

0300  
GEG ÁZÒÓÁFÁHÍ ÁT  
SÖ ÖÁUWÞVÝ  
ÚWÚÖWÜÁÖUWÜVÁÖSÖS  
ÖZÖÖ  
ÖEJÖÁKÍ EÄ I ì EÄ ÁÖCE

**STATE OF WASHINGTON  
KING COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,

Plaintiff,

v.

JOHN ELLIOTT, individually;  
SHANELLE SUNDE, individually;  
BRADY HOWARD, individually; GRACE  
KINNEY, individually; JULIE ELLIS,  
individually; PROBATE &  
ADMINISTRATION SERVICES LLC, a  
Washington limited liability company;  
SUNDE CONSULTING &  
ACCOUNTING LLC, a Washington  
limited liability company; ELLIS  
PROBATE SERVICES LLC, a Washington  
limited liability company; AURORA  
CREEK RANCH, LLC, a Washington  
limited liability company; FOUNDATION  
ESCROW, INC., a Washington  
corporation; ROBERT BROUILLARD,  
ESQ., individually; and DOUGLAS  
OWENS, ESQ., individually.

Defendants.

NO.

COMPLAINT FOR INJUNCTIVE  
AND OTHER RELIEF

**TABLE OF CONTENTS**

1

2 I. INTRODUCTION ..... 1

3 II. PARTIES..... 4

4 III. JURISDICTION AND VENUE ..... 7

5 IV. FACTS..... 8

6     A. Overview of Defendants’ “Probates for Profit” Scheme ..... 8

7     B. Washington’s Probate System and Defendants’ Fiduciary Duties..... 10

8     C. Defendants Converted and Commingled Assets, and Failed to Distribute to Heirs..... 14

9         1. Defendant Elliott converted and misappropriated probate estate funds ..... 14

10         2. Defendant Sunde converted and misappropriated probate estate funds ..... 17

11         3. Defendant Elliott mismanaged probate estate funds..... 20

12         4. Defendants converted and destroyed un-inventoried personal property ..... 21

13         5. Defendants Elliott, Sunde and others failed to disburse funds owed to heirs..... 23

14         6. Defendants Owens and Brouillard knowingly facilitated Elliott’s mishandling of estate

15             funds and other misconduct ..... 24

16         7. Defendant Brouillard and Elliott acted together to misappropriate estate funds ..... 27

17         8. Defendant Foundation and Elliott acted together to misappropriate estate funds ..... 30

18     D. Defendants Engaged in Systematic Self-Dealing..... 30

19         1. Defendants’ self-dealing companies..... 31

20         2. Defendants’ PR fees and PR attorney fees ..... 36

21             a. Inflated PR fees..... 36

22             b. Improper leveraging and collection of PR fees and PR attorney fees ..... 36

23             c. Loss, waste, and delay as a result of improper attorney fee arrangements..... 37

24         3. Defendants’ contracting fees ..... 39

25         4. Defendants’ real estate commissions..... 41

26         5. Defendants’ escrow fees ..... 44

1	6. Defendants’ pronounced self-dealing in non-intervention probates.....	45
2	7. Defendants’ improper purchases of probate properties and self-dealing using Straw	
3	PRs.....	48
4	a. Defendants’ improper purchases of estate properties from probate heirs .....	48
5	b. Defendants’ acquisition of estate properties and other self-dealing through Straw	
6	PRs.....	51
7	E. Defendants Engaged in Dishonesty and Secrecy Toward Heirs, the Courts, and Others .	54
8	F. Impacts of Defendants’ Scheme on Heirs, Real Property Buyers, and the Courts.....	56
9	V. FIRST CAUSE OF ACTION .....	57
10	VI. SECOND CAUSE OF ACTION.....	59
11	VII. THIRD CAUSE OF ACTION .....	63
12	VIII. PRAYER FOR RELIEF .....	66
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

1 Plaintiff State of Washington, by and through its attorneys Nicholas W. Brown,  
2 Attorney General, and Matt Geyman, Ben Carr, and Lauren Holzer, Assistant Attorneys  
3 General, brings this action against Defendants John Elliott, Shanelle Sunde, Brady Howard,  
4 Grace Kinney, Julie Ellis, Probate & Administration Services LLC, Sunde Consulting &  
5 Accounting LLC, Ellis Probate Services LLC, Aurora Creek Ranch, LLC, Foundation  
6 Escrow, Inc., Robert Brouillard, Esq. and Douglas Owens, Esq. The State alleges that  
7 Defendants engaged and continue to engage in unlawful, unfair, and deceptive acts and  
8 practices in violation of the Consumer Protection Act, RCW 19.86, Washington’s probate and  
9 estate laws, RCW Title 11, Washington’s escrow laws, RCW Title 18.44, common law  
10 fiduciary duties, and other laws. The State alleges the following on information and belief.

## 11 I. INTRODUCTION

12 1.1 Defendants manipulated Washington’s probate system and enriched themselves  
13 by engaging in a multi-year, statewide “probates for profit” scheme affecting the estates of  
14 hundreds of deceased Washington homeowners. Led by Defendant John B. Elliott, Defendants  
15 engaged in self-dealing, breaches of fiduciary duty, misrepresentations and concealment,  
16 commingling and other mishandling of estate funds, systematic violations of Washington’s  
17 consumer protection, probate, trust and escrow laws, and, as to Defendants Elliott, Shanelle  
18 Sunde, Probate & Administration Services LLC, Sunde Consulting & Accounting LLC, and  
19 Aurora Creek Ranch, LLC, conversion and misappropriation of millions of dollars owed to heirs.

20 1.2 The purpose of a probate, generally, is to collect and inventory a decedent’s  
21 property, pay creditors, and then distribute any remaining assets or proceeds to the decedent’s  
22 heirs and beneficiaries. The probate process is a solemn one, and its requirements are codified  
23 in RCW Title 11. If a person dies with a will in place, an “executor” may administer the probate.  
24 If a person dies intestate (without a will), a court may appoint an “administrator”—usually a  
25 family member of the decedent or their designee—to perform the required probate duties and  
26

1 settle the estate. Collectively, executors and administrators are known as “personal  
2 representatives,” or “PRs.”

3 1.3 A PR is a fiduciary and must act solely in the best interests of estate beneficiaries,  
4 creditors, and heirs. This includes the fiduciary duty of loyalty which prohibits the PR from  
5 engaging in self-dealing, conversion, or profiting from the estate at the expense of beneficiaries,  
6 creditors, and heirs. A PR must always put the estate’s interests ahead of their own.

7 1.4 That did not happen here. Rather, Defendants exploited two narrow statutory  
8 provisions—RCW 11.28.120(7) and 11.96A.050(4)—to quietly gain control over the estates of  
9 hundreds of deceased strangers, by launching probates in counties distant from the decedents,  
10 heirs, and estate properties, and getting themselves appointed as PRs over the estates of people  
11 whom they had never met.

12 1.5 Defendants’ predatory business scheme—led by Elliott—began by identifying  
13 distressed homes they wished to “flip” and sell, as real estate speculators might do. These homes  
14 were typically in disrepair after the homeowner died intestate. Despite having no connection to the  
15 deceased homeowners or any legal or equitable interest in the homes, Defendants initiated probate  
16 proceedings over the homeowners’ estates and petitioned for themselves to be appointed as PRs.  
17 As PRs, Defendants could list and sell the homes with little to no competition or court oversight.

18 1.6 Like foxes left to guard the henhouse, Defendants then used their PR powers to  
19 snatch what profits they could from each estate and interested third parties before moving on to  
20 repeat the process with the next probate.

21 1.7 Defendants used self-dealing transactions to charge inflated fees for their PR  
22 services, legal services, real estate listings, contracting services, and escrow services, which  
23 Defendants disbursed to themselves at escrow without court approval, all in violation of their legal  
24 obligations and fiduciary duties. Defendants sometimes secretly bought the estate properties for  
25 themselves, or secretly paid themselves large sums, or leveraged their fiduciary positions to collect  
26 unlawful fees. As a result, Defendants profited immediately from estate property sales even when,

1 as was often true, the transaction was a self-serving short sale with no proceeds left for the heirs.

2 1.8 Defendants' probate administrations yielded more than \$5 million in estate proceeds  
3 distributable to heirs. Yet according to records obtained in the State's investigation, less than  
4 \$3 million of such proceeds have been distributed, with millions of dollars now missing or  
5 unaccounted for.

6 1.9 Defendants also converted and commingled from estate trust accounts more than  
7 \$2 million owed to heirs.

8 1.10 Together, Defendants filed at least 213 probates across Washington over the last  
9 five years, working at a fevered pace to sell deceased strangers' homes, pay themselves quickly  
10 without court approval, and then open the next probate. The result is more than a hundred probates  
11 that remain open and languishing in Washington courts today, up to five years later.

12 1.11 Defendants' "probates for profit" enterprise is fundamentally irreconcilable with  
13 Washington law and the fiduciary duties required of PRs.

14 1.12 Lack of candor, lack of due diligence, lack of respect for fiduciary duties, and  
15 systematic violations of court orders and probate laws have permeated Defendants' probate  
16 administrations for years. On January 13, 2025, a Kitsap County Superior Court ordered Defendant  
17 Elliott to serve 30 days in jail for stonewalling a Special Master inquiry into his probate  
18 administration practices. As of the filing of this Complaint, a bench warrant for Elliott's arrest  
19 remains outstanding.

20 1.13 The State now brings this action and asks the Court to issue emergency (TRO),  
21 preliminary, and permanent injunctive relief enjoining and restraining Defendants from engaging  
22 the conduct complained of herein; assess civil penalties under RCW 19.86.140 of up to \$7,500 per  
23 violation for each violation of RCW 19.86.020; order Defendants to provide restitution of the illegal  
24 fees, charges, and all other amounts Defendants acquired through their systematic unlawful, unfair  
25 and deceptive conduct pursuant to RCW 19.86.080; and order such other and further relief as the  
26 Court deems just and proper.

1 **II. PARTIES**

2 2.1 The Plaintiff is the State of Washington. The Attorney General is authorized to  
3 commence this action pursuant to the Consumer Protection Act (CPA), RCW 19.86.080 and  
4 RCW 19.86.140.

5 2.2 Defendant John B. Elliott (Elliott) is an unmarried individual residing in Tacoma,  
6 Pierce County, Washington. At all times relevant hereto, Elliott was:

7 2.2.1 Personal representative (PR) in at least 160 probates filed in King County,  
8 Kitsap County, Spokane County, Skagit County, Thurston County, and  
9 Pierce County from 2019 to 2024;

10 2.2.2 *De facto* manager and controlling force behind at least 53 additional  
11 probates filed in various counties by Defendants Shanelle Sunde, Brady  
12 Howard, Grace Kinney, and Julie Ellis under his supervision and control;

13 2.2.3 Sole member, governor, and manager of Defendant Probate &  
14 Administration Services LLC (P&A Services);

15 2.2.4 Sole member, governor, and manager of Defendant Aurora Creek  
16 Ranch, LLC (Aurora Creek);

17 2.2.5 Sole member, governor, and manager of Seguros Pacific Real Estate, LLC  
18 (Seguros Pacific);

19 2.2.6 Sole member, governor, and manager of 542LiveOak, LLC  
20 (542LiveOak). 542LiveOak also did business as Destin Realty LLC;

21 2.2.7 *De facto* governor, manager, and agent of Destin Realty LLC (Destin), a  
22 d/b/a of Elliott’s company 542LiveOak, which Elliott continued to control  
23 after substituting his friend, Defendant Howard, as the nominal successor  
24 owner of the company;

25 2.2.8 *De facto* governor, manager, and agent of Ridgeback Real Estate, LLC  
26 (Ridgeback); and



1           2.6.1 PR in nine probates filed in Kitsap County in 2023 acting under Elliott's  
2           direct supervision and control;

3           2.6.2 Sole member, governor, and manager of Defendant Ellis Probate  
4           Services LLC (Ellis Probate); and

5           2.6.3 Daughter of Jolyne Baines, the owner and operator of Defendant  
6           Foundation Escrow, Inc.

7           2.7 Defendant Probate & Administration Services LLC (P&A Services) is a  
8 Washington limited liability company with its principal place of business located at 5500 Olympic  
9 Drive #H105-270, Gig Harbor, WA 98335. P&A Services was formed in October 2020 and is a  
10 single-member LLC with Elliott as its sole member and governor.

11          2.8 Defendant Aurora Creek Ranch, LLC (Aurora Creek) is a Washington limited  
12 liability company with its principal place of business located at 2721 S 14th St,  
13 Tacoma, WA 98405. Aurora Creek was formed in August 2023 and is a single-member LLC  
14 with Elliott as its sole member and governor.

15          2.9 Defendant Sunde Consulting & Accounting LLC (Sunde Consulting) was a  
16 Washington limited liability company with its principal place of business located at  
17 2508 179th St Ct E, Tacoma WA 98445. Sunde Consulting was formed in July 2020 as a single-  
18 member LLC with Sunde as its sole member and governor and was administratively dissolved  
19 on December 3, 2024.

20          2.10 Defendant Ellis Probate Services LLC (Ellis Probate) is a Washington limited  
21 liability company with its principal place of business located at 6642 Wapato St,  
22 Tacoma, WA 98409. Ellis Probate was formed in November 2023 and is a single-member LLC  
23 with Ellis as its sole member and governor.

24          2.11 Defendant Foundation Escrow, Inc. (Foundation) is a Washington corporation  
25 with its principal place of business located at 4119 6th Ave, Tacoma, WA 98406. Foundation  
26 was formed in June 2007, and at all times material hereto was solely owned and operated by

1 Jolyne Baines, its designated escrow officer, who is a WSBA-licensed Limited Practice Officer  
2 (LPO) and also the mother of Defendant Julie Ellis.

3 2.12 Defendant Robert Brouillard, Esq. (Brouillard) is an individual residing in  
4 Shoreline, King County, Washington. At all times material hereto, Brouillard was and continues  
5 to be an attorney licensed to practice in Washington State under bar number #19786.

6 2.13 Defendant Douglas Owens, Esq. (Owens) is an individual residing in Anacortes,  
7 Skagit County, Washington. Though he recently retired in 2024, at all times material hereto  
8 Owens was an attorney licensed to practice in Washington State under bar number #641.

9 2.14 Defendants operated as a common enterprise, and each of them knowingly  
10 assisted, directed, controlled, participated in, carried out, and/or approved of the acts, practices,  
11 and activities alleged in this Complaint, making each of them jointly and severally liable for the  
12 unfair or deceptive acts and practices described herein.

### 13 III. JURISDICTION AND VENUE

14 3.1 The Court has subject matter jurisdiction over this Complaint under the CPA,  
15 RCW 19.86, Washington's probate and estate laws, RCW 11.96A.020 and 11.96A.040, and  
16 Washington's escrow laws, RCW 18.44.490(4).

17 3.2 The Court has personal jurisdiction over Defendants because they engaged and  
18 continue to engage in the conduct that is the subject of this Complaint in King County,  
19 Washington, and elsewhere throughout the State of Washington.

20 3.3 Venue in King County is proper pursuant to RCW 4.12.020, RCW 4.12.025, and  
21 CR 82 because Defendants transacted and continue to transact business in King County, many  
22 of the events giving rise to this action occurred in King County, one of the Defendants resides  
23 in King County, Defendants opened multiple probates in King County, many of the probates at  
24 issue involve real property located in King County, many of the heirs reside in King County, and  
25 many of the buyers of real properties from the probates at issue reside in King County.

26 3.4 The Attorney General has the authority to commence this action as conferred by

1 the CPA, RCW 19.86.080, RCW 19.86.140, Washington’s probate and estate laws,  
2 RCW 11.96A.040, RCW 11.48.070, and Washington’s escrow laws, RCW 18.44.490(4).

#### 3 IV. FACTS

##### 4 A. Overview of Defendants’ “Probates for Profit” Scheme

5 4.1 Defendant Elliott worked as a real estate broker and agent for more than 20 years  
6 until December 27, 2018, when the Washington Department of Licensing revoked his real estate  
7 license based on repeated misconduct, including his failure to deal honestly and in good faith in  
8 real estate transactions in which he was involved.

9 4.2 Elliott also worked as an insurance broker for more than 10 years until  
10 October 22, 2014, when the Washington Office of the Insurance Commissioner revoked his  
11 insurance broker license for failure to maintain records, failure to reconcile and properly  
12 maintain premium accounts, failure to establish and maintain adequate records, and failure to  
13 provide records for inspection.

14 4.3 Beginning in late 2018, Elliott developed a new business scheme—administering  
15 third-party probates for profit. He planned to identify distressed real properties where the  
16 homeowners died intestate and no one had initiated probate proceedings, initiate probate  
17 proceedings and petition to be appointed as administrator/personal representative (PR) of their  
18 estates,<sup>1</sup> and then once appointed as PR, distribute estate assets in a manner profitable to himself  
19 and the other Defendants and their affiliated businesses.

20 4.4 Each Defendant named herein provided substantial assistance to Elliott with  
21 aspects of his illegal “probates for profit” scheme, and each of them, including Elliott, engaged  
22 in their own independent breaches of fiduciary duty and/or unlawful acts in pursuit of  
23 Elliott’s scheme.

---

24  
25 <sup>1</sup> Because this case involves intestate estates only, the State uses “administrator,” “personal  
26 representative,” and “PR” interchangeably.

1           4.5     Defendants Sunde, Howard, Kinney, and Ellis, each of whom acted as PRs under  
2 Elliott’s direct supervision and control in order to obscure Elliott’s involvement in these probate  
3 administrations, are sometimes referred to collectively herein as “Straw PRs.”

4           4.6     Elliott’s “probates for profit” scheme effectively allowed Elliott to continue to  
5 “flip” and sell houses even without a real estate broker’s license. That was Elliott’s goal and,  
6 even when speaking with third parties, Elliott described Defendants’ probate enterprise as one  
7 of “flipping houses.”

8           4.7     Before petitioning for appointment as PR, Defendants had no legal or equitable  
9 interest in the estates at issue. Virtually without exception, the deceased owners of the properties  
10 were strangers to Elliott, albeit strangers who had left behind property from which Elliott  
11 believed he could derive a profit.

12          4.8     Because Washington’s probate system relies heavily on *ex parte* proceedings,  
13 uncontested pleadings, and the honesty and integrity of those filing the pleadings, Defendants were  
14 able to open at least 213 probates statewide between March 2019 and January 2024 before being  
15 discovered by authorities.

16          4.9     Defendants opened 179 probates in Kitsap County, 11 in Spokane County, eight in  
17 Pierce County, eight in Skagit County, four in King County, and three in Thurston County. *See*  
18 Appendix A attached hereto (identifying Defendants’ probates by date filed, court, case number,  
19 estate name, real property address, county PR, PR’s attorney, and case status).

20          4.10    In the midst of Defendants’ “probates for profit” scheme, heirs were frequently left  
21 unaware or barely aware of the probate processes underway, heirs’ benefits were not maximized,  
22 and Defendants’ relatively few court filings did not account for the assets Defendants were  
23 funneling to themselves.

24          4.11    Almost uniformly, estate valuables like vehicles, jewelry, firearms, and other  
25 personal property disappeared during Defendants’ administration of these probates, with no  
26 accounting of their whereabouts by Defendants. So too did estate financial accounts.

1           4.12   Often, Defendants did not notify easily identifiable heirs that they were initiating  
2 probate proceedings at all. In some cases, Defendants locked heirs out of the homes in which they  
3 had lived with their now-deceased loved ones, before selling the homes out from under the heirs.  
4 On other occasions, Elliott lived rent-free in the estate homes, drove estate cars as his own, and sold  
5 estate cars and firearms obtained from estate properties to his friends cheaply and privately.

6           4.13   According to Umpqua Bank, Wells Fargo Bank, and JPMorgan Chase Bank records  
7 obtained by the State, Defendant Elliott converted, commingled, and apparently absconded with  
8 nearly \$1.8 million (\$1,770,299.65) in estate funds owed to heirs, closing out and removing all  
9 funds from dozens of estate trust accounts without justification or court authorization and  
10 transferring the funds into his own business and personal bank accounts. The conversion and  
11 commingling of estate funds into Elliott’s business and personal accounts began in approximately  
12 early 2023 and continued until as recently as November 2024.

13           4.14   According to Umpqua Bank records obtained in the State’s investigation, Defendant  
14 Sunde also converted and continues to convert nearly \$450,000 (\$446,701.50) of estate funds owed  
15 to heirs, treating estate trust accounts as “slush funds” available to pay her own personal expenses.  
16 Sunde’s misappropriation of estate funds began more than three ago and continued as recently as  
17 December 23, 2024. Like Elliott, Sunde has refused to respond to communications from heirs  
18 expressing their concerns about the estates she administered as the appointed PR.

19           4.15   In late June 2024, the Kitsap County Superior Court took the extraordinary step of  
20 staying more than 100 pending probate cases in which Elliott is named as PR and launched a Special  
21 Master inquiry due to the Court’s rising concerns about Elliott’s “failures to fulfill his fiduciary  
22 duties [as PR] and appearance of self-dealing.” The Special Master inquiry in Kitsap County  
23 remains ongoing but has thus far proven fruitless in obtaining the requested accountings and other  
24 missing information from Elliott.

25   **B.     Washington’s Probate System and Defendants’ Fiduciary Duties**

26           4.16   Probate is a statutory process governed by RCW Title 11. In a probate, a PR is

1 appointed by the court to collect and inventory a decedent’s assets, pay bills and taxes, satisfy  
2 creditors, distribute remaining assets to heirs and beneficiaries, and then properly close the  
3 matter. If there is no will, the court appoints an “administrator” to act as PR and administer the  
4 estate in accordance with Washington’s laws on intestate succession. RCW 11.04.

5 4.17 Defendants’ “probates for profit” scheme exploited a narrow subsection of  
6 RCW 11.28.120, which allows Washington courts to appoint a PR when a person dies intestate.  
7 Under this statute, surviving spouses receive first priority to serve as PR, followed by the  
8 decedent’s children, parents, and enumerated family members. The statute identifies other  
9 persons who may properly serve as PR, such as creditors, absent the appointment of next of kin.  
10 Finally, RCW 11.28.120(7) provides that if after 40 days no one else has been appointed, a court  
11 may appoint “any suitable person” to administer the estate. Defendants invariably sought to be  
12 appointed as “any suitable person” under RCW 11.20.120(7).

13 4.18 Elliott and his Straw PRs were never “suitable persons” to petition to administer  
14 the estates under RCW 11.20.120(7), as they had no legal or equitable interest in the intestate  
15 estates they sought to administer and petitioned for appointment for their own financial gain.  
16 While some probate courts may appoint professional fiduciaries with no legal or financial  
17 interest in an estate to administer a probate, this is a unique case where Defendants—who were  
18 wholly unaffiliated with the estates—both launched the probates and petitioned to have  
19 *themselves* appointed as PRs.

20 4.19 Defendants thus launched these probates over strangers’ estates with the  
21 predatory intent to profit and self-deal, without adequate disclosures to the appointing courts.  
22 Defendants, who were thus categorically unsuitable to be PRs, failed to meet the statutory  
23 “suitability” requirement in every one of their 213 probates.

24 4.20 Defendants’ initial petitions for appointment as PR also violated the common law  
25 principle of “standing” required to be a “real party in interest,” which requires some articulable  
26 legal or equitable interest in a matter being brought before the court. RCW 11.28.120(7) was

1 never intended to allow total strangers with no connection to an estate to initiate a court  
2 proceeding and gain access to strangers' estate resources for their own financial gain.

3 4.21 Moreover, as described more fully below, Defendants frequently failed to provide  
4 adequate notice to heirs of their intent to launch the probate or seek appointment as PR.  
5 Sometimes, Defendants failed to provide notice to easily identifiable heirs, and other times, they  
6 simply sent "notice" to persons unconnected to the estate (or to made-up persons) in order to  
7 manufacture notice for the court. In numerous cases, Defendants failed to actually identify or  
8 provide the requisite notice to all relevant heirs.

9 4.22 Defendants' "probates for profit" scheme also exploited RCW 11.96A.050(4),  
10 which allows "any county in the state of Washington" to serve as venue for a probate. Defendants  
11 routinely (179 times out of 213, over 84% of the time) selected Kitsap County as their chosen  
12 venue—even though the estate property, decedents, heirs, and even the Defendants themselves  
13 were located in other counties—because it allowed Defendants to administer the probates most  
14 quietly, easily, and cheaply. As early as 2020, Elliott's attorney, Defendant Owens, identified  
15 Kitsap County as the venue "friendliest to our plans."

16 4.23 Once appointed as PRs, Elliott and his Straw PRs became officers of the court.  
17 As such, they were duty-bound to act solely in the best interests of the heirs and creditors of the  
18 estate. This included fiduciary duties to avoid waste, loss, and/or delay, along with a fiduciary  
19 duty of loyalty prohibiting Defendants from engaging in self-dealing, converting estate assets,  
20 or otherwise profiting from the estates at the expense of beneficiaries. *See* RCW 11.48.010  
21 (requiring PRs to settle estates "as rapidly and quickly as possible, without sacrifice to the  
22 probate . . . estate"). As PRs, Defendants routinely breached these fiduciary duties by putting  
23 their personal interests ahead of the estate's interests.

24 4.24 RCW 11.98.078 codifies a PR's fiduciary duty of loyalty owed to the  
25 beneficiaries of the probate estate and provides that "a sale, encumbrance, or other transaction  
26 involving the investment or management of trust property entered into by the trustee for the

1 trustee’s own personal account or which is otherwise affected by a conflict between the trustee’s  
2 fiduciary and personal interests” is presumptively unlawful and voidable by the beneficiaries  
3 affected by the self-dealing transactions. Defendants consistently breached this duty of loyalty.

4 4.25 As attorneys for Elliott and his Straw PRs, Defendants Owens and Brouillard  
5 were also officers of the court and owed their own fiduciary duties to the heirs. When an attorney  
6 agrees to assist a PR with the proper administration of an estate, “the fiduciary duties of the  
7 attorney run not only to the personal representative but also to the heirs.” *In the Matter of the*  
8 *Estate of Larson*, 103 Wn.2d 517, 521, 694 P.2d 1051 (1985). Owens and Brouillard repeatedly  
9 breached these fiduciary duties by knowingly assisting their PR clients with engaging in  
10 self-dealing transactions, collecting unlawful fees, mismanagement of estate resources, and  
11 waste and delay in the administration of these probates.

12 4.26 Similarly, Defendant Foundation, the escrow agent in nearly all of Defendants’  
13 real property transactions, owed fiduciary duties to all parties to the sale including the third-party  
14 homebuyers and heirs of the probate estates. As the escrow agent, Foundation was required to  
15 act “as fiduciary to all parties to the escrow” and to “conduct the affairs with which it [was]  
16 entrusted with scrupulous honesty, skill, and diligence.” *Denaxas v. Sandstone Court of*  
17 *Bellevue, LLC*, 148 Wn.2d 654, 663, 63 P.3d 125 (2003) (citation omitted). Washington’s escrow  
18 statute also prohibits Foundation from engaging in any “scheme, device, or artifice to defraud or  
19 mislead borrowers or lenders or to defraud any person” or “any unfair or deceptive practice  
20 toward any person.” RCW 18.44.301. Foundation consistently violated these duties and  
21 obligations by knowingly assisting Defendants in self-dealing transactions, disbursing unlawful  
22 fees and commissions at escrow, and collecting inflated escrow fees under a secret fee  
23 arrangement with Elliott.

24 4.27 Intestate probates of the kind at issue are generally supervised by the court, except  
25 in instances where “non-intervention powers” are granted, wherein a PR “may administer and  
26 settle the estate without supervision or intervention by the court.” RCW 11.68.085. In the

1 absence of non-intervention powers, a PR must obtain court approval before selling estate  
2 property or distributing estate assets.

3 4.28 Elliott and his Straw PRs only rarely sought “non-intervention powers”.  
4 Consequently, nearly all of Defendants’ probate administrations required court supervision.  
5 Defendants were therefore prohibited from (1) selling estate real or personal property without  
6 prior court approval, or (2) paying fees or charges to themselves from sales of estate property  
7 without prior court approval. Despite these prohibitions, Defendants frequently sold estate  
8 homes without court approval, and routinely disbursed fees and other monies to themselves at  
9 closing through escrow, all without prior court approval in violation of RCW 11.68.085.

10 4.29 In rare instances, the court granted Elliott and his Straw PRs non-intervention  
11 powers. As described below, Defendants’ self-dealing and violations of fiduciary duties were  
12 even more pronounced and unchecked in those probates.

13 **C. Defendants Converted and Commingled Assets, and Failed to Distribute to Heirs**

14 4.30 At nearly every turn, Defendants mismanaged, commingled, or simply pocketed  
15 estate funds and assets. Defendants Elliott and Sunde converted estate funds and directed and  
16 the funds through their affiliated Defendant companies. Additionally, Defendant Ellis failed to  
17 distribute funds owed to heirs. Defendants Owens and Brouillard—Defendants’ attorneys—  
18 knew of and, in some cases assisted with, the conversion and mismanagement of estate funds  
19 and other misconduct by Elliott and his Straw PRs.

20 **1. Defendant Elliott converted and misappropriated probate estate funds**

21 4.31 By early 2023, Defendant Elliott began unlawfully withdrawing money from  
22 estate trust accounts without court authorization. For example, on January 20, 2023, Elliott  
23 unlawfully withdrew \$8,013.65 from the trust account of the *Estate of Marvin Engelhardt*,  
24 Kitsap County #21-4-00681-18, before submitting a final report on the probate, thereafter  
25 moving those funds into Defendant P&A Services’ account, then to his own personal account.  
26 Elliott failed to disclose this conversion of estate funds in his sworn declaration and final report

1 to the Court months later, and it appears that no one noticed that Elliott took the money.

2 4.32 Elliott continued to escalate his self-dealing, brazenly pocketing funds from  
3 probate trust accounts. On February 13, 2024 alone, Elliott—acting in his capacity as PR and  
4 lone signatory on 19 estate trust accounts—utilized cashier’s checks to withdraw more than  
5 \$475,000 from the estate trust accounts at Umpqua Bank and JPMorgan Chase Bank. In many  
6 instances, Elliott’s February 13 withdrawals reduced the trust accounts balances to zero. Elliott  
7 did not obtain court authorization for any of these withdrawals.

8 4.33 That same day, Elliott deposited 19 cashier’s checks for the same amounts—  
9 down to the penny—into his business account at P&A Services’ account at Umpqua Bank (P&A  
10 Services Acct #5875), as reflected in the chart below:

Last Name of Estate	First Name	Date of Transaction	Type of Transaction	Account monies were deposited into	Amount
Ashley	Freddie E	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 3,080.20
Birley	Nigel	2/13/2024	Withdrawal - transfer	P&A Services #5875	\$ 925.36
Bloemsma	John Lloyd	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 356.22
Brock	Diane Jo	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 90,000.00
Coppes	Glenn Arthur Coppes	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 5,341.00
Donaldson	Richard D.	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 24,885.12
Emler	Philip Wayne	2/13/2024	Withdrawal - OTC withdrawal	P&A Services #5875	\$ 2,500.00
Hatcher	Katie D.	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 16,818.95
Heathers	David Andrew	2/13/2024	Close Account - withdrawal OTC	P&A Services #5875	\$ 18,660.77
Hood	Connie E.	2/13/2024	Close Account - withdrawal OTC	P&A Services #5875	\$ 108,175.29

1	Kalka	Samuel D.	2/13/2024	Withdrawal - OTC withdrawal	P&A Services #5875	\$ 2,660.38
2						
3	McAdams	Gwendolyn C	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 3,150.60
4	Parrish	Royce L.	2/13/2024	Withdrawal - OTC withdrawal	P&A Services #5875	\$ 11,870.51
5						
6	Rimpila	Kevin Ray	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 1,126.73
7	Rosen	Cheryl A.	2/13/2024	Close Account - withdrawal OTC	P&A Services #5875	\$ 13,691.53
8						
9	Sioda	Elizabeth	2/13/2024	Close Account- withdrawal	P&A Services #5875	\$ 3,013.45
10	Triggs	Jim A.	2/13/2024	Withdrawal - OTC	P&A Services #5875	\$ 19,134.86
11	Velmer	Lolita Ingrida	2/13/2024	Withdrawal - transfer	P&A Services #5875	\$ 131,674.54
12	Weightman	Richard W.	2/13/2024	Withdrawal - OTC withdrawal	P&A Services #5875	\$ 19,000.60
13						

14  
15 4.34 Elliott subsequently transferred identical amounts from his P&A Services Acct  
16 #5875 at Umpqua Bank, first into his P&A Services' account at Wells Fargo Bank, Acct #6205,  
17 and then into various of his personal and business accounts (e.g., the business account of  
18 Defendant Aurora Creek, Elliott's single-member LLC contracting company), which he used, in  
19 part, to pay his personal expenses.

20 4.35 In some instances, Elliott deposited converted estate funds directly into his  
21 personal checking accounts. More frequently, however, Elliott used the model described  
22 above—a process known as “layering,” aimed at obscuring the true source of funds—to launder  
23 estate funds through his various businesses, including P&A Services, 542LiveOak, and Aurora  
24 Creek. That is, Elliott frequently deposited converted estate funds first into one company's  
25 account, then moved the funds from there to a second company's account, then moved the funds  
26

1 from there into yet another company’s account or into one of his personal accounts. Elliott also  
2 routinely paid his own personal expenses from his business accounts.

3 4.36 Elliot paid many of the other Defendants from converted estate funds. For  
4 example, Elliott paid Defendant Brouillard using commingled funds from P&A Services’ and  
5 Aurora Creek’s accounts at the same time Elliott was using these affiliated companies’ accounts  
6 to launder converted estate funds.

7 4.37 Elliott’s scheme to convert funds from estate trust accounts was prolific. Between  
8 June 2021 and March 2024, Elliott and his affiliated businesses appropriated and commingled  
9 nearly \$2 million (\$1,978,842.44) in estate funds. Nearly \$1.8 million of that (\$1,770,299.65)  
10 appears to have been converted—without court authorization—from estate trust accounts over  
11 which Elliott had sole control as PR, with Elliott nearly always withdrawing the funds at an  
12 Umpqua Bank, in person, in the form of a cashier’s check.

13 **2. Defendant Sunde converted and misappropriated probate estate funds**

14 4.39 Similarly, Defendant Sunde converted nearly \$450,000 in funds owed to heirs.  
15 Sunde was Elliott’s primary Straw PR between 2020 and 2021, operating to conceal Elliott’s  
16 involvement in various probates. Elliott profited from many of Sunde’s probates through fees  
17 and commissions paid to Elliott’s affiliated companies including Ridgeback, Red Dawg,  
18 542LiveOak, and Seguros Pacific.

19 4.40 Sunde was appointed as the PR in 36 probates, with Defendant Owens nearly  
20 always acting as her attorney, 19 of which remain open and languishing. Nearly all of these  
21 probates require court supervision.<sup>2</sup> In 12 of these probates, Sunde facilitated the sale of real  
22 property and subsequent deposit of sale proceeds into estate trust accounts, without obtaining  
23 the requisite court approval.

24 \_\_\_\_\_  
25 <sup>2</sup> The exception the *Estate of Laurence Pratt*, Pierce County #20-4-01343-1, in which the court  
26 granted Sunde “non-intervention powers.” In that probate case, Sunde has so far paid herself at least  
\$25,237.50 from the \$40,582.44 in the estate trust account.

1 4.41 Sunde deposited at least \$720,000 in real property sale proceeds into 12 trust  
2 accounts, administered by her, involving probates with identified heirs. Sunde allowed these  
3 probates to languish, while paying herself from the probate accounts—again, without court  
4 approval. Eleven of these probates remain open with no final reports or accounting, and the  
5 twelfth (*Estate of Ruth Rose*, Spokane County #20-4-01184-32) was administratively dismissed  
6 in June 2023 for lack of action on Sunde’s part.

7 4.42 Sunde has not sought or obtained court approval to disburse estate funds to herself  
8 or to otherwise withdraw monies from the estate trust accounts. Instead of disbursing estate funds  
9 to the rightful heirs of the decedent, Sunde has systematically and unlawfully converted those  
10 funds to herself and her company, Defendant Sunde Consulting.<sup>3</sup>

11 4.43 An example is the *Estate of Ruth Rose*, administratively dismissed by the court  
12 in June 2023 after years of inaction on Sunde’s part as the appointed PR. Pursuant to the *Rose*  
13 Estate’s bank records, Sunde has systematically and unlawfully siphoned monies from the  
14 account since 2021, when \$155,807.44 was initially disbursed to the probate account, ostensibly  
15 for disbursement to heirs. Astonishingly, even after the court dismissed the probate case in  
16 June 2023, Sunde paid herself out of the *Rose* estate trust account, as follows:

17

Date of Payment	Paid To	Amount	Description (Check Memo)
8/17/2023	Shanelle Sunde	\$ 5,000.00	PR work 40 hours - heir search
10/10/2023	Shanelle Sunde	\$ 3,000.00	PR hours
11/21/2023	Shanelle Sunde	\$ 3,000.00	Taxes
12/15/2023	Shanelle Sunde	\$ 1,750.00	Tax prep estate
12/27/2023	Shanelle Sunde	\$ 1,500.00	Research hours
1/12/2024	Shanelle Sunde	\$ 5,000.00	Research hours
1/26/2024	Sunde Consulting	\$ 4,975.00	Beneficiary - Genealogy search
2/5/2024	Sunde Consulting	\$ 2,500.00	Research hours
2/12/2024	Sunde Consulting	\$ 5,000.00	Heir research & estate taxes
2/23/2024	Sunde Consulting	\$ 5,000.00	Genealogy research
3/12/2024	Sunde Consulting	\$ 5,000.00	Research

18  
19  
20  
21  
22  
23  
24  
25

26 <sup>3</sup> Sunde Consulting is Sunde’s single-member, probaton administration LLC.

1	4/1/2024	Sunde Consulting	\$ 5,000.00	Research hours
2	4/30/2024	Sunde Consulting	\$ 3,500.00	Research
3	5/30/2024	Sunde Consulting	\$ 5,750.00	Estate tax prop & hours
4	6/10/2024	Sunde Consulting	\$ 3,500.00	Hours 5/15-5/31
5	6/27/2024	Sunde Consulting	\$ 3,500.00	Hours 5/15-5/31
6	8/20/2024	Sunde Consulting	\$ 6,500.00	Hours 5/15-5/31
7	8/26/2024	Sunde Consulting	\$ 5,000.00	Invoice hours
8	9/13/2024	Sunde Consulting	\$ 5,500.00	Reimbursement
9	9/30/2024	Sunde Consulting	\$ 5,000.00	Invoice hours
10	10/25/2024	Sunde Consulting	\$ 3,500.00	Hours
11	11/1/2024	Sunde Consulting	\$ 5,000.00	Hours Invoice
12	11/8/2024	Sunde Consulting	\$ 5,000.00	Invoice
13	11/13/2024	Sunde Consulting	\$ 3,000.00	Invoice
14	11/29/2024	Sunde Consulting	\$ 2,500.00	Invoice

15 As of the end of December 2024, only \$30,506.63 of the \$155,807.44 in sale proceeds remains  
16 in the *Rose* estate trust account.

17 4.44 Sunde continues to engage in systematic misappropriation and conversion of  
18 estate funds, including in role as the PR appointed in the probate of *Estate of Judy Bass*, Kitsap  
19 County #20-4-00652-18. In December 2024 alone, without prior court authorization, Sunde paid  
20 herself \$22,000 from the probate account in the form of transfers to Sunde Consulting. Notably,  
21 the most recent three transfers—occurring on December 12 and 23—occurred *after* Sunde  
22 Consulting was administratively dissolved by the Washington Secretary of State. Sunde has  
23 siphoned more than \$45,000 of the \$114,195.62 in the *Bass* estate trust account into her own  
24 accounts, and she has also failed to collect additional monies owed to *Bass* heirs  
25 from Foundation.

26 4.45 In addition to unlawfully paying estate funds directly into her personal accounts,  
Sunde also unlawfully commingled estate funds into Sunde Consulting. These estate funds were  
ultimately used to pay Owens and Elliott's businesses, as well as Sunde's personal expenses,  
including but not limited to DoorDash deliveries, Amazon purchases, cell phone bills, and other

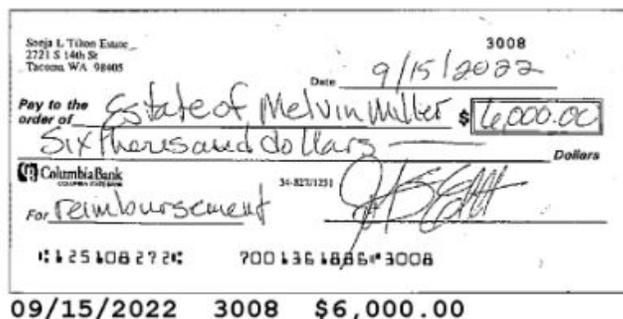
1 daily expenses. Sunde now depletes Sunde Consulting's account nearly as fast as she can  
2 replenish it.

3 4.46 Together, Sunde and Sunde Consulting have pocketed nearly \$450,000  
4 (\$446,701.50) in probate estate funds disbursed from trust accounts for which Sunde is the  
5 appointed PR, of which more than \$400,000 appears to have been converted by Sunde.

6 4.47 Sunde has refused to communicate with heirs and refuses to produce accountings  
7 of the funds administered and held by Sunde as a PR charged with operating for the benefit of  
8 those estates. More recently, Sunde stopped communicating with Owens, Elliott, and other  
9 Defendants altogether.

### 10 3. Defendant Elliott mismanaged probate estate funds

11 4.48 In addition to outright conversion and commingling of estate funds, Elliott also  
12 mismanaged estate funds by secretly moving money in and out of—and between—estate trust  
13 accounts in violation of his fiduciary duties. One example, evidenced by the check below,  
14 involved Elliott moving \$6,000 from the trust account for the *Estate of Sonja Tilton*,  
15 Kitsap County, 21-4-00122-18, to the trust account of the *Estate of Melvin Miller*, Kitsap County  
16 #22-4-00626-18, for “reimbursement”:



23 Defendants did not produce an accounting or other support for this “reimbursement.”

24 4.49 Notably, the *Miller* probate is an open, court-supervised probate, and Elliott's  
25 funds transfer occurred just before an heir substituted for Elliott as PR. In other words, Elliott  
26 had disbursed money out of the *Miller* trust account to himself, without authorization, then

1 replenished the *Miller* funds (from *Tilton*, an unrelated estate trust account), in an apparent effort  
2 to cover his tracks.

3 **4. Defendants converted and destroyed un-inventoried personal property**

4 4.50 When administering a probate, personal property assets must be inventoried and  
5 redistributed. However, Defendants’ probate administration reports focus exclusively on their  
6 disposition of real property. Conspicuously absent from Defendants’ probate filings is any  
7 mention or accounting of estate personal property: *e.g.*, vehicles, jewelry, firearms, furniture,  
8 electronics, photographs, cremated remains of family members, and financial assets  
9 and accounts.

10 4.51 Defendants systematically failed to inventory or account for estate personal  
11 property because they either converted it to themselves, sold it, gave it away to friends, or simply  
12 discarded it without record. In so doing, Defendants failed to preserve and account for estate  
13 personal property, deprived heirs of assets, and unjustly enriched Defendants at the expense  
14 of others.

15 4.52 Defendant Elliott ordered that almost all personal property in estate homes be  
16 discarded—typically to the dump—except in those instances when Elliott saw items he wanted  
17 to keep for himself or believed he could privately sell. Elliott failed to inventory the property  
18 being discarded, and cleanouts were routinely executed without notice to, or input from, heirs.

19 4.53 An example of missing and converted personal property is *Estate of Minnie Pearl*  
20 *Bennett*, Kitsap County #23-4-00550-18. At the time she passed, Ms. Bennett owned a nice home  
21 in Tacoma, Washington, full of valuable personal property including jewelry, gold watches, furs,  
22 and a Jaguar in the garage. She also had financial documents in a safe. Elliott petitioned to be  
23 appointed as PR over the *Bennett* estate, with Defendant Brouillard as his attorney. Without  
24 notice to Bennett’s heirs, Elliott performed a walk-through of the house and took numerous  
25 personal items he wanted—including items from the safe—before directing Mr. Richard “Rick”  
26 Fisher, a handyman Elliott regularly employed to “clean out” probate houses, to dispose of the

1 remaining personal property. Elliott then submitted to the court an inventory of Ms. Bennett’s  
2 assets that conspicuously omitted mention of any of Ms. Bennett’s significant personal property  
3 or financial assets—including those Elliott had retained for his personal use—and generally  
4 estimated the value of the *Bennett* estate’s total “furniture and household goods” at only \$1,000.

5 4.54 Multiple witnesses report that Elliott took possession of the *Bennett* Jaguar as his  
6 own personal vehicle, including having it re-keyed for himself, until heirs to the *Bennett* estate  
7 discovered his malfeasance and demanded that he return the Jaguar. The heirs complained to the  
8 court that Elliott failed to provide statutorily required notice of his appointment, mismanaged  
9 the probate, breached fiduciary duties, engaged in self-dealing, falsely claimed there were no  
10 substantial personal assets, tried to sell the home over their objection to secure a PR fee, and  
11 made false statements to the heirs. On November 17, 2023, the court in Kitsap County agreed,  
12 removed Elliott as PR, and ordered him to file accountings of the *Bennett* assets. As of the filing  
13 of this Complaint, Elliott still has not done so.

14 4.55 According to Mr. Fisher, Elliott “would take care of all the vehicles” they  
15 encountered during their cleanouts. In addition to converting the *Bennett* Jaguar, Elliott also  
16 converted other estate vehicles for his own personal benefit, in violation of his fiduciary duties,  
17 including a Nissan Sentra belonging to the *Estate of Gene Hart*, King County #22-4-06322-7,  
18 and a Ford Focus belonging to the *Estate of John Vagovic*, Spokane County #22-4-01667-32. As  
19 of the filing of this Complaint, Elliott was still in possession of both vehicles and had them  
20 insured in his own name.

21 4.56 Elliott privately sold two estate vehicles to Mr. Fisher and his family: a PT Cruiser  
22 belonging to the *Estate of Connie Hood*, Kitsap County #22-4-00946-18, and a Mazda Miata  
23 belonging to the *Estate of Steven Sutherland*, Kitsap County #23-4-00439-18. Elliott sold the  
24 vehicles to the Fishers for a total of \$5,500 and kept the money for himself. Elliott also gifted  
25 numerous operable firearms to Mr. Fisher belonging to the *Estate of Robert Dell Jones*, Kitsap  
26

1 County #22-4-00135-18. The firearms included two rifles, two pistols, carrying cases, and  
2 ammunition, collectively worth more than \$1,000:



10 Notably, Elliott sold the *Jones* home sold in April 2022 and closed the probate in June 2023 after  
11 the court approved Elliott’s final report. Elliott never disclosed his transfer of the *Jones* estate  
12 firearms (or his disposition of any other personal property, for that matter) to the court.

13 **5. Defendants Elliott, Sunde and others failed to disburse funds owed to heirs**

14 4.57 The estate trust accounts opened by Elliott and Sunde frequently held (and in  
15 some cases continue to hold) funds owed to heirs for years. In accounts where funds have not  
16 yet been converted by Elliott and Sunde, monies owed to heirs continue to languish without  
17 disbursement or proper accounting to the court.

18 4.58 Moreover, Defendants Elliott and Sunde also failed to inventory, collect, or  
19 distribute financial assets, including decedents’ savings, and life insurance proceeds. Examples  
20 include the *Estate of Minnie Pearl Bennett* and *Estate of Gene Hart*, described above, and the  
21 *Estate of Kris Matteson*, Kitsap County #20-4-00678-18, described more fully below. In these  
22 and other probates being administered by Elliott and Sunde, heirs complained of significant  
23 missing financial assets. Elliott and Sunde refused to provide any accountings or explanations  
24 to heirs.

25 4.59 On information and belief, Defendant Ellis, a Straw PR acting under Elliott’s  
26 supervision and control, has also failed to distribute financial assets owed to heirs.

1           4.60    In the *Estate of Henry Oakley*, Kitsap County #23-4-00874-18, Ellis, as PR, sold  
2 real property on March 7, 2024, yielding \$121,823.06 in proceeds for the estate. To date, there  
3 is no record of these sales proceeds being distributed to the heirs and, in fact, no record of where  
4 these proceeds are being held.

5           4.61    The *Oakley* probate also illustrates how Defendants worked together to facilitate  
6 Elliott’s “probates for profit” scheme. On February 1, 2024, six weeks *before* the real property  
7 sale, Elliott, Ellis, and Ms. Baines (Ellis’ mother) of Defendant Foundation discussed a problem  
8 they were collectively facing: the surviving wife of the decedent was living in a memory care  
9 facility and had not authorized the sale of the house. Baines emailed Elliott and Ellis saying,  
10 “We’ll need the son who has the power of attorney to sign a quit claim deed for any interest she  
11 may have.” Elliott responded, “We might need a plan B. He’s averse to doing anything.” It is  
12 unclear what “plan B” Defendants undertook to overcome the lack of authorization from the  
13 surviving spouse, but Defendants Ellis, Elliott, and Foundation forged ahead and sold the *Oakley*  
14 house, disbursing \$1,749.36 in escrow fees to Foundation and \$12,442.50 in listing commissions  
15 to Elliott’s then-girlfriend and romantic partner. Those fees and commissions were paid out  
16 immediately at closing through escrow, yet heirs still have not received the sale proceeds owed  
17 to them.

18           **6. Defendants Owens and Brouillard knowingly facilitated Elliott’s**  
19           **mishandling of estate funds and other misconduct**

20           4.62    Defendants Owens and Brouillard, attorneys for Elliott and his Straw PRs, have  
21 long known of the Defendant PRs’ conversion and/or mismanagement of probate funds, but took  
22 no steps to stop or report it, and, in the case of Brouillard, actively participated in Defendants’  
23 “probates for profit” scheme anyway.

24           4.63    By December 2022, if not earlier, Owens knew Elliott had mismanaged or  
25 converted estate funds in at least three probates: *Estate of Philip Emler*,  
26 Kitsap County #20-4-00720-18, *Estate of Sherri Cutino*, Kitsap County #20-4-01018-18, and

1 *Estate of Elizabeth Sioda*, Kitsap County #21-4-00676-18. Owens asked Elliott for financial  
2 details on the trust accounts for these probates so final reports could be prepared and, on  
3 December 22, 2022, Elliott responded by email: “[Y]ou’ve asked me to deposit the monies I  
4 received at close of escrow for Emler, Cutino, and Sioda in trust. I can’t. I don’t have it. I’m  
5 sorry.” According to Owens, upon receiving this email, Owens realized Elliott “was not acting  
6 as a fiduciary” and appeared to be “mishandling estate funds.”

7 4.64 Owens did nothing to alert the court or the estate heirs of Elliott’s apparent  
8 mishandling of estate funds and breaches of his duties as court-appointed PR. Owens took no  
9 remedial action to protect the estates or stop Elliott from opening new probates. Instead, Owens  
10 simply worked to “find other lawyers who could take over the representation and complete the  
11 probates.” Notably, when Elliott shifted his legal work to Brouillard in late 2022, Owens failed  
12 to alert Brouillard regarding his concerns that Elliott was mishandling estate funds. Owens  
13 simply withdrew from the cases and allowed Elliott to continue mishandling estate funds, now  
14 with Brouillard’s aid.

15 4.65 Owens developed similar concerns about Defendant Sunde’s handling of estate  
16 funds in 2022, noting that she failed to deposit checks into estate trust accounts and did not  
17 respond to Owens’ emails “for a period of more than six months.” Owens’ concerns about  
18 Sunde’s abandonment of her probates and failures to fulfill her duties caused him to withdraw  
19 from her cases. However, in withdrawing as counsel, Owens failed to report his concerns about  
20 Sunde to anyone or take any remedial action to protect the estates Sunde was administering.

21 4.66 Despite Owens’ failure to inform Brouillard of his ethical concerns regarding  
22 Elliott’s conduct as a PR, Brouillard has been well-aware of Elliott’s misconduct since he first  
23 began representing Elliott. In November 2022, Brouillard substituted for Owens as Elliott’s  
24 counsel in the *Estate of George Custer*, Kitsap County #22-4-00308-18. In that case, the court  
25 expressly found that Elliott had engaged in self-dealing, halted any pending real property sale,  
26 and ordered that no money be paid from the *Custer* estate to Defendant Owens, Defendant P&A

1 Services, 542LiveOak, Destin, or Elliott without further order of the court. Brouillard was both  
2 aware of the court’s findings and assisted Elliott in carrying out the court order.

3 4.67 Additional examples of Brouillard’s awareness of, and facilitation of, Elliott’s  
4 misconduct during probate administrations include: the *Estate of Linda Speer*,  
5 Kitsap County #23-4-00315-18, the *Estate of Odessa Freeman*, King County #23-4-02004-7,  
6 the *Estate of M. Pearl Bennett*, described above, and the *Estate of Harold Noble*,  
7 Kitsap County #23-4-00769-18, among others. Brouillard appeared as counsel and knowingly  
8 assisted Elliott’s misconduct in each of these probates.

9 4.68 In *Speer*, Elliott, as PR, concealed or failed to notice that the decedent had a will,  
10 attempted to sell a home already owned by the heirs, and engaged in fraud, waste, and  
11 mismanagement of estate resources. In October 2023, the *Speer* court found that Elliott was “not  
12 a suitable person to administer the estate,” and revoked his letters of administration.

13 4.69 Notably, in *Speer*, Brouillard was also provided specific documentation in  
14 July 2023 demonstrating that Elliott’s real estate license had been recently revoked for  
15 malfeasance, his insurance license had been revoked for failure to maintain records, that Elliott  
16 had criminal and protection order history involving multiple women, that he had recently filed  
17 for bankruptcy, that Elliott had been found liable for engaging in a fraudulent real estate  
18 transaction (*Reid v. Aspen Real Estate et al*, Pierce County #16-2-09340-5, where the trial court  
19 issued findings that Elliott had engaged in misrepresentation, “extremely sloppy” bookkeeping,  
20 defiance of court order, and had presented false testimony to the court), as well as specific acts  
21 of malfeasance in the context of other recent probate administrations.

22 4.70 In *Freeman*, Elliott failed to provide adequate notice of the probate, evicted the  
23 heir from the decedent’s house, and destroyed the heir’s personal property. In August 2023, the  
24 *Freeman* court found that Elliott was “not a ‘suitable person’” to act as PR for the estate and  
25 revoked his letters of administration.

26 4.71 In *Bennett*, heirs complained that Elliott failed to provide adequate notice of the

1 probate, failed to identify or communicate with heirs, breached his fiduciary duties, hid the fact  
2 the decedent had a will, was self-dealing and purchasing estate real property for himself,  
3 converted or destroyed personal property, had a history of dishonesty and criminality, and was  
4 receiving unlawful fees. Brouillard negotiated a settlement of the heirs' complaints in  
5 November 2023, which included Elliott being removed as PR and requiring him to file an  
6 inventory (which Elliott did not do).

7 4.72 In *Noble*, heirs complained in January 2024 that Elliott had hidden or failed to  
8 notice the decedent had a will, failed to acknowledge the estate had previously been  
9 administered, and failed to exercise due diligence vis-à-vis the estate. Incredulously, despite  
10 multiple court findings to the contrary, Brouillard told the court on February 9, 2024 that “There  
11 is no basis to find Mr. Elliott not suitable” to be a PR. Because Elliott voluntarily stepped aside  
12 as PR in *Noble* after serious allegations were levied by heirs, Brouillard argued that there was  
13 “no harm, no foul.”

14 4.73 For years, in the face of these allegations, documentation, and adverse court  
15 findings, Brouillard continued to assist Elliott with petitioning to open *even more probates*, in  
16 the process jeopardizing scores of intestate estates.

17 4.74 Brouillard also helped to facilitate Elliott's and his Straw PRs' conversion and  
18 mismanagement of various probate estate assets, self-dealing, and other misconduct as  
19 described herein.

20 **7. Defendant Brouillard and Elliott acted together to misappropriate estate**  
21 **funds**

22 4.75 In addition to conversion, commingling, and misappropriation described herein,  
23 Brouillard assisted Elliott with surreptitiously extracting estate funds from the *Estate of Patricia*  
24 *Howe* and siphoning them into Destin, Elliott's real estate firm, under specious circumstances.  
25 This deprived *Howe* heirs of assets and unjustly enriched Elliott and Brouillard.

26 4.76 In late 2021, Elliott installed Howard as nominal “owner” of Destin, though the

1 company remained in all respects Elliott's. Notably, Howard had no access at all to Destin's  
2 financial accounts. Brouillard knew that Elliott still controlled Destin.

3 4.77 In June 2022, Elliott was appointed as PR over the *Howe* probate, with Brouillard  
4 as his attorney. The *Howe* home sold on November 30, 2022, yielding significant proceeds due  
5 to heirs. At closing, escrow remitted \$9,000 to Elliott as a PR fee, paid by the buyer. Neither the  
6 escrow settlement statement nor the purchase and sale agreement made any mention of a listing  
7 commission or amount due to Destin as part of the sale.

8 4.78 On January 20, 2023, Elliott emailed Brouillard and Howard regarding *Howe* and  
9 another probate, saying:

10 *Good morning all, As we discussed yesterday, I twice signed exclusive listing*  
11 *agreements with Brady [Howard]'s firm where after the brokerage procured the*  
12 *ultimate buyer, I chose to cancel the listing. I did so promising that the firm would*  
13 *still receive the listing brokerage commission due. I hold the monies in both*  
*matters, but would like you Brady to formally retain counsel and send me a demand*  
*letter, which I'm happy to honor.*

14 In other words, Elliott proposed that Destin be paid monies out of two estates (*Howe* and another  
15 estate) in the form of listing commissions for home sales that did not occur. Howard took no  
16 action after the email, as he had no role in running Destin; Howard also did not retain counsel,  
17 as Elliott suggested, to send any demand letter. Instead, immediately after sending the January 20  
18 email, Elliott (now acting as *de facto* manager of Destin) engaged Brouillard to demand money  
19 from the *Howe* estate on Destin's behalf.

20 4.79 Brouillard complied with Elliott's instruction and prepared a letter on Destin's  
21 behalf demanding \$10,500 from the *Howe* estate, even though Brouillard represented Elliott as  
22 PR for the *Howe* estate.

23 4.80 Brouillard took no action at all as the *Howe* PR attorney to defend against the  
24 \$10,500 claim by Destin.

25 4.81 Brouillard then proceeded to issue an invoice, dated January 25, 2023, for  
26 preparing the demand letter making a claim against a probate estate being administered by his

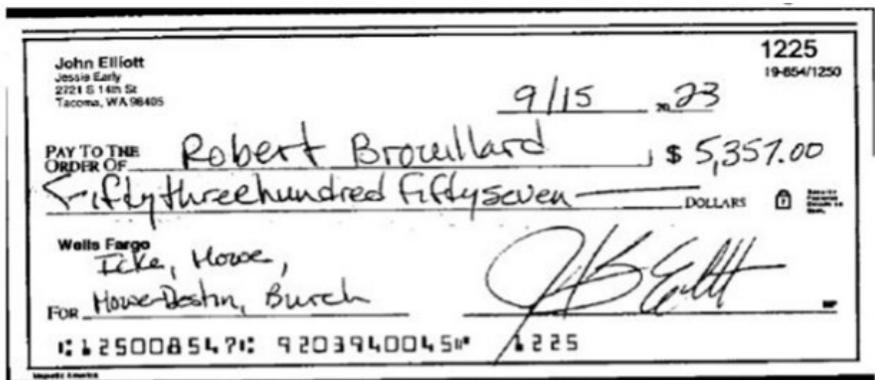
1 client. The invoice was made out to client “Destin Realty, LLC.” For services rendered,  
2 Brouillard wrote “1/20-23/23 Conferred by phone and email w/ John Elliott and Brady Howard  
3 re: commission monies owed by Elliott to client; reviewed applicable listing and purchase and  
4 sale agreements; drafted letter requesting payment and e-mailed to client for review; emailed  
5 letter.” Brouillard’s invoice requested \$568.75 in legal fees from Destin.

6 4.82 Seven months later, on August 22, 2023, Elliott and Brouillard submitted to the  
7 court a sworn final report in the *Howe* probate. Among other false statements, Elliott declared  
8 that \$10,500 was owed by the estate for “a commission owed to Destin Realty which was not  
9 paid at escrow.” The final report did not disclose the connection between Elliott, Brouillard, or  
10 Howard, nor disclose Elliott’s ownership interest in Destin.

11 4.83 The next day, on August 23, 2023, Brouillard emailed Elliott (but not Howard)  
12 his Destin invoice asking “John, Can the attached be paid from Destin’s share in *Howe* (assuming  
13 Destin’s share is approved)? Please advise.” Elliott said yes without speaking with Howard.

14 4.84 The Court approved Elliott’s final report on September 1, 2023. That same day,  
15 Brouillard re-submitted his invoice to Elliott (but not Howard) and said “John... This one should  
16 be paid out of Destin Realty’s distribution.”

17 4.85 The following check shows that, on September 15, 2023, Elliott paid Brouillard  
18 for Brouillard’s work as both the *Howe* PR attorney (among other probates) and as the Destin  
19 attorney in making a claim against the *Howe* estate:



1           4.86    In short, (1) Brouillard knew that Elliott was attempting to extract funds from the  
2 *Howe* estate through specious claims that Destin (Elliott’s own company) was “owed” such  
3 money, (2) Brouillard represented both sides of the transaction—representing the *Howe* PR as  
4 attorney and representing Destin as an entity making a claim against the *Howe* estate—and  
5 (3) Brouillard always knew that Elliott would pay his Destin fees too.

6           **8.       Defendant Foundation and Elliott acted together to misappropriate estate**  
7           **funds**

8           4.87    Defendants Elliott and Foundation on multiple occasions secretly kept for  
9 themselves funds owed to estates.

10          4.88    In both the *Estate of Sharon Gause*, Kitsap County #22-4-00617-18 and *Estate of*  
11 *Patricia Howe*, Kitsap County 22-4-00628-18, after buyers’ rescissions, Elliott and Foundation  
12 secretly kept and split the forfeited earnest monies for themselves despite acknowledging in  
13 emails that the earnest money should be given “to the seller” (*i.e.*, the estate).

14          4.89    After agreeing to split the earnest monies among themselves “50/50,” Elliott  
15 instructed Foundation to send his half of the earnest money via check “payable to Probate &  
16 Administration Services.” Receipt of the rescission monies was never documented or otherwise  
17 factored into other fees received by Elliott, P&A Services, or Foundation.

18          **D.       Defendants Engaged in Systematic Self-Dealing**

19          4.90    Defendants’ self-dealing was central to their “probates for profit” scheme.

20          4.91    Generally, once Defendant Elliott or his Straw PR was appointed by the court,  
21 Elliott would hire one of his affiliated construction companies—*e.g.*, Red Dawg, Aurora Creek,  
22 or 542LiveOak<sup>4</sup>—at inflated rates to fix up the distressed property.

23          4.92    Then, Elliott or his Straw PR would hire one of Elliott’s affiliated real estate  
24 firms—*e.g.*, Seguros Pacific, Ridgeback, 542LiveOak/Destin, or his then-girlfriend Ms. Early’s

---

25                   <sup>4</sup> Elliott hired 542LiveOak interchangeably as a contractor and/or a real estate broker, depending  
26 on the transaction. *See* paragraph 4.76.

1 real estate firm, Skyline Properties—at an inflated commission to list and sell the real property.

2 4.93 Then, Elliott, his Straw PR, and/or Owens and Brouillard would request inflated  
3 flat fees for purported work completed in their capacity as the PR or its PR attorney. The inflated  
4 flat fee would be disbursed to Defendants at closing through escrow, without the requisite court  
5 approval, in violation of Washington law. *See Larson*, 103 Wn.2d at 534.

6 4.94 Defendants routinely received disbursements of these fees and commissions where  
7 estate property sold at a short sale with no proceeds “due to seller,” *i.e.*, with nothing left for  
8 distribution to the heirs. Moreover, in multiple instances where no proceeds were left “due to  
9 seller,” the estate property debts had been substantially *less* than the property sale price, but the  
10 proceeds arising from the property sale were entirely consumed by Defendants’ inflated fees and  
11 commissions. In other words, the reason there was nothing left over for distribution to the heirs was  
12 because Defendants took it all.

13 4.95 As a result of their self-dealing, Defendants routinely profited directly and  
14 immediately from estate property sales even before the probate administration was finalized, and  
15 regardless of whether the probate administration was ever finalized at all.

16 4.96 Defendants engaged in other discrete acts of self-dealing too, including but not  
17 limited to self-purchasing estate properties, collecting undocumented payments, charging secret  
18 escrow fees, misappropriating estate funds, and administering non-intervention probates in a  
19 manner designed to maximize profits for Defendants. These practices were kept secret from  
20 heirs, real property buyers, and supervising courts.

21 **1. Defendants’ self-dealing companies**

22 4.97 Beginning in late 2018, Elliott opened and operated numerous businesses  
23 peripheral to probate administration, aimed at facilitating his scheme and disguising his  
24 profits, including:

25 4.97.1 Ridgeback Real Estate LLC, a real estate firm affiliated with Elliott. Billie  
26 Jo Brown (Elliott’s romantic partner at the time) was nominal member

1 and governor of Ridgeback, but Elliott exercised significant control of the  
2 company’s functions and control of its financial accounts.

3 4.97.2 Red Dawg Contracting LLC, a contracting company affiliated with  
4 Elliott. As with Ridgeback, Ms. Brown was nominal member and governor  
5 of Red Dawg, but Elliott exercised significant control of the company’s  
6 functions and control of its financial accounts.

7 4.97.3 Seguros Pacific Real Estate LLC, another real estate firm affiliated with  
8 Elliott. Unlike Ridgeback and Red Dawg, Seguros Pacific was a single-  
9 member LLC with Elliott as its sole member and governor.

10 4.97.4 Defendant P&A Services—a single-member LLC with Elliott as  
11 its sole member and governor—served as Elliott’s probate  
12 administration company.

13 4.97.5 542LiveOak LLC, Elliott’s general-purpose company and sometimes real  
14 estate firm. 542LiveOak LLC was formed as a single-member LLC with  
15 Elliott as its sole member and governor. In December 2021, 542LiveOak  
16 began sometimes doing business as “Destin Realty.” In 2022, Elliott  
17 installed Defendant Howard as nominal owner of 542LiveOak/Destin, but  
18 Elliott continued to exercise significant control over the company’s  
19 functions and sole control over the company’s financial accounts.

20 4.97.6 Defendant Aurora Creek, another contracting company affiliated with  
21 Elliott. Aurora Creek is a single-member LLC with Elliott as its sole  
22 member and governor.

23 4.98 As noted above, Elliott initially co-managed two of these affiliated businesses—  
24 Ridgeback and Red Dawg—with his romantic partner at the time, Billie Jo Brown. Ms. Brown  
25 also acted as a real estate agent for Elliott’s real estate firm, Seguros Pacific, after Elliott  
26 convinced her to become a real estate agent for him. Elliott posed as Ms. Brown’s “designated

1 broker” at Seguros Pacific beginning in 2019, though his real estate license was revoked at the  
 2 time. For these reasons, the primary place of business for Ridgeback, Red Dawg, Seguros  
 3 Pacific, and even 542LiveOak was initially Elliott’s residence at 6408 S Alder St,  
 4 Tacoma, WA 98409, where he lived with Ms. Brown.

5 4.99 By 2022, Elliott’s relationship with Ms. Brown had ended. Elliott then moved out  
 6 of the house at 6408 S Alder St, Tacoma, WA 98409 and into a house at 2721 S 14th St,  
 7 Tacoma, WA 98405. The 14th Street house became the new headquarters of Elliott’s businesses  
 8 including 542LiveOak/Destin Realty, P&A Services, and Aurora Creek.

9 4.100 By early 2023, Elliott became romantically involved with a woman named  
 10 Ms. Jessie Early. Elliott cohabited with Ms. Early at the 14th Street house and they shared at  
 11 least two bank accounts. As with Ms. Brown and others, Elliott soon encouraged Ms. Early to  
 12 become a real estate agent for him. Once Ms. Early became an agent with Skyline Properties, a  
 13 local real estate firm, Elliott used Ms. Early as the “listing agent” for his probate administrations.

14 4.101 One of the hallmarks of Elliott’s “probates for profit” scheme was his quiet use  
 15 of these interconnected businesses to extract large sums from a single probate administration  
 16 through multiple means. A few examples include the *Estate of Natalie McMahon*,  
 17 Kitsap County #21-4-01108-18, the *Estate of Gene Hart*, and the *Estate of Lawrence Quindica*,  
 18 Kitsap County #23-4-00044-18:

Self-Dealing in Individual Estates					
Estate	Personal Rep. (PR) & Fee	Listing Broker & Fee	Contractor Affiliate & Fee	Final Report Requests	Total Self-Dealing by Estate
McMahon	P&A Services \$ 5,000.00	542 Live Oak at 3.5% \$ 23,800.00	542 Live Oak for "clean out" charge \$ 20,361.38	Additional fees & expenses \$ 5,000.85	\$ 54,162.23
Hart	P&A Services \$ 9,000.00	Skyline Properties at 5% \$ 20,250.00	Aurora Creek for "flooring" charge \$ 10,311.00	None \$ -	\$ 39,561.00
Quindica	John Elliott \$ 7,200.00	Skyline Properties at 3.5% \$ 16,100.00	John Elliott for remodeling costs \$ 49,159.32	Additional fees & expenses \$ 5,341.65	\$ 77,800.97
<b>Total Self-Dealing:</b>					<b>\$ 171,524.20</b>

1 4.102 On those occasions when Elliott and his Straw PRs filed final reports with the  
2 court, the reports were often misleading and omitted relevant information about the  
3 affiliated companies.

4 4.103 As one example, in the *Estate of Natalie McMahon*, Elliott submitted a sworn  
5 “Administrator’s Final Report” on May 9, 2023. Elliott attached Foundation’s final settlement  
6 statement, outlining distribution of proceeds from Elliott’s sale of the *McMahon* home. Among  
7 the disbursements were PR fees to Elliott, together with over \$44,000 allocated to 542LiveOak  
8 for listing broker and construction work, including property preparation and “clean out” work.

9 4.104 Elliott’s *McMahon* final report failed to disclose his interest in 542LiveOak or  
10 the fact that he stood to receive \$20,361.38 as the sole member and governor of that company  
11 for property preparation and “clean out” work. Rather, Elliott requested authorization to disburse  
12 a fee to himself for *PR-related tasks* amounting to 14 hours (at the high rate of \$125/hour) for  
13 “Property Prep for Sale” and another 3 hours for “Onboard property.” By omitting any reference  
14 to his ownership interest in 542LiveOak, Elliott requested to be paid twice for the same work.

15 4.105 Similarly, after failing to disclose that he stood to receive most of the \$23,800  
16 listing commission to 542LiveOak, Elliott’s final report requested authorization for a separate,  
17 additional payment *as the PR* for work like “Close Real Estate Sale,” “Inspection of Property,”  
18 “Research Property,” and other tasks typically done by a listing agent to support a request for a  
19 significant listing commission. Again, by omitting material facts, Elliott sought to be paid twice  
20 for the same work.

21 4.106 Because the court was unaware of Elliott’s self-dealing and therefore unable to  
22 adequately assess the reasonableness of his accounting, Elliott’s final report was approved. At  
23 least \$54,161.38 in *McMahon* estate funds were disbursed to Elliott and his businesses.

24 4.107 The following chart outlines the *documented* fees and commissions Defendants  
25 pocketed through self-dealing under their “probates for profits” scheme. Notably, the totals  
26 below include amounts that were court-approved and some that were not. However, for the

1 reasons described herein, these amounts likely understate the amounts Defendants *actually*  
 2 received, as multiple Defendants engaged in commingling and conversion, significant estate  
 3 assets have disappeared while Defendants refuse to disclose those assets' whereabouts,  
 4 Defendants collected fees and commissions from each other that were never documented, and  
 5 some fees paid to individual Defendants are "hidden" within larger sums paid to  
 6 other Defendants:

<b>Self-Dealing By Entity</b>		
<b>Entity</b>	<b>Fees</b>	<b>Total Fees</b>
<b>Personal Representatives (PRs)</b>		<b>\$ 374,734.82</b>
John Elliott*	\$ 326,234.82	
Shanelle Sunde	\$ 43,500.00	
Gracy Kinney	\$ 5,000.00	
Julie Ellis	\$ -	
Brady Howard	\$ -	
<b>PR Attorneys</b>		<b>\$ 184,500.00</b>
Douglas Owens	\$ 184,500.00	
Robert Brouillard	\$ -	
<b>Listing Brokers</b>		<b>\$ 941,177.34</b>
Ridgeback*	\$ 358,355.44	
Skyline Properties	\$ 343,864.70	
Destin Realty*	\$ 112,315.95	
542 Live Oak*	\$ 78,480.00	
Seguros Pacific*	\$ 48,161.25	
<b>Contractor Affiliates</b>		<b>\$ 306,613.14</b>
Red Dawg*	\$ 155,575.61	
John Elliott*	\$ 52,681.80	
542 Live Oak*	\$ 26,953.63	
Jessie Early	\$ 26,740.10	
R. & S. Fisher	\$ 25,991.00	
Aurora Creek*	\$ 10,811.00	
P&A Services*	\$ 7,860.00	
<b>Escrow Company</b>		<b>\$ 225,683.60</b>
Foundation	\$ 225,683.60	
<b>Total Self-Dealing of Elliott &amp; Elliott-Controlled Entities (*):</b>		<b>\$ 1,177,429.50</b>
<b>Total Self-Dealing:</b>		<b>\$ 2,032,708.90</b>

1           **2. Defendants’ PR fees and PR attorney fees**

2           4.108 Defendants’ PR fees and PR attorney fees were inflated and unlawfully obtained.  
3 This resulted in losses to heirs, coercive practices towards real property buyers, unjustifiable  
4 delays and waste within administration of the probates, and deception toward the court.

5                   **a. Inflated PR fees**

6           4.109 In his early probate administrations from 2019 to 2021, Defendant Elliott  
7 requested PR fees of up to \$2,500. By early 2023, Elliott demanded PR fees of \$9,000 on  
8 virtually every probate, having inflated his fees by design. On September 12, 2022, in response  
9 to a question regarding his fees, Elliott said:

10                   *The \$9,000 figure is what I typically charge. \$2,000 of that is consumed in [taking*  
11 *certain actions to assess the assets, fix up the property, and sell the property,] then*  
12 *petition the Court to close the estate, then distribute inheritances to heirs and close*  
13 *the trust account. Then there’s a factor included for the start process, and we incur*  
*costs but are unable to recover those monies. After all this it’s my hope to earn*  
*\$2,000 for the effort.*

14 In other words, despite taking an oath to act as a fiduciary of the estate and to maximize benefits  
15 for creditors and heirs, Elliott systematically inflated his PR fees to ensure he turned a profit.  
16 Elliott also inflated his PR fees to make up for losses incurred on other, unrelated probates.

17           4.92 Moreover, as referenced above, Elliott’s fee justifications to the court routinely  
18 included acts for which he was already being reimbursed through his affiliated businesses. In  
19 many instances, Elliott was compensated twice for the same work—once in his capacity as PR  
20 and once in the form of a fee paid to one of Elliott’s affiliated companies.

21                   **b. Improper leveraging and collection of PR fees and PR attorney fees**

22           4.93 Elliott routinely leveraged his position as the PR authorized to sell an estate’s real  
23 property, together with his *de facto* role as shadow listing agent, to negotiate immediate payment  
24 of his PR fees and PR attorney fees by the real property *buyers*. Of the estimated 74 probate-  
25 related real property sales Defendants closed, the majority of the transactions involved large fees  
26 being paid at escrow to Elliott, Owens, and/or Brouillard by the real property buyers. These

1 payments occurred without the court’s advanced knowledge or authorization.

2 4.94 Buyers did not generally want to pay \$9,000 in additional (and unnecessary) fees.  
3 To induce them to pay, Elliott used his multiple roles within the real property transaction to offer  
4 a “good” (*i.e.*, reduced) price on the estate property. If an interested buyer still did not want to  
5 pay his PR fees and/or PR attorney fees on top of the “good” price, Elliott threatened not to sell  
6 the house to that buyer at all. In multiple instances, Elliott sold estate real property to a lower-  
7 offer buyer who agreed to pay Elliott’s fees instead of a higher-offer buyer who would not pay  
8 Elliott’s fees. *See, e.g., Estate of Kris Matteson* (Elliott sold real property to a buyer who offered  
9 \$15,000 less than another potential buyer but agreed to pay \$9,000 to Elliott at closing).

10 4.95 In this way, Elliott routinely sacrificed potential estate assets to ensure that he  
11 was paid immediately. He also routinely coerced good faith homebuyers into paying him inflated  
12 and unnecessary fees so that he could profit.

13 4.96 Due to the manner in which Defendants’ real property sales were negotiated and  
14 their working relationship with Foundation, Defendants’ PR fees, PR attorney fees, real estate  
15 commissions, contractor fees, and escrow fees were typically all paid at closing by escrow from  
16 the proceeds of the property sale, rather than held for payment upon receiving  
17 court authorization.

18 **c. Loss, waste, and delay as a result of improper attorney fee**  
19 **arrangements**

20 4.97 Because Defendants were paid immediately at escrow, Defendants frequently did  
21 not finish administering the probates at all or file reports, accountings, and receipts with the  
22 court. More than 100 of Defendants’ probate cases remain open and languishing across the state,  
23 years later: *e.g., Estate of Shirley Lee*, Skagit County #20-4-00280-29 (probate opened 1,675  
24 days ago, still no final report filed), and *Estate of Kris Matteson* (probate opened 1,623 days ago,  
25 still no final report filed).

26 4.98 Owens’ and Brouillard’s legal service agreements (LSAs) with Elliott and his

1 Straw PRs contributed to both 1) the improper leveraging of PR fees and PR attorney fees at the  
2 time of the real property sale, and 2) the delay and waste that occurred to the estates in the  
3 aftermath of the real property sale. That is, the terms of Owens’ and Brouillard’s LSAs had a  
4 demonstrably negative effect on the administration of Defendants’ probates.

5 4.99 Owens’ and Brouillard’s form LSAs described the scope of their legal services as  
6 encompassing “the sale, disposition, and all claims of the Client, arising out of the property in  
7 this case, the Estate of [Estate Name],” and contained the following operative language  
8 about fees:

9 *Client and Attorney agree that Attorney is to charge the Buyer of the Property, a*  
10 *flat fee of \$4,000,<sup>5</sup> which shall be the total fee for the probate transaction. Buyer*  
11 *will pay the total fee at closing of the Property being sold. Attorney agrees that if*  
*there is no sale of the Property, no Attorney fees shall be owed or paid.*

12 In other words, the LSA required the PR Defendants to negotiate and obtain a flat PR attorney  
13 fee (1) paid by the **buyer** of the estate property (and not by the estate, which would have required  
14 notice to and approval by the court) and (2) paid immediately at closing through escrow (and  
15 regardless of whether the “all claims” arising out of the probate were ever resolved). This did  
16 not result in any savings for the probate estate.

17 4.100 The LSAs incentivized the PR Defendants to sell real property at a reduced rate  
18 in exchange for the buyer’s agreement to immediately pay the (inflated) PR fees and PR attorney  
19 fees out of escrow at closing, particularly because it allowed them to avoid the time, expense,  
20 and court scrutiny associated with submitting a final report disclosing such fees in the probate.

21 4.101 Notably, Brouillard and Owens also routinely requested additional PR attorney  
22 fees to be paid later out of estate funds and received PR attorney fees from Elliott and his various  
23 affiliated businesses in addition to real property buyers, despite such fees being contrary to  
24 their LSAs.

25 \_\_\_\_\_  
26 <sup>5</sup> Under Defendant Brouillard’s LSA the PR attorney flat fee was \$3,000.

1           4.102 By charging a flat fee and receiving disbursement of those fees without court  
2 approval, Owens and Brouillard violated their fiduciary duties to charge no more than what was  
3 “reasonable and necessary based on... actual hours spent, and actual services provided.”  
4 *Larson* 103 Wn.2d at 534.

5           4.103 In Brouillard’s case, receipt of PR attorney fees disconnected from finalization of  
6 the probate also resulted in Brouillard’s disavowal of any duty to ensure the legality of Elliott’s  
7 or the Straw PRs’ subsequent actions, to review the accuracy of the PRs’ subsequent court  
8 filings, or to confirm that final court orders—*e.g.* to distribute monies to heirs—were ever carried  
9 out. The majority of probates where Brouillard acted as the PR attorney remain open and  
10 languishing, and many include court orders that have not been carried out. When confronted  
11 during a recent investigative deposition on how his inaction and inattention negatively affected  
12 estate heirs and the prompt administration of probates, Brouillard specifically disavowed any  
13 duty to the estate heirs or any obligation to ensure that the probates were properly finalized.

14           **3. Defendants’ contracting fees**

15           4.104 Defendants artificially inflated their contracting fees and failed to engage in  
16 competitive bidding for contractors, instead using affiliated companies that were, in several  
17 cases, wholly owned by Elliott. This resulted in losses to heirs, Defendants’ receipt of hidden  
18 fees paid from probate assets, misleading settlement statements, and deception toward the court.

19           4.105 Defendants almost never sought third-party bids for their cleanout or contracting  
20 work, preferring to refer such work to themselves: *e.g.*, to Red Dawg, 542LiveOak, or Aurora  
21 Creek, typically resulting in inflated fees and costs.

22           4.106 For example, in the *Estate of Gwendolyn McAdams*, Kitsap  
23 County #21-4-01063-18, Elliott as PR instructed Foundation to add a line item into their final  
24 escrow settlement statement for \$10,450 to be paid by the estate to “Fisher Services” (a company  
25 that did not exist, according to the Washington Secretary of State) for “Repairs/Clean-Up/Prep  
26 House.” Foundation entered the line item in the *McAdams* settlement statement, despite the fee

1 being wholly unsupported by paperwork or inventory. When asked about the \$10,450  
2 purportedly owed to him, Mr. Fisher, the person who performed that work testified he did not  
3 have a company called Fisher Services. He further confirmed under oath that the work done on  
4 the *McAdams* house did not justify a \$10,450 fee, nor did he ever receive a \$10,450 check for  
5 his work.

6 4.107 Similarly, in the *Estate of John Vagovic*, a line item in Foundation’s settlement  
7 escrow statement from the sale of real property reflected a disbursement of \$3,080 to “Richard  
8 Fisher” for “clean up on property.” However, in sworn testimony, Fisher stated that he and one  
9 other person worked on the *Vagovic* house for “five or six” hours and was surprised by the  
10 \$3,080 because it seemed “really high.” He further confirmed that he never received a check for  
11 \$3,080 for his work on the house.

12 4.108 Fisher charged Elliott \$25/hour for his labor (and his fellow laborers charged less)  
13 and he, like Elliott’s other laborers, never received checks directly from Foundation for his  
14 contracting work. At closing, Foundation made all disbursements directly to Elliott in  
15 accordance with his instructions—including as to the amounts. Elliott then paid his laborers, like  
16 Fisher, out of his own personal or contracting business accounts.

17 4.109 Bank records obtained in the context of the State’s investigation show that Elliott  
18 and his contracting companies routinely paid out to laborers far less than what the companies  
19 collected in contracting fees.

20 4.110 In sworn testimony, Elliott admitted that he regularly inflated his companies’  
21 contracting fees on probates to make up for costs incurred on other, unrelated probates that did  
22 not result in property sales. Elliott testified that he did this because he wanted his contracting  
23 companies to be profitable. In other words, in order to consistently turn a profit, Elliott siphoned  
24 money from profitable estates through inflated and unjustified fees and costs.

25 4.111 Elliott and his businesses rarely, if ever, created or provided detailed invoices  
26 justifying large cleanout, property preparation, or contracting fees. Elliott or his “assistant” at

1 P&A Services simply told Foundation what to write into their settlement statements for monies  
2 owed to Defendants for cleanout or contracting work, and Foundation obliged. Foundation's  
3 owner and designated escrow officer, Jolyne Baines (the mother of Elliott's Straw PR, Julie  
4 Ellis), simply took Elliott at his word without requiring invoices or supporting paperwork. Thus,  
5 despite Foundation's fiduciary duty to act in the best interests of all parties to the escrow  
6 transactions, Foundation failed to perform any due diligence, and simply followed Elliott's  
7 instructions as to the amounts for disbursement at closing.

8 4.112 Foundation also did not require Elliott or other PR Defendants to obtain court  
9 approval prior to disbursing funds from escrow, even where such disbursements were for fees  
10 supposedly incurred by the PR in the administration of the probate estate.

#### 11 **4. Defendants' real estate commissions**

12 4.113 Defendants' real estate commissions were similarly inflated and Defendants'  
13 choice of listing real estate firms was likewise self-serving and lacked competitive bidding.

14 4.114 Defendants never sought third-party bids for their listing brokerages, preferring  
15 to refer all such work to themselves, *e.g.*, Ridgeback, Seguros Pacific, 542LiveOak, Destin (and  
16 Skyline, described more fully herein). This resulted in further losses to heirs, loss of potential  
17 third-party business, hidden monies being paid to Defendant Elliott, and deception toward  
18 the court.

19 4.115 Defendants Brouillard, Owens, Sunde, Ellis, Kinney, Howard, and Foundation  
20 were keenly aware of, and in some cases facilitated, Elliott's self-dealing through his affiliated  
21 real estate companies—*e.g.*, 542LiveOak, Seguros Pacific, Destin, and/or Skyline.

22 4.116 Elliott's real estate firms almost invariably collected a 3.5- 5% listing commission  
23 from each probate real property sale.

24 4.117 The listing commissions charged by Elliott's real estate firms were above market-  
25 rate for real property transactions, and far exceed the amount required to cover expenses under  
26 the circumstances.

1           4.118 During a recent investigative deposition, Defendant Howard, designated broker  
2 for Elliott’s various real estate firms, testified that listing brokers typically make a 3%  
3 commission, because they “might get one listing a year... you have to go out and network.  
4 You've got to door knock. You've got to put out fliers. You've got to do a ton of marketing. It  
5 costs a lot of money.... and it might not ever close.” However, according to Howard, listing  
6 brokers working for Elliott “weren't doing any of the marketing. They weren't doing any of the  
7 door-knocking. They weren't doing anything that got them the business. They basically just sat  
8 there at their desk, and waited for John [Elliott] to hand them a property.”

9           4.119 Howard admitted that certain real estate firms can and will list and sell a house  
10 for far less than a 3% commission.

11           4.120 The justification for the large listing commissions, despite the properties simply  
12 being “handed” to the listing agent by Elliott, was that Elliott’s companies still wanted to turn a  
13 profit. Per Defendant Howard, Elliott was getting a large portion of the listing commissions  
14 because “he’s the one who’s doing the work... generating the lead... [t]hat’s basically what John  
15 was doing... generating leads—and then handing them off to listing agents to list.” In other  
16 words, Elliott profited by creating probate listings and directing them to his own real estate firms.

17           4.121 The listing commissions collected by Elliott and his real estate firms were  
18 typically allocated as follows: Howard received a \$500 cut of each commission to act as  
19 “designated broker,” the listing brokers typically received 25%-50%, and the remaining  
20 50%-75% of the commissions went to Elliott.

21           4.122 By late 2021, various third parties and courts began inquiring about Elliott using  
22 his own real estate firms as listing agents on probate cases. In December 2021, Elliott “sold”  
23 Destin (a d/b/a of Elliott’s company 542LiveOak) to his friend, Defendant Howard. Howard paid  
24 no money for Destin, and does not remember signing any purchasing paperwork. Thereafter,  
25 Elliott began using “Destin” as listing agent on probate administrations and claiming that such  
26 transactions were arms-length.

1           4.123 In his recent investigative deposition, Howard testified that even after Elliott  
2 changed 542LiveOak’s name to Destin in December 2021 and made Howard its nominal owner,  
3 there was “no difference” between the companies, “nothing changed” when it came to Elliott’s  
4 day-to-day operation of the company, and Elliott maintained sole control of the financial  
5 accounts for Destin. Elliott operated and controlled the financial accounts for all of his real estate  
6 firms, Ridgeback, Seguros Pacific, 542LiveOak, and Destin.

7           4.124 Even in June 2022, seven months after the “sale” of Destin to Howard, Elliott  
8 wrote himself large checks drawing on Destin’s bank account, including a check for \$83,672.20  
9 made out to Elliott personally. Elliott did this without Howard’s knowledge.

10          4.125 Elliott’s use of Destin to obscure his self-dealing did not last long. By the end of  
11 2022, the court in the *Custer* probate found that Elliott’s use of Destin constituted self-dealing.

12          4.126 Soon thereafter, by early 2023, Elliott began dating Ms. Early, and immediately  
13 employed her as his assistant at P&A Services. He also encouraged her to get her real estate  
14 license, promising her he would provide her with dozens of probate listings. Ms. Early promptly  
15 got her real estate license and became a broker with Skyline Properties. Thereafter, Elliott began  
16 using Ms. Early and “Skyline” as the listing brokers on probate administrations and claiming  
17 that such transactions were arms-length.

18          4.127 In early 2023, Elliott and Ms. Early also began living together, and sharing  
19 multiple bank accounts at both Umpqua and Wells Fargo Banks.

20          4.128 When Ms. Early received a Skyline listing commission (or any monies), she  
21 deposited the funds into one of her joint bank accounts with Elliott. Elliott regularly used the  
22 funds from that account to pay his own business and personal expenses, thereby directing  
23 hundreds of thousands of dollars of Skyline listing commissions to himself.

24          4.129 Elliott’s engaged in self-dealing even when one of his Straw PRs was appointed  
25 as probate administrator, in that he dictated their use of his affiliated companies in their probate  
26 administrations. For example, Defendant Ellis consistently used Elliott’s affiliated real estate

1 firms—*e.g.*, 542LiveOak or Skyline—as listing broker on probates where Ellis was court-  
2 appointed as PR.

3 4.130 This expectation was known to Elliott’s attorneys and Foundation as well. For  
4 example, on March 7, 2024, Ms. Early—who had by then ended her relationship with Elliott—  
5 emailed Brouillard, raising alarm that Elliott was collecting listing commissions on his probate  
6 administrations, characterizing his conduct as “illegal” and “a conflict of interest.” Elliott then  
7 admitted to Brouillard, who knew that Defendant Ellis was working as a Straw PR under Elliott’s  
8 direct supervision and control, that he (Elliott) had been collecting listing commissions on cases  
9 where Ellis was PR. Nevertheless, Brouillard continued to assist Elliott and Ellis with advancing  
10 their probate administrations, collecting fees, and concealing their self-dealing from the court.

11 **5. Defendants’ escrow fees**

12 4.131 Defendants’ use of Defendant Foundation for escrow in virtually every probate  
13 sale transaction—selected without competitive bidding—resulted in inflated escrow fees that  
14 were not disclosed to the buyer or to the affected heirs. This caused further losses to heirs and  
15 property buyers, hidden monies being paid to Foundation, and further deception of the courts.

16 4.132 In probate sale transactions, Foundation, acting as escrow, owed fiduciary duties  
17 to treat all parties to the transactions—Elliott and the Straw PRs as the sellers of the estate  
18 properties and the buyers of those properties—with strict neutrality, and without favoritism or  
19 preferential treatment to either side. Foundation consistently violated its fiduciary duties of  
20 neutrality by acting as an agent of Elliott and his Straw PRs in every transaction.

21 4.133 Foundation’s standard form Closing Agreement and Escrow Instructions  
22 informed all parties to the real estate transaction that Foundation was “not acting as the advocate  
23 or representative of either (or any) the parties.”

24 4.134 This representation by Foundation was false, misleading, and created a deceptive  
25 net impression that Foundation was complying with its fiduciary duties. In reality, Foundation  
26 was actively supporting and profiting from Elliott’s scheme.

1 4.135 Ms. Baines admitted that Foundation had a “spoken” agreement with Elliott under  
2 which they mutually agreed that Foundation would receive an extra \$1,000 in escrow fees to  
3 every Elliott-related probate sale. Foundation charged this additional escrow fee for “all the John  
4 Elliott probate transactions, regardless of who the personal representative was for the probate.”

5 4.136 Defendants never disclosed these inflated escrow fees to the buyers of the probate  
6 properties, or to heirs or other affected parties such as creditors of the estates, all of whom had a  
7 financial interest in the total closing costs of the probate sale.

8 4.137 Foundation also failed to disclose that the escrow fees were significantly higher  
9 than those it charged in transactions involving Foundation’s other regular escrow clients.

10 4.138 Foundation consistently charged these higher escrow fees in most if not all of  
11 Elliott’s probate transactions. These fees increased the transaction costs and reduced net  
12 proceeds from the sales of the estate properties.

13 **6. Defendants’ pronounced self-dealing in non-intervention probates**

14 4.139 Elliott has never submitted a final report in any probate where received non-  
15 intervention powers—*i.e.*, where the court agreed not to supervise Elliott’s administration of the  
16 probate—thus effectively preventing courts and heirs from scrutinizing Defendants’  
17 overspending and mismanagement of those estates.

18 4.140 In instances where Elliott was granted non-intervention powers, Elliott’s self-  
19 dealing became even more pronounced.

20 4.141 For example, in the *Estate of Sonja Tilton*, Kitsap County #21-4-00122-18,  
21 Defendant Elliott was granted non-intervention powers on May 21, 2021, after informing the  
22 court that the estate included at least four real properties, “significant cash in banks,” and other  
23 assets, collectively “worth approximately \$1.5 million.” Elliott identified two heirs to the estate:  
24 adults Kyle Tilton and Arielle Scott. Once appointed as PR with non-intervention powers,  
25 however, Elliott did not administer the estate “as rapidly and as quickly as possible, without  
26 sacrifice to the probate.” RCW 11.48.010. Instead, Elliott made convoluted arrangements that

1 have allowed him to continually collect large sums of money from the *Tilton* estate over the last  
2 three-and-a-half years.

3 4.142 Instead of promptly distributing the *Tilton* real properties to the heirs as they  
4 wished, Elliott and his attorneys worked with the heirs' uncle, Mr. Kevin Chambers (who was  
5 neither an heir nor a guardian of the heirs) to create and subject the heirs to various trusts: a  
6 revocable trust for Ms. Scott, for which Elliott himself is the trustee, and subsequently a special  
7 needs trust for Mr. Tilton, for which Mr. Chambers is the trustee. Elliott quitclaimed one *Tilton*  
8 house into each trust—2623 Stephenson Ave, Bremerton into Ms. Scott's trust, and  
9 2503 E 22nd St, Bremerton into Mr. Tilton's trust—and allowed the heirs to live in their  
10 respective houses.

11 4.143 Elliott paid Ms. Scott and Mr. Tilton a \$5,000 monthly stipend each out of the  
12 *Tilton* trust account he maintains at Umpqua Bank. Elliott did all this even though, according to  
13 Elliott himself in his investigative deposition, Ms. Scott “doesn't want her assets in a trust” and  
14 would “rather the property be titled in her name directly.”

15 4.144 Notably, according to handyman Mr. Fisher, Elliott forged Fisher's name as a  
16 witness on the legal documents establishing Ms. Scott's revocable trust.

17 4.145 Despite being aware that Ms. Scott wishes her revocable trust to be revoked,  
18 Elliott appeared surprised to learn that he is still trustee over Ms. Scott's revocable trust and  
19 agreed it should not exist if Ms. Scott wants it revoked. Elliott testified that he would  
20 immediately revoke the trust but as of the filing of this complaint, months later, he has not.

21 4.146 In August 2022, Elliott sold the third *Tilton* property located at 912 Park Ave,  
22 Bremerton—without listing it publicly—netting \$200,178 due to the estate. The sale proceeds  
23 were deposited into the *Tilton* trust account at Umpqua Bank.

24 4.147 Bank records for the same *Tilton* trust account show incoming checks each month  
25 for ~\$2200 rent payments relating to the fourth *Tilton* property. That is, Elliott treated the final  
26 *Tilton* house as a rental property and collected rent from it. In exercising his fiduciary duties as

1 PR of the *Tilton* estate, Elliott never sold the final property, but instead entered into an  
2 undisclosed rent-to-own (RTO) home purchase arrangement under which he has been receiving  
3 and keeping monthly payments as a “landlord” for the property for his own personal benefit.

4 4.148 Elliott, with the help of his attorneys, has established himself as a long-serving  
5 overseer, trustee, landlord, and money manager for the *Tilton* estate instead of acting as a PR,  
6 netting himself a tremendous profit in return. Over the years, Elliott has paid himself from the  
7 *Tilton* estate “administrative fees” totaling at least \$153,522.50.

8 4.149 Elliott has also mismanaged the *Tilton* estate funds (and commingled them with  
9 funds from the *Estate of Melvin Miller*), as described above.

10 4.150 As of November 30, 2024, according to Umpqua Bank records, only \$11,053.32  
11 remains in the *Tilton* trust account.

12 4.151 Another example of pronounced self-dealing in non-intervention probates is the  
13 *Estate of Ruth Richmond*, Kitsap County #23-4-00411-18. The court granted Elliott non-  
14 intervention PR powers in May 2023. Nothing has been filed with the court since.

15 4.152 Elliott lived rent-free in the *Richmond* home for many months. In 2023, Elliott  
16 texted his then-girlfriend, Ms. Early to discuss living in the *Richmond* home, saying “***I think the***  
17 ***court would not be pleased to find out that I am living in one of the houses that [sic] while I***  
18 ***have a non-intervention probate in that one, giving me a lot of lateral freedom... my fear is,***  
19 ***that would not be considered an appropriate use.***” Elliott then went on say that he might soon  
20 contrive to “adversely possess” one of the houses that Defendant Kinney was administering as  
21 Straw PR, or move into the house at issue in the *Estate of James Ritzman*,  
22 Kitsap County #23-4-00489-18 (which he thereafter did).

23 4.153 On May 7, 2024, as PR of the *Richmond* estate, Elliott wrote a check to P&A  
24 Services (*i.e.*, Elliott himself) drawing on the estate trust account in the amount of \$24,335.23  
25 for “admin + cash advances.” Two days later, on May 9, 2024, Elliott deposited a cashier’s check  
26 made out to “John Elliott re: The Estate of Ruth Sprong Richmond” in the amount of \$128,655

1 into his *personal checking account* #6205 at Wells Fargo—not into the *Richmond* estate trust  
2 account—and then converted those funds to pay Elliott’s business and personal expenses. To  
3 date, Elliott has paid himself at least \$152,990.23 from the *Richmond* estate.

4 **7. Defendants’ improper purchases of probate properties and self-dealing**  
5 **using Straw PRs**

6 4.154 Defendants purchased and attempted to purchase multiple estate real properties  
7 connected to their probate administrations through unrecorded quitclaim deeds, and for less than  
8 fair market value (FMV). In doing so, Defendants deprived heirs of potential assets, deprived  
9 third parties of potential real property purchases, and unjustly enriched Elliott and other  
10 Defendants. Defendants also employed Straw PRs to engage in, and obscure, their self-dealing.

11 **a. Defendants’ improper purchases of estate properties from probate**  
12 **heirs**

13 4.155 From early in their “probates for profit” scheme, Defendants attempted to  
14 purchase estate properties that were the subject of their probate administrations, routinely for  
15 less than FMV, thus enabling Defendants to “flip” the properties for their own benefit and profit.  
16 As part of this scheme, Defendants misled heirs about the value of the properties, sometimes  
17 employed Straw PRs to disguise self-dealing purchases, and knowingly and intentionally  
18 concealed their self-dealing from Washington courts.

19 4.156 By March 2021, if not earlier, Elliott asked Owens to develop a “second set of  
20 protocols when we find a property we would like to buy,” noting: “[i]f I’m the administrator it  
21 looks prohibitively challenging to become the buyer.” In connection with this request, Elliott  
22 expressed interest in purchasing a parcel of real property from the *Estate of Cynthia Draeger*,  
23 Pierce County 14-4-01601-1.

24 4.157 Three months later, in June 2021, Elliott and Owens successfully purchased the  
25 *Draeger* property via quitclaim deed “for ten dollars and other valuable consideration.” The  
26 *Draeger* home is located at 2721 S 14th St, Tacoma, WA, and later became the headquarters for

1 Elliott’s businesses including P&A Services, 542LiveOak, Destin, and Aurora Creek. The  
2 acquisition of the *Draeger* property became a template for Defendants’ subsequent acquisitions  
3 of estate properties.

4 4.158 By May 2021, Elliott befriended and began assisting Mr. Michael Smith—the  
5 *Draeger* heir, who had no experience in probate administration—with administering the *Draeger*  
6 estate as court-appointed PR. Elliott then convinced Mr. Smith that there was little value in the  
7 property and persuaded Mr. Smith to sign over ownership of the property directly to Elliott.

8 4.159 In a letter to Elliott (c/o Seguros Pacific) dated July 7, 2021, Owens wrote “Dear  
9 Mr. Elliott, Enclosed per direction of *my client* is the executed personal representative’s deed for  
10 the property from the above estate” (emphasis added), and included the quitclaim deed. In other  
11 words, despite his attorney-client relationship with Elliott and his knowledge that Elliott desired  
12 to purchase the *Draeger* property for himself, Owens convinced Mr. Smith that he would act as  
13 *Mr. Smith’s* attorney in selling the property to Elliott. Mr. Smith then signed away his property  
14 rights to Elliott for a pittance.

15 4.160 Elliott and his attorneys went on to repeat this process—*i.e.* either exploiting an  
16 impressionable heir or, in the alternative, employing a Straw PR—to acquire other estate  
17 properties through quitclaim deeds. In addition to violating their fiduciary duties, Elliott and his  
18 attorneys frequently failed to record these quitclaim deeds in order to conceal the transaction.

19 4.161 An example of Defendants’ improper acquisition of an estate property that was  
20 the subject of their own probate administration is *Estate of James Ritzman*, referenced above. In  
21 May 2023, Elliott was appointed as PR over the *Ritzman* probate. As one of his first acts as PR,  
22 on June 1, 2023, Elliott cancelled a pending public sale of the *Ritzman* property to a third party,  
23 indicating that he planned to “remarket the property... or we’ll oversee the rebuild ourselves,  
24 then list it for sale,” and further stated: “any other approach seems less than our best effort to  
25 serve the Ritzman family.” Elliott copied Defendant Brouillard on this email cancelling the  
26 *Ritzman* sale.



1 4.165 Another example of a self-dealing purchase of an estate property through  
2 manipulation of a probate heir is the *Estate of Kris Matteson*. There, Elliott befriended and  
3 advised an heir—who was appointed as PR but had no prior experience in probate  
4 administration—on how to administer the estate. Elliott then substituted as PR on the *Matteson*  
5 probate and persuaded the *Matteson* heir to sell the property quickly to him via a quitclaim  
6 drafted by his attorney. As now-owner of the property, PR, and shadow listing agent, Elliott  
7 collected large sums from the subsequent public sale of the *Matteson* property to a third party.

8 **b. Defendants’ acquisition of estate properties and other self-dealing**  
9 **through Straw PRs**

10 4.164 In instances where there they could not manipulate an impressionable heir, Elliott  
11 and his attorneys used Straw PRs—*e.g.*, Defendants Sunde, Howard, Kinney, and Ellis—to  
12 disguise and obscure their purchases of estate properties. They also used Straw PRs to direct fees  
13 and commissions to Defendants’ affiliated contracting and real estate businesses and obscure  
14 Elliott’s self-dealing.

15 4.165 From 2019 to 2021, early in Elliott’s “probates for profit” scheme, Defendant  
16 Sunde acted as Elliott’s Straw PR under his direct supervision and control. Sunde had been an  
17 early business partner of Elliott, and she was secretly paid by Elliott for her work as PR. In the  
18 context of her role as PR, at Elliott’s direction, Sunde repeatedly hired and paid fees to Elliott  
19 and his affiliated businesses.

20 4.166 In the *Estate of Mary Johanna Griffin*, Kitsap County 20-4-00780-18, Sunde was  
21 appointed as PR, with Owens acting as her attorney. Shortly after her appointment as PR, in  
22 November 2020, Sunde sold the *Griffin* home to Elliott via 542LiveOak, Elliott’s single-member  
23 LLC, with Owens drawing up the note and related sale documents. Sunde did not obtain an  
24 appraisal for the *Griffin* property in advance of the sale, nor did she list the property publicly.  
25 Elliott purchased the real property in exchange for the satisfaction of outstanding liens and fees,  
26 a \$2,500 PR fee to Sunde, a \$4,000 fee to Owens (paid by 542LiveOak at closing through

1 escrow), and \$10,000 to the *Griffin* estate: a gross sales price of approximately \$100,000.

2 4.167 A few months later, in February 2021, Elliott flipped the *Griffin* house and sold  
3 it to a third party for nearly \$400,000. Notably, Sunde never communicated with the *Griffin* heirs  
4 regarding her sale to Elliott or any other details about the estate, and has since refused to disburse  
5 to them any estate assets to which they are entitled.

6 4.168 Beginning in 2023, Defendants Kinney and Ellis began acting as Elliott's Straw  
7 PRs under Elliott's direct supervision and control. Defendant Kinney had been (and continued  
8 to be, even after becoming a Straw PR) an employee of P&A Services and "assistant" to Elliott.  
9 Defendant Ellis had no prior probate administration experience but was suggested to Elliott by  
10 her mother, Ms. Baines, owner of Defendant Foundation. Elliott secretly paid both Kinney and  
11 Ellis for their work as PR. Elliott and Brouillard began publicly putting forward Kinney and Ellis  
12 as PRs because, in Brouillard's words, "the Courts had expressed concern that [Elliott] had too  
13 many open cases."

14 4.169 As Straw PR, at Elliott's direction, Defendant Ellis assisted Elliott with  
15 acquisitions and attempted acquisitions of estate properties that were the subject of her probate  
16 administrations, for below FMV. An example includes the *Estate of Richard Pospisil*, Kitsap  
17 County #23-4-00873-18, where Ellis was appointed as PR, with Brouillard as her attorney. With  
18 Ellis' knowledge and acquiescence, Elliott and Brouillard privately drafted and obtained  
19 quitclaim deeds for the *Pospisil* property, promising \$5,000 to each of multiple heirs. A Zillow  
20 search reveals the 2023 tax assessed value of the *Pospisil* property was \$273,169.

21 4.170 Another example was *Estate of James Schubring*, Kitsap  
22 County #24-4-00005-18, where Ellis was again Straw PR, with Brouillard as her attorney. With  
23 Ellis' knowledge and acquiescence, Elliott and Brouillard worked privately to buy the *Schubring*  
24 property from the heirs via quitclaim deed, without a public sale, with Elliott remarking to  
25 Brouillard that this was "much like you helped me do with the *Ritzman* family."

26 4.171 Elliott used Straw PRs not only to purchase estate properties, but to disguise and

1 obscure other self-dealing, such as hiring Elliott’s affiliated businesses without competitive  
2 bidding, or collecting inflated contracting fees and listing commissions for Elliott’s businesses  
3 from real property buyers.

4 4.172 Elliott’s control over his Straw PRs and the manner in which they administered  
5 probates was self-evident in the *Estate of Mary Wright*, Kitsap County #23-4-00796-18. In  
6 October 2023, Defendant Kinney, as Elliott’s Straw PR, sold the *Wright* house under terms that  
7 included an immediate payment by the real property buyer of \$5,000 to P&A Services (Elliott’s  
8 probate administration company) and another \$500 to Aurora Creek (Elliott’s contracting  
9 company) even though ***neither Elliott nor P&A Services was involved in the probate at all***, nor  
10 was there any documented work done by Aurora Creek. Moreover, Kinney directed a \$3,000  
11 listing commission paid to Elliott’s romantic partner, Ms. Early. In other words, Kinney  
12 delivered to Elliott the same outcome Elliott would have sought if he had been the appointed PR.

13 4.173 Another example is the *Estate of Danny Joe Stevens*,  
14 Kitsap County #23-4-00892-18. In January 2024, Defendant Ellis, as Straw PR and at Elliott’s  
15 direction, negotiated and interlineated that the *Stevens* real property buyer must “pay \$12,000 to  
16 Aurora Creek Ranch at closing” for unspecified contracting work. Notably, Ms. Early was again  
17 the listing broker for the sale.

18 4.174 The *Stevens* home sale fell through. Unrelatedly, Ms. Early and Elliott ended their  
19 romantic involvement and had a falling-out.

20 4.175 Elliott thereafter instructed Ellis not to use Ms. Early as listing broker on Ellis’  
21 probates anymore. Elliott emailed Brouillard and Ms. Baines, Ellis’s mother, at Foundation to  
22 inform them of his decision to avoid using Ms. Early as listing broker, instructing that “*Stevens*  
23 [and other probates] are insolvent...with liabilities that exceed the single asset’s value. I believe  
24 she [Ellis] can elect to be done.” Shortly thereafter, Elliott emailed Ellis directly and told her to  
25 cancel any further listing of the *Stevens* property and “allow [it] and your remaining matters (like  
26 Pospisil) to time out without more time and cost expended, if that’s acceptable to Robert

1 [Brouillard].” Ellis, acting as Elliott’s Straw PR, did as Elliott instructed.

2 4.176 Since June 2024, when the Kitsap County Superior Court stayed Defendant  
3 Elliott’s PR powers and opened its Special Master investigation, all probates being administered  
4 by Ellis and Kinney—all of which involve Brouillard as the PR attorney—have fallen dormant.  
5 Specifically, neither Ellis or Kinney has filed an interim or final report with the court, noted a  
6 hearing, nor have there been any apparent real or personal property sales. Nothing at all has  
7 happened on their probates in nearly eight months. In other words, once Elliott became  
8 unavailable, Kinney’s and Ellis’ probates stopped.

9 4.177 The apparent abandonment of Kinney’s and Ellis’ probates over the last seven  
10 months constitutes waste to the respective estates, and breach of Kinney’s and Ellis’ fiduciary  
11 duties under RCW 11.48.010, described below.

12  
13 **E. Defendants Engaged in Dishonesty and Secrecy Toward Heirs, the Courts, and  
Others**

14 4.178 Defendants systematically concealed their actions from heirs, homebuyers,  
15 creditors or potential creditors of the probate estates, Washington courts, and the public at large.  
16 Defendants were also dishonest with the courts and affected heirs. They also consistently failed  
17 to provide adequate notice to or communicate with the affected heirs.

18 4.179 Just before petitioning to be appointed as PRs, Defendants sent misleading form  
19 introduction letters to heirs in which Defendants described their services as “administrative  
20 assistance with the estate’s inventory and distribution of assets” and assured the persons  
21 receiving the letter that “the process will create no risk or liability for you or your family.”  
22 Defendants also baselessly claimed that they had already identified inheritance owed to the heirs.  
23 In fact, Defendants did not provide heirs with any assistance, had not identified any inheritance  
24 owed to heirs, never inventoried estate properties, frequently did not distribute monies to heirs,  
25  
26

1 and in many cases acted directly contrary to heirs' interests. Defendants also concealed that they  
2 intended to acquire PR powers so they could sell the estate properties for their own benefit.

3 4.180 Defendants misleadingly informed courts that they had provided notice to all  
4 probate heirs or potential heirs of their respective petitions and appointments, when in fact,  
5 Defendants regularly failed to do so. Defendants frequently failed to identify easily-identifiable  
6 heirs, or simply made up names of people who had no connection to the estates, in their petitions  
7 for appointment in order to claim to the court that notice had been provided. In addition to the  
8 Elliott and his Straw PRs, Defendants Owens and Brouillard took active roles in identifying (and  
9 failing to identify) heirs. Defendants consistently violated RCW 11.28.237, which requires  
10 notice of the probate proceedings to be sent to every heir of the decedent within 20 days of the  
11 appointment of the PR. It also requires proof that such notice be filed with the court.

12 4.181 In each new probate, Elliott and his Straw PRs filed petitions for appointment as  
13 PRs of the probate estates in which they characterized themselves to the courts as "suitable  
14 persons" to administer the estates under RCW 11.28.120(7) without ever disclosing that they  
15 intended to engage in self-dealing and administer the probates for personal profit.

16 4.182 Defendants also concealed that they were administering probates through limited  
17 liability companies (LLCs), which are not "suitable persons" and are categorically disqualified  
18 from administering probates pursuant to RCW 11.36.010(1). For their own legal protection,  
19 Elliott, Sunde, and Ellis each created single-member LLCs to administer their probates—*i.e.*,  
20 Defendants Probate & Administration Services LLC, Sunde Consulting & Accounting LLC, and  
21 Ellis Probate Services LLC. At all times after incorporation of their LLCs and in the context of  
22 their PR work, and in violation of the law, Elliott, Sunde, and Ellis administered probates through  
23 their respective LLCs—categorically disqualified persons—and kept it secret from the courts.

24 4.183 Defendants also refused to provide accountings or explanations of their self-  
25 dealing to inquiring heirs and courts, and Defendants' few court filings failed to disclose their  
26 various acts of self-dealing. Pursuant to RCW 11.76.010 and 11.76.030, Elliott and his Straw

1 PRs were required to file annual and final reports and inventories to provide accountings of all  
2 properties collected and transacted. Elliott and his Straw PRs systematically failed to provide  
3 required annual and final reports to the courts and violated their statutory duties under  
4 RCW 11.76.010. Elliott and his PRs also steadfastly refused to provide accountings or  
5 explanations to heirs, even when court-ordered to do so. In this way, Defendants have long  
6 operated in secrecy.

7 **F. Impacts of Defendants’ Scheme on Heirs, Real Property Buyers, and the Courts**

8 4.193 Defendants’ violations of the law have the potential to greatly impact not only  
9 the rights of probate heirs, but also those of good-faith homebuyers of the estate properties. They  
10 also impact the Washington probate system and the Washington courts administering these  
11 probates statewide.

12 4.194 Defendants have administered at least 213 probates across the state of  
13 Washington, and their violations of the law place at risk the orderly administration and finality  
14 of those probates, as well as the finality of any real property sales arising from them.

15 4.195 In at least two of Defendants’ probate cases already, Defendants’ failures to  
16 provide adequate notice to heirs have been cited as a basis to estop or unwind real property sales.  
17 Lack of notice to heirs can result in constitutional deprivation of property. *Hesthagen v. Harby*,  
18 78 Wn.2d 934, 942, 481 P.2d 438 (1971). It was, in part, for this reason that in the *Estate of*  
19 *Helen M. Roulst*, Kitsap County #23-4-00197-18, the court revoked Elliott’s PR powers based  
20 on his failure to identify and provide the required notice to the estate heir of 1) Elliott’s potential  
21 petition for appointment, 2) his appointment as PR, 3) that he had placed the decedent’s real  
22 property on the market for sale without consulting the heir as the sole beneficiary, and 4) Elliott’s  
23 motion for sale of said real property. The court thereafter ***unwound the sale of the Roulst real***  
24 ***property to a good faith homebuyer***, and the buyer lost the property they had purchased.

25 4.196 Similarly, in the *Estate of Odessa Freeman*, King County #23-4-04004-7,  
26 Elliott’s unlawful acts as PR ultimately resulted in the nullifying of a real property purchase and

1 sale to a good faith buyer. There, the court found that Elliott as PR—without proper notice to  
2 the heir or standing to initiate the probate—engaged in misconduct against the heir and then  
3 nearly sold the home out from under the heir to a third party. The court *enjoined and estopped*  
4 *Elliott’s nearly-completed sale of the home to a third party*, even after the third party had signed  
5 a purchase and sale agreement.

6 4.197 In other words, Defendants’ unlawful actions have already had real impacts on  
7 the rights of both heirs and good faith homebuyers.

8 4.198 Defendants’ “probate for profit” scheme must be stopped.

9 **V. FIRST CAUSE OF ACTION**  
10 **Unfair or Deceptive Acts in Violation of the CPA, RCW 19.86.020 /**  
11 **Conversion, Commingling of Funds, and Failure to Distribute Funds to Heirs**  
**(Elliott, Sunde, P&A Services, Sunde Consulting, Ellis and Ellis Probate)**

12 5.1 Plaintiff realleges and incorporates by reference the allegations set forth in each of  
13 the preceding paragraphs.

14 5.2 Pursuant to the CPA, RCW 19.86.020, “unfair or deceptive acts or practices in the  
15 conduct of any trade or commerce are hereby declared unlawful.”

16 5.3 The personal representative (PR) of a probate estate stands in a fiduciary  
17 relationship to those beneficially interested in the estate and is required to exercise utmost good  
18 faith and diligence in administering the estate in the best interests of the beneficiaries of the estate.

19 5.4 The fiduciary duties owed by the PR of a probate estate include, *inter alia*, the  
20 fiduciary duty of loyalty.

21 5.5 The fiduciary duty of loyalty prohibits a PR from converting, commingling, or  
22 otherwise failing to distribute estate funds to the heirs of the estate they are appointed to administer.

23 5.6 Defendants Elliott, Sunde, and Ellis have been appointed as the PR responsible for  
24 administering various probate estates in the state of Washington by several Washington courts.

1           5.7     Defendants Elliott, Sunde, and Ellis routinely utilized Defendants P&A Services,  
2 Sunde Consulting, and Ellis Probate, respectively, to perform their duties as an appointed PR over  
3 probate estates.

4           5.8     In the course of administering probate estates, Defendants Elliott, Sunde, P&A  
5 Services, and Sunde Consulting engaged and continue to engage in unfair or deceptive acts or  
6 practices within the meaning of the CPA, RCW 19.86.020, including but not limited to  
7 the following:

8                   5.8.1    Converting proceeds derived from the sales of real property held in  
9                                probate estates over which they were appointed as PR that were owed to,  
10                               and should have been distributed, to the heirs of those estates;

11                   5.8.2    Commingling estate proceeds with their own personal funds held in their  
12                               own non-fiduciary, non-trust accounts;

13                   5.8.3    Failing to account for the disappearance of proceeds from the sale of  
14                               probate estate property, which proceeds were required to be distributed to  
15                               the beneficiaries such estates; and

16                   5.8.4    Failure to timely distribute proceeds from the sale of estate property to the  
17                               beneficiaries entitled to receive them.

18           5.9     In the course of administering probate estates, Defendants Ellis and Ellis Probate  
19 engaged and continue to engage in unfair or deceptive acts or practices within the meaning of  
20 the CPA, RCW 19.86.020, including but not limited to the following:

21                   5.9.1    Failing to account for the disappearance of proceeds from the sale of  
22                               probate estate property, which proceeds were required to be distributed to  
23                               the beneficiaries such estates; and

24                   5.9.2    Failure to timely distribute proceeds from the sale of estate property to the  
25                               beneficiaries entitled to receive them.  
26



1 estate they administered, including the fiduciary duty of loyalty which prohibited them from  
2 engaging in self-dealing, converting estate assets, wasting, or otherwise profiting from the estate at  
3 the expense of the beneficiaries.

4 6.4 These fiduciary duties extended to P&A Services, Sunde Consulting, and Ellis  
5 Probate insofar as Elliott, Sunde, and Ellis, respectively, acted through those companies when  
6 performing, or failing to perform, their fiduciary duties owed to the heirs.

7 6.5 Pursuant to RCW 11.98.078, these Defendants, and each of them, were and are also  
8 presumptively prohibited from engaging in self-dealing transactions when administering or  
9 facilitating the administration of these probate estates including transactions entered into for their  
10 “own personal account or which [were] otherwise affected by a conflict between [their] fiduciary  
11 and personal interests” and the interests of the heirs.

12 6.6 Pursuant to RCW 18.44.301(1) and (2), Defendant Foundation was and is at all  
13 times prohibited from “[d]irectly or indirectly employ[ing] any scheme, device, or artifice to  
14 defraud or mislead borrowers or lenders or to defraud any person” and/or “[d]irectly or indirectly  
15 engag[ing] in any unfair or deceptive practice toward any person.”

16 6.7 Defendants Elliott, Sunde, Howard, Kinney, Ellis, P&A Services, Sunde  
17 Consulting, Ellis Probate, Aurora Creek, Owens, Brouillard, and Foundation engaged and continue  
18 to engage in unfair or deceptive acts or practices within the meaning of the CPA,  
19 RCW 19.86.020, including but not limited to the following:

20 6.7.1 Using Straw PRs to conceal Defendant Elliott’s role as the person  
21 directing and controlling all of these probates;

22 6.7.2 Coordinating, planning, and carrying out self-dealing transactions as set  
23 forth above for their own benefit at the expense of the heirs and buyers or  
24 potential buyers of probate properties;

25 6.7.3 Sending deceptive form letters to heirs or potential heirs at the beginning of  
26 each new probate describing their services as “administrative assistance

1 with the estate’s inventory and distribution of assets” and assuring the heirs  
2 or potential heirs that “the process will create no risk or liability for you or  
3 your family” without disclosing that they intended to acquire PR powers so  
4 they could profit at the expense of the heirs;

5 6.7.4 Filing form petitions for appointment as PRs of the probate estates  
6 describing themselves the proposed PRs as “suitable persons” to administer  
7 the estates under RCW 11.28.120(7), without disclosing that they intended  
8 to engage in self-dealing and administer the probates for personal profit;

9 6.7.5 As to Defendants Elliott, P&A Services, Owens, and Brouillard only, filing  
10 form petitions for appointment as PRs of the probate estates describing  
11 Defendant Elliott as a “suitable person” to administer the estates under RCW  
12 11.28.120(7), without disclosing adverse facts demonstrating Elliott’s lack  
13 of “suitability” including but not limited to: Elliott’s prior acts of  
14 malfeasance, Elliott’s prior mismanagement of estate funds and other funds,  
15 Elliott’s relevant license revocations, Elliott’s recent financial distress,  
16 Elliott’s refusal to comply with court orders, Elliott’s poor bookkeeping,  
17 Elliott’s untruthful testimony and misrepresentation, and court findings of  
18 Elliott not being a “suitable person” to administer other probates;

19 6.7.6 Filing “Oaths of Administrator” swearing to “perform the duties of  
20 Administrator according to the laws of the State of Washington” and to settle  
21 the estate “as rapidly and quickly as possible, without sacrifice to the probate  
22 . . . estate” again without disclosing their self-dealing operation and profit  
23 motivations;

24 6.7.7 Foundation’s concealment from the buyers of probate properties that it was  
25 acting in concert with Elliott and his Straw PRs, combined with its false  
26 statement in its form Closing Agreement and Escrow Instructions expressly

1                    assuring buyers that Foundation was “not acting as the advocate or  
2                    representative of either (or any) of the parties”; and

3                    6.7.8    Otherwise concealing these self-dealing transactions from the affected  
4                    heirs, the Courts, and other affected parties including the buyers in probate  
5                    sale transactions, creditors or potential creditors of the estate, and others.

6                    6.8        These unfair and deceptive acts or practices occurred in trade or commerce within  
7                    the meaning of the CPA, RCW 19.86.020 and RCW 19.86.010(2), specifically, the provision of  
8                    probate administration services for the benefit of heirs, creditors or potential creditors, buyers or  
9                    potential buyers of probate properties, and proper operation of Washington’s legal system for the  
10                   administration of probate estates.

11                   6.9        These unfair and deceptive acts or practices impacted the public interest because it  
12                   affected and continues to affect numerous heirs, creditors or potential creditors, buyers or potential  
13                   buyers of probate properties, Washington courts, and others participating in or having an interest in  
14                   the proper administration of these probate estates. These practices constitute a pattern of conduct of  
15                   which there is a real and substantial potential for repetition.

16                   6.10      Because Defendants, and each of them, knowingly assisted, directed, controlled,  
17                   participated in, carried out, and/or approved of these acts, practices, and activities in violation of the  
18                   CPA, and their conduct, separately considered, constitutes a breach of their legal and fiduciary  
19                   duties, each of them is jointly and severally liable for these violations.

20                   6.11      Based on these unfair and deceptive acts or practices, Plaintiff is entitled to relief  
21                   under the CPA including preliminary and permanent injunctive relief pursuant to CR 65,  
22                   RCW 19.86.080, and RCW 11.48.070, restitution pursuant to RCW 19.86.080, civil penalties  
23                   pursuant to RCW 19.86.140 for every violation of RCW 19.86.020, and reimbursement of  
24                   reasonable attorneys’ fees and costs pursuant to RCW 19.86.080.

1 **VII. THIRD CAUSE OF ACTION**  
2 **Unfair and Deceptive Acts in Violation of the CPA, RCW 19.86.020 /**  
3 **Violations of Probate and Escrow Statutes and Common Law Fiduciary Duties**  
4 **(Elliott, Sunde, Howard, Kinney, Ellis, Owens, Brouillard and Foundation)**

5 7.1 Plaintiff realleges and incorporates by reference the allegations set forth in each  
6 of the preceding paragraphs.

7 7.2 Pursuant to the CPA, RCW 19.86.020, “unfair or deceptive acts or practices in  
8 the conduct of any trade or commerce are hereby declared unlawful.”

9 7.3 As fiduciaries, Elliott, Sunde, Howard, Kinney, Ellis, Owens, Brouillard, and  
10 Foundation were and are at all times required to act solely in the best interests of the heirs of the  
11 estate they administered, including the fiduciary duty of loyalty which prohibited them from  
12 engaging in self-dealing, converting estate assets, wasting, or otherwise profiting from the estate  
13 at the expense of the beneficiaries.

14 7.4 Defendants Elliott, Sunde, Howard, Kinney, Ellis, Owens, Brouillard, and  
15 Foundation engaged and continue to engage in unfair or deceptive acts or practices within the  
16 meaning of the CPA, RCW 19.86.020, including but not limited to the following:

17 7.4.1 Charging and collecting flat fee PR fees associated with the sale of  
18 probate properties and distributing those flat fee PR fees to themselves at  
19 escrow without prior court approval;

20 7.4.2 Charging and collecting flat fee PR attorney fees associated with the sale  
21 of probate properties and distributing those flat fee PR attorney fees to  
22 themselves at escrow without prior court approval;

23 7.4.3 Charging and collecting real estate broker fees associated with the sale of  
24 probate properties and distributing those real estate broker fees to  
25 themselves at escrow without prior court approval;

- 1 7.4.4 Charging and collecting contractor fees associated with the sale of probate  
2 properties and distributing those contractor fees to themselves at escrow  
3 without prior court approval;
- 4 7.4.5 Charging and collecting escrow fees associated with the sale of probate  
5 properties, including undisclosed escrow fees of an additional \$1,000 in  
6 each probate sale transaction, and distributing those escrow fees to  
7 themselves at escrow without prior court approval;
- 8 7.4.6 Failing to settle the probate estates as rapidly and quickly as possible,  
9 without sacrifice to the probate estate;
- 10 7.4.7 Selling estate properties without court approval as required by  
11 RCW 11.72.002;
- 12 7.4.8 Failing to file annual reports informing the Courts of the status of pending  
13 probates as required under RCW 11.76.010;
- 14 7.4.9 Failing to file Final Reports as required under RCW 11.76.030 when the  
15 probate estates were ready to be closed, informing the Courts of the  
16 condition of the estate and seeking court approval for a settlement of the  
17 estate and distribution of estate property and discharge of the  
18 personal representative;
- 19 7.4.10 Charging inflated escrow fees under Defendant Foundation's secret fee  
20 arrangement with Defendant Elliott and concealing those inflated escrow  
21 fees from buyers of the probate properties and affected heirs;
- 22 7.4.11 Failing to disclose to buyers of the probate properties and affected heirs  
23 the conflict of interest between Defendant Foundation and its owner and  
24 escrow officer, Jolyne Baines, and her daughter, Defendant Julie Ellis,  
25 who acted as Elliott's Straw PR for some of the probate estates;  
26

1 7.4.12 As to Defendants Elliott, Sunde, and Ellis, and their respective single-  
2 member LLCs, Defendants Probate & Administration Services LLC,  
3 Sunde Accounting & Consulting LLC, and Ellis Probate Services LLC,  
4 acting or purporting to act as PRs through non-attorney LLCs when those  
5 LLCs were “legal persons” that were categorically disqualified from  
6 administering probates; and

7 7.4.13 Failing to provide notice to all heirs or potential heirs of the probate  
8 estates, thus preventing them from becoming aware of Defendants’  
9 ongoing scheme, in violation of Defendants’ statutory and  
10 fiduciary duties.

11 7.5 These unfair and deceptive acts or practices occurred in trade or commerce within  
12 the meaning of the CPA, RCW 19.86.020 and RCW 19.86.010(2), specifically, the provision of  
13 probate administration services for the benefit of heirs, creditors or potential creditors, buyers or  
14 potential buyers of probate properties, and proper operation of Washington’s legal system for  
15 the administration of probate estates.

16 7.6 These unfair and deceptive acts or practices impacted the public interest because  
17 it affected and continues to affect numerous heirs, creditors or potential creditors, buyers or  
18 potential buyers of probate properties, Washington courts, and others participating in or having  
19 an interest in the proper administration of these probate estates. These practices constitute a  
20 pattern of conduct of which there is a real and substantial potential for repetition.

21 7.7 Because Defendants, and each of them, knowingly assisted, directed, controlled,  
22 participated in, carried out, and/or approved of these acts, practices, and activities in violation of  
23 the CPA, and their conduct, separately considered, constitutes a breach of their legal and  
24 fiduciary duties, each of them is jointly and severally liable for these violations.

25 7.8 Based on these unfair and deceptive acts or practices, Plaintiff is entitled to relief  
26 under the CPA including preliminary, and permanent injunctive relief pursuant to CR 65,

1 RCW 19.86.080, and RCW 11.48.070, restitution pursuant to RCW 19.86.080, civil penalties  
2 pursuant to RCW 19.86.140 for every violation of RCW 19.86.020, and reimbursement of  
3 reasonable attorneys' fees and costs pursuant to RCW 19.86.080.

#### 4 **VIII. PRAYER FOR RELIEF**

5 Wherefore, the State prays for the following relief:

6 8.1 That the Court adjudge and decree that the Defendants have engaged in the conduct  
7 complained of herein.

8 8.2 That the Court adjudge and decree that the conduct complained of constitutes  
9 unfair or deceptive acts or practices and is unlawful in violation of the Consumer Protection Act,  
10 RCW 19.86.

11 8.3 That the Court adjudge and decree that Defendants Elliott, Sunde, Howard, Ellis,  
12 Kinney, P&A Services, Sunde Consulting, Ellis Probates, Aurora Creek, Owens and Brouillard's  
13 violations of Washington's probate and estate laws, including but not limited to their violations  
14 of RCW 11.48.010 (general fiduciary duties), RCW 11.48.210 (compensation and attorney's fees),  
15 RCW 11.56.265 (approval of broker fees and closing expenses), RCW 11.72.002 (sale of estate  
16 property), RCW 11.98.078 (duty of loyalty), RCW 11.48.070 (concealed or embezzled property),  
17 and their common law fiduciary duties constitute unfair or deceptive acts or practices and are  
18 unlawful under the Consumer Protection Act, RCW 19.86.

19 8.4 That the Court adjudge and decree that Defendant Foundation's violations of  
20 Washington's escrow laws, including but not limited to RCW 18.44.301(2) (deceptive escrow  
21 practices) and its common law fiduciary duties constitute unfair or deceptive acts or practices and  
22 are unlawful under the Consumer Protection Act, RCW 19.86.

23 8.5 That the Court issue emergency (TRO), preliminary, and permanent injunctive  
24 relief pursuant to the Consumer Protection Act, RCW 19.86.080, freezing any and all trust  
25 accounts and any other accounts created or administered by Defendants Elliott, Sunde, Howard,  
26 Ellis, Kinney, P&A Services, Sunde Consulting, Ellis Probates, and/or Aurora Creek now

1 holding funds that are owed or owing to heirs, and enjoining and restraining those Defendants  
2 and all other persons acting or claiming to act for, on behalf of, or in concert or participation  
3 with those Defendants from continuing or resuming the conversion, commingling, and other  
4 mishandling of funds complained of herein.

5 8.6 That the Court issue such other preliminary and permanent injunctive relief  
6 pursuant to the Consumer Protection Act, RCW 19.86.080, as necessary to enjoin and restrain  
7 Defendants and all other persons acting or claiming to act for, on behalf of, or in concert or  
8 participation with Defendants from continuing or resuming the unlawful conduct complained  
9 of herein.

10 8.7 That the Court assess civil penalties, pursuant to RCW 19.86.140, against  
11 Defendants for each violation of RCW 19.86.020 caused by the conduct complained of herein.

12 8.8 That the Court, as an equitable remedy, disgorge Defendants of money or property  
13 acquired by Defendants by means of the conduct and violations complained of herein.

14 8.9 That the Court make such orders pursuant to RCW 19.86.080 as it deems  
15 appropriate to provide for restitution to heirs of money or property unlawfully acquired by  
16 Defendants by means of the conduct complained of herein.

17 8.10 That the Court award Plaintiff its costs and reasonable attorney's fees in this  
18 action, pursuant to RCW 19.86.080; and

19 //

20 //

21 //

22 //

23 //

24 //

25 //



# APPENDIX A

## Probate Information

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
1	3/8/2019	Pierce	19-4-00411-1	Estate of Edna Dehls	3621 N Orchard St Tacoma, WA 98407	Pierce	John Elliott	Nicholas Franz	Closed
2	11/19/2019	Pierce	19-4-02096-5	Estate of Barbara Harrison-Philpot	6241 S Fife St Tacoma, WA 98409	Pierce	John Elliott	Nicholas Franz	Closed
3	11/20/2019	Pierce	19-4-02106-6	Estate of Ann Louise Denzer	4528 A St Tacoma, WA 98418	Pierce	John Elliott	Pro Se	Closed
4	11/21/2019	Kitsap	19-4-00946-18	Estate of Loretta Marian Welsh	2817 SE Forest Villa Ct Port Orchard, WA 98366	Kitsap	John Elliott	Pro Se	Open
5	11/21/2019	Kitsap	19-4-00947-18	Estate of Mary F Blue	8800 Deeridge Pl SE Port Orchard, WA 98367	Kitsap	John Elliott	Pro Se	Filed, Not Opened
6	12/2/2019	Pierce	19-4-02151-1	Estate of Johnny Lee Riley	1213 S Highland Dr Tacoma, WA 98465	Pierce	John Elliott	Pro Se	closed
7	12/2/2019	Thurston	19-4-00894-34	Estate of John Paul Jones Jr	4226 Thornton Rd SE Olympia, WA 98513	Thurston	John Elliott	Pro Se	Filed, Not Opened
8	12/2/2019	Thurston	19-4-00895-34	Estate of Walter John Shafer	3544 Donnelly Dr SE Olympia, WA 98501	Thurston	John Elliott	Pro Se	Filed, Not Opened
9	12/17/2019	Kitsap	19-4-01018-18	Estate of Mable Laurell Marshall	1713 Park Ave Bremerton, WA 98337	Kitsap	Brady Howard	Doug Owens	Open
10	2/19/2020	Thurston	20-4-00120-34	Estate of Janis Clare Gaiter	512 N 77th St Seattle, WA 98103	King	Shanelle Sunde	Doug Owens	Open
11	3/11/2020	Pierce	20-4-00489-1	Estate of Roger L Gavel	1910 147th St Ct E Tacoma, WA 98408	Pierce	Brady Howard	Nicholas Franz	Closed
12	4/30/2020	Skagit	20-4-00165-29	Estate of Walter Collins	515 S National Ave Bremerton, WA 98312	Kitsap	Brady Howard	Doug Owens	Closed
13	6/5/2020	Skagit	20-4-00226-29	Estate of Adrian Renee Holloway	317 128th St S Tacoma, WA 98444	Pierce	Shanelle Sunde	Doug Owens	Closed

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
14	6/25/2020	Skagit	20-4-00254-29	Estate of Randy Topinio	3229 S 291st St Auburn, WA 98001	King	Shanelle Sunde	Doug Owens	Closed
15	6/25/2020	Skagit	20-4-00253-29	Estate of Lourdez C Bautista	317 128th St S Tacoma, WA 98444	Pierce	Shanelle Sunde	Doug Owens	Closed
16	7/9/2020	Pierce	20-4-01201-0	Estate of Shawn Reinhardt	213 Groff Ave Orting, WA 98360	Pierce	Shanelle Sunde	Nicholas Franz	Closed
17	7/13/2020	Skagit	20-4-00277-29	Estate of Wilmer A Stilwell	4537 S Sheridan Ave Tacoma, WA 98418	Pierce	Shanelle Sunde	Doug Owens	Open
18	7/13/2020	Skagit	20-4-00280-29	Estate of Shirley Lee	8335 Zircon Dr SW #A-14 Lakewood, WA 98498	Pierce	John Elliott	Doug Owens	Open
19	7/13/2020	Skagit	20-4-00279-29	Estate of Ray Brown	17225 Renton Maple Valley Rd SE Maple Valley, WA 98038	King	John Elliott	Doug Owens	Open
20	7/13/2020	Skagit	20-4-00278-29	Estate of Margaret Parkinson	7038 South D St Tacoma, WA 98408	Pierce	Shanelle Sunde	Doug Owens	Closed
21	7/24/2020	Spokane	20-4-01096-32	Estate of Laurence A Duchesneau	2921 S Austin St Seattle, WA 98108	King	Shanelle Sunde	Rob Sargent	Closed
22	7/31/2020	Pierce	20-4-01343-1	Estate of Laurence Pratt	3017 Forest Rim Ct S Puyallup, WA 98374	Pierce	Shanelle Sunde	Nicholas Franz	Open
23	8/5/2020	Spokane	20-4-01152-32	Estate of Steven Eugene Peterson	10202 9th Ave Ct E Tacoma, WA 98445	Pierce	Shanelle Sunde	Rob Sargent	Closed
24	8/10/2020	Spokane	20-4-01184-32	Estate of Ruth C Rose	11003 17th Ave SW Seattle, WA 98146	King	Shanelle Sunde	Rob Sargent	Closed
25	8/10/2020	Kitsap	20-4-00595-18	Estate of David Lee Bergstrom	13118 Goodnough Dr NW Gig Harbor, WA 98332	Pierce	Shanelle Sunde	Doug Owens	Open
26	8/10/2020	Spokane	20-4-01183-32	Estate of John Lee Tweedy	13213 4th Ave S Burien, WA 98168	King	Shanelle Sunde	Rob Sargent	Closed
27	8/13/2020	Pierce	20-4-01482-9	Estate of William Robert Shepherd	650 SW 316th St Federal Way, WA 98023	King	Shanelle Sunde	Nicholas Franz	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
28	8/24/2020	Spokane	20-4-01258-32	Estate of Janet Drury	14408 200th St E Graham, WA 98338	Pierce	Shanelle Sunde	Rob Sargent	Closed
29	8/25/2020	Kitsap	20-4-00652-18	Estate of Judy C Bass	15854 8th Ave SW Burien, WA 98166	King	Shanelle Sunde	Doug Owens	Open
30	8/25/2020	Kitsap	20-4-00653-18	Estate of Gail Marie Pohlot	16305 127th Ave SE Renton, WA 98058	King	John Elliott	Doug Owens	Open
31	9/3/2020	Kitsap	20-4-00678-18	Estate of Kris Matteson	11431 Fry Ave SW Port Orchard, WA 98367	Kitsap	John Elliott	Doug Owens	Open
32	9/3/2020	Kitsap	20-4-00680-18	Estate of Andy N K Lam	76 Cedar St #1001 Seattle, WA 98121	King	Shanelle Sunde	Doug Owens	Closed
33	9/18/2020	Kitsap	20-4-00720-18	Estate of Phillip Wayne Emler	15103 31st Pl S, SeaTac, WA 98188	King	John Elliott	Doug Owens	Open
34	10/8/2020	Kitsap	20-4-00776-18	Estate of Janis Clare Gaiter	512 N 77th St Seattle, WA 98103	King	Shanelle Sunde	Doug Owens	Open
35	10/9/2020	Kitsap	20-4-00780-18	Estate of Mary Johanna Griffin	9230 Lake Dr SW Lakewood, WA 98498	Pierce	Shanelle Sunde	Doug Owens	Open
36	10/21/2020	Kitsap	20-4-00835-18	Estate of Carolyn E Graves	33049 35th Ave SW Federal Way, WA 98023	King	Shanelle Sunde	Doug Owens	Open
37	10/21/2020	Kitsap	20-4-00834-18	Estate of Craig Kenneth Henriksen	212 Kensington Ave SW Orting, WA 98360	Pierce	Shanelle Sunde	Doug Owens	Open
38	10/23/2020	Kitsap	20-4-00844-18	Estate of Barbara Mae Tilson	303 Starling St SW Orting, WA 98360	Pierce	Shanelle Sunde	Doug Owens	Open
39	10/23/2020	Kitsap	20-4-00843-18	Estate of Michael Kevin Patten	8315 230th Ave E Buckley WA 98321	Pierce	Shanelle Sunde	Doug Owens	Open
40	11/2/2020	Kitsap	20-4-00870-18	Estate of David Warren Price	6011 Long Lake Rd SE Port Orchard, WA 98367	Kitsap	John Elliott	Doug Owens	Open
41	11/6/2020	Kitsap	20-4-00885-18	Estate of Virginia Agda Hussey	417 Chester Ave Bremerton, WA 98337	Kitsap	Shanelle Sunde	Doug Owens	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
42	11/13/2020	Kitsap	20-4-00899-18	Estate of Marvin L Thayer	15801 85th Ave E Puyallup, WA 98375	Pierce	Shanelle Sunde	Doug Owens	Closed
43	12/3/2020	Kitsap	20-4-00941-18	Estate of Theodore Stanley Edwards	603 W 2nd St Aberdeen, WA 98520	Grays Harbor	Shanelle Sunde	Doug Owens	Open
44	12/3/2020	Kitsap	20-4-00942-18	Estate of Lilalee E Fleming	11813 237th Ave Ct E Buckley, WA 98321	Pierce	Shanelle Sunde	Doug Owens	Open
45	12/11/2020	Kitsap	20-4-00980-18	Estate of Brendan Murray Weiks	3106 Chelsea Ct NW Olympia, WA 98502	Thurston	Shanelle Sunde	Doug Owens	Open
46	12/11/2020	Kitsap	20-4-00977-18	Estate of Roger Dale Williams	34503 8th Ave Ct E Roy, WA 98580	Pierce	John Elliott	Doug Owens	Closed
47	12/11/2020	Kitsap	20-4-00979-18	Estate of Betty Martha Corey	19613 19th St Ct W Lakebay, WA 98349	Pierce	Shanelle Sunde	Doug Owens	Closed
48	12/16/2020	Kitsap	20-4-00998-18	Estate of George Albert Eliassen	29125 23rd Pl S Federal Way, WA 98003	King	John Elliott	Doug Owens	Open
49	12/21/2020	Kitsap	20-4-01013-18	Estate of Margaret Dehaven	849 Nisqually Pk Dr SE Lacey, WA 98513	Thurston	Shanelle Sunde	Doug Owens	Open
50	12/21/2020	Kitsap	20-4-01018-18	Estate of Sherri Lynn Cutino	108 W 6th St North Bend, WA 98045	King	John Elliott	Doug Owens	Open
51	12/21/2020	Kitsap	20-4-01017-18	Estate of Peter A Goodwin	1410 W Casino Rd #19 Everett, WA 98204	Snohomish	John Elliott	Doug Owens	Open
52	12/21/2020	Kitsap	20-4-01016-18	Estate of Eric Garold Jennings	3570 S Monroe St Tacoma, WA 98409	Pierce	Shanelle Sunde	Doug Owens	Open
53	12/21/2020	Kitsap	20-4-01015-18	Estate of Janet Marguerite Cunningham	560 Duck Lake Dr NE Ocean Shores, WA 98569	Grays Harbor	Shanelle Sunde	Doug Owens	Closed
54	1/4/2021	Kitsap	21-4-00006-18	Estate of Don Earl Brevik Jr	7028 65th Ave NE Marysville, WA 98270	Snohomish	Shanelle Sunde	Doug Owens	Open
55	1/4/2021	Kitsap	21-4-00009-18	Estate of Jim A Triggs	4519 Mayvolt Rd SE Port Orchard, WA 98366	Kitsap	John Elliott	Doug Owens	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
56	1/4/2021	Kitsap	21-4-00008-18	Estate of Karen Maxine Leard	110 S Gold St Centralia, WA 98531	Lewis	Shanelle Sunde	Doug Owens	Closed
57	1/4/2021	Kitsap	21-4-00007-18	Estate of William Garnet Wilder	4738 Bellwood Dr NE Olympia, WA 98506	Thurston	Shanelle Sunde	Doug Owens	Open
58	2/8/2021	Kitsap	21-4-00122-18	Estate of Sonja L Tilton	912 Park Ave Bremerton, WA 98337	Kitsap	John Elliott	Doug Owens	Open
59	2/16/2021	Kitsap	21-4-00154-18	Estate of Doris Jeanette Parker	1502 Foxfire Dr SE Olympia, WA 98513	Thurston	John Elliott	Doug Owens	Closed
60	2/16/2021	Kitsap	21-4-00160-18	Estate of Cheryl A Rosen	128 Leonard Rd #1 Onalaska, WA 98570	Lewis	John Elliott	Doug Owens	Open
61	2/16/2021	Kitsap	21-4-00158-18	Estate of Alphonse Leopold Tardif	(1) 3 Malone Hill Rd Elma, WA 98541 (2) 5 Malone Hill Rd Elma, WA 98541 (3) 5377 US Hwy 12 Elma, WA 98541	Grays Harbor	John Elliott	Doug Owens	Open
62	2/17/2021	Kitsap	21-4-00169-18	Estate of Daniel P Erwin	740 W 8th St Port Angeles, WA 98363	Clallam	John Elliott	Doug Owens	Closed
63	2/18/2021	Kitsap	21-4-00176-18	Estate of Richard A Donaldson Sr	24018 221st Ln SE Maple Valley WA, 98038	King	John Elliott	Doug Owens	Open
64	2/19/2021	Kitsap	21-4-00185-18	Estate of Josephine M Bevard	3508 L St Vancouver, WA 98663	Clark	John Elliott	Doug Owens	Closed
65	3/10/2021	Kitsap	21-4-00258-18	Estate of Theodore Aaron Snyder	12818 23rd Ave S Seatac, WA 98125	King	John Elliott	Doug Owens	Closed
66	3/10/2021	Kitsap	21-4-00256-18	Estate of Kimberly Ann Renner	13677 High Ct SW Port Orchard, WA 98367	Kitsap	John Elliott	Doug Owens	Open
67	3/15/2021	Kitsap	21-4-00268-18	Estate of Richard William Weightman	10720 Eustis Hunt Rd E Graham, WA 98338	Pierce	John Elliott	Doug Owens	Open
68	3/15/2021	Kitsap	21-4-00269-18	Estate of Samuel D Kalka	6419 Stephan Ct SE Lacey, WA 98503	Thurston	John Elliott	Doug Owens	Open
69	3/15/2021	Kitsap	21-4-00270-18	Estate of Lila Wodrus Trammel	655 SW Trout Ct Camas, WA 98607	Clark	John Elliott	Doug Owens	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
70	3/26/2021	Kitsap	21-4-00318-18	Estate of Margaret Lorraine Lewis	12 Crestview Dr Port Angeles, WA 98362	Clallam	John Elliott	Doug Owens	Open
71	3/26/2021	Kitsap	21-4-00317-18	Estate of Barbara Reeves	4803 165th Ave SW Lakebay, WA 98351	Pierce	John Elliott	Doug Owens	Open
72	4/1/2021	Kitsap	21-4-00333-18	Estate of Glenn A Coppes Jr	2122 NE 77th Ave Vancouver, WA 98664	Clark	John Elliott	Doug Owens	Open
73	4/1/2021	Kitsap	21-4-00332-18	Estate of Joann Read	5409 37th Ave SE Lacey, WA 98503	Thurston	John Elliott	Doug Owens	Open
74	4/5/2021	Kitsap	21-4-00341-18	Estate of Carol M Giron	1057 S 124th St Seattle, WA 98168	King	John Elliott	Doug Owens	Open
75	4/9/2021	Kitsap	21-4-00354-18	Estate of Diedre D Wilcoxon	21 Blueberry Hill Rd Port Ludlow, WA 98365	Jefferson	John Elliott	Doug Owens	Closed
76	4/9/2021	Kitsap	21-4-00355-18	Estate of Mary F Hymas	9605 NE 4th St Vancouver, WA 98664	Clark	John Elliott	Doug Owens	Open
77	4/29/2021	Kitsap	21-4-00428-18	Estate of William G Richards	7530 14th Lp NE Olympia, WA 98516	Thurston	John Elliott	Doug Owens	Closed
78	4/29/2021	Kitsap	21-4-00427-18	Estate of Chetta C Wallace	2430 E Ryan Dr Port Angeles, WA 98362	Clallam	John Elliott	Doug Owens	Closed
79	4/29/2021	Kitsap	21-4-00425-18	Estate of John Colin Willenberg	(1) 313 Nevada St Longview, WA 98632 (2) 805 Ayers St Kelso, WA 98626	Cowlitz	John Elliott	Doug Owens	Closed
80	6/18/2021	Kitsap	21-4-00635-18	Estate of Donald Lee Rogers	325 Vine St Pe Ell, WA 98572	Lewis	John Elliott	Doug Owens	Closed
81	6/18/2021	Kitsap	21-4-00633-18	Estate of Katie D Hatcher	16234 Prarie Creek Lp SE Yelm, WA 98597	Thurston	John Elliott	Doug Owens	Open
82	7/1/2021	Kitsap	21-4-00675-18	Estate of Linda Diane Slaton	3202 181st Wy SE Tenino, WA 98589	Thurston	John Elliott	Doug Owens	Open
83	7/1/2021	Kitsap	21-4-00676-18	Estate of Elizabeth Sioda	1407 S 44th St Tacoma, WA 98419	Pierce	John Elliott	Doug Owens	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
84	7/1/2021	Kitsap	21-4-00677-18	Estate of John Lloyd Bloemsma	23518 118th Ct E Buckley, WA 98321	Pierce	John Elliott	Doug Owens	Open
85	7/2/2021	Kitsap	21-4-00679-18	Estate of Lottie Mae Gillam	5209 S Steele St Tacoma, WA 98409	Pierce	John Elliott	Doug Owens	Closed
86	7/6/2021	Kitsap	21-4-00681-18	Estate of Marvin Darryl Engelhardt	5836 S Warner St Tacoma, WA 98409	Pierce	John Elliott	Doug Owens	Closed
87	7/12/2021	Kitsap	21-4-00697-18	Estate of William W Ohara	20212 NE Redmond Rd Redmond, WA 98053	King	John Elliott	Doug Owens	Closed
88	8/2/2021	Kitsap	21-4-00762-18	Estate of Russell George Vanous	172 S Elsa St Buckley, WA 98321	Pierce	John Elliott	Doug Owens	Closed
89	8/9/2021	Kitsap	21-4-00783-18	Estate of Violeta Terese Tuncap	10308 97th St SW Lakewood, WA 98498	Pierce	John Elliott	Doug Owens	Filed, Not Opened
90	8/20/2021	Kitsap	21-4-00826-18	Estate of Carol Lynn Yohey	140 Tremont St Port Orchard, WA 98366	Kitsap	John Elliott	Doug Owens	Closed
91	8/20/2021	Kitsap	21-4-00827-18	Estate of Lois Diane Lemon	1227 Daniels Ct Bremerton, WA 98312	Kitsap	John Elliott	Doug Owens	Closed
92	9/3/2021	Kitsap	21-4-00878-18	Estate of Robert Clarence McDaniel	19421 129th Ave NE Bothell, WA 98011	King	John Elliott	Doug Owens	Closed
93	9/3/2021	Kitsap	21-4-00877-18	Estate of Shirley Evelyn Smith	2224 194th Ave SW Lakebay, WA 98349	Pierce	John Elliott	Doug Owens	Open
94	9/14/2021	Kitsap	21-4-00906-18	Estate of Thomas Strack	1819 S Sprague Ave Tacoma, WA 98405	Pierce	John Elliott	Doug Owens	Closed
95	10/25/2021	Kitsap	21-4-01063-18	Estate of Gwendolyn C McAdams	7221 East E St Tacoma, WA 98404	Pierce	John Elliott	Doug Owens	Open
96	10/25/2021	Kitsap	21-4-01062-18	Estate of Donald Paul Strong	14219 41st Ave NW Gig Harbor, WA 98332	Pierce	John Elliott	Doug Owens	Open
97	10/27/2021	Kitsap	21-4-01071-18	Estate of John J Peterson	4060 S Bell St Tacoma, WA 98418	Pierce	John Elliott	Doug Owens	Filed, Not Opened

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
98	11/5/2021	Kitsap	21-4-01108-18	Estate of Natalie A McMahon	20318 100th Ave SE Kent, WA 98405	Pierce	John Elliott	Doug Owens	Closed
99	11/5/2021	Kitsap	21-4-01109-18	Estate of Nigel Birley	33020 10th Ave SW #Z104 Federal Way, WA 98023	King	John Elliott	Doug Owens	Closed
100	11/5/2021	Kitsap	21-4-01106-18	Estate of Jeffery Lane Lopez	1414 12th Ave #206 Seattle, WA 98122	King	John Elliott	Doug Owens	Closed
101	11/5/2021	Kitsap	21-4-01107-18	Estate of Tom Charles Girard	1819 5th St SE Puyallup, WA 98372	Pierce	John Elliott	Doug Owens	Open
102	11/18/2021	Kitsap	21-4-01150-18	Estate of Freddie E Ashley	201 Country Estates Dr W Rainier, WA 98576	Thurston	John Elliott	Doug Owens	Open
103	12/7/2021	Kitsap	21-4-01214-18	Estate of Orville Kenneth Stevens	1751 S 42nd St Tacoma, WA 98418	Pierce	John Elliott	Doug Owens	Closed
104	12/13/2021	Kitsap	21-4-01240-18	Estate of David Ian Solsness	5232 Pullman Ave NE Seattle, WA 98105	King	John Elliott	Doug Owens	Closed
105	1/3/2022	Kitsap	22-4-00006-18	Estate of Erlina Reed	1526 Almira Ct Bremerton, WA 98310	Kitsap	John Elliott	Doug Owens	Open
106	1/5/2022	Kitsap	22-4-00027-18	Estate of Mark Olsen	12317 135th St Ct NW Gig Harbor, WA 98329	Pierce	John Elliott	Doug Owens	Closed
107	1/18/2022	Kitsap	22-4-00076-18	Estate of Dorothy G Quickstad	7316 18th Ave NE Seattle, WA 98115	King	John Elliott	Doug Owens	Closed
108	1/18/2022	Kitsap	22-4-00075-18	Estate of Hans G Dinesen	23983 Road 6 SE Warden, WA 98857	Grant	John Elliott	Doug Owens	Filed, Not Opened
109	1/31/2022	Kitsap	22-4-00135-18	Estate of Robert Dell Jones	2604 S 226th St #A201 Des Moines, WA 98198	King	John Elliott	Doug Owens	Closed
110	2/4/2022	Kitsap	22-4-00157-18	Estate of Mable L Walker	4411 140th St SW Lynnwood, WA 98087	Snohomish	John Elliott	Doug Owens	Closed
111	2/7/2022	Kitsap	22-4-00162-18	Estate of Royce Lester Parrish	1488 Marlin Dr SE Port Orchard, WA 98366	Kitsap	John Elliott	Doug Owens	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
112	3/4/2022	Kitsap	22-4-00288-18	Estate of Idella Ruth Hele	14301 30th Ave NE Seattle, WA 98125	King	John Elliott	Doug Owens	Closed
113	3/9/2022	Kitsap	22-4-00311-18	Estate of Bert Audway Bidwell	9800 NE 3rd St Vancouver, WA 98664	Clark	John Elliott	Doug Owens	Open
114	3/9/2022	Kitsap	22-4-00308-18	Estate of George Alexander Custer	7103 NE 75th St Vancouver, WA 98661	Clark	John Elliott	Doug Owens	Closed
115	3/9/2022	Kitsap	22-4-00309-18	Estate of Jacob Albert Schlaht	9029 8th Ave NW Seattle, WA 98117	King	John Elliott	Doug Owens	Filed, Not Opened
116	3/9/2022	Kitsap	22-4-00307-18	Estate of Mary Florence Hughes	1466 NE Hostmark St Poulsbo, WA 98370	Kitsap	John Elliott	Doug Owens	Open
117	3/16/2022	Kitsap	22-4-00341-18	Estate of Jeffrey J Lasnier	6911 Olive Ave Stanwood, WA 98292	Snohomish	John Elliott	Doug Owens	Open
118	3/31/2022	Kitsap	22-4-00385-18	Estate of Joseph J Colby	22510 NE Alder Falls Rd Battle Ground, WA 98604	Clark	John Elliott	Doug Owens	Filed, Not Opened
119	4/5/2022	Kitsap	22-4-00410-18	Estate of David C Love	7005 76th Dr NE Marysville, WA 98270	Snohomish	John Elliott	Doug Owens	Closed
120	4/5/2022	Kitsap	22-4-00409-18	Estate of Larry L Burch	4529 Crescent Ave Everett, WA 98203	Snohomish	John Elliott	Doug Owens	Closed
121	4/5/2022	Kitsap	22-4-00407-18	Estate of Mary M Lochmann	12839 Miller River Rd NE Skykomish, WA 98288	King	John Elliott	Doug Owens	Filed, Not Opened
122	4/20/2022	Kitsap	22-4-00465-18	Estate of Kevin Ray Rimpila	2127 E Hoquiam Rd Hoquiam, WA 98550	Grays Harbor	John Elliott	Doug Owens	Open
123	4/20/2022	Kitsap	22-4-00464-18	Estate of Ira Burton	1707 32nd Ave S Seattle, WA 98144	King	John Elliott	Doug Owens	Open
124	4/20/2022	Kitsap	22-4-00463-18	Estate of James N Hood	17042 431st Ave SE North Bend WA 98045	King	John Elliott	Doug Owens	Open
125	4/20/2022	Kitsap	22-4-00462-18	Estate of William E Rutledge	412 S 321st Pl #A1 Federal Way, WA 98003	King	John Elliott	Doug Owens	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
126	4/29/2022	Kitsap	22-4-00518-18	Estate of Belle Alegre Rosencrants	4931 NW Knute Anderson Rd Silverdale, WA 98383	Kitsap	John Elliott	Doug Owens	Filed, Not Opened
127	4/29/2022	Kitsap	22-4-00508-18	Estate of Mertie Mae Winston	2013 78th St Ct E Tacoma, WA 98404	Pierce	John Elliott	Doug Owens	Filed, Not Opened
128	4/29/2022	Kitsap	22-4-00532-18	Estate of Eugenia A Suriano	8511 19th Ave NW Seattle, WA 98117	King	John Elliott	Doug Owens	Closed
129	5/5/2022	Kitsap	22-4-00534-18	Estate of David Andrew Heathers	1101 SW Harrier Cir #104 Oak Harbor, WA 98277	Island	John Elliott	Doug Owens	Open
130	5/27/2022	Kitsap	22-4-00517-18	Estate of James Loren Snell	1515 13th Ave NW Puyallup, WA 98371	Pierce	John Elliott	Doug Owens	Closed
131	5/31/2022	Kitsap	22-4-00628-18	Estate of Patricia H Howe	24020 35th Pl S Kent, WA 98032	King	John Elliott	Doug Owens	Closed
132	5/31/2022	Kitsap	22-4-00617-18	Estate of Sharon D Gause	13832 38th Ave S Tukwila, WA 98168	King	John Elliott	Doug Owens	Open
133	5/31/2022	Kitsap	22-4-00627-18	Estate of Fred Warren Bernard	2922 Sumner Ave Hoquiam, WA 98550	Grays Harbor	John Elliott	Doug Owens	Open
134	5/31/2022	Kitsap	22-4-00626-18	Estate of Melvin Dale Miller	4007 S 342nd St Auburn, WA 98001	King	John Elliott	Doug Owens	Open
135	5/31/2022	Kitsap	22-4-00624-18	Estate of Terry Lynn Simmons	890 SR 7 Morton, WA 98356	Lewis	John Elliott	Doug Owens	Open
136	6/7/2022	Kitsap	22-4-00651-18	Estate of Diane M Penney Wagster	11405 NE 91st St Kirkland, WA 98033	King	John Elliott	Doug Owens	Filed, Not Opened
137	8/1/2022	Spokane	22-4-01644-32	Estate of Jerret T Rose	3668 SE Salmonberry Rd Port Orchard, WA 98366	Kitsap	John Elliott	Grover Peters	Open
138	8/4/2022	Spokane	22-4-01667-32	Estate of John J Vagovic	10021 SE 235th Pl #B301 Kent WA 98031	King	John Elliott	Grover Peters	Open
139	8/4/2022	Spokane	22-4-01666-32	Estate of Dustin M Ritzenthaler	210 Market St N Bucoda, WA 98530	Thurston	John Elliott	Grover Peters	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
140	8/4/2022	Spokane	22-4-01668-32	Estate of Frank Yulfo	1314 N Callow Ave Bremerton, WA 98312	Kitsap	John Elliott	Grover Peters	Open
141	8/4/2022	Spokane	22-4-01670-32	Estate of Michael T Timmermans	720 88th Dr SE Lake Stevens, WA 98258	Snohomish	John Elliott	Grover Peters	Filed, Not Opened
142	8/4/2022	Spokane	22-4-01671-32	Estate of Ronald Edward Barnes	2101 S Cushman Ave Tacoma, WA 98405	Pierce	John Elliott	Grover Peters	Open
143	8/29/2022	Kitsap	22-4-00946-18	Estate of Constance F Hood	17042 431st Ave SE North Bend, WA 98045	King	John Elliott	Doug Owens	Open
144	9/9/2022	King	22-4-06322-7	Estate of Gene David Hart	2015 Trenton Ave Bremerton, WA 98310	Kitsap	John Elliott	Robert Brouillard	Open
145	10/21/2022	Kitsap	22-4-01133-18	Estate of Lester Dean Jorgensen	13325 27th Ave S, Seatac, WA 98168	King	John Elliott	Grover Peters	Open
146	10/21/2022	Kitsap	22-4-01131-18	Estate of Dennis Moore Lakins Sr	8516 166th St Ct E Puyallup, WA 98375	Pierce	John Elliott	Grover Peters	Open
147	10/21/2022	Kitsap	22-4-01132-18	Estate of James E Stokes	5327 80th Ct SW Olympia, WA 98512	Thurston	John Elliott	Grover Peters	Filed, Not Opened
148	11/8/2022	Kitsap	22-4-01198-18	Estate of Claudia A Lewis	7620 S Sheridan Ave Tacoma, WA 98408	Pierce	John Elliott	Grover Peters	Closed
149	11/28/2022	Kitsap	22-4-01253-18	Estate of Bonnie Kay Miller	27323 218th Ave SE Maple Valley, WA 98038	King	John Elliott	Grover Peters	Filed, Not Opened
150	11/28/2022	Kitsap	22-4-01251-18	Estate of Thomas Juanito Orseno	26480 Woodmont Dr S Des Moines, WA 98168	King	John Elliott	Grover Peters	Filed, Not Opened
151	12/27/2022	Kitsap	22-4-01338-18	Estate of James Edward Icke	5836 S 292nd St Auburn, WA 98001	King	John Elliott	Robert Brouillard	Closed
152	12/27/2022	Kitsap	22-4-01340-18	Estate of William E Holly	6396 SE Mullenix Rd Port Orchard, WA 98367	Kitsap	John Elliott	Robert Brouillard	Closed
153	12/27/2022	Kitsap	22-4-01339-18	Estate of Margaret Hiner	3307 Heather Pl W University Place, WA 98466	Pierce	John Elliott	Robert Brouillard	Closed

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
154	12/27/2022	Kitsap	22-4-01341-18	Estate of Adolph Hammer	912 Coolidge Rd Aberdeen, WA 98520	Grays Harbor	John Elliott	Robert Brouillard	Open
155	1/17/2023	Kitsap	23-4-00046-18	Estate of Lolita Ingrida Velmer	3008 40th St SE Puyallup, WA 98405	Pierce	John Elliott	Grover Peters	Closed
156	1/17/2023	Kitsap	23-4-00045-18	Estate of Floyd David Peres	4716 76th St E Tacoma, WA 98443	Pierce	John Elliott	Grover Peters	Closed
157	1/17/2023	Kitsap	23-4-00042-18	Estate of James Perkins	3508 S Sheridan Ave Tacoma, WA 98418	Pierce	John Elliott	Robert Brouillard	Open
158	1/17/2023	Kitsap	23-4-00044-18	Estate of Lawrence A Quindica Jr	810 138th St S Tacoma, WA 98444	Pierce	John Elliott	Robert Brouillard	Closed
159	1/17/2023	Kitsap	23-4-00043-18	Estate of Gerald Irwin Ness	7402 29th St W University Place, WA 98466	Pierce	John Elliott	Robert Brouillard	Closed
160	1/24/2023	Kitsap	23-4-00071-18	Estate of Lawrence A Quinda Jr	810 138th St S, Tacoma WA 98444	Pierce	John Elliott	Robert Brouillard	Closed
161	1/31/2023	Kitsap	23-4-00107-18	Estate of Sophia L Haratyk	1305 E 68th St Tacoma, WA 98404	Pierce	John Elliott	Robert Brouillard	Closed
162	3/7/2023	Kitsap	23-4-00197-18	Estate of Helen M Roulst	(1) 2101 Beacon Ave S Seattle, WA 98144 (2) 2106 Beacon Ave S Seattle, WA 98144 (3) 2112 11th Ave S Seattle, WA 98144	King	John Elliott	Robert Brouillard	Open
163	3/7/2023	Kitsap	23-4-00196-18	Estate of Jean D Veldwyk	(1) 3933 S Farrar St Seattle, WA 98134 (2) 3939 S Farrar St Seattle, WA 98134	King	John Elliott	Robert Brouillard	Closed
164	3/14/2023	Kitsap	23-4-00228-18	Estate of Nancy Jean Jenks	7345 16th Ave SW Seattle, WA 98106	King	John Elliott	Robert Brouillard	Closed
165	4/4/2023	Kitsap	23-4-00313-18	Estate of Mark A Pray	18415 Elkhorn Blvd E Orting, WA 98360	Pierce	John Elliott	Robert Brouillard	Open
166	4/4/2023	Kitsap	23-4-00314-18	Estate of Frank C Johnson	4007 23rd Ave SW Seattle, WA 98106	King	John Elliott	Robert Brouillard	Open
167	4/4/2023	Kitsap	23-4-00315-18	Estate of Linda Rose Speer	5840 NE Timberland Dr Kingston, WA 98346	Kitsap	John Elliott	Robert Brouillard	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
168	4/18/2023	Kitsap	23-4-00360-18	Estate of Sergey Gazaryants	5631 200th St #B217 Lynnwood, WA 98036	Snohomish	John Elliott	Robert Brouillard	Closed
169	4/25/2023	Kitsap	23-4-00390-18	Estate of Joan Sweet Brown	6702 South C St Tacoma, WA 98408	Pierce	John Elliott	Robert Brouillard	Closed
170	4/25/2023	Kitsap	23-4-00388-18	Estate of Francoise Germaine Lau	6433 S Ferdinand St Tacoma, WA 98409	Pierce	John Elliott	Robert Brouillard	Open
171	4/25/2023	Kitsap	23-4-00389-18	Estate of Carlton Bernard Heard	3600 Narrows Vw Ln #202 Bremerton, WA 98310	Kitsap	John Elliott	Robert Brouillard	Closed
172	5/2/2023	Kitsap	23-4-00412-18	Estate of Kaumil J Patel	4228 East T St Tacoma, WA 98404	Pierce	John Elliott	Robert Brouillard	Open
173	5/2/2023	Kitsap	23-4-00413-18	Estate of Jerry D Coursey	7232 S Lawrence St Tacoma, WA 98409	Pierce	John Elliott	Robert Brouillard	Filed, Not Opened
174	5/2/2023	Kitsap	23-4-00410-18	Estate of Kathryn Darlene Foreman	7634 S 112th St Seattle, WA 98178	King	John Elliott	Robert Brouillard	Open
175	5/2/2023	Kitsap	23-4-00411-18	Estate of Ruth Sprong Richmond	1363 Old Military Rd SE Tenino, WA 98589	Thurston	John Elliott	Robert Brouillard	Open
176	5/8/2023	Kitsap	23-4-00439-18	Estate of Steven Shannon Sutherland	12900 SE 268th St #P1 Kent, WA 98030	King	John Elliott	Robert Brouillard	Open
177	5/8/2023	King	23-4-03476-4	Estate of Frances Dorothy Brazil	(1) 1516 29th Ave Seattle, WA 98122 (2) 3560 S Holly St Seattle, WA 98118	King	John Elliott	Robert Brouillard	Closed
178	5/8/2023	Kitsap	23-4-00440-18	Estate of James L Bozich	956-30 Cinebar Rd Cinebar, WA 98533	Lewis	John Elliott	Robert Brouillard	Open
179	5/16/2023	Kitsap	23-4-00489-18	Estate of James Oliver Ritzman	233 Colorado St Longview, WA 98632	Cowlitz	John Elliott	Robert Brouillard	Open
180	5/30/2023	King	23-4-04004-7	Estate of Odessa Freeman	3328 34th Ave S Seattle, WA 98144	King	John Elliott	Robert Brouillard	Closed
181	5/30/2023	Kitsap	23-4-00548-18	Estate of Douglas J Wise	5618 Green Hills Ave NE Tacoma, WA 98422	Pierce	John Elliott	Robert Brouillard	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
182	5/30/2023	Kitsap	23-4-00549-18	Estate of John Robert Moshier	159 Bear Ridge Rd Mossyrock, WA 98564	Lewis	John Elliott	Robert Brouillard	Open
183	5/30/2023	Kitsap	23-4-00550-18	Estate of M Pearl Bennett	6102 N 24th St Tacoma, WA 98406	Pierce	John Elliott	Robert Brouillard	Open
184	6/2/2023	King	23-4-04117-5	Estate of Ida Eugenia Ferguson	9808 S 218th St Kent, WA 98031	King	John Elliott	Robert Brouillard	Closed
185	6/6/2023	Kitsap	23-4-00575-18	Estate of Pauline R Rogers	13617 96th Ave NW Gig Harbor, WA 98329	Pierce	John Elliott	Robert Brouillard	Open
186	6/6/2023	Kitsap	23-4-00576-18	Estate of Aubrey Hart Sparks	1729 S 43rd St Tacoma, WA 98418	Pierce	John Elliott	Robert Brouillard	Open
187	6/6/2023	Kitsap	23-4-00574-18	Estate of Scott Olene McCullough	1809 Vista Lp SW Tumwater, WA 98512	Thurston	John Elliott	Robert Brouillard	Filed, Not Opened
188	6/13/2023	Kitsap	23-4-00605-18	Estate of Tim Byron Keely	403 W Cushing St Aberdeen, WA 98520	Grays Harbor	John Elliott	Robert Brouillard	Open
189	6/13/2023	Kitsap	23-4-00606-18	Estate of Anne Shu-Hsia Pai	18902 8th Ave NW #207 Shoreline, WA 98177	King	John Elliott	Robert Brouillard	Open
190	6/20/2023	Kitsap	23-4-00640-18	Estate of Hiram Smith	5232 33rd Ave S Seattle, WA 98118	King	John Elliott	Robert Brouillard	Open
191	6/20/2023	Kitsap	23-4-00633-18	Estate of Chet Eugene Haus	9674 Topsail Pl NW Silverdale, WA 98383	Kitsap	John Elliott	Robert Brouillard	Open
192	6/20/2023	Kitsap	23-4-00632-18	Estate of George P McCarthy	429 W 6th St Aberdeen, WA 98520	Grays Harbor	John Elliott	Robert Brouillard	Open
193	6/20/2023	Kitsap	23-4-00631-18	Estate of Nita Marie Wilderman	23411 102nd Ave SE #E107 Kent, WA 98031	King	John Elliott	Robert Brouillard	Filed, Not Opened
194	7/11/2023	Kitsap	23-4-00711-18	Estate of Judith Lea Fox	2538 19th Pl SE #C9 Auburn, WA 98002	King	John Elliott	Robert Brouillard	Open
195	7/11/2023	Kitsap	23-4-00712-18	Estate of Diane Judith Brock	2504 SE Balboa Dr Vancouver, WA 98683	Clark	John Elliott	Robert Brouillard	Open

Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
196	7/18/2023	Kitsap	23-4-00738-18	Estate of Richard C Jeffries	2013 106th St S Tacoma, WA 98444	Pierce	John Elliott	Robert Brouillard	Open
197	7/25/2023	Kitsap	23-4-00770-18	Estate of Bette L Rigby	4331 S 239th Pl Kent, WA 98032	King	John Elliott	Robert Brouillard	Open
198	7/25/2023	Kitsap	23-4-00769-18	Estate of Harold Clarke Noble	12227 Andrew Sater Rd Everett, WA 98208	Snohomish	John Elliott	Robert Brouillard	Open
199	8/1/2023	Kitsap	23-4-00796-18	Estate of Mary Margaret Wright	2721 S 14th St Tacoma, WA 98407	Pierce	Grace Kinney	Robert Brouillard	Open
200	8/8/2023	Kitsap	23-4-00820-18	Estate of Samuel Melvin Armstrong	9612 Hedera Ct SE Olympia, WA 98513	Thurston	Grace Kinney	Robert Brouillard	Filed, Not Opened
201	8/22/2023	Kitsap	23-4-00874-18	Estate of Henry R Oakley	20220 SE 320th St Kent, WA 98042	King	Julie Ellis	Robert Brouillard	Open
202	8/22/2023	Kitsap	23-4-00872-18	Estate of Ceaser Joseph Borroz	9195 Barnes Dr Castle Rock, WA 98611	Cowlitz	Julie Ellis	Robert Brouillard	Open
203	8/22/2023	Kitsap	23-4-00873-18	Estate of Richard William Pospisil	950 Mt. Olympus Ave SE Ocean Shores, WA 98569	Grays Harbor	Julie Ellis	Robert Brouillard	Open
204	8/29/2023	Kitsap	23-4-00892-18	Estate of Danny Joe Stevens	1747 Burwell St Bremerton, WA 98337	Kitsap	Julie Ellis	Robert Brouillard	Open
205	8/29/2023	Kitsap	23-4-00893-18	Estate of Shirley J Atwood	2410 Hastings Ave W Port Townsend, WA 98368	Jefferson	Julie Ellis	Robert Brouillard	Open
206	9/5/2023	Kitsap	23-4-00926-18	Estate of Kathleen L Sowers	303 N River St Montesano, WA 98563	Grays Harbor	Grace Kinney	Robert Brouillard	Filed, Not Opened
207	9/5/2023	Kitsap	23-4-00925-18	Estate of Thomas Gordon Sovey	949 Tipsoo Lp N Rainier, WA 98576	Thurston	Grace Kinney	Robert Brouillard	Closed
208	9/12/2023	Kitsap	23-4-00965-18	Estate of Marjorie G Grochowicz	6810 46th Ave E Tacoma, WA 98443	Pierce	Grace Kinney	Robert Brouillard	Open
209	9/19/2023	Kitsap	23-4-01002-18	Estate of Linne Volm	4925 42nd Ln SE Lacey, WA 98503	Thurston	Julie Ellis	Robert Brouillard	Open

Personal Representative									
Row	Date Filed	Court	Cause Number	Estate Name	Real Property Address	County	Personal Representative (PR)	PR Attorney	Case Status
210	10/10/2023	Kitsap	23-4-01081-18	Estate of Sylvia Frazer Bradley	1106 Rhoton Ct Yelm WA 98597	Thurston	Julie Ellis	Robert Brouillard	Open
211	10/10/2023	Kitsap	23-4-01082-18	Estate of Maxine G Hemphill	7726 195th Ave SW Rochester, WA 98579	Thurston	Grace Kinney	Robert Brouillard	Open
212	1/2/2024	Kitsap	24-4-00005-18	Estate of James Schubring	17902 48th Ave S SeaTac, WA 98188	King	Julie Ellis	Robert Brouillard	Open
213	1/2/2024	Kitsap	24-4-00007-18	Estate of Lula Daisy Coston	2336 SW 338th St Federal Way, WA 98123	King	Julie Ellis	Robert Brouillard	Open