IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SNOHOMISH

WILLIAM ORLEY MILLER JR.,

Petitioner,

v.

CANDI LYNN BRIGHTWELL,

Respondent.

**CASE NO.: 25-2-03181-31**

**DECLARATION OF WILLIAM ORLEY MILLER JR. IN SUPPORT OF PETITION FOR RENEWAL OF PROTECTION ORDER AND FOR PROPERTY ACCESS**

I, WILLIAM ORLEY MILLER JR., declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. I am the Petitioner in the above-entitled action, Case No. 25-2-03181-31, which is my Anti-Harassment Order against Respondent Candi Lynn Brightwell. I seek renewal of this Protection Order and specific orders regarding access to my property, belongings, and animals.
2. I am a combat veteran with Post-Traumatic Stress Disorder (PTSD) and have a diagnosed life-threatening medical condition (carotid artery dissection), which requires ongoing medical care and is exacerbated by stress and hostile interactions. My medical conditions classify me as a vulnerable adult under **RCW 74.34.020**.
3. My prior Anti-Harassment Order (Case No. 25-2-03181-31) was effective until the hearing on April 22, 2025. I was unable to attend that renewal hearing because I was on life support due to a medical crisis on April 13, 2025, directly caused by Respondent's harassment. My absence was not willful and was due to circumstances beyond my control. As a result, the Order lapsed.
4. Despite the lapse of the prior order and the granting of a Temporary Protection Order in my favor (Case No. 25-2-04968-31) on May 30, 2025, Respondent's pattern of harassment, control, and unlawful actions has persisted and escalated, necessitating the renewal of my Protection Order and specific court intervention for property access.

**I. ONGOING HARASSMENT, VIOLATIONS OF LAW, AND NEED FOR RENEWAL**

The following incidents and behaviors demonstrate the ongoing pattern of harassment by Respondent Candi Lynn Brightwell:

1. Denial of Property Access (May 29, 2025 - Present):  
   On May 29, 2025, Respondent prevented my entry and denied my access to the shared property located at 1024 S Machias Rd, Snohomish, WA 98290, despite police confirmation of no legal restrictions on my presence. This denial of access to my property and animals constitutes coercive control (RCW 7.105.010) and continues to date.
2. Unlawful Withholding and Removal of Personal Property from Residence:  
   Respondent has consistently and unlawfully withheld my property and animals. Specifically, items stored in my old room have been removed by Respondent without my permission or my ability to confirm receipt of all my items. These include essential belongings such as Yeti items, electronics, cosmetics and skin care items, furniture, and many other personal effects. These items remain locked away and I have been prevented from using or accessing them. This constitutes unlawful exclusion/ouster (RCW 59.18.290), denial of essential services (RCW 59.18.300) as part of my household, and further acts of coercive control (RCW 7.105.010), effectively evicting me from my designated space overnight without warning.
3. Impeding Access via Attorney Communication (Ongoing since June 4, 2025):  
   Despite a Temporary Protection Order granted in my favor (Case No. 25-2-04968-31) explicitly allowing text communication regarding joint property, Respondent's attorney instructed me on June 4, 2025, to cease all communication with Respondent. This instruction, and Respondent's subsequent actions, has forced me to attempt to communicate through her lawyer to gain access to my property and animals, of which I clearly have custody per the court order. I have reached out on May 30, 2025, and daily since, including June 3 and June 4, 2025. While Respondent initially communicated, as soon as I mentioned my belongings, my rights, or my animals, she ceased communication. This attempt to circumvent a court order and force communication through a third party (where no response has been received regarding my attempts to access items or animals) constitutes further interference with my ability to access my business items and care for my animals. This extends the pattern of coercive control (RCW 7.105.010) and obstruction, attempting to impose an authority that contradicts a court order and impede my ability to fulfill my responsibilities.
4. Violation of Prior Protection Order (April 12, 2025 - Ongoing):  
   On April 12, 2025, Respondent Candi Lynn Brightwell violated my anti-harassment order (Case No. 25-2-03181-31) by engaging in indirect communication through her daughter, Samantha, for tool access. This action was a direct violation of RCW 7.105.450. Respondent continues this pattern by irresponsibly using her daughter as an intermediary and confidant, directing her without concern for the ramifications of placing her in an untenable position and to circumvent the court order that restricted Petitioner's communication. This included Petitioner grabbing her youngest daughter in a manner that conveyed fear of my non-threatening approach, which demonized me further, caused the children to believe they had to protect their mother, and thus exploited their innocence and manipulated them into a position detrimental to their development, a clear form of coercive control (RCW 7.105.010).
5. Surveillance and Privacy Violations (Ongoing):  
   Respondent has engaged in surveillance and eavesdropping via security cameras without my consent. These cameras are used for coercive control (RCW 7.105.010) and constitute a violation of privacy laws (RCW 9.73.030). She has also engaged in unauthorized access to my email and phone accounts (hacking), constituting violations of privacy laws (RCW 9.73.030) and potentially computer trespass (RCW 9A.90.040).
6. False Reporting and Threats of Unlawful Action (Ongoing):  
   Respondent has made unsubstantiated police reports and threatened legal action, including attempting to remove me from the property via unsubstantiated wellness checks (Early March 2025). This conduct may constitute false reporting (RCW 9A.84.040). Respondent has also threatened to use photos to incriminate me and "put me behind bars" if I do not leave the house and relinquish my items, constituting attempted extortion (RCW 9A.56.110) and a severe act of intimidation.
7. Unlawful Harassment and Discrimination (Ongoing):  
   Respondent has engaged in public humiliation, mocking, and used homophobic slurs (e.g., "Why don't you go suck some dick because I know you like it"), which constitute unlawful harassment (RCW 10.14.020) and discrimination (RCW 49.60). Her hostile and demeaning conduct, including yelling and accusations, also constitutes unlawful harassment (RCW 10.14.020).
8. Physical Aggression and Reckless Endangerment (December 2024 Incident):  
   During a December 2024 incident, Respondent physically struck, pushed, spit on, and followed me while inciting responses. She also kicked in the door to the shop when I attempted to retreat and barricade myself to escape her actions. This conduct constitutes assault in the fourth degree (RCW 9A.36.041) and created a substantial risk of death or serious physical injury, constituting reckless endangerment (RCW 9A.36.050).
9. Exploitation of Vulnerability & Alienation (Ongoing):  
   Respondent exploits my known PTSD and mental health crises by engaging in tactics that would trigger me despite prior briefings. This includes announcing what I did or said in duress, denying the validity of assaults leading to my breakdown, using my financial position in her favor, and leveraging my mental state and terrible losses in my family to effectively deem me as a monster. During these crises, Respondent did not engage in supportive actions as a good Samaritan or partner, but instead used indirect persuasion to make me believe I was the cause of everything, including her treatment and the perceived loss of respect from her own family due to her spending time with me. Respondent also created a narrative with friends and family that I am a "druggy sex worker" and shared intimate videos (showing me performing as an adult model while nude and erect) and details with her daughter, constituting severe privacy violations (RCW 9.73.030 and potentially RCW 9A.86.010) and emotional abuse. This constitutes abuse of a vulnerable adult (RCW 74.34.020) and coercive control (RCW 7.105.010).
10. **Other Relevant Incidents:**
    * **On or around November 2024 (Ashtray Incident):** Respondent physically struck me with an ashtray, causing severe bruising and inflammation to my CT joint. This conduct constitutes **assault in the fourth degree (RCW 9A.36.041)**.
    * **November 6, 2024:** Respondent withheld my dog and other personal belongings. I was arrested for property damage and for lying to an officer based on Respondent's report, with police never attempting to establish probable cause for the lying charge. Around this date, Respondent met me at Lake Stevens Community Park to discuss relationship problems. During this meeting, Respondent openly displayed a Ruger Mark V pistol on the seat of her vehicle, which was a show of power and caused me fear.
    * **July 30, 2024:** Respondent was arrested for domestic violence charges due to a bleeding split on my forehead. I refused to speak with officers about the incident, knowing they were attempting to make an arrest. After I took a shower, I discovered Respondent was gone, and Respondent's mother informed me of Respondent's arrest. I then contacted various Snohomish County offices and spoke to the arresting officer, providing false information about the events to facilitate Respondent's release from jail without charges. Respondent was subsequently released with no probable cause on the following Monday. This incident caused significant distress and disruption.
    * **Misuse of Property (Ongoing):** Misuse and destruction of my business tools and shop stock, impacting my livelihood and business operations. This constitutes **coercive control (RCW 7.105.010)**.
    * **Hostile Living Conditions (Ongoing):** Attempts to impose unlawful landlord-tenant conditions (RCW 59.18) by confining me in uninhabitable conditions and restricting access to my household and property. This includes **unlawful exclusion or ouster (RCW 59.18.290)** and **denial of essential services (RCW 59.18.300)**.
    * **VAWA Violation:** Violation of the Violence Against Women Act (VAWA), 18 U.S.C. § 2265, through a pattern of domestic violence and harassment that crosses state lines or tribal lands, impacting interstate commerce or travel.

**II. IMPACT ON PETITIONER'S HEALTH AND WELL-BEING (Justifying Ongoing Protection)**

Respondent's severe emotional and mental abuse has directly impacted my health. This harassment exacerbated my PTSD and contributed significantly to a medical crisis on April 13, 2025, involving a mistake on the dose of a substance, resulting in hospitalization and placement on life support. I have experienced multiple hospitalizations since receiving the denial order in Respondent's case (Case #: 25-2-03361-31). I have a diagnosed carotid artery dissection, a life-threatening condition, which is directly exacerbated by stress and hostile interactions. Due to being on life support, I was unable to attend the renewal hearing for my anti-harassment order (Case No. 25-2-03181-31), causing it to lapse. This ongoing harassment continues to pose a direct threat to my life and recovery, **and has led to significant financial losses due to my company's inability to fully function.** My inability to recover safely has directly threatened my life. This ongoing harassment continues to pose a direct threat to my life and recovery, forcing me to stay away from my property.

**III. PETITIONER'S VULNERABLE ADULT STATUS**

Petitioner asserts that he meets the definition of a **vulnerable adult under RCW 74.34.020** due to his functional, mental, or physical inability to care for himself, particularly in the context of his PTSD, mental health crises, and severe medical conditions requiring hospitalization and life support. Respondent's exploitation of Petitioner's vulnerability is a pattern of abuse.

**IV. COURT'S PRIOR FINDING (Related Case)**

On May 30, 2025, the Snohomish County Superior Court **granted a Temporary Protection Order in favor of Petitioner William Orley Miller Jr. against Respondent Candi Lynn Brightwell** (Case No. 25-2-04968-31). This judicial finding confirms the existence of harassment by Respondent against Petitioner, further supporting the need for renewal of this protection order.

**V. REQUEST FOR RELIEF (Renewal of Order & Property Access)**

WHEREFORE, Petitioner William Orley Miller Jr. respectfully requests that this Honorable Court:

1. **RENEW** the Anti-Harassment Protection Order (Case No. 25-2-03181-31) against Respondent Candi Lynn Brightwell for a period of [Specify duration, e.g., 1 year, 2 years, permanent if applicable under RCW 7.105.315(5)].
2. **ORDER** Respondent Candi Lynn Brightwell to immediately provide Petitioner William Orley Miller Jr. with all keys and current access codes to the shared property at **1024 S Machias Rd, Snohomish, WA 98290**, ensuring his full, unobstructed access and free use as a co-owner of the property, including the woodshop, for work and access to all his items, in accordance with his rights under Committed Intimate Relationship law.
3. **ORDER** Respondent Candi Lynn Brightwell to allow Petitioner William Orley Miller Jr. unobstructed access to document all belonging and assets at **1024 S Machias Rd, Snohomish, WA 98290** to ensure a fair and equitable outcome in the property division proceedings.
4. **ORDER** that Petitioner William Orley Miller Jr. shall have the ability to reside at **1024 S Machias Rd, Snohomish, WA 98290** until a legal process for property division is completed, consistent with his rights as a co-owner in a Committed Intimate Relationship.
5. **ORDER** Respondent Candi Lynn Brightwell to immediately provide Petitioner William Orley Miller Jr. with access to all personal belongings currently withheld or removed from his former room and other areas of the property, including but not limited to Yeti items, electronics, cosmetics and skin care items, furniture, and any tools or shop stock. This access is crucial for Petitioner's livelihood and personal well-being.
6. **ORDER** Respondent Candi Lynn Brightwell to cease any attempts to impede Petitioner's access to his property, business items, or animals by forcing communication through legal counsel, which contradicts existing court orders allowing direct communication regarding joint property (PO\_030\_Temporary\_Protection\_Order\_AH-DV-STK\_1.24.pdf, page 4, Section 8.B) and interferes with Petitioner's granted custody of his animals.
7. **ORDER** any other relief deemed necessary by the Court to ensure Petitioner's safety, prevent further harassment, and secure his property rights.

**[SECTION: Signature Block - Page 2 of PO 018 or similar]**

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

DATED this **4th** day of June, 2025, at Snohomish, Washington.

WILLIAM ORLEY MILLER JR., Petitioner (Pro Se)