

**SUPERIOR COURT OF WASHINGTON
FOR KING COUNTY**

THOMAS BRET HAGGERTY, an Individual

Petitioner,

vs.

SAYIAN PHASAVATH, an individual.

Respondent.

NO. 14-3-06850-0

DECLARATION AND NOTICE OF T. BRET
HAGGERTY DATED 3/26/2015

COVER SHEET

ATTACHED HERETO IS:

DECLARATION AND NOTICE BY T. BRET HAGGERTY DATED MARCH 26, 2015

Date: March 26, 2015

From: T. Bret Haggerty
13222 29th Avenue SE
Mill Creek, WA 98012
(425) 385-3459
bhaggerty@gmail.com

To: Law Office of Michael W. Bugni
11300 Roosevelt Way NE, Suit 300
Seattle, WA 98125
(206) 365-5500

King County Superior Court Judge(s)
516 Third Ave
Seattle, WA

Attention: Karma Zaike, Erika Reichley, Judges of King County Superior Court, Thomas Kuffel
King County Prosecutors Office

Subject: King County Superior Court Casue 14-3-06850-0 Haggerty v. Phasavath

It has come to my attention that a hearing took place on March 6, 2015, in attendance was Ericka Reichley (for the respondent) and it was in front of Lori Kay Smith. I have yet to obtain the calendar information from the clerk as to when and by whom this hearing was scheduled by the Bugni Law Office when I do I will update this information. No Notice was provided to me concerning this hearing either prior to or post hearing.

Venue was changed on this case at your demand, Ms. Zaike, and at a hearing in Snohomish County Superior court on August 15, 2014 you (Zaike) made the following statement to SCSC Judge Anita Farris *"I was aware that Mr. Haggerty and Mr. Hupy had filed, but I wasn't aware that—or excuse me. I was not aware that the matter had actually been filed. I was aware that they threatened to file. I was not aware of the summary judgment. However there are a number of Judges in King County who are new judges and I believe we'll be able to address the matter."* Notwithstanding the fact that you lied to Judge Farris about your knowledge of cause 14-2-03819-2 you indicate intent to seek a Judge who was not a party to that lawsuit so ALL parties would be free from the scourge of a prejudiced and/or biased trier of fact. But as I suspected you have refused to follow your own words, again another Karma lie which Lori Kay Smith has stated she will reward you for via voodoo jurisprudence.

According to an email I have in my possession you were made aware that in fact the King County Prosecutor had accepted service on behalf of all named defendants in that action (some 54 King County Superior Court Judges, now including at least one Division I COA Judge and one Washington Supreme Court Justice) on May 1, 2014.

On October 14, 2014 King County Superior Court Judge Susan Craighead signed an order of Judicial assignment (coincidentally she assigned it to another named defendant Judge Ronald Kessler) and a order concerning the case schedule, copies of this schedule were provided to me by your office as required by Local Court Rule. Judge Craighead later reassigned the case to Judge Palmer Robinson and then to Judge Elizabeth Berns (all of whom were named defendants in the SnoCo 2014 action in which I was a co-plaintiff) no consideration from your office OR any actor from the King County Superior Court bench to address these clear and unambiguous violations of the appearance of fairness doctrine (aka DUE PROCESS OF LAW) and/or my constitutional rights.

As part of the Craighead order of case schedule there are several areas of concern for me; first Craighead entered an order requiring an *"Adequacy/Threshold Hearing Order"* citing KCLFLR 13(d)(2) with a required completion date of 2/03/2015 further ordering *"If no threshold Order is obtained by this deadline, all parties must appear at Status Conference Hearing"* while this order clearly is factual proof that Judge Craighead was NOT versed in the case and violated common law, my constitutional rights, and Judicial Cannon(s) as Snohomish County Superior Court had already ruled finding Adequate cause for the trial to move forward, in fact the trial was mere days away when you (Zaika) sought to change venue to King County. King County Superior Court had absolutely ZERO jurisdiction to re litigate this already settled matter concerning adequate cause. This violation or attempted violation is a matter presently before Snohomish County Superior Court SCSC Cause 15-2-03021-1 Haggerty v. Craighead, Robinson, Smith, Berns, and 1-75 John Does and will be addressed there.

Craighead further ordered that a "Status Conference" would be required on March 6, 2015 in King County Courthouse room E-835 at 9:00 a.m. "If Confirmation of Issues AND response or joinder to the petition are not filed or threshold hearing for modifications has not been heard, all parties must appear at the hearing." The Order, notwithstanding Craighead's authority to issue any such order, clearly states BOTH Confirmation of Issues and Response to Petition must be absent for the hearing to happen, as the case file unquestionably demonstrates and Ms. Reichley admits a response to the petition was filed and Snohomish County found adequate cause for the matter to proceed, there was and is no authority for this hearing to have happened nor is there any authority for any hearing to happen on March 27, 2015. I will say this Ms. Zaika and any other lawyer Judge on who reads this I will file additional legal action against any person or entity who violates and/or attempts to violate my constitutional rights.

In the March 6, 2015 hearing Bugni Lawyer Erika Reichley makes numerous false statements to the court;

1. Reichley states on March 6, 2015 *"yeah. So this case was transferred from Snohomish County. It was determined that King County was the proper venue because of the substantial history this case has in King County."* This is a false statement not supported by any Snohomish County Superior Court Order. A lawyer working for Michael Bugni lies again.
2. Next Reichley states *"The case was filed under a new cause number so one of the reasons we haven't filed a confirmation of issues is we are going to ask that the cases be consolidated."* Indicating at some point a proper Motion for Consolidation will be calendared and opposing party will be provided Notice of such (as required by Supreme Court and Local King County Rules) as of this date no Notice of any such Motion has been provided to me.
3. Judge Smith questioned service of the hearing stating *"And there was—I don't know—do we have—is proper service in the other—filed in the other cause number?"* to which Reichley responded *"There was. So there was service—my client filed a response and adequate cause was found. And then the case was transferred because of venue, but I have a few requests for relief regarding where the case is now."* Reichley lied to the court concerning service, no service or notice of the March 6, 2015 hearing was provided by Bugni Law Office of this hearing nor were any advance copies of any Motion(s) for relief the Respondent intended to seek in clear violation of Local and Supreme Court Rules (and likely Rules of Professional Conduct)
4. Reichley further discusses matters which are not on the case record such as one of the children turning 18, and more importantly she mentions a Writ of Habeas Corpus which Zaïke obtained with the legal assistance and counsel of the King County Sheriff and presented it to Judge Deb Fleck (ret.) in October 2013 AT THE SAME TIME SHE WAS DEFENDING SNOCO PARENTING ACTION, counsel willfully and deliberately sought the aid of Fleck likely in and through a KCBA Family Law Section relationship to obtain relief from a court she knew no longer had subject matter jurisdiction in violation of Supreme Court Rules, Local Court Rules, Rules of Professional Conduct, and Judge Fleck violated Judicial Canons in issuing the warrants. Of note is the fact Judge Fleck exceeded her authority when she issued warrants for search, detainment, and seizure of property including third parties and further violated the law when she failed to place time limits on the warrants. I fully expect to address these violations of my constitutional right in upcoming legal action.
5. Reichley eluded to Judge Smith that a child had turned 18 was of some import, however Judge Fleck assumed lifetime Jurisdiction over Thomas J. Haggerty by failing to place an expiration date on either the Writ of Habeas Corpus and/or the associated Warrants,

violating the constitutional rights of Thomas J. Haggerty, and third party who had information as to his whereabouts, and myself.

6. Reichley fails to mention to Judge Smith that Judge Palmer Robinson in December of 2013 conducted a UCCJEA hearing with the Gallatin County Montana Court in which Jurisdiction was transferred because of the minor Thomas J. Haggerty was fleeing Domestic Violence committed by the mother, Sayian Phasavath.
7. Judge Smith orally states she will be consolidating the cases, presumably 04-3-00375-3 and 14-3-06850-0, and will be sanctioning me for failure to appear and/or some other unknown or voodoo Jurisprudence she can create. In clear violation of my constitutional rights, in violation of the appearance of fairness, in violation of Judicial Canons, Court Rules, and every fundamental principle our judicial system is built upon.
8. Judge Smith regularly spoke at and attended the "secret" KCBA Family Law Section Meetings, in which she disseminated in a discriminatory manner Judicial Intellectual Property which has benefited you Bugni, Zaike, Reichley at the detriment of me and my children.
9. Reichley on March 6, 2015 states her desire and intention to consolidate cases but on February 25, 2015 Ms. Zaike served me with Respondents first set of Interrogatories asking for information she has obtained this year via subpoena duces tecum served on all of my financial institutions. So the intent of the Bugni Law firm and its agents has been stated to harass and intimidate me via improper use of the legal system. These interrogatories which have been sent to me will not be responded to. They serve only to the enrichment of the Bugni law office and frustrate the lawful administration of justice.

In closing Ms. Zaike, Judge Smith, Ms. Reichley, Mr. Bugni, and any other lawyer and/or Judge who is and/or may become involved the hearing that took place on March 6, 2015 was without authority of law and in violation of my constitutional rights. Any hearings, including the one scheduled for March 27, 2015 will also be in above mentioned violation(s). Your interrogatories dated 2-25-15 in cause number 14-3-06850-0 are improper and will not be responded to.

The record is clear and the facts are clear that the Judges of the King County Superior Court and counsel for the respondent have conspired to deprive my constitutional rights in violation of all known laws and protections concerning such. I will respond appropriately and lawfully to all past trespasses and any future trespasses of my rights swiftly and in measure to the degree of violation.

I swear under penalty of perjury of the laws of the state of Washington, as enforced in King and Snohomish Counties, the foregoing is true and correct. Signed in the city of Mill Creek, Washington State this 26th day of March, 2015.


T. Bret Haggerty

Cc: KCSC Judge Susan Craighead via email
KCSC Judge Lori Kay Smith via email
KCSC Judge Palmer Robinson via email
KCSC Judge Elizabeth Berns via email
Michael Bugni via email
Karma Zaike via email
Ericka Reichley via email