IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SNOHOMISH

CANDI LYNN BRIGHTWELL,

Petitioner,

v.

WILLIAM ORLEY MILLER JR., Respondent.

**CASE NO.: 25-2-03361-31**

**RESPONDENT WILLIAM ORLEY MILLER JR.'S RESPONSE TO PETITION FOR PROTECTION ORDER**

COMES NOW the Respondent, WILLIAM ORLEY MILLER JR., and for his Response to Petitioner Candi Lynn Brightwell's Petition for Protection Order, states as follows:

**I. GENERAL RESPONSES TO PETITIONER'S ALLEGATIONS**

1. Response to Allegations Regarding April 13, 2025 (Hospitalization Incident):

Respondent denies that he expressed suicide threats or intentionally overdosed. Respondent states that on April 13, 2025, due to severe emotional and mental distress directly caused by Petitioner's ongoing harassment, he experienced a medical crisis. Medical reports from that day (Exhibit 8, 9) indicate that while in a state of extreme duress, a substance (1-4 butanediol, metabolized as GHB) was ingested by Respondent, leading to a medical crisis due to a mistake on the dose. Respondent has no clear personal recollection of the entire day's events due to this crisis. Petitioner Candi Lynn Brightwell was aware of the substance Respondent had ingested and despite this awareness, allowed Respondent to sit unattended on the side of the house for hours until he was in a critical medical state. This conduct constitutes neglect of a vulnerable adult (RCW 74.34.020). This medical crisis required immediate hospitalization and placement on life support. Respondent's medical records (Exhibit 8, 9, 10) confirm his hospitalization, the nature of the medical crisis, and a diagnosed carotid aneurysm. Respondent's inability to attend the subsequent hearing for his anti-harassment order (Case No. 25-2-03181-31) was a direct result of being on life support.

1. Response to Allegations Regarding April 11, 2025 (Respondent's Anti-Harassment Order):

Respondent denies that his anti-harassment order filed on April 11, 2025 (Case

No. 25-2-03181-31), was "full of lies" or that police found him "lying a lot."

Respondent states that his anti-harassment order was filed due to Petitioner's

actual harassment and actions violating his rights, as detailed in his own Petition for Protection Order (Case No. 25-2-04968-31), which was recently granted a Temporary Protection Order in his favor. Respondent states that the anti-harassment order (Case No. 25-2-03181-31) restricted Petitioner Candi Brightwell from communicating with Respondent, but did not restrict Respondent from communicating with anyone. Respondent's communication with his daughter, Samantha, was a direct response to Petitioner Candi Brightwell involving Samantha as an intermediary and liaison, directing her daughter without concern for the ramifications of placing her in an untenable position, and in direct violation of the anti-harassment order.

1. Response to Allegations Regarding April 5, 2025 (Police Call & Refusal to Leave): Respondent denies being "out of control" or intentionally "scaring daughters." Respondent states that Petitioner's actions on this date constituted harassment. Respondent admits refusing to leave the property, as he had every right to be there. Petitioner's attempts to make him leave were without legal basis. Respondent admits disengaging certain security systems, cameras, or Wi-Fi, which was done in response to Petitioner's surveillance, unauthorized access to Respondent's accounts, and attempts to control Respondent's private space. Respondent states that Petitioner has engaged in surveillance and eavesdropping via security cameras on the property and has accessed Respondent's emails and phone accounts without authorization. These cameras were used to engage in coercive control over Respondent.
2. Response to Allegations Regarding April 6, 2025 (Property Damage & 911 Call):

Respondent denies causing property damage by throwing objects at Petitioner. Respondent states that on April 6, 2025, Petitioner engaged in hostile and demeaning conduct, including yelling and making accusations. Petitioner attempted to prevent Respondent's access to the shop area and blocked access to his animals (Lilly, Rayne, and Macy). Petitioner admitted to eavesdropping on Respondent's private conversations. Petitioner's call to 911 on this date was unsubstantiated. Respondent denies any implied suicide attempt on this date; any marks on his neck were not related to self-harm.

1. Response to Allegations Regarding Early March 2025 (Return to House & Narcan Incident):

Respondent admits returning to the shared property, which he has a right to access. Respondent denies breaking the garage door, stating that the garage door was stuck and jammed due to items placed in its way by Petitioner. When Respondent opened the already difficult garage door, it jumped off its tracks, which has occurred previously and is a recurring issue. Respondent denies yelling at Petitioner or throwing things at her car without provocation. Respondent states that Petitioner's conduct on this date was part of an ongoing pattern of harassment and instigation, causing distress through hostile and demeaning actions.

1. Response to Allegations Regarding December 2024 (Physical Assault & Exploitation of Crisis):

Respondent denies throwing heavy objects at the door or yelling at Petitioner. Respondent states that Petitioner's actions on this date were part of an ongoing pattern of harassment and instigation. Specifically, Petitioner engaged in ongoing neglect and mind games, including stonewalling tactics and constantly making excuses to refuse communication until 9:00 p.m. daily. Petitioner's refusal to discuss important matters, such as Christmas plans, directly provoked distress. When Petitioner observed Respondent's distress, she further instigated hostile conduct. During this incident, Petitioner physically struck, pushed, spit on, and followed Respondent, while inciting responses. This conduct constitutes assault in the fourth degree (RCW 9A.36.041). Petitioner also kicked in the door to the shop when Respondent attempted to retreat and barricade himself to escape her actions. This conduct created a substantial risk of death or serious physical injury to Respondent, constituting reckless endangerment (RCW 9A.36.050). While a criminal domestic violence case has been filed against Respondent stemming from this incident, Respondent denies the allegations as presented by Petitioner and is actively fighting the charge.

1. Response to Allegations Regarding November 6, 2024 (Taking Dog/Items & Lying to Police):

Respondent denies taking items or the dog without authorization. Respondent denies pushing Petitioner. Respondent denies lying to officers about Petitioner having a weapon. Respondent states that he was arrested for property damage and for lying to an officer based on Petitioner's report, with police never attempting to establish probable cause for the lying charge. Respondent states that Petitioner withheld his dog and other personal belongings. Around this date, Petitioner met Respondent at Lake Stevens Community Park to discuss relationship problems. During this meeting, Petitioner openly displayed a Ruger Mark V pistol on the seat of her vehicle, which was a show of power and caused Respondent fear.

1. Response to Allegations Regarding July 30, 2024 (Arrest):

Respondent denies hitting Petitioner. Petitioner was arrested for domestic violence charges due to a bleeding split on Respondent's forehead. Respondent refused to speak with officers about the incident, knowing they were attempting to make an arrest. After Respondent took a shower, he discovered Petitioner was gone, and Petitioner's mother informed him of Petitioner's arrest. Respondent then contacted various Snohomish County offices and spoke to the arresting officer, providing false information about the events to facilitate Petitioner's release from jail without charges. Petitioner was subsequently released with no probable cause on the following Monday. This incident caused significant distress and disruption.

**II. AFFIRMATIVE DEFENSES AND FURTHER STATEMENT OF FACTS**

1.  **Petitioner's Harassment and Course of Conduct:**  Petitioner Candi Lynn Brightwell has engaged in a consistent and escalating pattern of harassment, control, and unlawful actions against Respondent William Orley Miller Jr. These actions violate Respondent's rights and the laws of Washington State, including those pertaining to  **Committed Intimate Relationships (Washington case law, e.g.,  *Connell v. Francisco* ,  *In re Marriage of Lindsey* )** , and constitute:

○ Denial of property access (May 29, 2025). This denial of access to the property and animals constitutes  **coercive control (RCW 7.105.010)** .

○ Petitioner made Respondent believe that if he gave them space and let them have the animals for emotional support, it would facilitate healing; however, this was a tactic of  **coercive control (RCW 7.105.010)**  to gain leverage over Respondent and his property.

○ Violation of anti-harassment order (Case No. 25-2-03181-31) through indirect communication via children (April 12, 2025, and ongoing). This is a violation of  **RCW 7.105.450** .

○ Irresponsible use of her daughter, Samantha, as an intermediary and confidant, directing her daughter without concern for the ramifications of placing her in an untenable position, and to circumvent a court order that restricted Petitioner's communication, not Respondent's. This included Petitioner grabbing her youngest daughter in a manner that conveyed fear of Respondent's approach, despite Respondent posing no threat, which demonized Respondent further, causing the children to believe they had to protect their mother, and thus exploiting their innocence and manipulating them into a position detrimental to their development, which is a clear form of  **coercive control (RCW 7.105.010)** .

○ Alienation of Respondent from his support system by confiding in her family (including the girls) and spreading intimate details that Respondent trusted her with to his friends and family, effectively removing his ability to have support. This constitutes  **coercive control (RCW 7.105.010)** .

○ Attempts to prevent access to property, tools, and animals. This constitutes  **coercive control (RCW 7.105.010)** .

○ Surveillance and eavesdropping via security cameras without consent. These cameras were used to engage in  **coercive control (RCW 7.105.010)**  over Respondent and constitute a  **violation of privacy laws (RCW 9.73.030)** .

○ Unauthorized access to Respondent's email and phone accounts, constituting a  **violation of privacy laws (RCW 9.73.030)**  and potentially  **computer trespass (RCW 9A.90.040)** .

○ Making unsubstantiated police reports and threatening legal action, which may constitute  **false reporting (RCW 9A.84.040)** .

○ Public humiliation, mocking, and use of 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)** .

○ Withholding of Respondent's property and animals. This constitutes  **coercive control (RCW 7.105.010)** .

○ Misuse and destruction of Respondent's business tools and shop stock, impacting his livelihood and business operations. This constitutes  **coercive control (RCW 7.105.010)** .

○ Hostile and demeaning conduct, including yelling and accusations. This constitutes  **unlawful harassment (RCW 10.14.020)** .

○ Actions on April 13, 2025, where Petitioner was aware of a dangerous substance ingested by Respondent in a state of extreme duress, yet allowed him to remain unattended until he was in a critical medical state. This conduct constitutes  **neglect of a vulnerable adult (RCW 74.34.020)** .

○ Attempts to remove Respondent from his property via unsubstantiated wellness checks (Early March 2025), which may constitute  **false reporting (RCW 9A.84.040)** .

○ Ongoing neglect, mind games, and stonewalling tactics that cause distress and are the basis for the criminal assault charge currently filed against Respondent. This constitutes  **unlawful harassment (RCW 10.14.020)**  and  **coercive control (RCW 7.105.010)** .

○ Displaying a  **Ruger Mark V**  pistol on the seat of her vehicle to Respondent at Lake Stevens Community Park, constituting a direct threat and act of  **intimidation (RCW 7.105.010 as a form of coercive control)** .

○ Violations of Respondent's property rights and attempts to impose unlawful landlord-tenant conditions  **(RCW 59.18)**  by confining him in uninhabitable conditions and restricting access to his household and property. This includes  **unlawful exclusion or ouster (RCW 59.18.290)**  and  **denial of essential services (RCW 59.18.300)** .

○ Physical assault (striking, pushing, spitting on) and following Respondent while inciting responses during the December 2024 incident. This conduct constitutes  **assault in the fourth degree (RCW 9A.36.041)**  and created a substantial risk of death or serious physical injury to Respondent, constituting  **reckless endangerment (RCW 9A.36.050)** .

○ Exploitation of Respondent's known PTSD and mental health crises during the December 2024 incident and other times, by engaging in tactics that would trigger Respondent despite prior briefings on what to avoid or take caution in. This included announcing what Respondent did or said in duress, denying the validity of assaults leading up to Respondent's breakdown, using Respondent's financial position in her favor, and leveraging Respondent's mental state and terrible losses in his family to effectively deem him as a monster. During these crises, Petitioner did not engage in supportive actions as a good samaritan or partner, but instead used indirect persuasion to make Respondent believe he was the cause of everything, including her treatment and the perceived loss of respect from her own family due to her spending time with him. Petitioner also created a narrative with friends and family that Respondent is a "druggy sex worker" and shared intimate videos (showing Respondent 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).**

○  **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.

1. **Impact on Respondent's Health and Well-being:**  Petitioner's severe emotional and mental abuse has directly impacted Respondent's health. This harassment exacerbated Respondent's 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.  **Respondent has experienced multiple hospitalizations since receiving the denial order in Petitioner's case (Case #: 25-2-03361-31).**  Respondent has a diagnosed carotid artery dissection, a life-threatening condition, which is directly exacerbated by stress and hostile interactions. Due to being on life support, Respondent was unable to attend the renewal hearing for his anti-harassment order (Case No. 25-2-03181-31), causing it to lapse. This ongoing harassment continues to pose a direct threat to Respondent's life and recovery, forcing him to stay away from his property.
2. **Respondent's Vulnerable Adult Status:**  Respondent 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. Petitioner's exploitation of Respondent's vulnerability is a pattern of abuse.

1. **Court's Prior Finding:**  On May 30, 2025, the Snohomish County Superior Court  **granted a Temporary Protection Order in favor of Respondent William Orley Miller Jr. against Petitioner Candi Lynn Brightwell**  (Case No. 25-2-04968-31). This judicial finding confirms the existence of harassment by Petitioner against Respondent, further supporting the denial of Petitioner's current petition.

**III. REQUEST FOR RELIEF**

WHEREFORE, Respondent WILLIAM ORLEY MILLER JR. respectfully requests that this Honorable Court:

1. **DENY**  Petitioner Candi Lynn Brightwell's Petition for Protection Order in its entirety.
2. **FIND**  that Petitioner Candi Lynn Brightwell has engaged in a pattern of harassment, control, and unlawful actions against Respondent William Orley Miller Jr., as detailed in Section II, point 1, above.
3. **FIND**  that Petitioner Candi Lynn Brightwell's Petition constitutes abusive litigation under  **RCW 26.51.020**  and/or is frivolous.
4. **ORDER**  Petitioner Candi Lynn Brightwell to pay Respondent William Orley Miller Jr.'s reasonable attorney's fees and costs incurred in defending against this Petition.
5. Consider the recently granted Temporary Protection Order in favor of Respondent William Orley Miller Jr. (Case No. 25-2-04968-31) as evidence of Petitioner Candi Lynn Brightwell's harassing conduct.
6. Grant such other and further relief as the Court deems just and equitable.

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

DATED this day 8th of June, 2025, at Snohomish, Washington.

WILLIAM ORLEY MILLER JR., Respondent