IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SNOHOMISH

WILLIAM ORLEY MILLER JR., )

)

Petitioner, ) CASE NO.: [To be assigned]

)

v. ) PETITION FOR DISSOLUTION OF

) COMMITTED INTIMATE RELATIONSHIP

CANDI LYNN BRIGHTWELL, )

)

Respondent. )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

I. JURISDICTION AND PARTIES

1.1 Petitioner William Orley Miller Jr. is a resident of Snohomish County, Washington, and has been continuously domiciled in this state for more than 90 days preceding the filing of this petition.

1.2 Respondent Candi Lynn Brightwell is a resident of Snohomish County, Washington.

1.3 This Court has jurisdiction over the parties and subject matter pursuant to RCW 26.09.

II. COMMITTED INTIMATE RELATIONSHIP

2.1 The parties were in a committed intimate relationship from approximately September 1, 2018, through April 2025, a period of approximately six and one-half years.

2.2 The relationship was marriage-like in nature, evidenced by:

a. Continuous cohabitation at multiple shared residences including a property in Bellevue, Washington, and the current property at 1024 S Machias Rd, Snohomish, WA 98290

b. Petitioner's inclusion on Respondent's Aflac health insurance policy from 2020 through April 1, 2025

c. Joint ownership and operation of multiple vehicles during the relationship

d. Shared financial responsibilities and joint property acquisition

e. Integration of families and presentation as a committed couple to the community

2.3 The relationship meets all criteria established in Connell v. Francisco for recognition as a committed intimate relationship under Washington law.

III. PETITIONER'S VULNERABILITIES AND MEDICAL HISTORY

3.1 Petitioner is a United States Army combat veteran with service-connected Post-Traumatic Stress Disorder (PTSD), a condition fully known to Respondent throughout the relationship.

3.2 Petitioner suffers from life-threatening medical conditions including:

a. Cerebral artery aneurysm requiring surgical intervention

b. Pituitary gland mass requiring surgical excision

c. History of multiple life-threatening medical emergencies

3.3 Medical Crisis Timeline:

a. July 2024: Petitioner flatlined at Pilchuck River, leading to discovery of pituitary mass and first signs of neurological complications

b. September 2024: Emergency surgery for pituitary mass biopsy revealed cerebral artery aneurysm, requiring immediate surgical repair and full mass excision

c. April 2025: Third or fourth life-threatening hospitalization requiring life support

d. Respondent provided support only during the July 2024 incident; abandoned Petitioner during subsequent medical crises

3.4 Petitioner successfully completed a two-week intensive treatment program at Well-found Mental Health Facility, receiving tools, knowledge, and medical support to control and prevent future mental health crises.

IV. RESPONDENT'S PATTERN OF ABUSE AND COERCIVE CONTROL

4.1 Exploitation of Medical Vulnerabilities:

Respondent systematically exploited Petitioner's medical crises and PTSD condition to gain advantage in property control and relationship dynamics, including:

a. Timing property exclusions immediately following major surgeries and hospitalizations

b. Using Petitioner's vulnerable state to coerce agreement to disadvantageous property arrangements

c. Abandoning Petitioner at Well-found Mental Health Facility after promising transportation

4.2 Financial Abuse and Property Control:

a. Forcing Petitioner into homelessness during recovery from brain surgery

b. Changing locks to prevent access to business tools and personal property

c. Using Petitioner's business materials (Mudd Monkies Inc. stock) for unauthorized property modifications

d. Disposing of Petitioner's personal property without consent

4.3 Severe Trauma During Forced Homelessness:

During the period of homelessness caused by Respondent's exclusion from the shared property, Petitioner suffered extreme trauma including:

a. Theft of personal vehicle (dump truck) and clothing

b. Physical assault and robbery at gunpoint

c. Sexual assault by three perpetrators who restrained, drugged, and repeatedly assaulted Petitioner while bound to a bed, including forced injection of unknown substances

4.4 Exploitation and Breach of Trust:

After Petitioner disclosed the sexual assault trauma to Respondent in confidence, Respondent:

a. Exploited this vulnerability against Petitioner

b. Disclosed intimate details to Respondent's daughter and Petitioner's family members

c. Used the disclosure to further isolate Petitioner from support systems

d. Weaponized Petitioner's trauma to gain advantage in legal proceedings

4.5 Mutual Protection Orders:

In September 2024, due to Petitioner's compromised mental state from PTSD and vulnerable adult status, mutual protection orders were entered. Respondent's manipulation during this period prevented Petitioner from making decisions that would have protected his interests.

V. COMMUNITY PROPERTY AND PETITIONER'S CONTRIBUTIONS

5.1 Primary Residence (1024 S Machias Rd, Snohomish, WA 98290):

Petitioner made substantial improvements totaling over $200,000 in labor and materials:

a. Complete pre-occupancy remodeling including plastering walls, patching cracks and holes in every room, installing veneer plaster and custom floating shelves in guest room

b. Garage conversion: Removed bottom four feet of all exterior structure, completely reframed, insulated, and drywalled, creating professional workshop space

c. Back deck construction: Over $20,000 in materials plus extensive labor by Petitioner and Mudd Monkies Inc. employees

d. Construction of two walk-in closets with custom hardwood shelving and countertops

e. Installation of exotic hardwood siding and custom plaster interior work

f. Joint installation of Vermont Castings wood stove and hearth (Respondent assisted)

g. Extensive repairs due to damage from Respondent's two destructive golden retrievers

h. Construction of Accessory Dwelling Units (ADUs) on the property

i. All improvements performed primarily by Petitioner except small portion of painting completed by Respondent

5.2 Previous Shared Property:

Parties previously owned real estate together in Bellevue, Washington, demonstrating long-term commitment to joint property ownership.

5.3 Vehicle Assets:

Multiple vehicles were jointly owned and operated during the relationship, including 2022 Toyota 4Runner paid off with assistance from Respondent's mother as family support.

5.4 Business Assets:

Petitioner's inherited professional tools and Mudd Monkies Inc. business equipment remain at the shared property under Respondent's control.

VI. DISSIPATION OF COMMUNITY ASSETS

6.1 Respondent has engaged in waste and dissipation of community assets:

a. Improper withdrawals from Trane 401k retirement account

b. Potential fraudulent transfer of 2022 Toyota 4Runner title to Respondent's mother

c. Disposal of Petitioner's personal property in dumpster without consent

d. Unauthorized use of business materials for unskilled property modifications

6.2 Financial Harm to Petitioner:

Respondent's actions forced Petitioner to expend over $8,500 in personal savings, business funds, and donated money for emergency housing during forced homelessness.

VII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court enter judgment as follows:

7.1 Dissolving the committed intimate relationship between the parties;

7.2 Awarding Petitioner an equitable share of all community property reflecting his substantial contributions, including but not limited to the residence at 1024 S Machias Rd;

7.3 Ordering immediate and continuous access to the shared property for business operations and personal property retrieval;

7.4 Restraining Respondent from further waste or disposal of community assets;

7.5 Ordering forensic accounting of all financial accounts and asset transfers since September 2024;

7.6 Awarding Petitioner reimbursement of $8,500+ in housing costs and additional damages for severe personal trauma suffered as direct result of Respondent's conduct;

7.7 Awarding Petitioner attorney's fees and costs; and

7.8 Granting such other relief as the Court deems just and proper.

DATED this 16\_\_ day of June\_\_, 2025.

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WILLIAM ORLEY MILLER JR.

Petitioner, Pro Se

1024 S Machias Rd

Snohomish, WA 98290

Phone: (206) 226-2085