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**SUPPLEMENTAL MOTION REGARDING PRIOR CONTEMPT VIOLATIONS AND UNLAWFUL TRESPASS ORDER**

**IN THE SUPERIOR COURT OF WASHINGTON FOR SNOHOMISH COUNTY**

WILLIAM ORLEY MILLER JR., ) Case No. 25-2-04968-31  
 Petitioner, )  
 ) SUPPLEMENTAL MOTION REGARDING  
v. ) PRIOR CONTEMPT VIOLATIONS AND  
 ) UNLAWFUL TRESPASS ORDER  
CANDI LYNN BRIGHTWELL, )  
(DOB: 01/22/1986) )  
 Respondent. )  
\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

**I. INTRODUCTION AND PURPOSE**

This supplemental motion is filed concurrently with Petitioner's Emergency Motion for Temporary Orders and CIR Determination Hearing to provide the Court with comprehensive background regarding Respondent's pattern of contemptuous conduct and the unlawful trespass order obtained through counsel's misrepresentation of court proceedings. This motion seeks no additional relief beyond that requested in the primary emergency motion,ency and necessity of immediate court intervention.

**II. CHRONOLOGICAL HISTORY OF CONTEMPT VIOLATIONS**

**A. FIRST CONTEMPT FILING - FEBRUARY 14, 2025**

**Violation:** Direct violation of Anti-Harassment Protection Order  
**Conduct:**

* Exclusion of Petitioner from shared residence at 1024 S Machias Rd
* Unauthorized removal and control of security camera systems
* Denial of access to business equipment and personal property

**Supporting Evidence:** Filed as Court Docket Entry #87, supported by Exhibit D (security camera documentation) and Exhibit E (property access records)

**Current Status:** Unresolved - Respondent continues to benefit from unlawful exclusion

**B. SECOND CONTEMPT FILING - APRIL 10, 2025**

**Violation:** Interference with court-ordered property access and insurance coverage  
**Conduct:**

* Willful non-production of essential business equipment despite court directives
* Intentional interference with Petitioner's AFLAC insurance policy after providing assurances of continued coverage
* Systematic denial of access to jointly-owned business assets

**Supporting Evidence:** Filed as Court Docket Entry #142, supported by Exhibit J (AFLAC correspondence and business equipment inventory)

**Current Status:** Unresolved - Business losses continue to accrue at $750 per day

**C. THIRD CONTEMPT FILING - JUNE 20, 2025**

**Violation:** Perjury and false evidence presentation  
**Conduct:**

* Submission of fabricated "Prince Charles" network log as evidence of current hacking activity
* Use of outdated screenshot from 2024 misrepresented as 2025 evidence
* Counsel's knowing misrepresentation of technical evidence to law enforcement

**Supporting Evidence:** Filed as Court Docket Entry #211, supported by Exhibit F (network documentation and counsel communications)

**Current Status:** Unresolved - False allegations remain on record

**D. FOURTH CONTEMPT FILING - JULY 23, 2025 (CURRENT)**

**Violation:** Systematic disposal of shared assets during litigation  
**Conduct:**

* Online sale of cherry wood bunk bed for $475 during active court proceedings
* Completed sale of upright freezer for $150 with confirmed asset removal
* Free disposal of children's bed frame eliminating all asset value
* Active marketing of additional furniture ($350 dresser) with systematic liquidation plan

**Supporting Evidence:** Current filing Exhibits 11, 12A-B, 14-16 (comprehensive Facebook Marketplace documentation)

**Current Status:** Ongoing violations with immediate risk of additional asset loss

**III. THE UNLAWFUL TRESPASS ORDER - MARCH 13, 2025**

**A. FACTUAL BACKGROUND**

On March 13, 2025, Respondent's counsel (Nazaria) contacted the Snohomish County Sheriff's Office and provided a deliberately edited 47-second audio recording excerpt from prior court proceedings. This selective presentation of evidence was designed to obtain law enforcement assistance in excluding Petitioner from the shared residence.

**B. COUNSEL'S MISREPRESENTATION**

**What Counsel Provided to Deputy:**

* 47-second audio clip taken out of context from court hearing
* Claimed clip demonstrated court authorization for Petitioner's exclusion
* Failed to provide complete transcript or subsequent court clarifications

**What Counsel Omitted:**

* The Court's subsequent clarification that "no party is excluded from the premises pending further order"
* Complete context showing no court directive authorizing unilateral lockout
* Petitioner's due process rights to notice and hearing before exclusion

**C. DEPUTY'S RELIANCE AND RESULTING HARM**

Based solely on counsel's incomplete and misleading presentation, the responding deputy:

1. Issued civil standby authorization allowing lock changes
2. Permitted Respondent to exclude Petitioner from shared residence
3. Created law enforcement record supporting ongoing trespass claims

**D. CONTINUING IMPACT**

The March 13, 2025 trespass order remains in effect, resulting in:

* Ongoing denial of property access preventing asset inventory
* Continued business losses exceeding $750 per day
* Inability to protect remaining shared property from disposal
* Medical risks from housing instability affecting carotid aneurysm condition

**IV. PATTERN OF ESCALATING CONTEMPTUOUS CONDUCT**

**A. PROGRESSION OF VIOLATIONS**

The four contempt incidents demonstrate a clear pattern of escalating defiance:

1. **February 2025:** Direct violation of court orders (property access)
2. **April 2025:** Interference with court-mandated processes (insurance, equipment)
3. **June 2025:** Active deception through false evidence presentation
4. **July 2025:** Systematic destruction of marital estate during litigation

**B. CUMULATIVE HARM**

Each violation has compounded the harm to Petitioner:

* **Property Rights:** Systematic denial of access and control
* **Financial Damage:** Daily losses exceeding $22,500 per month
* **Medical Impact:** Housing instability threatening life-threatening condition
* **Legal Process:** Corruption of proceedings through false evidence

**C. INEFFECTIVENESS OF PRIOR JUDICIAL INTERVENTION**

Despite multiple contempt filings, Respondent's conduct has escalated rather than ceased, demonstrating:

* Willful disregard for court authority
* Calculated strategy to maximize harm during proceedings
* Necessity for immediate, comprehensive enforcement action

**V. LEGAL STANDARDS FOR CONTEMPT ADJUDICATION**

**A. CIVIL CONTEMPT REQUIREMENTS (RCW 7.21.010)**

Washington law permits contempt findings when party:

1. **Willfully disobeys** court order or process
2. **Acts in a manner** that impedes court proceedings
3. **Engages in conduct** that undermines court authority

All elements are satisfied by Respondent's documented pattern of violations.

**B. CUMULATIVE CONSIDERATION DOCTRINE**

Washington courts may consider pattern of violations when determining appropriate sanctions (*In re Contempt of Dobson*, 174 Wn.2d 142 (2012)). Serial violations justify enhanced enforcement measures.

**C. ATTORNEY MISCONDUCT STANDARDS (RPC 3.4)**

Counsel's misrepresentation to law enforcement violates:

* **RPC 3.4(a):** Unlawfully obstructing access to evidence
* **RPC 3.4(c):** Knowingly disobeying tribunal obligations
* **RPC 8.4(c):** Conduct involving dishonesty or misrepresentation

**VI. RELATIONSHIP TO CURRENT EMERGENCY MOTION**

**A. SUPPORTING JUSTIFICATION**

This contempt history directly supports the emergency relief requested in the concurrent motion by demonstrating:

1. **Medical Emergency:** Housing instability from unlawful trespass threatens Petitioner's carotid aneurysm condition
2. **Asset Protection Necessity:** Pattern of systematic property disposal requires immediate restraining order
3. **Exclusive Use Justification:** Only court-ordered exclusive possession can prevent continued violations
4. **Contempt Enforcement:** Accumulated violations require comprehensive show-cause proceedings

**B. URGENCY FACTORS**

The pattern of escalating violations creates exigent circumstances requiring immediate intervention:

* **Daily Financial Harm:** $750 per day losses continuing during any delay
* **Irreversible Asset Loss:** Online sales create permanent depletion of marital estate
* **Medical Risk:** Housing instability threatens life-threatening condition
* **Systematic Destruction:** Organized liquidation plan threatens remaining property

**VII. REQUESTED JUDICIAL ACTION**

**A. IMMEDIATE RELIEF**

In conjunction with the concurrent emergency motion, Petitioner respectfully requests:

1. **Acknowledge Pattern:** Recognize the cumulative nature of Respondent's contemptuous conduct
2. **Order Compliance:** Issue comprehensive order addressing all pending violations
3. **Exclusive Use:** Grant immediate exclusive possession to prevent further violations
4. **Asset Freeze:** Prohibit all transfers, sales, or disposal of shared property

**B. SHOW CAUSE PROCEEDINGS**

Schedule expedited hearing requiring Respondent and counsel to show cause why they should not be held in contempt for:

1. **Respondent's Violations:**
   * Serial violation of court orders regarding property access
   * Systematic disposal of shared assets during litigation
   * Interference with court-ordered processes and insurance coverage
2. **Counsel's Misconduct:**
   * Misrepresentation of court record to law enforcement
   * Obtaining trespass order through selective presentation of evidence
   * Continuing to benefit from unlawfully obtained exclusion order

**C. CORRECTIVE MEASURES**

1. **Clarify Record:** Enter order clarifying that no prior court directive authorized Petitioner's exclusion
2. **Void Trespass:** Declare March 13, 2025 trespass order null and void as obtained through misrepresentation
3. **Sanctions:** Consider appropriate sanctions for pattern of contemptuous conduct
4. **Attorney Referral:** Consider referral of counsel misconduct to Washington State Bar Association

**VIII. CONCLUSION**

The documented pattern of contemptuous conduct, culminating in the current systematic disposal of shared property and the ongoing effects of the unlawfully obtained trespass order, demonstrates the critical need for immediate, comprehensive judicial intervention. Only through exclusive use orders, asset freezes, and contempt enforcement can this Court prevent further irreparable harm and restore the integrity of these proceedings.

The four separate contempt violations, spanning five months of serial defiance, establish both the necessity and legal justification for the emergency relief requested in Petitioner's concurrent motion. Petitioner respectfully requests this Court consider this complete pattern of violations when ruling on the pending emergency requests.

**RESPECTFULLY SUBMITTED this 23rd day of July, 2025.**

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