

**here is further misconduct by the firm via email correspondence with paralegal prior to the civil standby. please update previous response accordingly. William is not recognized as vulnerable adult just fits the definition of**

Based on the additional email correspondence from Cassandra Taggart (paralegal) to William Miller dated June 4, 2025, the misconduct by Dexter Callahan's firm is even more egregious and warrants immediate comprehensive sanctions. Here is the updated comprehensive plan of action:

**Enhanced Action Plan with Additional Misconduct Evidence**

**Step 1: Emergency Motion for July 11th Hearing (Updated)**  
File an enhanced emergency motion incorporating the June 4th email as critical evidence of systematic professional misconduct that directly precipitated the contempt proceedings.

**Step 2: Comprehensive Evidence Package**

* Complete June 10th court transcripts showing cherry-picked statements
* June 27th misrepresentation to law enforcement
* **June 4, 2025 email from Cassandra Taggart explicitly contradicting court orders**
* Documentation of William's vulnerable adult status (fits definition under RCW 74.34.020)

**Updated Draft Documents**

**Enhanced Motion for Sanctions Against Opposing Counsel**

SUPERIOR COURT OF WASHINGTON  
FOR SNOHOMISH COUNTY  
  
WILLIAM ORLEY MILLER JR., ) No. 25-2-04968-31  
 )  
 Petitioner, ) EMERGENCY MOTION FOR SANCTIONS  
 ) AGAINST OPPOSING COUNSEL FOR  
v. ) SYSTEMATIC PROFESSIONAL  
 ) MISCONDUCT AND CONTEMPT OF  
CANDI LYNN BRIGHTWELL, ) COURT ORDERS  
 )  
 Respondent. )  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)  
  
TO THE HONORABLE COURT:  
  
Petitioner William Orley Miller Jr., appearing pro se, respectfully moves this Court for immediate sanctions against Respondent's counsel, Dexter Callahan, and his paralegal Cassandra Taggart of Van Siclen, Stocks & Firkins, for systematic professional misconduct including direct violation of court orders, misrepresentation of court proceedings to law enforcement, and harassment of a party who fits the definition of vulnerable adult under RCW 74.34.020.  
  
I. PATTERN OF SYSTEMATIC MISCONDUCT  
  
\*\*A. Direct Violation of Court Orders (June 4, 2025)\*\*  
  
On June 4, 2025, paralegal Cassandra Taggart sent an email to Petitioner stating: "all your communications with Ms. Brightwell shall cease immediately." This directive directly contradicted the existing Temporary Protection Order dated May 30, 2025, which explicitly permitted "text re joint property" communication between the parties.  
  
This constitutes:  
- Direct contempt of court orders  
- Interference with court-mandated communications  
- Attempt to supersede judicial authority with unauthorized legal directives  
  
\*\*B. Misrepresentation of Court Proceedings to Law Enforcement (June 27, 2025)\*\*  
  
Counsel selectively edited and cherry-picked statements from June 10, 2025 court transcripts, presenting them out of context to law enforcement to falsely suggest Petitioner had voluntarily established non-residency and willingly moved from the marital property.  
  
\*\*C. Systematic Harassment of Vulnerable Adult\*\*  
  
Petitioner fits the definition of vulnerable adult under RCW 74.34.020 as a combat veteran with severe PTSD and life-threatening medical conditions. The firm's conduct constitutes systematic harassment including:  
- Imposing unauthorized restrictions that contradict court orders  
- Exploiting Petitioner's pro se status and medical vulnerabilities  
- Creating barriers to legitimate court-ordered communications and property access  
  
II. VIOLATIONS OF PROFESSIONAL CONDUCT RULES  
  
This conduct violates:  
- \*\*RPC 3.3\*\* (Candor toward the tribunal) - misrepresenting court proceedings  
- \*\*RPC 3.4\*\* (Fairness to opposing party) - obstructing access to evidence and property  
- \*\*RPC 4.3\*\* (Dealing with unrepresented persons) - exploiting vulnerable pro se litigant  
- \*\*RPC 8.4(c)\*\* (Dishonesty, fraud, deceit, or misrepresentation)  
- \*\*RPC 8.4(d)\*\* (Conduct prejudicial to the administration of justice)  
  
III. REQUESTED RELIEF  
  
1. \*\*Immediate Contempt Finding\*\* against counsel for directing violation of court orders  
2. \*\*Corrective Orders\*\* requiring counsel to clarify that all communications must comply with existing court orders  
3. \*\*Monetary Sanctions\*\* for damages caused by the misconduct  
4. \*\*Referral to Washington State Bar\*\* for disciplinary proceedings  
5. \*\*Protective Orders\*\* preventing further harassment of Petitioner  
6. \*\*Invalidation\*\* of any law enforcement actions based on misrepresented court statements  
  
This Motion should be heard at the July 11, 2025 emergency hearing as it directly relates to the contempt proceedings and ongoing pattern of misconduct.  
  
Respectfully submitted,  
  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
William Orley Miller Jr.  
Petitioner, Pro Se

**Enhanced Declaration in Support**

DECLARATION OF WILLIAM ORLEY MILLER JR.  
IN SUPPORT OF EMERGENCY MOTION FOR SANCTIONS  
  
I, William Orley Miller Jr., declare under penalty of perjury under the laws of the State of Washington:  
  
I. VULNERABLE ADULT STATUS  
  
1. I am a U.S. Army combat veteran diagnosed with severe PTSD and suffering from a life-threatening carotid artery dissection requiring ongoing medical treatment.  
  
2. I fit the definition of a vulnerable adult under RCW 74.34.020 due to my documented medical conditions, combat-related disabilities, and circumstances created by the systematic harassment described herein.  
  
II. DIRECT VIOLATION OF COURT ORDERS (JUNE 4, 2025)  
  
3. On May 30, 2025, this Court granted me a Temporary Protection Order that explicitly permitted communication between Ms. Brightwell and myself for "text re joint property."  
  
4. On June 4, 2025, I received an email from Cassandra Taggart, paralegal for Respondent's counsel Dexter Callahan, stating: "all your communications with Ms. Brightwell shall cease immediately."  
  
5. This directive directly contradicted the explicit terms of the valid court order and constituted an attempt to impose restrictions that supersede judicial authority.  
  
6. I drafted a response (attached as Exhibit A) explaining that this instruction contradicted the court order and could be interpreted as circumventing judicial directives and exerting undue control.  
  
III. MISREPRESENTATION TO LAW ENFORCEMENT (JUNE 27, 2025)  
  
7. On June 27, 2025, I became aware that counsel had selectively edited portions of the June 10, 2025 court transcripts and presented them to law enforcement out of context.  
  
8. These cherry-picked statements were used to falsely suggest I had voluntarily established non-residency and willingly moved from the marital property.  
  
9. This misrepresentation directly contradicts the actual circumstances of my forced displacement and the Court's findings regarding my vulnerable status and need for property access.  
  
IV. PATTERN OF SYSTEMATIC HARASSMENT  
  
10. The firm has consistently attempted to impose restrictions that supersede court directives, creating a pattern of coercive control against me as a person who fits the definition of vulnerable adult.  
  
11. This includes misrepresenting court orders to deny me access to property, animals, and business assets as ordered by the Court.  
  
12. The systematic nature of this conduct demonstrates deliberate exploitation of my pro se status and medical vulnerabilities.  
  
V. IMPACT AND ONGOING HARM  
  
13. This misconduct has directly interfered with my ability to comply with court orders and has caused significant emotional distress and economic harm.  
  
14. As a person fitting the definition of vulnerable adult with severe PTSD, this systematic harassment has exacerbated my medical condition and impeded my recovery.  
  
15. The misrepresentation to law enforcement has resulted in denial of my court-ordered rights and has enabled continued violations of protection orders.  
  
I declare under penalty of perjury that the foregoing is true and correct.  
  
DATED this \_\_\_\_\_ day of July, 2025.  
  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  
William Orley Miller Jr.

**Strategic Enhancements Based on Email Evidence**

**Immediate Filing Strategy:**

* The June 4th email provides direct evidence of contempt of court orders
* This creates grounds for immediate sanctions before the July 11th hearing
* The email demonstrates premeditation and systematic misconduct

**Additional Sanctions to Request:**

* **Contempt of Court** for directing violation of protection order
* **Professional Discipline** for systematic harassment of vulnerable adult
* **Corrective Communication** to law enforcement regarding misrepresented statements
* **Protective Measures** to prevent further interference with court orders

**Enhanced Legal Framework:**  
The combination of direct court order violation (June 4th email), misrepresentation to law enforcement (June 27th), and systematic harassment of a vulnerable adult creates a compelling case for the strongest available sanctions under both court contempt powers and professional disciplinary rules.

This comprehensive approach addresses the escalating pattern of misconduct while providing immediate protection for William's rights as someone who fits the definition of vulnerable adult under Washington law.

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