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June 1, 2017

Michael Gantine  
c/o Goldberg & Jones  
1200 Westlake Ave. N #700  
Seattle, WA 98109

*Sent via email*

*Re: Summary of Washington State procedural history – for client use only not for filing with court*

Dear Michael,

Per your request, below is a summary of the procedure in the Washington State matter. You asked me to highlight the criminal actions by Michelle. It is hard for me to do this as I am not a criminal attorney and an action is only “criminal” once a court has deemed it to be so. However, I will provide a summary of the civil law which I believe she violated.

There have been three separate actions in Washington State King County Superior Court involving your and Michelle’s son. A writ of habeas corpus action (cause number 17-2-03892-0); a domestic violence protection order DVPO action (cause number 17-2-01981-0); and a parenting plan modification action (cause number 17-3-01263-1).

The Washington State action started when Ms. Watts sought a DVPO on January 30, 2017, the day after your son was taken out of her custody by Bellevue Police Department and put into your custody. This was done through the missing child’s search out of Illinois. Bellevue Police Department acted on an “assist” to the DuPage police.

Ms. Watts obtained an ex parte DVPO which stated that your child would reside with her but did not decide whether the court actually had jurisdiction under the UCCJEA. Based on that ex parte DVPO, Ms. Watts had the child removed from your care in Florida and brought back to Washington State.

The January 30, 2017 ex parte DVPO was before the court on February 13, 2017 at a return hearing. The court on February 13, 2017 reissued the DVPO but put your son back in your care and “stayed” any issues concerning your son. The Washington State court on February 13<sup>th</sup> declined to

exercise emergency jurisdiction under the UCCJEA and specifically recognized that Illinois had jurisdiction and was exercising jurisdiction under the UCCJEA. The court also recognized that the mother took your son out of Illinois and brought him to Washington State without notifying you or the court of her taking your son or of her whereabouts. The court set another hearing for April 13, 2017 to give the court time to address the UCCJEA issues and determine if Washington State or Illinois should have jurisdiction. This hearing was subsequently continued to May 18, 2017.

On February 17, 2017, you petition the Washington State court for a Writ of Habeas Corpus to allow law enforcement to take your son out of the mother's care and place him into your care, and allow you to take your son home to Florida. Your request for a Writ of Habeas Corpus was based on the current Illinois order, which was issued on February 29, 2016, which awarded you custody of your son. The Washington State court issued the Writ and ordered that law enforcement put your son back into your custody immediately and allowed you to take your son home to Florida.

On March 3, 2017, the mother started her parenting plan action in Washington State. In her Petition, the mother did not tell the court that there was a current custody order from Illinois. The mother instead asked the court to issue a new parenting plan without any regard to the lawful, valid February 29, 2016 order from Illinois.

On April 7, 2017 The Washington State court initiated a judicial conference with the court in Illinois to decide the issue of jurisdiction. The Illinois court said it wanted to maintain jurisdiction. Washington State thus declined to exercise UCCJEA jurisdiction, recognized that Illinois currently has exclusive, continuing jurisdiction under the UCCJEA, dismissed the parenting plan action in Washington State, and said that the DVPO action can only proceed as to whether there should be a DVPO between you and the mother – the child could not be part of the DVPO action. The mother asked the court to reconsider its decision. On May 15, 2017 the court entered an order declining to reconsider it's April 7, 2017 decision.

On May 18, 2017, the court issued an oral ruling dismissing the mother's DVPO, and issuing "CR 11" sanctions, specifically finding the the mother filed her DVPO action without merit. The court took the time to write a detailed order memorializing his findings. This written order was issued on May 23, 2017. **This May 23, 2017 order dismissed all orders issued under cause number 17-2-01981-0 including the February 17, 2017 order which the mother used to get custody in Florida.** The mother was aware of the court's ruling dismissing the DVPO action because she was in court on that date.

The May 23, 2017 order lists all the ways that the mother has been found to have acted in bad faith. Judge McCullough also found the mother to have acted in bad faith in taking the child out of Illinois. The mother is currently being criminally investigated in Bellevue, Washington for forging the child's

birth certificate.

Let me know if you need copies of any of the referenced orders or if you have any questions.

A handwritten signature in black ink that reads "Natalie Roberts". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Natalie Roberts  
Attorney at Law