing of two minor children, and facilitating continued familial abuse by Yorks, again, always with the imprimatur of state legitimacy.

**Count II: For Declaratory and Injunctive Relief from Ongoing Violation of Article, I, Section 3 of the WA Constitution**

(Against the State and the State Administrative Office of the Courts and State Officials in Their Official and Personal Capacities as May be Discovered and Proven at Trial)

Plaintiff realleges and incorporates by reference the paragraphs set out above as though fully set forth herein and below.

7.15 Plaintiff Ms. Bloom seeks prospective equitable relief against officials of the Washington State Administrative Office of the Courts (AOC) for and its officers and/or representative employees, as may be discovered, for ongoing and systemic violations of her guaranteed due process rights under the Washington and U.S. Constitutions.

7.16 The AOC has assumed statutory responsibility for the training, oversight, and regulatory supervision of Guardians ad Litem (GALs) pursuant to RCW 26.12.175 and General Rule (GR) 23. Despite this inherent responsibility and unique authority, AOC officials have permitted the GAL system to operate without any meaningful public accountability, procedural safeguards, or grievance adjudication process.

7.17 Consequent to this systemic failure:

- 1 a) Complaints of GAL misconduct—even as catastrophic as perjury, bias, illegal  
2 ex parte contact, and disregard of court orders—are dismissed without any  
3 known investigation, hearing, or right of review.
- 4 b) The administrative GR 31.1 rules implemented by the AOC do not permit an  
5 independent or impartial forum, in fact they actively prevent public access, to  
6 adjudicate these complaints or provide redress to aggrieved parties.
- 7 c) This regulatory void directly contributed to the loss of Plaintiff’s custody  
8 rights through reliance on falsified evidence, secreting exonerating evidence  
9 and the unverified reports submitted by court-appointed GALs, even those  
10 like Parker, with a lengthy documented history of material misconduct.

11 7.18 Even after the police substantiated findings of serious misconduct, the AOC still  
12 sanctioned GAL Parker to continue accepting appointments, perpetuating harm to  
13 Plaintiff and similarly situated parties. The vast majority of cases for which he was  
14 selected and assigned involved allegations of domestic violence and child abuse.

15 7.19 Plaintiff alleges that these ongoing practices and omissions amount to State  
16 obliviousness to its duty, whereby the State affirmatively ensures a structural and  
17 systemic denial of promised due process under Article I, Section 3 of the Washington  
18 Constitution.

19 7.20 Accordingly, Plaintiff seeks declaratory and injunctive relief requiring:

- 20 a) That this Court declare the current grievance procedures and oversight  
21 structure, or lack thereof, for GALs, as maintained by the AOC, to be  
22 constitutionally inadequate under Article I, Section 3.  
23  
24



- 1           b) That the Court enjoin the AOC from certifying or authorizing GALs until and  
2           unless they have established a meaningful, adjudicative process for GAL  
3           grievance review is implemented;
- 4           c) That the AOC adopt and enforce clear performance and disciplinary  
5           standards;
- 6           d) That the public has access to complaint outcomes;
- 7           e) That there are meaningful procedures in place to suspend or decertify GALs  
8           who have been found to commit misconduct.

9           **Count III: For Damages Relief from Violation of Article, I, Section 7 of the WA**  
10           **Constitution**

11           (Against the State and the State Administrative Office of the Courts and State Officials in Their  
12           Official and Personal Capacities as May be Discovered and Proven at Trial)

13           Plaintiff realleges and incorporates by reference the paragraphs set out above as though fully set  
14           forth herein and below.

15           Article I, Section 7 of the Washington Constitution provides that:

16           **“No person shall be disturbed in his private affairs, or his home invaded, without**  
17           **authority of law.”**

18           7.21       Plaintiff Gina Bloom has a guaranteed fundamental liberty interest under the  
19           Washington and United States Constitutions to be free from the unreasonable State search  
20           and seizure, the invasion into her personal affairs or her home without authority of law.

21           7.22       Despite these recognized fundamental liberty interests, GALs are endowed by the  
22           State to enter into the private affairs of citizens, seize personal information and materials,  
23           provide them to the opposing party, the court and other ancillary service providers, as  
24           individually determined by the GAL, prescribed by RCW 26.12.175 and governed by GR  
25           23. However, the program and process entirely lack any mechanism to ensure legal  
26           compliance, for meaningful oversight, public accountability, or procedural remedy.

1 7.23 In this case, GAL Parker was legislatively granted access and thereby possessed a  
2 vast record of Ms. Bloom’s personal information, and that of her sons, without limitation,  
3 medical, financial, mental health, including the detailed reports of Yorks pervasive sexual  
4 assault of Ms. Bloom as well as third party reports supporting allegations that Yorks is  
5 sexually molesting his oldest son. GAL Parker possessed the personal information and  
6 then contorted it, misrepresented it and maliciously falsified the record to ensure his  
7 employer colleagues and those at Canfield Meadow success in trial, and remove Ms.  
8 Bloom’s children from her custody achieving additional long-term control over her life  
9 for her abuser Yorks.

10 **Count IV: For Damages Relief from Violation of Article, I, Section 10 of the WA**  
11 **Constitution**

12 (Against the State, the State Administrative Office of the Courts and State Officials in Their  
13 Official and Personal Capacities as May be Discovered and Proven at Trial)

14 Plaintiff realleges and incorporates by reference the paragraphs set out above as though fully set  
15 forth herein and below.

16 WA State Constitution Art I § 10 Administration of Justice.

17 **“Justice in all cases shall be administered openly, and without unnecessary delay.”**

18 7.24 Due process requires transparency and accountability. As introduced above, the  
19 Defendants have established and follow customs and policies that ensure justice is not the  
20 primary pursuit in GAL program administration and management and that the process is  
21 wholly hidden from the public, including the participant complaining party.

22 7.25 The State and the State AOC and its officers and officials are legally compelled to  
23 adhere to principles of justice, expediency and transparency, none of which are present,  
24 or even sought by the State in this case or elsewhere with GAL cases.

Defendants Breach of Duty

**Count V: For Damages State Negligence: Breach of Statutory Duty RCW 26.12.175.**

(Against the State, the State Administrative Office of the Courts and State Officials in Their Official and Personal Capacities as May be Discovered and Proven at Trial)

Plaintiff realleges and incorporates by reference the paragraphs set out above as though fully set forth herein and below.

7.26 Under RCW 26.12.175 the State imposes a duty upon the AOC and Superior Courts to ensure the integrity, neutrality, and qualification of GALs appointed in family law matters. The State statute authorizes the creation and regulation of GAL registries.

7.27 Under *Cummins v. Lewis County*, 156 Wn.2d 844 (2006), when a governmental entity undertakes a regulatory duty, it assumes an obligation to exercise reasonable care in its performance. The State, the AOC and Snohomish Superior Court categorically breached that duty causing significant emotional and physical damages and distress to herself and her family.

7.28 By continuing to authorize Brian J. Parker to serve as GAL while ignoring formal complaints, disregarding evidence of perjury, and failing to enforce registration renewal requirements, the AOC engaged in grossly negligent regulatory conduct.

6.17 This breach directly and proximately caused Plaintiff to lose custody of her children, access to family resource, the home and finances, suffer unmendable reputational harm, and endure continuing emotional and psychological injury.

## VIII. DAMAGES

8.1 Plaintiff has suffered substantial damages, including but not limited to:

- a) Extreme emotional distress from wrongful separation from her children;
- b) Extreme emotional and physical health distress and malady due to the exasperated abusive litigation tactics employed by Canfield Madow and perpetuated by GAL Parker for the State.

- 1 c) Monumental financial losses from remedial legal fees required to challenge  
2 fraudulent GAL reports and continued litigation to right his wrongs;  
3 d) Total loss of access to the marital home and assets;  
4 e) Significant and lasting damage to her reputation due to false allegations of  
5 criminal, mentally ill, and neglectful behavior, leveled by GAL Parker and  
6 included in his reports to the court;  
7 f) The profound and irreversible devastation of a mother unjustly torn from her  
8 children—her parental rights stripped away through false allegations  
9 weaponized by her abuser with the aid of the State. The years stolen from her,  
10 the milestones missed, and the inability to protect or comfort them in their  
11 most vulnerable moments—losses so deep they can never be reclaimed.

12 8.2 Plaintiff seeks economic damages in an amount to be determined at trial and non-  
13 economic remedies in the form of declaratory relief and injunction.

#### 14 IX. PRAYER FOR RELIEF

15 WHEREFORE, Plaintiff respectfully requests that the Court enter judgment in her favor and  
16 grant the following relief:

##### 17 Declaratory Relief

18 10.1 Judicial declaration that the current Guardian ad Litem (GAL) grievance and  
19 oversight framework administered by the Washington Administrative Office of the  
20 Courts (AOC) and implemented under RCW 26.12.175, as applied, violates the  
21 procedural and substantive due process rights of family law litigants under Article I, §§ 3,  
22 7 and 10 of the Washington State Constitution and the Fourteenth Amendment to the  
23 United States Constitution.  
24

1 Injunctive Relief

2 10.2 A permanent injunction directing the AOC to:

- 3 a) Establish a transparent, impartial, and timely grievance adjudication process  
4 for GAL complaints;
- 5 b) Enforce statutory registration and application renewal requirements for GALs  
6 statewide;
- 7 c) Publish public-facing outcomes of substantiated grievances, disciplinary  
8 actions, or removals;
- 9 d) Prohibit GAL assignments for individuals not in current standing on approved  
10 registries.
- 11 e) Prospective Structural Relief
- 12 f) An order requiring the AOC to adopt oversight and audit procedures to  
13 monitor GAL appointment patterns, evaluate for potential conflicts of interest,  
14 and implement safeguards against judicial favoritism or attorney-directed  
15 assignments.

16 Monetary Relief

17 (State Negligence Claim Results in Violations of Constitution) RCW 4.92.090

18 10.3 An award of general and special damages in an amount to be proven at trial  
19 against the State of Washington for negligent regulatory conduct in the administration  
20 and enforcement of RCW 26.12.175.

21 10.4 An award of general and special damages in an amount to be proven at trial  
22 against the State of Washington, State AOC and its Officers or Agents as identified for  
23 failure to properly administer and enforce the GAL program in accordance with the  
24 Washington State Constitution and RCW 26.12.175.

Attorneys' Fees and Costs

10.5 An award of Plaintiff's reasonable attorneys' fees and costs incurred in this action pursuant to applicable state law.

Other and Further Relief

10.6 Such other and further relief as the Court deems just, proper, and equitable to restore Plaintiff's rights and ensure the integrity of judicial administrative processes impacting family law litigants.

DATED this 27 day of May 2025.

Respectfully submitted,



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Shannon M. Draughon WSBA No. 35424  
Carnation Legal LLC  
Attorney for Gina Bloom, Plaintiff herein



Rasham Nassar, WSBA No. 61436  
Pharos Law PLLC  
Attorney for Gina Bloom, Plaintiff herein

# Plaintiff's Exhibit

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**CHRONOLOGICAL** September 27, 2016

# Snohomish County GAL Scandal

Written by  
[melindadrew.flintstebbins](#)



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*This blog was written by Melinda L. Drewing and Flint Stebbins, in collaboration with Adam Ballout and ABC Law Group, LLP.*

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Most people don't associate the phrase Guardian ad Litem (GAL) with perjury, theft, fraud, retaliation, and bias so severe that a GAL would place a child's physical well-being at risk. Maybe now they should. After nearly a year of litigation, court findings were made against several Snohomish County Volunteer Guardians ad Litem (VGALs), paid staff of the Snohomish County VGAL Program (the Program), and at least one Program attorney in a child welfare case in Everett, Washington. Guardians ad Litem and the Program that recruits and manages them were excoriated by a Superior Court judge for those transgressions as well as a series of strategic moves systematically applied by the Program. A strategy so corrupt that it constituted abusive litigation tactics (including an 8,000-page document dump), supplying false information to the Court, concealing and destroying evidence of their misconduct, and retaliating repeatedly against defense attorneys. During this lengthy litigation the Program's actions led to countless continuances of hearings, delays, and tacit refusals to comply with Court orders, none of which was in the best interest of the child. This Program demonstrated its priority was to protect its own interests even at the expense of the child it was appointed protect. This leads one to question whose best interests are actually being advocated for.

Guardians ad litem are appointed by the Court in child welfare cases to make recommendations on what he or she believes is in the child's best interest after conducting an independent investigation of the facts of the case, meeting with all the parties and participating in at least monthly visits with the child. The purpose behind the Volunteer Guardian ad Litem is to make sure

the court would know as much as it could about the long-term welfare needs of each child in a dependency case, where the court is very often charged with attempting to predict the future. Implementation of this concept on a scale as large as the courts needed was cost-prohibitive unless the courts could rely on volunteers to perform this task. In 1984, the National CASA Association (NCASAA) opened its office in Seattle and began providing funding to start new CASA programs. Today there are over 75,000 CASA volunteers across the United States. Washington State has 2500 |PLUS| volunteer CASAs.

The Snohomish County Volunteer Guardian ad Litem Program consists of approximately 7 Program Coordinators who supervise volunteers, numerous support staff, 2 or 3 County officials who manage the Program, and two staff attorneys who, all together, have created a sophisticated organization designed for the highly complex task of child welfare litigation. Impressively, this organization has, over a number of years, recruited more than 300 individuals and cultivated in them a willingness to commit what can be the equivalent of part-time to full-time hours at no compensation. With little to no public understanding of the child welfare system, the Program must educate their volunteers on even the most basic tasks and language of the process. This is done through an initial 3-day training and on-going training which is supposed to include education regarding the state Guardian ad Litem Rules and the Program's own policy.

The typical demographic is that of an older (often retired) upper-middle class white woman. It is not unusual for volunteers to have had some introduction to the child welfare system in their past, including as foster parents themselves. Among the requirements to become a Volunteer Guardian ad Litem are background checks to ensure they have no criminal or CPS history. In contrast, the system is nearly exclusively populated by

parents with criminal history, substance abuse and mental health issues, but most commonly, families mired in poverty. These parents are not always likeable and are understandably distrustful of most everyone in the process.

However, reunification and preservation of families is what the Dependency system is designed to do and those responsible for supervising these volunteers should be ensuring that this is what is occurring whenever possible. Or at the very least when VGALs recommend termination of parental rights, which they commonly do, such recommendations are made within the scope of the law.

It is easy to see how these volunteers would struggle with the notion of returning a child to one or both of those parents when the VGAL has observed and, not infrequently, become enmeshed with a foster family that appears to be a better alternative to the biological family. In fact, it would be difficult to see how they would not take that view. What appears to have occurred is, in an effort to maintain volunteer interest and commitment to do this time-consuming, emotionally wrenching work, volunteers' judgment and biases were not being subject to scrutiny, actions beyond the limits of their authority seemed to be encouraged, and misconduct was systematically excused and covered up under the guise of protecting the child's best interest.

Unsurprisingly, this led to an attitude that volunteers were incapable of bias, misconduct, or retaliation. This created a dangerously exaggerated sense of self-importance and infallibility. In order to maintain this façade, the Program deliberately disregarded, whitewashed, or concealed countless warning signs. The misconduct and violations of Statewide GAL rules by those in this case was not new nor is it likely they were unique to this county. What sets this case apart is that the behaviors became so blatant that the Court was unable to ignore

the violations or dismiss them as a minor transgression by a volunteer who meant well but didn't know any better. This Court, in an unprecedented move, completely disregarded the GAL's trial testimony. Through the diligence and zealous advocacy of the mother's two defense attorneys and their law firm the case could finally be made that not only were the GAL Program and its volunteers capable of committing these violations but that there was a long standing pattern of these behaviors extending well beyond this one case.

The catalyst for these findings was a termination trial that occurred in August 2015. In addition to presenting the mother's case that she had adequately remedied the alleged parental deficiencies, the defense sought to highlight what appeared to be coordinated efforts between the GAL, foster mother, and the foster mother's adoption agency social worker to sabotage any reunification of this child with her mother so that the child could be adopted by her current foster family. The mother's attorneys scrutinized, on cross-examination, the GAL's recommendation to terminate the parents' rights, and the actions of both the VGAL, who passed away 7 months before the trial, and the VGAL's supervisor, who was appointed upon her own request as the replacement GAL after the VGAL's death.

This evidence demonstrated the widespread misconduct by the VGAL and the replacement GAL. Much of that misconduct involved the VGAL's improper interactions with the child's foster family – providing the foster mother and her adoption agency social worker with the parents' confidential medical, mental health, and criminal records as well as discussions and commitments made by the VGAL about limiting the mother's visitation and ensuring that these visits would not be expanded or liberalized. The actions of this VGAL became so insidious that the Court found that the child's physical well-being was put in jeopardy in an effort to manufacture evidence against the

parents and that the VGAL and the Program had acted contrary to the child's best interests. The mother's counsel proved that the VGAL's actions were intentional and that the VGAL knew of the wrongfulness of those actions, which was demonstrated by evidence that the VGAL began utilizing her home email address (itself a violation of VGAL policy) to prevent her actions from being traced.

The evidence further established that the VGAL's supervisor/replacement GAL, had knowledge of at least some of the prior VGAL's misconduct. Despite this knowledge and a GAL Rule requiring disclosure to the court and all parties of even "potential improprieties" by a GAL, she did not disclose it, but deliberately concealed and even destroyed evidence of the misconduct and evidence demonstrating her knowledge of that misconduct. This Program official was found by the court to have engaged in her own misconduct and bias before, during, and after the trial and that the GAL lacked candor to the court and that her testimony was uninformed, inconsistent, dishonest and biased. Despite these issues, the Court terminated the parents' rights in September 2015.

Following the Court's findings regarding this misconduct, the mother's attorneys submitted a formal complaint with the Program against the GAL. This administrative complaint process must be pursued prior to a motion on these issues being brought before the court. The Program has 5 days to make an initial determination on the complaint, but instead indicated their determination would be made sometime within 60 days. The mother's attorneys quickly filed a motion to remove the GAL for cause with the Court.

In response, the VGAL Program and Snohomish County Superior Court Administration went on the offensive against mother's

counsel and their firm. The Program's very first action upon receiving the complaint against the GAL was to contact the State Office of Public Defense, the contracting financial agency of the mother's counsels' firm, to arrange a meeting to discuss "significant issues that have arisen" with that firm. Given that the Program, at that point, had made no investigation into the merits of the complaint and certainly knew about the Court's findings, this was clearly an attack on the firm for making the complaint against the GAL. Two months later, the Program concluded that the complaint against the GAL was "unfounded."

More retaliation followed. After the trial, nearly the entire dependency defense bar in the county joined the mothers' counsel in signing a letter to the Program expressing concerns about that GAL remaining on active cases. This letter revoked releases of information to that VGAL supervisor in light of her failure to protect parents' confidential information, her concealment of such egregious misconduct, and her involvement in efforts to manufacture evidence against parents. Instead of dealing with the GAL misconduct, the Program's response to this letter was to terminate the contract of a VGAL contract attorney who signed the letter. The court later found that the Program intended to send the message to the mother's counsel and other defense attorneys that if they opposed the Program or acted in solidarity with the mother's counsel's firm, they too would be retaliated against.

The Program also attacked mother's counsel in court alleging CR 11 violations in the mother's motion to remove the GAL. The Program brought motions to redact and strike portions of the mother's pleadings, arguing that there was no factual basis supporting the assertions of misconduct made. Later, Superior Court Administration filed a motion for the Court to reconsider the findings related to the VGALs and the Program itself. The Program also had the Civil Division of the County's Prosecutor's

Office write the mother's attorneys a letter threatening to sue them, asserting that just by making reference to misconduct by the Program occurring outside this case, mother's counsel violated the confidentiality rules that the program itself was found to be violating in every instance that the rule was implicated.

Subsequently, the mother's attorneys brought a motion to vacate the court's trial judgment arguing that the GAL's and the Program's failures to investigate, document, disclose, or correct any of the prior and ongoing misconduct of the VGAL and GAL deprived the parents of a fair trial and so severely undermined the reliability of the court's decision, that it should not stand. A seemingly endless series of post-trial hearings commenced as the defense demonstrated the extent of the VGAL misconduct while the Program scrambled to cover its tracks with little concern to the child's need for permanency and a quick resolution.

During this stage of the litigation, the mother's attorneys produced evidence of improper and illegal infiltration of a Defense Attorney LISTSERV through the Washington Defender Association (WDA) by another Snohomish County VGAL, on an unrelated case, for almost five years. The information she accessed on the LISTSERV was disseminated throughout the program and used on at least one occasion by one of the Program's attorneys. This incident was also offered to further demonstrate the Program's pattern and history of deceptive tactics and lack of fair dealings with those who oppose them.

The VGAL's presence on the LISTSERV was first uncovered during a discovery conference in May of 2015 with a VGAL Program Attorney and an Assistant Administrator for the Program on the unrelated case. During the meeting, the opposing counsel alluded to knowledge of the defense firm's unfiled

Motion to Compel discovery and efforts to obtain information from defense attorneys in other counties on their experiences obtaining discovery from their VGALs/CASAs. This information, including a draft of the unfiled motion, was posted on the Defense LISTSERV which the VGAL saw and immediately provided to the Program. This motion stemmed from the firm's longstanding difficulty with obtaining meaningful and timely discovery from the Program. A complaint was filed against that VGAL for those actions. The complaint was summarily dismissed by the Program as having "no potential merit."

The court viewed the LISTSERV infiltration as part of a pattern of conduct of a lack of fair dealings by the Program and found that that VGAL committed perjury in her explanations of how and why she got on the LISTSERV and what she did with the information she had access to. The Court found that the VGAL's presence on the WDA LISTSERV was at least in part "to surreptitiously gain opposing counsels' thought processes on cases and strategies and to surveil conversations between opposing counsel relating to dependency case strategy." The Court added that the Snohomish County VGAL Program, its lawyers and the VGAL had a very clear, well established ethical duty to not read the confidential e-mails when they saw what was contained in them. Ethical duties which required them to advise defense counsel about them, return them, and to not use them for strategic purposes. They failed to comply with these ethical duties, but instead the VGAL secretly maintained her presence on the LISTSERV for more than 4 years and disseminated materials she accessed throughout the program.

In presenting evidence and testimony on the LISTSERV infiltration and the Program's refusal to take any action on it, another issue that became apparent was that the VGAL program's standard practice for handling complaints was to immediately violate a rule requiring that complaints be kept



confidential from the VGAL. Instead, its practice appeared to be for the Program to immediately notify the VGAL or GAL that a complaint had been filed against them and by whom. Somewhat unsurprisingly, under this practice, throughout the entire history of the Program not a single complaint was ever found to have merit. Worse, complaining parties were often subject to bias and retaliation after submitting a complaint.

On June 10, 2016, more than ten (10) months after the original trial date, all parties returned once again to Superior Court to hear whether the parents' motion to vacate the verdict would be granted. The motion was denied.

While the Court determined both the VGAL/GAL should have been removed for cause as a result of multiple violations, she concluded that those violations and the transgressions committed by the VGAL Program did not prevent a fair proceeding or affect the outcome of the trial, as required to satisfy CR 60. Significant in this decision was that the Court already gave no weight or consideration to the GAL's testimony at trial. The parents are likely to appeal. However, as no current case law exists addressing the issue of misconduct of a Guardian ad Litem and termination of parental rights it is unclear how the parents will fare on appeal.

Despite not vacating the trial judgment, the Court made dozens of scathing findings against the Program and most importantly the Court found that "The misconduct by the Guardian ad litem seriously jeopardized the finality and permanency for this child, directly contrary to the best interest of the child." As a result, the Court granted sanctions in the form of attorneys' fees, education requirements, and public notice for any bad faith litigation abuses that are found. The precise details of these sanctions will be determined in a hearing to occur later this year.

The injustice to this family of the Program's efforts to rig the process against them is heart-wrenching and is something that will likely haunt the attorneys – who have fought this case so hard – for the rest of their careers. But it is also what will inspire those involved in this area of law to continue to fight in this broken system on behalf of parents who are justifiably terrified that their children will be forever lost to it. While it may seem that there would be a sense of vindication in finally having the Court acknowledge these practices within the Program, any satisfaction in that sense is grossly overshadowed by the question of how many past clients lost their cases and their children because of the Program's long success in concealing their misconduct.

After almost a year of litigation, it is still shocking, even to jaded defense attorneys that people who they worked with on a regular basis, could have engaged and continues to engage in actions that are not only legally but ethically wrong, but especially doing so under the guise of advocating for children. The court opined that such acts by an arm of the court impacts the appearance of fairness as to our entire county court system. She indicated that it would be impossible to measure how and to what extent retaliation against a small firm in such a small legal community would affect the willingness of all parents' attorneys to zealously advocate to protect their client's constitutional rights to raise their children. She left all parties with the strong message that when VGALs retaliate, they are placing their personal passions for revenge ahead of the needs of any children whose best interest they are supposed to protect.

Very little has changed since these findings have been made and, if anything, the situation has almost gotten worse as families' cases have been consistently delayed as a result of the turmoil within the program. There has been no accountability or remorse shown by any of the individuals involved. Without this

accountability it will be almost impossible for the system to move forward and to make the changes necessary to ensure that these abuses are never repeated.

The therapeutic nature of the dependency process often leads to an implied culture for all parties to work cooperatively for the betterment of the family. While good in theory this practice can present serious issues when it comes to protecting the parents' and children involved in this process as it can affect defense attorneys' ability to make challenges to the system. Backlash from other parties or a lack of support from the bench further helps to ensure that the status quo is maintained.

For years our office has struggled with the Program's ability to skirt accountability, cause unnecessary continuances and delays in our clients' cases, operate outside of their legal role and engage in questionable behaviors during its investigations with little to no consequences. Dependency defense attorneys are already working with a stacked deck. Statute, case law, the Court, Assistant Attorney Generals, the Department of Social and Health Services Social Workers, Guardians ad Litem, and Foster parents are all purportedly working to advance the "best interest of the child." It seems insane that one would still feel the need to operate outside the law in order to achieve what the system is designed to achieve.

These findings were long overdue, particularly when some of the actions taken by the aforementioned VGALs and the Program took place over a year ago, and is exemplary of the underlying problems within Washington State's child welfare system and the struggles that defense attorneys advocating for the parents face within it. While it appears that the County may now finally be listening, the actual impact that this may have for our clients and their families is yet to be seen.

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# Plaintiff's Exhibit

B

**From:** Sean Moore [smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com)  
**Subject:** RE: Yorks Matter (20-3-00465-31)  
**Date:** January 15, 2021 at 2:09 PM  
**To:** Norris, Nancy [nancy.norris@snoco.org](mailto:nancy.norris@snoco.org), Canfield, Damon [dcanfield@canfieldmadow.com](mailto:dcanfield@canfieldmadow.com)  
**Cc:** Amy Ferrier [aferrier@canfieldmadow.com](mailto:aferrier@canfieldmadow.com), Hannah Bartow [hbartow@canfieldmadow.com](mailto:hbartow@canfieldmadow.com)

SM

**CAUTION :** This email originated from outside of this organization. Please exercise caution with links and attachments.

Received, thank you.

**Sean Moore | Genesis Law Firm, PLLC**

3802 Colby Ave. Floor 2 | Everett, WA 98201

Tel: (866) 631-0028 x123 | Fax: (866) 654-0192

[smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com) | [www.genesislawfirm.com](http://www.genesislawfirm.com)

---

**From:** Norris, Nancy [<mailto:nancy.norris@snoco.org>]  
**Sent:** Friday, January 15, 2021 1:37 PM  
**To:** Canfield, Damon <[dcanfield@canfieldmadow.com](mailto:dcanfield@canfieldmadow.com)>  
**Cc:** Amy Ferrier <[aferrier@canfieldmadow.com](mailto:aferrier@canfieldmadow.com)>; Hannah Bartow <[hbartow@canfieldmadow.com](mailto:hbartow@canfieldmadow.com)>; [smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com)  
**Subject:** RE: Yorks Matter (20-3-00465-31)

Attached is the Notice assigning Brian Parker as the GAL for this matter. Thank you!

**Nancy A. Norris**

Judicial Coordinator

Snohomish County Superior Court

3000 Rockefeller M/S 502

Everett, WA 98201

[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)

***Please note:** I respond to all e-mails as soon as possible. If you do not receive a reply from me to your e-mail by the end of business on the day your e-mail was sent, please feel free to reach out to me again via email. Thank you.*

---

**From:** Norris, Nancy  
**Sent:** Friday, January 15, 2021 11:43 AM  
**To:** Damon Canfield <[dcanfield@canfieldmadow.com](mailto:dcanfield@canfieldmadow.com)>  
**Cc:** Amy Ferrier <[aferrier@canfieldmadow.com](mailto:aferrier@canfieldmadow.com)>; Hannah Bartow <[hbartow@canfieldmadow.com](mailto:hbartow@canfieldmadow.com)>; [smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com)  
**Subject:** RE: Yorks Matter (20-3-00465-31)

Thank you! Our office will take steps to assign Brian Parker to this case and will provide with a Notice once signed.

**Nancy A. Norris**

Judicial Coordinator

Snohomish County Superior Court

3000 Rockefeller M/S 502

Everett, WA 98201

[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)

***Please note:** I respond to all e-mails as soon as possible. If you do not receive a reply from me to your e-mail by the end of business on the day your e-mail was sent, please feel free to reach out to me again via email. Thank you.*

---

**From:** Damon Canfield <[dcanfield@canfieldmadow.com](mailto:dcanfield@canfieldmadow.com)>  
**Sent:** Friday, January 15, 2021 11:41 AM  
**To:** Norris, Nancy <[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)>  
**Cc:** Amy Ferrier <[aferrier@canfieldmadow.com](mailto:aferrier@canfieldmadow.com)>; Hannah Bartow <[hbartow@canfieldmadow.com](mailto:hbartow@canfieldmadow.com)>; [smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com)  
**Subject:** Re: Yorks Matter (20-3-00465-31)

**CAUTION :** This email originated from outside of this organization. Please exercise caution with links and attachments.

Yes. Brian Parker.

Damon

Sent from my iPhone

On Jan 15, 2021, at 11:32 AM, Norris, Nancy <[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)> wrote:

Amy and Hannah:

Copying the below to you in Mr. Canfield's absence. Thank you.

**Nancy A. Norris**  
Judicial Coordinator  
Snohomish County Superior Court  
3000 Rockefeller M/S 502  
Everett, WA 98201  
[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)

***Please note:** I respond to all e-mails as soon as possible. If you do not receive a reply from me to your e-mail by the end of business on the day your e-mail was sent, please feel free to reach out to me again via email. Thank you.*

---

**From:** Norris, Nancy  
**Sent:** Friday, January 15, 2021 11:30 AM  
**To:** Canfield, Damon <[dcanfield@canfieldmadow.com](mailto:dcanfield@canfieldmadow.com)>; [smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com)  
**Subject:** RE: Yorks Matter (20-3-00465-31)  
**Importance:** High

Counsel:

Were the parties able to reach agreement to an alternate GAL? Please let me know as soon as possible. If I receive no response by 3pm today, our office will take steps to appoint a GAL who is available for this assignment. Thank you.

**Nancy A. Norris**

Judicial Coordinator  
Snohomish County Superior Court  
3000 Rockefeller M/S 502  
Everett, WA 98201  
[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)

***Please note:** I respond to all e-mails as soon as possible. If you do not receive a reply from me to your e-mail by the end of business on the day your e-mail was sent, please feel free to reach out to me again via email. Thank you.*

---

**From:** Norris, Nancy

**Sent:** Tuesday, January 12, 2021 5:18 PM

**To:** Damon Canfield <[dcanfield@canfieldmadow.com](mailto:dcanfield@canfieldmadow.com)>;  
[smoore@genesislawfirm.com](mailto:smoore@genesislawfirm.com)

**Subject:** Yorks Matter (20-3-00465-31)

Counsel:

GAL Renee DeFreece, who was nominated for the GAL appointment in this matter in Orders entered yesterday, has let our office know that she is not available for this appointment. Please let me know by 5 pm on Thursday, January 14, 2021, whether or not the parties can agree upon an alternate GAL. The current Title 26 GAL private pay registry can be found here: [GAL TITLE LISTS.xlsx \(snohomishcountywa.gov\)](#).

Thank you.

**Nancy A. Norris**

Judicial Coordinator  
Snohomish County Superior Court  
3000 Rockefeller M/S 502  
Everett, WA 98201  
[nancy.norris@snoco.org](mailto:nancy.norris@snoco.org)

***Please note:** I respond to all e-mails as soon as possible. If you do not receive a reply from me to your e-mail by the end of business on the day your e-mail was sent, please feel free to reach out to me again via email. Thank you.*





# Plaintiff's Exhibit

C

# BRIAN PARKER GAL ASSIGNED CASES for SNOHOMISH SUPERIOR COURT

	Title	Case Number	GAL Assigned to	Start Time	
CM	Tharp, Michelle & Gruol, Brad	10-3-01103-1	Parker, Brian	1/30/2020 10:30	
CM	Lucas, Jeanette & Miller, Ryan	19-3-01938-31	Parker, Brian	4/24/2020 13:00	
	NIELSEN, Kristy & Brian	20-3-00087-31	Parker, Brian	6/4/2020 17:00	
	CALDWELL, Daniel & Jacee	19-3-02231-31	Parker, Brian	6/17/2020 15:30	
CM	Patton, Tell & Maxey, Shonda	20-3-00969-31	Parker, Brian	7/17/2020 10:00	
	Griffiths, Ricky & Rivera, Elise	09-5-00026-2	Parker, Brian	7/21/2020 12:00	NON-EXISTENT CASE
CM	Sanchez, David & Reed, Jessica	20-3-01143-31	Parker, Brian	9/11/2020 16:00	
	Custody of Schmuck/Murphy, Elisa/La Hoz, Jorge & Schmuck, Nathaniel/La Hoz, Natalie	16-3-02011-31	Parker, Brian	12/7/2020 17:00	
CM	YORKS, Brian & Olimpia	20-3-00465-31	Parker, Brian	1/11/2021 18:00	
	De Simone, Michelina & Smith, II, Winfred	20-3-02282-31	Parker, Brian	1/11/2021 18:00	
CM	PEDROZA, Juan and Marcia	19-3-02944-31	Parker, Brian	2/8/2021 16:00	
	TUCKER, Sarah & Devin	20-3-00259-31	Parker, Brian	3/2/2021 12:00	
	Craigen, Michelle & Garcia, Gilbert	20-3-01257-31	Parker, Brian	6/7/2021 18:00	
	Orriss, Faith & Cox, Nathan	16-3-02661-31	Parker, Brian	7/16/2021 12:00	
	Garcia Toro, Cynthia & Nelson, Shakore	21-3-01368-31	Parker, Brian	8/3/2021 18:00	
CM	Robbins, Ian and Evangelista, Amanda	21-3-01519-31	Parker, Brian	8/26/2021 17:00	
CM	BARRY, Jefferson & Ruby	21-3-01260-31	Parker, Brian	10/12/2021 10:00	
	GOW, Jan & Anthony	21-3-00701-31	Parker, Brian	10/12/2021 16:00	
CM	Taylor, Emilie & Trammell, Nathan	21-3-02120-31	Parker, Brian	11/5/2021 10:00	
CM	Sanford, Jonathan & Blomquist, Amber	21-3-02183-31	Parker, Brian	12/2/2021 11:00	
	FALK, Samantha & Brandon	21-3-01834-31	Parker, Brian	3/17/2022 11:00	
CM	SINEEV, Olga & Sergei	22-3-00502-31	Parker, Brian	4/28/2022 12:00	
	Morgan, Aaron v. Erickson, Lara	18-3-00243-31	Parker, Brian	7/6/2022 15:00	
CM	Harrison, Shelley & Cooper, Justin	22-3-00713-31	Parker, Brian	7/26/2022 12:00	
	Bowman, Taylor & Wilhoit, Misty	19-3-02807-31	Parker, Brian	9/6/2022 10:00	

**TOTAL GAL ASSIGNED CASES : 24**

**TOTAL CASES FOR CANFIELD & MADOW (CM) : 12**

# Plaintiff's Exhibit

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HEIDI PERCY  
COUNTY CLERK  
SNOHOMISH CO. WASH



IN THE SUPERIOR COURT OF WASHINGTON  
COUNTY OF SNOHOMISH

In re:	)	NO. 20-3-00087-31
	)	
KRISTY K. NIELSEN,	)	RESPONSE DECLARATION OF
Petitioner,	)	J. MICHAEL GALLAGHER
and	)	ATTORNEY FOR PETITIONER
	)	RE: GAL REQUEST FOR FEES
BRIAN T. NIELSEN,	)	
Respondent.	)	

J. MICHAEL GALLAGHER, being first duly sworn on oath, deposes and says:

1. I am the attorney for the Petitioner in this action and I have personal knowledge of the facts contained in this declaration.

2. I am making this declaration in response to the Guardian ad Litem's request for additional fees.

3. At this time, we are opposing the GAL's request for additional fees for the reasons stated below. In light of the deficiencies in his investigation, reporting and recommendations, further discovery needs to be conducted on his work to date and his recommendations before further work is authorized by the court.

4. We have agreed to pay him three hours for the deposition scheduled on August 26. See email of 8/6/20, attached (Exhibit A).

DECLARATION OF J. MICHAEL GALLAGHER - 1

Law Offices of  
**J. Michael Gallagher**  
Attorneys at Law

1203 West Main Street  
Monroe, WA 98272  
360-794-7531

1       **I. This GAL Violated the GALR, the rules and standards all GALs are required to**  
2       **follow, and ignored the statutory requirements re development of a parenting**  
3       **plan in making his recommendations**

4           5.       A review of the Washington State Title 26 Family Law Guardian ad Litem Guidebook,  
5       Wash.St. Admin Office of the Courts, 2008; the Association of Family and Conciliation Courts  
6       Model Standards of Practice for Child Custody Evaluations, 2006; The Art and Science of Custody  
7       Evaluations, Jonathan W. Gould, David A. Martindate, Guilford Press, 2007; RCW 26.12.175;  
8       Superior Court Guardian ad Litem Rules (GALR), all stand for the following principles:

- 9           a.       GALs must be familiar with all applicable statutes and case law;  
10          b.       GALs must have sufficient and supplement training;  
11          c.       GALs must approach his/her appointment without bias or prejudice;  
12          d.       GALs must conduct a balanced fact finding investigation and become informed about the  
13          case;  
14          e.       GALs shall limit duties to those ordered by the court;  
15          f.       GALs shall not have ex parte communication with the court;  
16          g.       GALs shall act professionally and treat parties with respect.

17       **II. The GAL was not familiar with the applicable statutes and case law**

18       RCW 26.09.002 clearly indicates the legal standard re development of parenting plans:

19       Parents have the responsibility to make decisions and perform other parental functions  
20       necessary for the care and growth of their minor children. In any proceeding between  
21       parents under this chapter, **the best interests of the child** shall be the standard by  
22       which the court determines and allocates the parties' parental responsibilities. The state  
23       recognizes the fundamental importance of the parent-child relationship to the welfare  
24       of the child, and that the relationship between the child and each parent should be  
25       fostered unless inconsistent with the child's **best interests**. Residential time and  
26       financial support are equally important components of parenting arrangements. **The**  
27       **best interests of the child** are served by a parenting arrangement that best maintains a  
28       child's emotional growth, health and stability, and physical care. Further, **the best**  
      **interest of the child** is ordinarily served when the existing pattern of interaction  
      between a parent and child is altered only to the extent necessitated by the changed  
      relationship of the parents or as required to protect the child from physical, mental, or  
      emotional harm. (emphasis added.)

DECLARATION OF J. MICHAEL GALLAGHER - 2

Law Offices of  
**J. Michael Gallagher**  
Attorneys at Law

1203 West Main Street  
Monroe, WA 98272  
360-794-7531

1           6.     The Guardian ad Litem in this matter, Brian Parker, filed his Initial GAL report on  
2 July 31, 2020. (By court order dated June 25, 2020, the report was due before July 1. See attached  
3 Exhibit B). Nowhere in this report is "best interests of the child" discussed and it is especially absent  
4 in the justification for his recommendations.

5           7.     Further, there was **no discussion** of the criteria for establishing a temporary parenting  
6 plan as required by RCW 26.09.197 and 26.09.187. Noticeably absent was any discussion of the  
7 legislatively mandated consideration of the factors determinative re Residential Provisions as  
8 specified in RCW 26.09.187(3). In particular, the following:

9           (a) The court shall make residential provisions for each child which encourage  
10 each parent to maintain a loving, stable, and nurturing relationship with the child,  
11 consistent with the child's developmental level and the family's social and economic  
12 circumstances. The child's residential schedule shall be consistent with  
13 RCW 26.09.191. Where the limitations of RCW 26.09.191 are not dispositive of the  
child's residential schedule, the court shall consider the following factors:

14           (i) **The relative strength, nature, and stability of the child's relationship**  
15 **with each parent;**

16           (ii) The agreements of the parties, provided they were entered into knowingly  
17 and voluntarily;

18           (iii) Each parent's past and potential for future performance of parenting  
19 functions as defined in \*RCW 26.09.004(3), including whether a parent has taken  
20 greater responsibility for performing parenting functions relating to the daily needs of  
21 the child;

22           (iv) The emotional needs and developmental level of the child;

23           (v) The child's relationship with siblings and with other significant adults, as  
24 well as the child's involvement with his or her physical surroundings, school, or other  
25 significant activities;

26           (vi) The wishes of the parents and the wishes of a child who is sufficiently  
27 mature to express reasoned and independent preferences as to his or her residential  
28 schedule; and

          (vii) Each parent's employment schedule, and shall make accommodations  
consistent with those schedules.

**Factor (i) shall be given the greatest weight. (emphasis added).**

DECLARATION OF J. MICHAEL GALLAGHER - 3

Law Offices of  
**J. Michael Gallagher**  
Attorneys at Law

1203 West Main Street  
Monroe, WA 98272  
360-794-7531

1           **III.    GALs Must Approach His/Her Appointment Without Bias or Prejudice**

2           8.       This GAL did not follow this proscription. His report ignores the deposition testimony  
3 of the Respondent who admitted to filing false tax returns, underreporting his income and fabricating  
4 his "disability." While these admissions do not per se directly relate to "parenting," they certainly  
5 relate to the Respondent's credibility on all issues, including his allegations about the Petitioner  
6 concerning her use of alcohol and abuse of the child.  
7

8           9.       Instead, the GAL focused all of his attention on the Mother's alleged deficits and even  
9 made a credibility determination based upon her "shaking" during an interview, concluding that this  
10 was evidence of an alcohol problem.

11          10.       It is unknown what training and/or expertise the GAL has in the area of drug and  
12 alcohol abuse.

13          11.       All of the above is a clear indication of bias in favor of the Father, and at a minimum,  
14 lacks the appearance of fairness.

15          12.       In addition, the GAL was informed by the Petitioner that she had a recent drug and  
16 alcohol evaluation, yet he made no effort to obtain the evaluation, other than requesting the Petitioner  
17 supply it. No request for a release, no effort to talk to the drug and alcohol evaluator, no request to  
18 Petitioner's counsel for assistance in obtaining the evaluation. The evaluation, which is positive for  
19 the Petitioner, is filed separately under seal, along with her two most current UAs (both negative) for  
20 the court's review.  
21

22          13.       The GAL did not talk with anyone from the child's school, nor his counselor from  
23 Compass Health, though he quotes extensively from Compass Health records in his report.  
24

25  
26  
27       **DECLARATION OF J. MICHAEL GALLAGHER - 4**

28  
Law Offices of  
**J. Michael Gallagher**  
Attorneys at Law  
1203 West Main Street  
Monroe, WA 98272  
360-794-7531



1 **IV. GALs must conduct a balanced fact-finding investigation and become informed re the**  
2 **case**

3 14. The above discussion is evidence that this did not occur.

4 **VI. The GAL misled the court on discovery fees**


5 15. The GAL has stated in his motion for additional fees that the Petitioner, through her  
6 attorney, refused to pay fees for the deposition. Exhibit A proves this statement is untrue.

7 **VII. Conclusion**

8 16. For all the above reasons, the court should find that the GAL's request for additional  
9 fees after a questionable investigation and a report containing conclusions not discussing the best  
10 interests of the child or made without consideration of the statutory factors required by RCW  
11 26.09.187, are premature at best. The deposition of the GAL needs to take place so that the court has  
12 all relevant information before it authorizes additional monies be paid to a GAL that, at this point,  
13 arguably has not done a sufficient or competent job.

14  
15 I declare under the penalty of perjury under the laws of the State of Washington that the  
16 foregoing statement is true and correct to the best of my knowledge.

17 Dated at Cape Cod, Massachusetts on August 10, 2020.

18  
19   
20 J. Michael Gallagher, WSBA#12645  
21 Attorney for Petitioner  
22  
23  
24  
25  
26

27 DECLARATION OF J. MICHAEL GALLAGHER - 5

28  
Law Offices of  
**J. Michael Gallagher**  
Attorneys at Law  
1203 West Main Street  
Monroe, WA 98272  
360-794-7531

# **EXHIBIT A**

Law Offices of  
**J. Michael Gallagher**  
Attorneys At Law

1203 West Main Street  
Monroe, WA 98272  
(360) 794-7531

## Sharon Andrews

---

**From:** J. Michael Gallagher  
**Sent:** Thursday, August 6, 2020 4:11 PM  
**To:** Brian Parker; Sharon Andrews; Aaron Shields - The Shields Law Firm (aaron@theshieldslawfirm.net)  
**Cc:** Jennifer Winter; Kristy Nielsen  
**Subject:** Re: Nielsen--review hearing and deposition

Mr. Parker. You have lied in your declaration when you stated that "Petitioner has stated through her attorney she is not willing to pay my fees for this deposition."

I direct you to the email below, sent 8/5 @ 10:39 a.m. I strongly suggest you amend your declaration, as an officer of the court.

In addition, I have a notice of absence filed covering 8/10 - 8/17. It asks that no motions be filed requiring a response during that time.

Your motion shows either a lack of knowledge of the court file, or a lack of professional courtesy. Either way, this motion needs to be reset after coordination with all sides. Fees will be sought for your lack of cooperation.

---

**From:** J. Michael Gallagher  
**Sent:** Wednesday, August 5, 2020 10:39 AM  
**To:** Brian Parker <Brian@portgardnerlaw.com>; Sharon Andrews <frontdesk@seattlelawcenter.com>; Aaron Shields - The Shields Law Firm (aaron@theshieldslawfirm.net) <aaron@theshieldslawfirm.net>  
**Cc:** Jennifer Winter <jennifer@theshieldslawfirm.net>; Kristy Nielsen <kristyknelsen@hotmail.com>  
**Subject:** RE: Nielsen--review hearing and deposition

What is your published hourly rate for your GAL work? We will agree to three hours for the deposition.

**From:** Brian Parker <Brian@portgardnerlaw.com>  
**Sent:** Wednesday, August 5, 2020 10:30 AM  
**To:** J. Michael Gallagher <jmgallagher@seattlelawcenter.com>; Sharon Andrews <frontdesk@seattlelawcenter.com>; Aaron Shields - The Shields Law Firm (aaron@theshieldslawfirm.net) <aaron@theshieldslawfirm.net>  
**Cc:** Jennifer Winter <jennifer@theshieldslawfirm.net>; Kristy Nielsen <kristyknelsen@hotmail.com>  
**Subject:** RE: Nielsen--review hearing and deposition

I am not available until after 8/21, and as stated, must be paid in advance.

## Brian Parker

Attorney and Title 26 Guardian ad Litem

**PORT GARDNER**

**LAW GROUP**

A PROFESSIONAL SERVICES  
CORPORATION

2918 Colby Avenue, Suite 201

Everett, WA 98201  
T 425.259.5100/ F 425.789.1214  
[www.portgardnerlaw.com](http://www.portgardnerlaw.com)

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**From:** J. Michael Gallagher <[jmgallagher@seattlelawcenter.com](mailto:jmgallagher@seattlelawcenter.com)>

**Sent:** Wednesday, August 5, 2020 10:28 AM

**To:** Brian Parker <[Brian@portgardnerlaw.com](mailto:Brian@portgardnerlaw.com)>; Sharon Andrews <[frontdesk@seattlelawcenter.com](mailto:frontdesk@seattlelawcenter.com)>; Aaron Shields - The Shields Law Firm ([aaron@theshieldslawfirm.net](mailto:aaron@theshieldslawfirm.net)) <[aaron@theshieldslawfirm.net](mailto:aaron@theshieldslawfirm.net)>

**Cc:** Jennifer Winter <[jennifer@theshieldslawfirm.net](mailto:jennifer@theshieldslawfirm.net)>; Kristy Nielsen <[kristyknielsen@hotmail.com](mailto:kristyknielsen@hotmail.com)>

**Subject:** RE: Nielsen--review hearing and deposition

We need to take your deposition before the review hearing with time for my court reporter to transcribe and me to submit to the court. What is your earliest availability after 8/21? This may require a date for the review after 9/1.

As far as additional fees, we will not agree. You can address this at the review hearing.

Sent from Mail for Windows 10

**From:** Brian Parker

**Sent:** Wednesday, August 5, 2020 10:03 AM

**To:** Sharon Andrews; Aaron Shields - The Shields Law Firm ([aaron@theshieldslawfirm.net](mailto:aaron@theshieldslawfirm.net))

**Cc:** Jennifer Winter; Kristy Nielsen; J. Michael Gallagher

**Subject:** RE: Nielsen--review hearing and deposition

I'm not available until after August 21st. I will also need to motion the court for extra fees, as I have hit the approved fee mark. Your client should be prepared to pay her outstanding balance (\$500) and place an additional \$1,800 in trust to cover preparing for and attending the deposition. If the parties will agree to a stipulated order, I won't have to request additional fees for bringing the motion.

## Brian Parker

Attorney and Title 26 Guardian ad Litem

**PORT GARDNER**

**LAW GROUP**

A PROFESSIONAL SERVICES  
CORPORATION

2918 Colby Avenue, Suite 201  
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T 425.259.5100/ F 425.789.1214  
[www.portgardnerlaw.com](http://www.portgardnerlaw.com)

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**From:** Sharon Andrews <[frontdesk@seattlelawcenter.com](mailto:frontdesk@seattlelawcenter.com)>

**Sent:** Wednesday, August 5, 2020 9:45 AM

**To:** Aaron Shields - The Shields Law Firm ([aaron@theshieldslawfirm.net](mailto:aaron@theshieldslawfirm.net)) <[aaron@theshieldslawfirm.net](mailto:aaron@theshieldslawfirm.net)>; Brian Parker <[Brian@portgardnerlaw.com](mailto:Brian@portgardnerlaw.com)>

**Cc:** Jennifer Winter <[jennifer@theshieldslawfirm.net](mailto:jennifer@theshieldslawfirm.net)>; Kristy Nielsen <[kristyknelsen@hotmail.com](mailto:kristyknelsen@hotmail.com)>; J. Michael Gallagher <[jmgallagher@seattlelawcenter.com](mailto:jmgallagher@seattlelawcenter.com)>

**Subject:** RE: Nielsen--review hearing and deposition

Mr. Shields and Mr. Parker:

As you know, Mr. Gallagher will be out of state next week. Attached is a stipulation and agreed order to continue the review hearing currently set for August 14 to September 1. Please sign and return and we will file it with the court.

In addition, Mr. Parker, Mr. Gallagher would like to take your deposition on August 20 beginning at 1:30 p.m. via Zoom. Please confirm that date will work for you and I will send out the Notice of Deposition/Subpoena Duces Tecum.

Thank you,

Sharon Andrews  
Legal Assistant  
Law Offices of J. Michael Gallagher  
1203 West Main Street  
Monroe, WA 98272  
(360) 794-7531  
(206) 441-7090 Seattle office

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## **EXHIBIT B**

Law Offices of  
**J. Michael Gallagher**  
Attorneys At Law

1203 West Main Street  
Monroe, WA 98272  
(360) 794-7531

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HEIDI PERCY  
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Superior Court of Washington  
County of Snohomish

In re the Marriage of  
KRISTY K. NIELSEN,

Petitioner,

vs.

BRIAN T. NIELSEN,

Respondent.

NO. 20-3-00087-31

ORDER ON PETITIONER'S  
MOTION FOR REVISION

**IT IS HEREBY ORDERED:**

The court denies in part and grants in part Petitioner's Motion for Revision. The court maintains the court's May 15, 2020 orders except as follows:

1. The temporary parenting plan entered on May 15, 2020 shall remain in place however, the Tuesday visit shall be a morning visit from 8:00 a.m. to 11:00 a.m. and Mother may have one additional morning visit each week on Thursday from 8:00 a.m. 11:00 a.m.
2. The Guardian ad litem is directed to prepare a preliminary report on or before July 1, 2020 regarding the mother's temporary visitation.

ORDER ON PETITIONER'S  
MOTION FOR REVISION - 1

**THE SHIELDS LAW FIRM, PLLC**  
2531 WETMORE AVENUE  
EVERETT, WA 98201  
425-263-9798

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Dated: 6/25/2020

  
\_\_\_\_\_  
The Honorable Richard T. Okrent,  
Judge

ORDER ON PETITIONER'S  
MOTION FOR REVISION - 2

**THE SHIELDS LAW FIRM, PLLC**  
2531 WETMORE AVENUE  
EVERETT, WA 98201  
425-263-9798



# Plaintiff's Exhibit

E



Gina Yorks &lt;ginayorks24@gmail.com&gt;

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**AGO Complaint**

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crcmail@atg.wa.gov <crcmail@atg.wa.gov>  
To: ginayorks24@gmail.com

Mon, Aug 16, 2021 at 9:26 AM

Olimpia,

Your complaint has been received by the Consumer Resource Center. We are experiencing longer than usual complaint processing times due to implementation of remote work sites in response to Governor Inslee's statewide proclamation on COVID-19 guidelines. We will continue to answer phones in our call center; however, you may experience delays or connection issues when contacting us by phone. To better serve you, we encourage you to contact us by email if you have any questions about your complaint or if you have trouble reaching us by phone. You may email us at [CRC@atg.wa.gov](mailto:CRC@atg.wa.gov).

Thank you for your patience.

Information Submitted:

\*\*\*\*\*

Olimpia Georgiana Yorks  
1526 85th Ave NE  
lake stevens, WA 98258

Contact Phone: (425) 535-6334  
Alternate Phone:  
Email: [ginayorks24@gmail.com](mailto:ginayorks24@gmail.com)  
Age Range: 30-39

Are you an active duty service member, a military dependent, retired from active duty, or a veteran: No

If English is not your first language, what is your first language: Romanian

\*\*\*\*\*

Business Name: Port Gardner Law Firm/G.A.L BRIAN J PARKER

Everett, WA 98201

Bus Phone:  
Email:  
Website:

Names and addresses of any other businesses involved in your complaint:  
Brian Parker

Transaction date:  
Amount in dispute:

\*\*\*\*\*

Explanation of complaint:

Brian Parker is our court appointed G.A.L.  
This is a domestic violence divorce.  
My spouse,Brian Yorks received visitation between August 5th 2021 and August 14th 2021.  
Without my consent or knowledge,Brian flew to Florida with our 2 boys ages 5 and 7,violating his DVPO order and without any notice to me or my attorney.  
Brian Parker knew about this and approved of it.  
Damon Canfield,his attorney also knew about this and approved it.  
A charge is pending with The City Of Everett Prosecutors.  
Brian Parker has been extremely biased since the beginning with his reports.  
He is arrogant,dismissive and failed to investigate multiple domestic violence issues as well as alcohol and drug abuse about my spouse.  
Brian Parker condoned the DVPO violation,removing the children from the state of Wa, and did not give any notice to me,as their mother and full custodian.Extremely unprofessional on his part.I do not believe Brian Parker is neutral and I do not believe Brian Parker has my children's welfare and best interest.I have asked Brian Parker to withdraw from this case but so far he hasn't.

Complaint as Public Record: Yes  
Disclosure Notices: Yes

\*\*\*\*\*  
\*\*\*\*\*

If you have any questions about the complaint submittal process, you may contact our Consumer Resource Center at 1-800-551-4636 between 10:00 a.m. and 3:00 p.m., Monday through Friday.

Sincerely,

Bob Ferguson and the AGO staff

Consumer protection issues constantly change, with new scams and threats emerging every week. To be automatically notified, please consider signing up for one or more of our newsletters (<http://eepurl.com/bd6bM5>) to keep up-to-date on the latest AGO news, opinions, consumer alerts, Ask the AG columns, and blog posts.

You can also follow us on the social networking sites Twitter (<http://www.twitter.com/agowa>), YouTube (<http://www.youtube.com/washingtonago>) and Facebook (<https://www.facebook.com/WAStateAttorneyGeneral>).

# Plaintiff's Exhibit

F

Superior Court of the State of Washington  
for Snohomish County

GUARDIAN AD LITEM PROGRAM  
SNOHOMISH COUNTY COURTHOUSE  
3000 Rockefeller Avenue M/S 502  
Everett, WA 98201-4060

RE: **TITLE 26 GAL REGISTRY APPLICATION**

Dear Applicant:

To be considered for our Registry, originals of the following must be submitted by mail or hand-delivered to the address below:

1. Application Form (attached – pages 1-6).
2. Oath of Guardian ad Litem (attached – pages 7-9).
3. Confidential Application and Release Form (attached – page 10).
4. Your résumé/CV.
5. Proof of Title 26 GAL approved mandatory initial certification training for new applications.

If you are applying to our Title 26 GAL Registry for the first time and wish to be included on our County Pay Registry, the following is also required:

6. Form W-9 (available at [www.irs.gov](http://www.irs.gov)).

Additionally, please make sure to download and read the following:

7. [Snohomish County Guardian ad Litem Administrative Policies.](#)
8. [Washington State GALRs and Snohomish County SCLGALRs.](#)

Please mail the completed applications **with all attachments** and original signatures to:

Mitchell A. Peterson  
Programs Administrator  
Snohomish County Superior Court  
3000 Rockefeller Avenue, M/S 502  
Everett, Washington 98201

Thank you for your interest in serving as a Title 26 Guardian Ad Litem for Snohomish County Superior Court.

Enclosures

**SNOHOMISH COUNTY SUPERIOR COURT  
TITLE 26 GAL APPLICATION**

***The following information provided by you will be made available to the public for review:***

Name: Brian J. Parker

Business Name or Firm: The Port Gardner Law Group

Business Address: 2918 Colby Ave, Ste 201

City and State: Everett, WA Zip Code: 98201

Business Phone: (425) 259-5100 Fax: (425) 789-1214

Alternate Phone: (      )        (This will not be kept confidential.)

Email address: Brian@PortGardnerLaw.com

WSBA or Washington State Certificate #: 41015

1. I hereby apply to serve as a Title 26 Guardian ad Litem.
2. I have never been convicted of a felony or a crime involving moral turpitude.  
**Must initial:** bjp

3. My formal education is as follows:  
J.D. issued by the University of Alabama School of Law in 2003  
LL.M. issued by the Australian National University in 2005

4. Please indicate the date, county and sponsor where you completed the initial mandatory training:

Initial Training:  
Date: Spring 2013 County/Sponsor: King County Bar Association

5. I attended the following additional Title 26 GAL training(s):

Date: \_\_\_\_\_ County/Sponsor: \_\_\_\_\_

Date: \_\_\_\_\_ County/Sponsor: \_\_\_\_\_

Date: \_\_\_\_\_ County/Sponsor: \_\_\_\_\_

Date: \_\_\_\_\_ County/Sponsor: \_\_\_\_\_

6. Number of years of experience as a Title 26 GAL: 9

7. Number of appointments as a Title 26 GAL and the county or counties of appointment:  
75+ reports issued in Snohomis, Clark, Skagit, and Whatcom counties.
8. The following is a statement of my criminal history, if any, as defined by RCW 9.94A.030, for a period covering ten (10) years:  
None
9. Your knowledge, training, and experience in each of the following areas: general training related to Title 26 GAL duties; specific training related to issues potentially faced by children in dissolution, custody, paternity, and other family law proceedings; and specific training or education related to child disability or developmental issues. Attach additional pages as necessary; please do not refer to résumé/CV as part of your response.  
I have practiced law in Washington State since 2008, and have issued reports as a Guardian ad Litem in over 65 cases. I have numerous relevant CLE's.
10. Identify the names of any counties in which you have been removed from a GAL Registry pursuant to a grievance action; the name of the court and cause number of any case in which the court has removed you for cause; and any founded allegations of abuse or neglect against you as defined in RCW 26.44.020:  
None.
11. The following is a statement of the extent of liability coverage in force covering any errors, omissions and acts of professional negligence (provide name of company and policy limits):  
Midmark Casualty Insurance Company. \$500,000, \$1,000,000 Aggregate
12. I agree to advise the Court immediately in the event of any complaint, investigation or action being commenced, which could lead to professional discipline or suspension; removal or suspension from any county's GAL Registry; the suspension or revocation of my professional license; and/or to the filing of criminal charges for a felony or crime involving allegations of theft, dishonesty or moral turpitude. **Must initial:** BJP

13. My private pay Guardian ad Litem fees are as follows: \$4,000 Retainer; and \$225 per hour. Other: (if applicable):

\$1,000 additional retainer before trial, \$500 additional retainer before being deposed.

14. The following **must** be included with this application (check the item below to acknowledge inclusion with your application):

☐ **If you are a new applicant**, copy of the certificate from the training provider evidencing successful completion of the mandatory Title 26 GAL initial training.

☒ Résumé/curriculum vitae, showing work and professional or personal experience in or related to the Title 26 GAL Registry that would assist in the performance and completion of Guardian ad Litem duties.

☒ Completed and signed statements regarding professional complaints, investigations, or disciplinary actions and claims or litigation (pages 4 and 5 of this application).

☐ **FOR COUNTY PAY GAL REGISTRY APPLICANTS ONLY:** Signed acknowledgment and agreement to be bound by the Court's policies in which compensation is sought at county expense (page 6 of this application).

☒ Signed Oath of Guardian ad Litem (page 7 of this application).

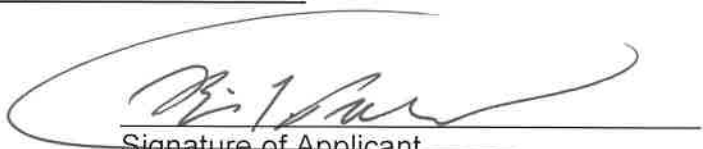
☒ Signed release of information directed to all professional regulatory bodies, which have licensed or supervised the applicant within the last ten (10) years (page 10 of this application).

15. If you are an attorney and desire that your application be considered for your admission to our county pay Title 4 GAL Registry, you **must** check here ☐ and you **must** select either the second or third checkbox on page 6 of this application, as appropriate, and sign and date the same.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed this 17 day of Sept, 2022, at

Everett, WA  
(City and State)

  
Signature of Applicant



**PROFESSIONAL COMPLAINTS, INVESTIGATIONS OR DISCIPLINARY ACTIONS**

(Please check mark one box below.)



Description of the nature, status and outcome of any professional complaints, investigations or disciplinary actions, lawsuits or professional liability claims, and any order for removal as Guardian ad Litem prior to completion of Guardian ad Litem duties. Please provide summary and outcome only and attach additional pages if needed.

I have had two clients and one litigant in a GAL case complain to the bar association in the past, but in each case it was deemed no professional misconduct was alleged, and no investigation or follow up was performed.

I have one litigant in a GAL case in Snohomish County claim she has reported me to the Attorney General, but I have not received a copy of that complaint, any information on what department within the Attorney General's office she reported me to, or specific information on the nature of her complaint. Upon information and belief, this stems with her simply disagreeing with my report, and not any specific allegation of professional misconduct.

The same client who allegedly reported me to the Attorney General and who filed a bar complaint also filed a complaint with Snohomish County Court Administration, asking that I be removed from the registry.

There have been no other complaints that I know of, and I have never been disciplined or sanctioned by a bar association or removed from any GAL registry. Nor have I been removed from a GAL case before completion of my duties (other than declining appointment once a conflict of interest was discovered, which was before I began my investigation but after appointment).



I affirm that there have been no professional complaints, investigations or disciplinary actions, lawsuits or professional liability claims and any order for removal as Guardian ad Litem prior to completion of Guardian ad Litem duties.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Date: 9-19-22



Signature

Brian J. Parker

Print Name

**CLAIMS OR LITIGATION**  
(Please check mark one box below.)

☐

Description of any claims, or litigation that has been commenced, involving allegations of improper fee charges, charges of fraud, theft or other forms of dishonesty or professional malpractice or misconduct. Please provide summary and outcome only and attach additional pages if needed.

None.

☒

I affirm that there have been no claims or litigation involving allegations of improper fee charges, charges of fraud, theft or other forms of dishonesty or professional malpractice or misconduct.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Date: 4-19-22



Signature

Brian J. Parker

Print Name

**ACKNOWLEDGMENT AND AGREEMENT**  
**FOR COUNTY PAY GAL REGISTRY APPLICANTS ONLY**

**\*\*\*PLEASE NOTE\*\*\***

**If this Acknowledgment and Agreement is completed and returned and the applicant is accepted to the Title 26 GAL Registry:**

- The non-attorney applicant will also be included on the county pay Title 26 GAL Registry.
- Attorney applicants: If you wish to be included on a county pay Registry, you must select one of the following:

☐ The attorney applicant desires to be included on the Title 26 GAL Registry for county pay matters.

☐ The attorney applicant desires to be included on ONLY the Title 4 GAL Registry for county pay matters **and** has selected the checkbox in paragraph 15 of the application (NOTE: failure to complete paragraph 15 will exclude you from Title 4).

☐ The attorney applicant desires to be included on BOTH Title 4 and Title 26 GAL Registries for county pay matters **and** has selected the checkbox in paragraph 15 of the application (NOTE: failure to complete paragraph 15 will exclude you from Title 4).

**DO NOT COMPLETE THIS PAGE IF YOU DO NOT INTEND TO BE**  
**INCLUDED ON A COUNTY PAY REGISTRY**

\*\*\*\*\*

Appointed Guardians ad Litem are responsible to manage their assigned cases within the scope and fee scales set by the bench. All bills must be timely and itemized with a copy of the Order Appointing the Guardian ad Litem submitted at the time of billing.

All excess fees beyond the set fee schedule must be pre-approved through written or email request to the Programs Administrator for Superior Court. Generally, pre-approval of excess or additional fees will be limited to no more than six to ten (6-10) hours of service.

I certify that I have read and agree to be bound by the Court's policies in cases in which compensation is sought at public expense. Currently, the rate for Title 26 GAL County cases is set at \$65/hour up to 20 hours maximum, including costs, and for Title 4 GAL County cases, \$50/hour up to 12 hours maximum, including costs.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Brian J. Parker

\_\_\_\_\_  
Print Name

### OATH OF GUARDIAN AD LITEM

I am on the Guardian ad Litem Registry for Snohomish County. Whenever appointed to act as Guardian ad Litem, I will perform all duties required of me by law. By my signature below and my initials on the attached, I acknowledge I have read the attached Snohomish County Superior Court Guardian Ad Litem Code of Conduct and agree to be bound and will abide by the same.

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

Date: 1-19-22



Signature

Brian J. Parker

Printed Name

2918 Colby Ave, Ste 201

Business Address

Everett, WA

98201

City and State

Zip Code

(425)

259-5100

Business Telephone Number

**SNOHOMISH COUNTY GUARDIAN AD LITEM REGISTRY  
CODE OF CONDUCT**

1. The Guardian ad Litem shall represent the best interests of the persons for whom he or she is appointed.
2. The Guardian ad Litem shall make a reasonable inquiry as to the facts and issues in dispute and shall decline the appointment if the Guardian ad Litem is not qualified, competent or able to complete the matter in a timely manner. The Guardian ad Litem shall locate professional resources as necessary to assist in the Guardian ad Litem's evaluation and recommendations.
3. The Guardian ad Litem shall maintain the ethical principles of the Guardian ad Litem's own profession.
4. The Guardian ad Litem shall remain qualified for the registry to which the Guardian ad Litem is appointed and shall promptly advise the court of any grounds for disqualification or unavailability to serve.
5. The Guardian ad Litem shall maintain independence and objectivity in the Guardian ad Litem investigation.
6. The Guardian ad Litem shall avoid any actual or apparent conflict of interest or impropriety in the conduct of Guardian ad Litem duties. The Guardian ad Litem shall avoid self-dealing or association from which the Guardian ad Litem might directly or indirectly benefit, other than for compensation as Guardian ad Litem. The Guardian ad Litem shall take action immediately to resolve any potential conflict or impropriety. The Guardian ad Litem shall advise the court and the parties of action taken, or resign from the matter, as may be necessary to resolve the conflict or impropriety.
7. The Guardian ad Litem shall treat the parties with respect, courtesy, fairness and good faith, regardless of race, color, creed, religion, national origin, cultural heritage, gender, age, education, economic status, marital status, sexual orientation or disability.
8. The Guardian ad Litem shall inform the court concerning all relevant information disclosed or made available to the Guardian ad Litem.
9. The Guardian ad Litem shall not guarantee or create the impression that any portion of the investigation will remain confidential.
10. The Guardian ad Litem shall maintain the privacy of the parties, and shall make no disclosures about the case or investigation except in reports to the court or as necessary to perform the duties of the Guardian ad Litem.

**SNOHOMISH COUNTY GUARDIAN AD LITEM REGISTRY  
CODE OF CONDUCT**

11. The Guardian ad Litem shall perform duties in a prompt and timely manner. The Guardian ad Litem shall maintain adequate documentation to substantiate recommendations and conclusions. The Guardian ad Litem shall keep complete and contemporaneous records of actions taken and the time and expense incurred.
12. The Guardian ad Litem shall report to law enforcement and/or Child Protective Services any child abuse or neglect as defined in RCW 26.44 or adult abuse as defined in RCW 74.34 as found by him or her.

BRIAN J. PARKER, J.D., LL.M.  
Port Gardner Law Group  
2918 Colby Ave, Suite 201  
(425) 259-5100  
Bparker4478@gmail.com (personal)  
Brian@PortGardnerLaw.com (work)

#### BAR ADMISSIONS

State of Washington - Admitted 12/10/08  
WSBA # 41015  
U.S. District Court, Western District of Washington - Admitted 2011

#### EDUCATION

##### **Title 26 Family Law Guardian ad Litem Certification Training**

- Spring 2013  
21 hour Title 26 GAL training and certification course meeting statutory and local rule requirements for GAL certification.

##### **Center for Conflict Studies**

- July 2007  
32 hour mediation course satisfying State of Oregon civil mediator requirements

##### **LL.M. International Law**

– December 2005  
Australian National University, Canberra, ACT, Australia  
Activities and Awards: I achieved distinctions in several classes, and served as research assistant to Professor Hilary Charlesworth, who included my work in her report to the Australian National Parliament on the legality of Australian military action in Iraq in 2004.

##### **Juris Doctor**

– May 2003  
University of Alabama School of Law, Tuscaloosa, AL  
Activities: Alabama Disabilities Advocacy Program, Legal Services of Alabama (volunteer law clerk), Civil Rights Law Society, Latin American Law Association, Students for Alabama Constitutional Reform, Board Member Public Interest Law Institute Awards and Scholarships: Full Tuition Scholarship, 2000-2001; Order of the Samaritan/VLP Public Interest Award

##### **Bachelor of Science Degree in Political Science**

Magna Cum Laude  
– May 2000  
Athens State University, Athens, AL  
Activities: Pre-Law Society

##### **Associates Degree in Paralegal Studies**

– May 1998

Wallace State Community College, Hanceville, AL

Activities: Vice President, Paralegal Society Awards and Scholarships: Tuition scholarship 1996-1998, WestLaw Book Award 1998

## RECENT PROFESSIONAL EXPERIENCE

### Summary:

My practice has been litigation-centric since December, 2008 in increasingly responsible positions focusing on family law, criminal defense, probate, and guardianships with frequent court appearances, brief and pleading drafting, and bench trial and jury trial experience, including civil and class C felony jury trial experience. I have extensive public interest experience in near indigent defense work, representation of indigent allegedly incapacitated adults, the Volunteer Lawyer Program's Homeless Court, Housing Justice Project, Family Law Clinics, and pro bono guardianship cases.

### **Port Gardner Law Group,**

Attorney

June 2019-Present

Continued to represent clients through contested litigation as well as non-litigation solutions such as mediation, collaborative family law, and other cooperative solutions.

### **Clark County Elder Law**

Founding Partner,

Jan 2019-June 2019

Continued general litigation-centric practice with a shift in emphasis to serving Clark County's elder population and incorporated a greater degree of drafting and advising on litigation avoidance. Provided civil litigation and family law counsel to the elderly and families, with a focus on negotiating settlements or seeking dismissals of civil cases against the elderly or disabled, assisting in avoiding, contesting, or dismissing guardianships; contesting or applying for protection orders; estate planning with an eye towards inter-generational asset preservation and tax planning in conjunction with a CPA; contested and uncontested probates; TEDRA actions; and serving as a title 26 Guardian ad Litem.

### **The Vern McCray Law Firm**

Associate Attorney, February 2014-December 2018 (4 years 10 months)

Litigation focused practice focusing on family law (including serving as a Title 26 Guardian ad Litem), guardianships, criminal defense, probate, administrative law, and protective orders, as well as providing public service through legal clinics sponsored by DSHS and The Clark County Volunteer Lawyer's Program, near indigent defense, the moderate means program, court appointed representation of indigent alleged incapacitated persons and guardian ad litem work for low income families. Co-wrote a chapter on protective orders with Mr. McCray for Scott Horenstein's family law deskbook published in the Washington Practice series by West publishing.

### **Brian Parker, Attorney at Law**



Solo Practitioner, August 2012-January 2014 (1 year 5 months):

litigation focused solo practitioner; focusing on guardianships (usually representing the alleged incapacitated person), family law, criminal defense, and no-contact and antiharassment orders; as well as providing public service through the Volunteer Lawyer's Program, the moderate means program, and court-appointed representation of guardianship clients at public expense.

**Law Office of Nicole T. Dalton, PLLC**

Associate Attorney July 2011-July 2012 (1 year):

Primarily family law, custody-centric matters often overlapping with Child Protective Services involvement; many District Court misdemeanor and gross misdemeanor criminal defense cases for indigent clients; small caseload of guardianship/probate matters.

**Brian Parker, Attorney at Law**

Solo Practitioner December 2008-June 2011 (2 years 6 months):

Litigation focused solo practitioner; mainly family law, criminal defense, small business contracts litigation, some real estate litigation, and public interest involvement in pro bono homeless court cases and reduced-fee, pro-bono guardianship actions.

**Clark County Volunteer Lawyer Program**

Volunteer Lawyer Early 2009-June 2019: (10 years +)

Homeless Court Program, family law advice and review clinics, Housing Justice Project clinics and dockets. I served as Chairman of the Homeless Court Program in calendar year 2011, and continued to volunteer for the duration of my residence in Clark County.

**Washington County Circuit Court**

Family Law Court Operations Specialist 2 May 2006 to December 2008 (2 years 7 months):

Provided customer service, procedural and filing information tasks ensuring compliance with Oregon Rules of Civil Procedure and statutes governing filing procedure.

# Plaintiff's Exhibit

G



Gina Bloom &lt;gina@thedissolutionadvocatesnw.com&gt;

**Records request K177236-SSCGR311**

1 message

**Galvin, Lisa** <Lisa.Galvin@co.snohomish.wa.us>  
To: Gina Bloom <gina@thedissolutionadvocatesnw.com>

Fri, Jan 31, 2025 at 3:38 PM

Ms. Bloom,

This email is to update you on your administrative records request K177236-SSCGR311 under General Rule 31.1.

Specifically you requested:

*"I am submitting this request for public records related to policies and procedures concerning Guardian ad Litem (GAL) oversight in Snohomish County Superior Court. Specifically, I request the following:*

- 1. Policies and Procedures: Any policies, guidelines, or procedures related to the oversight, accountability, and evaluation of Guardians ad Litem appointed by the court. Documentation of processes or standards used to assess or scrutinize the recommendations made by GALs to the court.*
- 2. Oversight Mechanisms: Records detailing any internal or external review mechanisms, audits, or evaluations of GAL performance or recommendations. Policies addressing how the court handles complaints or grievances filed against GALs.*
- 3. Training and Qualification Standards: Any records outlining training requirements, certification processes, or ongoing education expectations for GALs serving Snohomish County Superior Court.*
- 4. Impact on Judicial Decisions: Policies or guidelines that explain the role or weight of GAL recommendations in judicial decision-making adopted by Snohomish Superior Court judicial officers.*
- 5. Any policies or guidelines used to determine when a private-pay GAL is appointed versus a state-paid GAL. Criteria used to evaluate a party's ability to pay for a private GAL.*
- 6. Policies ensuring equitable access to GAL services regardless of financial status. Any data regarding the outcomes or satisfaction rates of cases involving private-pay versus state-paid GALs."*

Please find judicial administrative records responsive to your request available for download [here](#). I was able to collect and prepare these records within an hour, therefore there is no charge.

Additionally, please note the following:

1. For the second portion of item 1 of your request, Superior Court has no responsive administrative records
2. For the first part of item 2 of your request, Superior Court has no responsive administrative records
3. For item 4 of your request, Superior Court has no responsive administrative records.
4. For item 5 of your request, Superior Court has no responsive administrative records.
5. For the second part of item 6 of your request, Superior Court has no responsive administrative records. For the first part of this item, some responsive information can be found on the Appointment of GAL forms that the court uses, which have been provided as responsive to this request.

Superior Court of Washington, County of \_\_\_\_\_

In re:

Petitioner/s (*person/s who started this case*):

\_\_\_\_\_

And Respondent/s (*other party/parties*):

\_\_\_\_\_

No. \_\_\_\_\_

Order Appointing  
Guardian ad Litem for a Child  
(ORAPGL)

**Order Appointing Guardian ad Litem for a Child**

**Use this form** to appoint a GAL to investigate and report on a child's best interests for a Parenting Plan, Residential Schedule, or parentage decision.

**Do not use this form** to appoint a GAL for a minor parent, or a child who is added as a party in this case, use form FL All Family 147 instead.

1. A motion to appoint a Guardian ad Litem (GAL) for the children listed below was made by the (*check one*): ☐ Petitioner ☐ Respondent ☐ Court:

Child's name	Age	Child's name	Age
1.		2.	
3.		4.	
5.		6.	

2. The court finds it is in the best interest of the children listed in **1** to appoint a Guardian ad Litem. The court has authority to make this appointment under (*check one*):

☐ divorce (dissolution) law, ch. 26.09 RCW. ☐ parentage law, ch. 26.26A RCW and  
☐ domestic violence law, ch. 26.50 RCW. ☐ ch. 26.26B RCW.

➤ **The Court Orders:**

3. (*GAL's name*): \_\_\_\_\_ is appointed Guardian ad Litem (GAL) for the children listed in **1** above. The GAL must always act in the children's best interests.

4. **GAL's Rights**

All parties must serve the Guardian ad Litem (GAL) with:

- Notice of any court hearing or proposed agreement involving these children, and
- Copies of all documents they file in this case.

The court clerk must give the GAL free, certified copies of this *Order*, upon request.

## 5. GAL's Duties

The Guardian ad Litem's (GAL's) duties include:

- Going to all court hearings and pretrial conferences for this case that are related to the children, unless the court says otherwise, and
- Investigating and reporting factual information to the court on issues set out below.

The GAL is ordered to investigate and file a report only on the issues checked below, unless the court approves investigation into other issues (*check all that apply*):

- ☐ All issues related to making a parenting plan for these children including any of the issues below whether they are specifically checked or not:
- ☐ Only the issues that are checked below:
- |   |  |
|---|--|
| <input type="checkbox"/> Parenting abilities              | <input type="checkbox"/> Petitioner <input type="checkbox"/> Respondent                            |
| <input type="checkbox"/> Abandonment or neglect by        | <input type="checkbox"/> Petitioner <input type="checkbox"/> Respondent                            |
| <input type="checkbox"/> Criminal history of              | <input type="checkbox"/> Pet. <input type="checkbox"/> Resp. <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Domestic violence of             | <input type="checkbox"/> Pet. <input type="checkbox"/> Resp. <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Mental health issues of          | <input type="checkbox"/> Pet. <input type="checkbox"/> Resp. <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Physical health issues of        | <input type="checkbox"/> Pet. <input type="checkbox"/> Resp. <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Sexual abuse allegations against | <input type="checkbox"/> Pet. <input type="checkbox"/> Resp. <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Substance abuse of               | <input type="checkbox"/> Pet. <input type="checkbox"/> Resp. <input type="checkbox"/> Other: _____ |
- ☐ Any other issues discovered that could affect the **safety** of the children.
- ☐ All issues related to deciding who the legal parents are for these children.
- ☐ Whether genetic testing should be done to decide who the legal parents are.
- ☐ Whether the children's names should be changed.
- ☐ For cases about *changing* a parenting/custody order: whether the children have been integrated into the home of the parent who has less time under the current order.
- ☐ Other: \_\_\_\_\_

## 6. GAL's Report

The Guardian ad Litem's (GAL's) report must include:

- Facts about the issues listed in **5** above.
- The children's preferences for the parenting plan (if they stated any),
- Any facts about whether the children stated their preferences voluntarily, and
- Any facts about the children's level of understanding.

The report may include recommendations based on the investigation.

**Deadline!** Unless the court extends the deadline, the report must be filed and served on all parties by (*date*) \_\_\_\_\_, which is at least 60 days before the trial.

The parties (or their lawyers, if any) have the right to inspect and copy the GAL's file of data gathered during the investigation, including the names and addresses of everyone the GAL consulted. **Exception:** information in the GAL's file that is confidential by law or sealed by a court shall **not** be shared with the parties or their lawyers.

## 7. Access to the Children and Information

The Guardian ad Litem (GAL) is allowed reasonable access to the children, and to all records and people with information that affects the children, including:

- Child care providers
- Physical and mental health care providers
- Schools and other educational institutions
- Law enforcement agencies, Child Protective Services, and the Department of Children, Youth, and Families (or equivalent agencies if outside Washington)
- All providers for the parents related to issues the GAL is ordered to investigate including mental health and substance abuse records where applicable.

*Note: agencies may withhold or black out legally protected parts of requested information.*

## 8. Release of Information

The signatures of parties or children 12 or older below mean they give permission to the agencies and professionals listed in **7** above to share information related to the issues the GAL is ordered to investigate about themselves and the children with the GAL.

## 9. Confidentiality

The Guardian ad Litem (GAL) will:

- Have access to all Superior Court and Juvenile Court files related to their duties, including sealed and confidential documents. **Exception:** The GAL will not have access to information sealed under RCW 13.50.050(7);
- Keep confidential any sealed and confidential information (unless their duties as GAL require otherwise);
- Tell the court if their report includes any sealed or confidential information; and
- File their report in two parts: one public and one sealed as required by GR 22.

Any party or the GAL may ask the court to make confidential any reports or documents placed in the file, if there is a good reason to do so.

## 10. GAL's Fees

The Guardian ad Litem's (GAL's) hourly fee is \$ \_\_\_\_\_. The GAL may not charge more than a total of \$ \_\_\_\_\_ without court review and approval.

The GAL's fees will be paid as follows (*check one*):

- ☐ \_\_\_\_ % paid by Petitioner \_\_\_\_\_  
\_\_\_\_ % paid by Respondent \_\_\_\_\_  
\_\_\_\_ % paid by (*specify*): \_\_\_\_\_
- ☐ \_\_\_\_ % or \$ \_\_\_\_\_ paid by the County at public expense. However, if the parties' financial circumstances change, the court may order the parties to pay the fees according to their ability to pay.
- ☐ Other: \_\_\_\_\_

**Billing Process:**

- The GAL must file an itemized statement of time and expenses with the court and provide a copy to the person/s or entity responsible for payment.
- The GAL may file any request for payment with the court, along with an itemized statement and a proposed order.

**11. Appointment Ends**

The GAL's appointment ends when the GAL is discharged by the court or earlier if:

- ☐ the final *Parenting Plan* or *Residential Schedule* is signed by the court.
- ☐ parentage is decided.
- ☐ other (*specify*): \_\_\_\_\_

**12. Other Orders** (if any):

\_\_\_\_\_  
\_\_\_\_\_

**Ordered.**

\_\_\_\_\_  
Date Judge or Commissioner

**Petitioner and Respondent or their lawyers fill out below:**

*A party's signature authorizes release of information as described in 8 above.*

This document (*check any that apply*):

- ☐ is an agreement of the parties
- ☐ is presented by me
- ☐ may be signed by the court without notice to me

This document (*check any that apply*):

- ☐ is an agreement of the parties
- ☐ is presented by me
- ☐ may be signed by the court without notice to me

▶ \_\_\_\_\_  
*Petitioner signs here or lawyer signs here + WSBA #*

▶ \_\_\_\_\_  
*Respondent signs here or lawyer signs here + WSBA #*

\_\_\_\_\_  
*Print Name Date Print Name Date*

**Children age 12 or older sign below to authorize release of information as described in 8:**

▶ \_\_\_\_\_  
*Child signs here Print name Date*

▶ \_\_\_\_\_  
*Other child signs here Print name Date*

**Guardian ad Litem signs below to accept appointment:**

▶ \_\_\_\_\_  
*GAL signs here Print name Date*

<b>SNOHOMISH COUNTY SUPERIOR COURT POLICIES AND PROCEDURES</b>	
Superior Court Operations: Chapter 9	<b>Created Date:</b> 04/27/05
<b>Policy: SCO 9.00 Guardian Ad Litem Committee</b>	<b>Revised Date:</b> 10/12/2017
<b>Signature: <u>MARILYN J. FINSEN</u> Court Administrator</b>	Reformatted 01/01/2016

## **POLICY**

Guardian Ad Litem Committee

## **APPLICABILITY**

This policy applies to the employees of Superior Court facilitating the courts Guardian ad Litem Committee.

## **DEFINITIONS**

## **DEPARTMENT DIRECTIVES**

### **A. COMMITTEE COMPOSITION**

The Court approved composition of the Guardian ad Litem Committee on January 13, 1999 as follows:

1. Presiding Judge or his/her designee,
2. The Chair of the Family Law, GAL, ITA Committee or his/her designee,
3. A Court Commissioner as designated by the Presiding Judge,
4. Snohomish County Bar Association President or his/her designee, and
5. The Superior Court Programs Administrator, shall staff the committee.
6. The Presiding Judge shall designate one of the members above as chair of the committee.

### **B. COMMITTEE RESPONSIBILITIES**

The Guardian ad Litem Committee's duties shall be to solicit and accept application for inclusion on said Registries, recommend criteria for appointees, maintain and determine those who will be on the Registries of appointees, provide payment for publicly paid service, and otherwise administer said Registries.

Any modification of criteria for appointment to a Guardian ad Litem registry will first be referred to the Judges for approval.



The Guardian ad Litem Committee shall cause complaints or grievances to be investigated and resolved pursuant to SCLGALR 7.

#### C. MEETING SCHEDULES

The Committee shall meet at such times and for such purposes as designated by the Presiding Judge or the chair.

<b>SNOHOMISH COUNTY SUPERIOR COURT POLICIES AND PROCEDURES</b>	
Superior Court Operations: Chapter 9	<b>Created Date:</b> 04/27/05
<b>Policy: SCO 9.05 Guardian Ad Litem Qualifications</b>	<b>Revised Date:</b> 11/27/2017
<b>Signature: <u>MARILYN J. FINSEN</u> Court Administrator</b>	Reformatted 01/01/2016

## **POLICY**

Guardian Ad Litem Qualifications

## **APPLICABILITY**

This policy applies to the qualification and screening of Guardian ad Litem applicants for placement and/or annual updates on the Superior Court Guardian ad Litem Registry for Title 11 and Title 26. Court Appointed Special Advocates (CASA) Registries are maintained under separate Juvenile Court Policies.

## **DEFINITIONS**

## **DEPARTMENT DIRECTIVES**

### **A. SERVICE REQUIREMENT**

Persons approved for placement on each registry serve at the discretion of the Court.

Inclusion or maintenance of any person on any registry is within the sole discretion of the Guardian ad Litem committee and/or Snohomish County Superior Court Bench.

### **B. APPLICATION REQUIREMENTS**

Each person requesting to be listed on any of the registries shall initially and/or annually submit an application on the approved form provided by the Court which shall include the following information;

1. Identification of the person, name of registry or registries applied for, and a listing of the professional credentials, with license or professional enrollment number;
2. Level of formal education, to include, but not limited to, degrees and major areas of concentration;
3. Training related to the Guardian ad Litem duties;
4. Number of years of experience as Guardian ad Litem;

5. Number of appointments as a Guardian ad Litem and in which counties the appointments were made;
6. Statement of criminal history, as defined in RCW 9.94A.030;
7. Description of fees charged by the applicant and a statement of the applicants willingness to accept cases on a reduced fee basis;
8. Agreement to advise the Court immediately in the event of any complaint, investigation, or action being commenced which could lead to:
  - a. Discipline of the applicant,
  - b. Suspension or revocation of the applicant's professional license,
  - c. Filing of criminal charges for a felony or a crime involving allegations of theft, dishonesty or moral turpitude.
9. Certification that the applicant:
  - a. Has met the education and experience requirements,
  - b. Has completed the training requirements,
  - c. Has read and agreed to be bound by the Court's policies in cases in which compensation is sought at a public expense, and
  - d. Has read and has agreed to be bound by SCLGALR 2.

#### C. SUPPORTING DOCUMENTATION

1. Copy of the certificate from the training provider evidencing successful completion of the current training required for the area of Guardian ad Litem practice;
2. Curriculum vitae or resume showing work and professional or personal experience in or related to the field that would assist in the performance and completion of Guardian ad Litem duties;
3. Signed release of information directed to all professional regulatory bodies which have licensed or supervised the applicant within the last ten (10) years;
4. Sworn statement of the nature, status and outcome of any professional complaints, investigations or disciplinary actions, lawsuits or professional liability claims, and any order for removal of the Guardian ad Litem prior to completion of the Guardian ad Litem duties;
5. Sworn statement of any claims, or litigation that has been commenced, involving allegations of improper fee charges, charges of fraud, theft or other forms of dishonesty or professional malpractice or misconduct;
6. Completed forms for criminal records checks; and
7. Copy of recently completed Guardian ad Litem report (if available).

#### D. EDUCATION AND/OR EXPERIENCE REQUIREMENTS

Guardians ad Litem for Title 11 Registry

1. Applicants for the Title 11 Registry shall meet the education and/or experience requirements mandated by RCW 11.88.090.
2. Nothing in RCW 11.88.090 prohibits the Snohomish County Superior Court from adopting additional requirements regarding education and/or experience, if necessary.

Guardians ad Litem for Title 26

**Attorneys for the Family Law Registry**

1. Member of the Washington state Bar Association in good standing; **AND**
2. Five (5) years of experience in the practice of law with substantial experience in Family Law or Dependency cases; **AND**
3. Proof of successful completion of Guardian ad Litem training as required by Title 26.

**Non-Attorneys for the Family Law Registry**

1. Proof of successful completion of Guardian ad Litem training as required by Title 26 and has sufficient training and experience in family law cases; **and either**
2. Bachelors Degree in any of the following fields: social work, psychology, counseling, nursing, education or equivalent field **and** five (5) years of relevant experience; **or**
3. Certified or licensed by the State of Washington as a social worker, mental health therapist or marriage and family counselor, psychologist, nurse or physician, in good standing **and** five (5) years of relevant experience; **or**
4. Graduate level degree in any of the following fields: social work, psychology, counseling, nursing, medicine, education or equivalent field; **or**
5. Five (5) years of experience as a Volunteer Guardian ad Litem (VGAL) or Court Appointed Special Advocate (CASA), presently in good standing.

**E. CHARACTER AND/OR BACKGROUND INFORMATION**

The applicant should be of high moral character, and shall not have any of the following within the last twenty (20) years:

1. Conviction of a felony or of a crime involving theft, dishonesty or moral turpitude;
2. A professional certification or license suspension or revocation;
3. Pending investigations or actions for any of the above.

A person may be denied listing on, or may be temporarily suspended from, the registry for any other reason that places the suitability of the person to act as Guardian ad Litem in question.

A person requesting to be listed on a registry shall attend the training required by the Court.

**F. ON-GOING TRAINING**

The Court may periodically sponsor or approve training programs that applicants shall be required to attend to maintain and improve their level of proficiency.

<b>SNOHOMISH COUNTY SUPERIOR COURT POLICIES AND PROCEDURES</b>	
Superior Court Operations: Chapter 9	<b>Created Date:</b> 04/27/05
<b>Policy: SCO 9.07 Guardian Ad Litem Registry Administration</b>	<b>Revised Date:</b> 10/12/2017
<b>Signature: <u>MARILYN J. FINSEN</u> Court Administrator</b>	Reformatted 01/01/2016

## **POLICY**

Guardian Ad Litem Registry Administration

## **APPLICABILITY**

This policy applies to the qualification and screening of Guardian ad Litem applicants for placement and/or annual updates on the Superior Court Guardian ad Litem Registry.

## **DEFINITIONS**

## **DEPARTMENT DIRECTIVES**

### **A. GUARDIAN AD LITEM REGISTRY**

The Superior Court Programs Administrator/designee is responsible to create and maintain a list of Guardian ad Litem under RCW Chapters 26.09, 26.10, 26.26 11.88 and SPR 98.16W.

### **B. REGISTRY ADMINISTRATION**

The Court shall maintain and administer the Guardian ad Litem registries through the Superior Court Programs Administrator and the Guardian ad Litem Committee.

The adoption and minor settlement registries will be maintained principally for informational purposes, and will not actually be managed and/or monitored.

These registries shall not include the Court Appointed Special Advocate (CASA) program at DJJC. Those programs will continue to be administered separately by their respective Juvenile Court programs.

These requirements and procedures will also apply to persons not listed on a registry who are appointed to serve as a Guardian ad Litem in cases for which there is a registry.

### **C. ANNUAL UPDATE**

The Superior Court Programs Administrator or his/her designee shall advise, in writing, each person listed on the registry of the annual update of information and the date by which that update must be received by the Court.

Each registry shall be reconstituted annually after an open application period has been publicly announced. Applicants approved for placement on the registry shall be notified of the placement date. The Court may allow additional applicants to be added to the registry periodically.

#### D. REGISTRY APPOINTMENT REQUIREMENT

Persons approved for placement on each registry serve at the discretion of the Court.

#### E. APPLICATION PROCESS

Applications for placement on the registry will be accepted at any time.

The Superior Court Programs Administrator/designee shall do initial screening and then referral shall be made to the Guardian ad Litem Committee for review and action.

#### F. CRITERIA FOR REGISTRY

The Court will consider applications as follows:

1. Having a sufficient number of Guardians ad Litem,
2. Achieving and maintaining diversity,
3. Retaining panels of persons with substantial experience and special knowledge within the given field,
4. Maintaining panels of persons with the ability to promptly, professionally, and the capably fulfill the role and duties of a Guardian ad Litem.

Each applicant will be required to acknowledge he or she has read and has agreed to be bound by the Code of Conduct of Guardians ad Litem.

#### G. RETENTION ON REGISTRIES

A person shall not remain on the registry unless the person maintains a current application with attachments.

A person may be removed or suspended for due cause after a review by the Guardian ad Litem committee.

The Guardian ad Litem Committee may review a Guardian's ad Litem conduct as part of the annual evaluation, or upon request of the Superior Court Programs Administrator after review of an evaluation or complaint.

#### H. RE-APPLICATION TO REGISTRY AFTER DISCIPLINE

A Guardian ad Litem who has been removed from the registry under this section may reapply to the registry no sooner than twenty-four (24) months after removal.

**Superior Court of Washington, County of Snohomish**

In re:

\_\_\_\_\_  
Petitioner/Plaintiff(s)

And

\_\_\_\_\_  
Respondent/Defendant(s)

No. \_\_\_\_\_

**Supplemental Order Appointing  
Guardian Ad Litem and Setting  
Compliance Hearing**

ORAPE [CLERK'S ACTION REQUIRED]  
ORCNT [CLERK'S ACTION REQUIRED]  
ORAPGL [CLERK'S ACTION REQUIRED]

This matter, having come on before the undersigned Judge or Court Commissioner of the above-entitled court, and appearing that an investigation and report by a Guardian ad Litem is necessary to aid the court in making a decision, the Court further deems necessary the following [as authorized under Administrative Order 36-10]:

1. Both parties shall obtain the Guardian ad Litem (GAL) Personal Information Form from Court Administration or online at <https://www.snohomishcountywa.gov>, complete these forms, and **return to the GAL** within 48 hours after receiving a copy of this order (or no later than **4 PM on** \_\_\_\_\_).
2. In the event that multiple GALs are named in the Order, the GAL Program staff will contact the GALs and determine who will be appointed. In the event the GAL(s) named in the Order are not available, GAL Program staff will assign an available GAL and notify the parties prior to the deadline stated in #1 when possible.
3. Both parties shall obtain any other supplemental materials, including additional questionnaire and release forms, from the GAL and return to the GAL at the deadline determined by the GAL.
4. Both parties shall pay their portion of the retainer (see section 10, page 3 of Order Appointing GAL) by **4 PM on TUESDAY**, \_\_\_\_\_. The GAL will report compliance to Programs staff.
5. The GAL shall inform the court of any failure to comply with any of the above requirements **on the Wednesday** prior to Compliance Hearing. **The Compliance Hearing takes place if the retainer is not paid & required paperwork is not completed & returned.** The Court may strike pleadings of the non-complying party. These hearings are typically held on the 3<sup>rd</sup> Monday following the date of this Order.

**COMPLIANCE HEARING IS SET FOR: MONDAY, 9:00AM on**  
\_\_\_\_\_ **(date) COURT CONFIRMED.**

[ ]The guardian ad litem is authorized to require that parties comply with an evaluation, assessment, or other testing for issues designated in section 5, page 2 of Order Appointing GAL.



The following information **must be provided in full** for the persons named below who appear to the Court to be involved in this matter. *(Court ordered services **may not be initiated** unless the requested information is provided in full.)*

Petitioner	Respondent
<b>Name:</b> _____ <small>First, Middle initial, and Last name</small> <b>Address:</b> _____  <b>Home Phone:</b> (    ) _____ <b>Work Phone:</b> (    ) _____ <b>Email:</b> _____ <b>Other names used:</b> _____	<b>Name:</b> _____ <small>First, Middle initial, and Last name</small> <b>Address:</b> _____  <b>Home Phone:</b> (    ) _____ <b>Work Phone:</b> (    ) _____ <b>Email:</b> _____ <b>Other names used:</b> _____
Petitioner's Attorney	Respondent's Attorney
<b>Name:</b> _____ <b>Address:</b> _____  <b>Phone:</b> (    ) _____ <b>Email:</b> _____	<b>Name:</b> _____ <b>Address:</b> _____  <b>Phone:</b> (    ) _____ <b>Email:</b> _____
Minor Children	
<b>Name:</b> _____ <b>Age:</b> _____ <b>Address:</b> _____   <b>Name:</b> _____ <b>Age:</b> _____ <b>Address:</b> _____   	<b>Name:</b> _____ <b>Age:</b> _____ <b>Address:</b> _____   <b>Name:</b> _____ <b>Age:</b> _____ <b>Address:</b> _____   

The following are other cases involving these parties that are now or in the past have been before this court or other courts: \_\_\_\_\_

DONE IN OPEN COURT this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

\_\_\_\_\_  
Judge/Commissioner

Presented by: \_\_\_\_\_

WSBA# \_\_\_\_\_

Attorney for: \_\_\_\_\_

Approved for entry by Petitioner: \_\_\_\_\_

Presented by: \_\_\_\_\_

WSBA# \_\_\_\_\_

Attorney for: \_\_\_\_\_

Approved for entry by Respondent: \_\_\_\_\_

# INFORMATION FOR PARTIES AND GUARDIANS AD LITEM

## Snohomish County Guardian ad Litem Program

A Guardian ad Litem [GAL] has been appointed in your case by this Court to investigate and provide a report to the Court of the GAL's recommendations as to your child's best interests with regard to a parenting plan or residential schedule.

### Steps the parties must follow:

1. **Read your GAL Order and this Supplemental Order *carefully* and follow all requirements.**
2. **Complete your Parent Questionnaire and Other Adult Questionnaire(s) (for anyone over the age of 18 residing with you). Return completed forms to your GAL by the date provided on page 1, paragraph 1, of this Order. Do **NOT** file the completed forms with the Clerk's office or return them to the Court.**
3. **Contact your GAL as soon as possible to introduce yourself and, if you are responsible for a share of the fees, discuss payment of the retainer. The Court does not accept payments on behalf of GALs. You must make payment directly to the GAL by the date indicated on page 1, paragraph 4, of this Order.**
4. **If you have difficulties with paying fees and/or completing and providing the Questionnaires to the GAL, communicate this to your GAL.**
5. **When you have turned in forms and paid your share of fees to the GAL, you will be in compliance with your GAL.**

### GAL Compliance Hearing

When the court orders a GAL, the Court also sets a Compliance Hearing. The GAL Compliance Hearing is to monitor that the GAL has all the necessary documents, information, and required payment to begin the investigation and avoid delays in the case. The GAL will communicate with Court Administration regarding compliance of the parties and if the hearing is needed to address a lack of completion of the requirements by one or both parties. If you have completed the requirements, you will be in compliance with the GAL. If all parties are reported by the GAL as in compliance prior to the GAL Compliance Hearing, said hearing will be stricken by the Court. If any party fails to timely pay the GAL or fails to cooperate with the GAL process, that party may face sanctions, including monetary penalties, the striking of pleadings, discharge of the GAL, a finding of intransigence, and/or another remedy deemed appropriate by the Court (Snohomish County Administrative Order 36-10).

## ADR Compliance Hearings

The Case Schedule sets a deadline for completion of ADR/Mediation and a hearing to review ADR/Mediation Compliance. ADR Compliance Hearings are stricken **ONLY** after the filing of a Notice of ADR/Mediation Compliance, Notice of Settlement, Order Waiving Mediation, or entry of final orders.

**For all Non-Compliant cases, the ADR Compliance will be WITHOUT ORAL ARGUMENT and will be conducted based on a review of the Court file and information provided by parties by filing ADR Compliance Status Report.**

In cases where a GAL has been appointed, the GAL Report must be completed, received, and reviewed prior to engaging in ADR/Mediation. The Case Schedule and ADR Compliance Hearing require that parties and the GAL understand and adhere to the following:

1. **Be aware of the Case Schedule and the ADR Compliance Deadline.** If the date of this GAL appointment makes mediation by the ADR Compliance Deadline impractical, it is the responsibility of the parties or their attorneys to seek a continuance of the Case Schedule in accordance with SCLSPR 94.04(c)(3)(F). Hearings to continue the Case Schedule **must** be held before the date set for the ADR Compliance Hearing.
2. **A due date for the GAL Report** should be included in the Order Appointing GAL (RCW 26.12.175, GALR 2(i)). This due date should allow for compliance with the ADR Compliance Deadline.
3. **The GAL should notify the parties and the Court immediately** if it becomes apparent that the GAL Report cannot be completed by its due date, or if the GAL is instructed to stop or pause work by one or both parties (GALR 2(i)).
4. The GAL, the parties, and their attorneys are expected to take action as necessary to **ensure that the GAL Report is timely received** and does not result in an inability to comply with the Case Schedule, **OR**, when good cause exists, the GAL, the parties, and their attorneys are expected to take action as necessary to make a motion to request **that the GAL Report due date and the Case Schedule be extended**. (SCLSPR 94.04(c)(3)(D), GALR 2(o)).
5. **The GAL may face sanctions for failing to timely file reports, or for other violations of the GALRs, the SCLGALRs, the RCWs or any applicable Court or Administrative Orders. GALR 2.**

# Plaintiff's Exhibit

H



Julia Dubrow &lt;juliadubrow10@gmail.com&gt;

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## AGO Complaint

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crcmail@atg.wa.gov <crcmail@atg.wa.gov>  
To: juliadubrow10@gmail.com

Wed, Jan 25, 2023 at 12:12 PM

Dubrow ,

Your complaint has been received by the Consumer Resource Center. You will receive a response from the Consumer Resource Center within 10 business days with your assigned complaint number. If you do not receive your complaint number within 10 business days, please contact us by calling 1-800-551-4636.

Thank you for your patience.

Information Submitted:

\*\*\*\*\*

Dubrow Julia  
Main Street  
Olympia , WA 98507

Contact Phone: (206) 989-0077  
Alternate Phone:  
Email: [juliadubrow10@gmail.com](mailto:juliadubrow10@gmail.com)  
Age Range: 40-49

Are you an active duty service member, a military dependent, retired from active duty, or a veteran: No

If English is not your first language, what is your first language:

\*\*\*\*\*

Business Name: Wa State Superior Courts  
All counties  
Wa State , WA

Bus Phone:  
Email:  
Website:

List any additional businesses you are filing this complaint against and their contact information:  
Civil rights discrimination based on gender

Transaction date:  
Amount in dispute:

\*\*\*\*\*

Explanation of complaint:

Att: Bob Ferguson, Attorney General of Washington.

## Superior Courts in WA State:

We have an epidemic of abused mothers and abused children being controlled and further abused with Family Court support.

Are you aware the 'underground' survivor community will tell an abuse survivor to stay in the abusive relationship to protect children? The reason for this is because the Family Courts are failing far too often in favor of ideology. The LGBT community has more protection and support than a traditional heterosexual cis mother, who is the predominant person standing before a commissioner or a judge in 95+% of cases. Historically Mothers are treated as barn animal breeders or surrogates, and in 2023 that is more prevalent than ever.

We have an epidemic of third-party court professionals who are not informed of the nuances of DV, and they do not want to be. At the recent International Coercive Control Conference there were a few King County Court representatives, but there were none of their regular referred third party professionals. We have a bench that doesn't skip a beat to punish a mother for acting on biological instincts – protecting children. I know some amazing Fathers. Except those are not the fathers standing before you with aggressive lawyers treating your courtroom as a boardroom with a sales pitch defaming and character assassinating a mother that simply stated her truth. A truth that exposes the abuser. Their best punishment for a Mother is to hurt her child or take her child away.

I applaud the training efforts coming from many organizations, however, we are beyond trainings. The agendas behind the organizations providing trainings are often the same personalities of abusers. It's like the fox guarding the hen house.

Education won't help, as evidenced by judges' deliberate disregard and suppression of credible evidence of abuse by fathers and the fabrication of negative evidence about mothers. And new child protection/DV laws won't help, because Family Court judges violate laws (and rights) with impunity because there is no way to hold judges accountable within the Family Court system: that is the point. The system is designed specifically so that they have virtually unlimited discretion, i.e. nearly absolute power, and can use it to keep men empowered in their family.

Many in the DV/survivor community are quick to use the term Narcissistic. I do not agree. We are dealing with varying degrees of sociopathy which even the best trained PHD's do not see at the onset. It is not fair to expect someone on the bench to see it for the 15-20 minutes they grace the boardroom being sold on a narrative that serves the abuser. A GAL / JD does not see this disordered personality, but we are giving them decision making authority with no recourse or accountability for irreparable harm. Statistically speaking in the US , if a GAL is assigned to a case, the Mother will be punished 50% of the time. In King County this percentage is higher. Snohomish County is second highest in the state . Why the war on Mothers?

What WA Family Courts are doing to women, more specifically mothers, is barbaric. We are being discriminated against based on our sex and biology. We are treated like barnyard animals that are serving the purpose of creating heirs for men. The only time I ever see positive outcomes coming out of any WA Family Court is when the evidence is so overwhelming that the courts are forced to do the right thing.

The only time I see a mother come out on the other side OK is when there is verifiable proof of sexual abuse to the child. Short of that and she loses.

We are being terrorized and coerced through our maternal instinct, which is a biological fact, proven through the scientific community. We have been duped into thinking that women are equal under the law in the modern day, and we are not. We are living in the dark ages. If men were supposed to be raising children, they would have breasts and birth canals.

The Family Court system is nothing more than a human trafficking operation that is making more money than any other profession in the community and we have to take a really good hard look at it.

Mothers are being targeted and there is an agenda beyond our little situations. It's a systemic gender crisis. Women as mothers are under attack in Family Courts.

Mothers have been ignored, discredited, disbelieved, unfairly and inaccurately pathologized and scrutinized and

illegally had their children taken away for having the nerve to make allegations of child sexual abuse . Mothers have been unconstitutionally and illegally held to a higher standard of proof, as some mothers even have gag orders in place where they cannot talk about any type of abuse on social media. That violates freedom of speech and commissioners and judges should be aware of The First Amendments Rights .

This is a very gendered problem. It is an equal protection problem that should not exist in 2023. Women and children are systemically being discriminated against in a very non-objective non-neutral way. The ONLY reason some moms got their cases turned around and they were finally able to protect their children after years spent in custody battles was that they NEVER GAVE UP. They kept fighting until the evidence was so overwhelming that the Family Court system was no longer allowed to turn a blind eye.

The stories are endless every day.

The courts must find a way to follow up with these "high conflict" (AKA: one parent is targeting the other) cases to ensure the right decision was made. To date, that only happens if parties have the funding and 95% do not. As a society we wonder what is happening to our youth. This is one piece of that puzzle. Children must remain with their safe parent, even if it defies a social justice ideology, or the fantastical acting job an abuser father and his lawyer(s) are presenting.

Often Mothers are painted as the psychological issue by the courts third parties, forced into therapies at their own expense, and gaslit. Prior, their abuse was \*only\* in their family home, but they left and have been met with unfathomable abuse + their child(ren) remain the abused pawn.

We have sick serial patriarchal individuals running the show. This needs to change. Mothers – of any race, ethnicity, and gender relationship preference must be protected. As it stands, birth rates are down in the US across the board and school districts are planning for declining enrollment for the next decade, at least. This trend has catastrophic economic impacts.

Mothers need to be a protected class. Instead, Abusers have become the Family Court Protected Class.

I understand that you cannot and probably will not respond. I hope you take this complaint as direct feedback straight from the field and not diluted through private interests' organizations. The financial and representation playing field must be leveled. In fact, I would encourage the bench seek direct community feedback from the very people that live the hellish life created by their abusers and further fostered by the family court professionals.

Women as mothers are under attack in Family Court and we respectfully file our complaint for further investigation.

Signed,

One hundred and forty-six mothers ( 146 ) as victims of WA State Family Court.

Complaint as Public Record: Yes

Disclosure Notices: Yes

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If you have any questions about the complaint submittal process, you may contact our Consumer Resource Center at 1-800-551-4636 between 10:00 a.m. and 3:00 p.m., Monday through Friday.

Sincerely,

Bob Ferguson and the AGO staff

Consumer protection issues constantly change, with new scams and threats emerging every week. To be automatically notified, please consider signing up for one or more of our newsletters (<https://eepurl.com/bd6bM5>) to keep up-to-date on the latest AGO news, opinions, consumer alerts, Ask the AG columns, and blog posts.

You can also follow us on the social networking sites Twitter (<https://www.twitter.com/agowa>), YouTube (<https://www.youtube.com/washingtonago>) and Facebook (<https://www.facebook.com/WAStateAttorneyGeneral>).



Julia Dubrow &lt;juliadubrow10@gmail.com&gt;

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**Your Complaint to the Attorney General's Office dated January 25, 2023 CCTN 341182**1 message

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**ATG MI CYF CCTN** <cyfcctn@atg.wa.gov>

Thu, Feb 16, 2023 at 4:39 PM

To: "Juliadubrow10@gmail.com" &lt;Juliadubrow10@gmail.com&gt;

Dear Gina Yorks:

Thank you for the complaint you submitted to the Washington State Attorney General's Office. You write on behalf of a group of mothers who you state are victims of Washington State family courts, which you state fail to protect abused mothers and children. I am an assistant attorney general who represents the Department of Children, Youth, and Families (DCYF). In this capacity, I have been asked to respond to your e-mail.

I appreciate the importance of the issues you raise in your complaint and the concerns you voice. Please be aware that Washington courts are an independent branch of state government and the Attorney General has no authority over them. Therefore, when citizens are dissatisfied with the legal system they generally need to find an attorney experienced in that area of the law to advocate for their interests. If you or others need advice and representation from an attorney with expertise in family law, a list of referral services for Washington State is on the website of the Washington State Bar Association ([www.wsba.org/](http://www.wsba.org/)). The toll-free number is 1-800-945-9722. Also, a list of free legal services and self-help materials can be found at Washington Law Help ([www.washingtonlawhelp.org/](http://www.washingtonlawhelp.org/)). You may also be able to get advice, assistance, or referrals to local attorneys from organizations such as the Northwest Justice Project ([www.nwjustice.org/](http://www.nwjustice.org/)). They have a legal advocacy program called CLEAR that is a central intake, advice, and referral service that may be able to refer you to affordable legal services. The CLEAR intake number is 1-888-201-1014.

If you have specific recommendations for strengthening state laws to enhance the protection of mothers and vulnerable children in the family court system, I would encourage you to contact your local legislators. The Legislative Information Center number is 360-786-7573; the toll-free Legislative Hotline number is 1-800-562-6000; and their web site address is [www.leg.wa.gov/legislature](http://www.leg.wa.gov/legislature). Through those numbers or the Legislature's web site you will be able to locate contact information for your state senator and representatives. You may also want to directly contact some legislators who work on the House and Senate Committees that work in this area. In the House of Representatives, these are the Human Services, Youth, and Early Learning Committee and the Civil Rights & Judiciary Committee; in the Senate, they are the Human Services Committee and the Law & Justice Committee. You can access contact information for legislators on these committees through the Legislature's website at [www.leg.wa.gov/legislature/pages/committeelisting.aspx](http://www.leg.wa.gov/legislature/pages/committeelisting.aspx).

Please understand that under state law the Attorney General's Office provides legal advice and representation to elected and appointed state officials and to state agencies, including DCYF.



Our office cannot provide legal advice or representation to private citizens except in limited areas that do not apply here. I wish you the best in resolving the issues of concern to you. Thank you again for contacting the Attorney General's Office.

Sincerely,

CARRIE HOON WAYNO  
Senior Assistant Attorney General

# Plaintiff's Exhibit

## I



Gina Yorks &lt;ginayorks24@gmail.com&gt;

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**Records request K096015 under GR 31.1**

1 message

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**Galvin, Lisa** <Lisa.Galvin@co.snohomish.wa.us>  
To: Gina Yorks <ginayorks24@gmail.com>

Wed, Jun 7, 2023 at 4:51 PM

Ms. Yorks,

This email is to update you on your records request K096015 under GR 31.1.

Specifically, you requested:

*"Hello, I spoke with Mitchell and I am inquiring about the two Guardian ad Litem grievances filed: one was from August 2021 and one was from January 2023. I am inquiring about copies of both grievances to include all materials. Thank you."*

Superior Court Administration's responsive records for this request are exempt from disclosure. Please see the attached withholding log, which includes a description of the withheld record(s), the statutory basis for the exemption(s), and a brief explanation of how the exemption applies to these records.

This request is now closed.

-

You are entitled to a review of this response. Petition for internal review must be submitted in writing to the Public Records Specialist within 90 days of issuance of Public Records Specialist's decision. Petition for external review must be submitted in writing to the Public Records Specialist within 30 days of issuance of the court's internal review decision. External review may only be requested after completion of an internal review. The form *Request for Review of Public Records Specialist's Decision* can be found [here](#).

Sincerely,

**Lisa Galvin** (*She/her/hers*)

Public Disclosure Specialist, ADA Coordinator

Snohomish County Superior Court Administration

**Mailing address:** [3000 Rockefeller Avenue](#), Mail Stop 502

**Physical address:** [3000 Rockefeller Avenue](#), Room 5-5620  
[Everett, WA 98201](#)

**tel:** 425.388.3369 **email:** [lisa.galvin@snoco.org](mailto:lisa.galvin@snoco.org)

*Please address me as Lisa or Ms. Galvin, thank you!*



**K096015 Withholding Log.pdf**

408K

# K096015 WITHHOLDING LOG

Department: Snohomish County Superior Court Administration

# of pages	Type	Description	Date	Author	Recipient	Exemption	The cited exemption applies because the withheld information includes the following:
1	Excel spreadsheet	Line item on a spreadsheet containing summary information on GAL complaints	8/20/2021	Court staff	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.
53	Scanned documents, .pdf format	Complaint to the GAL Committee regarding GAL Brian Parker, including exhibits, articles and other documents supporting the complaint.	8/20/2021	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.
1	Scanned document, .pdf format	Response letter to Olimpia Yorks regarding her complaint against Brian Parker	8/31/2021	GAL Committee chair Judge Paul Thompson	Olimpia G. Yorks	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded
1	Excel spreadsheet	Line item on a spreadsheet containing summary information on GAL complaints	1/19/2023	Court staff	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.
100	Scanned documents, .pdf format	Complaint to the GAL Committee regarding GAL Brian Parker, including exhibits, articles, and other documents supporting the complaint.	1/19/23	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.

# K096015 WITHHOLDING LOG

Department: Snohomish County Superior Court Administration

# of pages	Type	Description	Date	Author	Recipient	Exemption	The cited exemption applies because the withheld information includes the following:
29	Scanned documents, .pdf format	Exhibit 1, documents submitted to support Olimpia Yorks' 1/19/23 complaint against GAL Brian Parker	1/19/23	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.
22	Scanned documents, .pdf format	Exhibit 2, documents submitted to support Olimpia Yorks' 1/19/23 complaint against GAL Brian Parker	1/19/23	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.
13	Scanned documents, .pdf format	Exhibit 3, documents submitted to support Olimpia Yorks' 1/19/23 complaint against GAL Brian Parker	1/19/23	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded.
12	Scanned documents, .pdf format	Exhibit 4, documents submitted to support Olimpia Yorks' 1/19/23 complaint against GAL Brian Parker	1/19/23	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded
9	Scanned documents, .pdf format	Exhibit 5, documents submitted to support Olimpia Yorks' 1/19/23 complaint against GAL Brian Parker	1/19/23	Olimpia G. Yorks	Snohomish County Superior Court GAL Committee	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded

# K096015 WITHHOLDING LOG

Department: Snohomish County Superior Court Administration

# of pages	Type	Description	Date	Author	Recipient	Exemption	The cited exemption applies because the withheld information includes the following:
1	Email message	Email message sent from Mitch Peterson, Programs Manager for Snohomish County Superior Court Administration, to Judge Paul Thompson, chair of the GAL Committee, summarizing Olympia G. York's 1/19/23 complaint against GAL Brian Parker. The message includes 6 scanned .pdf attachments: the original complaint and the 5 exhibits described above.	1/19/23	Mitch Peterson	Judge Paul Thompson	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded
1	Scanned document, .pdf format	Response letter to Olympia Yorks regarding her complaint of 1/19/23 against Brian Parker	1/24/23	GAL Committee chair, Judge Paul Thompson	Olimpia G. Yorks	Superior Court Local Court Rules, SCLCR 7.1(f)	A complaint against a GAL that was determined to be unfounded