

FILED

SEP 09 2019

KCDC - East Division  
Bellevue

**Court of Washington**

**For**

ZHANG, Chunmei

Petitioner

vs.

REPASS, Richard Eduardo

Respondent

No.

191-427

**Petition for Order for Protection  
(PTORPRT)**

1. ☒ I am a victim of domestic violence committed by the respondent.  
☒ A member of my family or household is a victim of domestic violence committed by the respondent.  
☐ I am a ☐ guardian ☐ guardian ad litem ☐ next friend of a minor who is 13 to 15 years of age and is a victim of domestic violence in a dating relationship with a person age 16 or older. The name of the minor victim is \_\_\_\_\_.  
This person's identifying information is provided in paragraph 5 below.
2. ☒ The victim lives in this county.  
☐ The victim left their residence because of abuse and this is the county of their new or former residence.
3. The victim's age is: \_\_\_\_\_ Respondent's age is: \_\_\_\_\_  
☐ Under 16 ☐ 16 or 17 ☒ 18 or over ☐ Under 16 ☐ 16 or 17 ☒ 18 or over
4. The victim and the respondent are:  
☒ Intimate Partners because they are:  
☐ current or former spouses or domestic partners ☐ parents of a child-in-common  
☒ age 16 or older and are/were in a dating relationship, and are currently residing together or resided together in the past ☐ age 16 or older and are/were in a dating relationship, but have *never* resided together.  
☐ Family or household members because they are:  
☐ current or former adult cohabitants as roommates ☐ adult in-laws ☐ adults related by blood ☐ parent and child ☐ stepparent and stepchild ☐ grandparent and grandchild.

5. Identification of Minors (if applicable) ☐ No Minors involved.

Name (First, Middle Initial, Last)	Age	Race	Sex	How Related to Petitioner	Respondent	Resides with
Zhenxuan JIA ("Andy")	12	Asian	M	child	none	Petitioner

6. Other court cases or other restraining, protection or no-contact orders involving me, the minors and the respondent:

<b>Case Name</b>			
<b>Case Number</b>			
<b>Court/County</b>			

**I Request an Order for Protection** following a hearing that will:

<sup>1</sup> ☒ **Restrain** respondent from causing any physical harm, bodily injury, assault, including sexual assault, and from molesting, harassing, threatening, or stalking ☒ me ☒ the minors named in paragraph 5 above ☐ these minors only:

(If the court orders this relief, and you and the respondent are current or former spouses or domestic partners, parents of a child-in-common, age 16 or older and are/were in a dating relationship, and are currently residing together or resided together in the past, age 16 or older and are/were in a dating relationship, but have *never* resided together, the respondent will not be able to obtain or possess a firearm, other dangerous weapon, ammunition, or concealed pistol license for the duration of the order.)

<sup>2</sup> ☒ **Restrain** respondent from harassing, following, keeping under physical or electronic surveillance, cyberstalking as defined in RCW 9.61.260, and using telephonic, audiovisual, or other electronic means to monitor the actions, locations, or wire or electronic communication of ☒ me ☒ the minors named in paragraph 5 above ☐ only the minors listed below; ☐ members of the victim's household listed below ☐ the victim's adult children listed below:

<sup>3</sup> ☒ **Restrain** respondent from coming near and from having any contact whatsoever, in person or through others, by phone, mail, or any means, directly or indirectly, except for mailing of court documents, with ☒ me ☒ the minors named in paragraph 5 above, subject to any court-ordered visitation ☐ these minors only, subject to any court-ordered visitation:

<sup>4</sup> ☒ **Exclude** respondent from ☐ our shared residence ☒ my residence ☒ my workplace ☒ my school ☒ the residence, day care, or school of ☒ the minors named in paragraph 5 above ☐ these minors only:  
☐ other:

You have a right to keep your residential address confidential.



<p><sup>5</sup> <input type="checkbox"/> <b>Direct</b> respondent to vacate our shared residence and restore it to me.</p>
<p><sup>6</sup> <input checked="" type="checkbox"/> <b>Prohibit</b> respondent from knowingly coming within, or knowingly remaining within  100 ft _____ (distance) of <input type="checkbox"/> our shared residence <input checked="" type="checkbox"/> my residence <input checked="" type="checkbox"/> my  workplace <input checked="" type="checkbox"/> my school <input checked="" type="checkbox"/> the day care or school of <input checked="" type="checkbox"/> the minors named in paragraph  5 above. <input type="checkbox"/> these minors only:  <input type="checkbox"/> other: _____</p>
<p><sup>7</sup> <input checked="" type="checkbox"/> <b>Grant</b> me possession of essential personal belongings, including the following:  my and my child's clothing items; my own original artworks, photo albums and  portfolios, which are irreplaceable and irreproducible; jewelry; books; electronics; art  supplies; musical instruments that belong to me and my child</p>
<p><sup>8</sup> <input type="checkbox"/> <b>Grant</b> me use of the following vehicle:  Year, Make &amp; Model _____ License No. _____</p>
<p><sup>9</sup> <input type="checkbox"/> <b>Other:</b>    </p>
<p>Protection involving a minor:</p>
<p><sup>10</sup> <input type="checkbox"/> Subject to any court-ordered visitation, <b>Grant</b> me the care, custody and control of  <input type="checkbox"/> the minors named in paragraph 5 above <input type="checkbox"/> these minors only:</p>
<p><sup>11</sup> <input checked="" type="checkbox"/> <b>Restrain</b> respondent from interfering with my physical or legal custody of <input checked="" type="checkbox"/> the  minors named in paragraph 5 above <input type="checkbox"/> these minors only:</p>
<p><sup>12</sup> <input type="checkbox"/> <b>Restrain</b> the respondent from removing from the state: <input type="checkbox"/> the minors named in  paragraph 5 above <input type="checkbox"/> these minors only:</p>
<p>Additional Requests:</p>
<p><sup>13</sup> <input checked="" type="checkbox"/> <b>Direct</b> the respondent to participate in appropriate treatment or counseling services.</p>
<p><sup>14</sup> <input checked="" type="checkbox"/> <b>Require</b> the respondent to pay the fees and costs of this action.</p>
<p><sup>15</sup> <input checked="" type="checkbox"/> <b>Remain Effective</b> longer than one year because respondent is likely to resume acts of  domestic violence against me if the order expires in a year.</p>
<p>Protection involving pets.</p>
<p><sup>16</sup> <input type="checkbox"/> <b>Grant</b> me exclusive custody and control of the following pet(s) owned, possessed,  leased, kept, or held by me, respondent, or a minor child residing with either me or the  respondent. (Specify name of pet and type of animal.):  _____.</p>



<sup>17</sup> ☐ **Prohibit** respondent from interfering with my efforts to remove the pet(s) named above.

<sup>18</sup> ☐ **Prohibit** respondent from knowingly coming within, or knowingly remaining within \_\_\_\_\_ (distance) of the following locations where the pet(s) are regularly found:  
☐ petitioner's residence (You have a right to keep your residential address confidential.)  
☐ \_\_\_\_\_ Park  
☐ other: \_\_\_\_\_

**Protection from Firearms and Other Dangerous Weapons**

<sup>19</sup> ☒ **Require** the respondent to surrender all firearms, other dangerous weapons, and any concealed pistol licenses, and prohibit the respondent from accessing, obtaining, or possessing firearms, other dangerous weapons, or concealed pistol licenses.

Notice: If you **are** the respondent's intimate partner, after actual notice and an opportunity to be heard at the hearing, the court may be required to order the respondent to surrender firearms, other dangerous weapons, or concealed pistol licenses.

**I want emergency temporary protection effective immediately, that lasts (up to 14 days) until the court hearing:**

- ☒ An emergency exists as described below. I request that a **Temporary Order for Protection** granting the relief requested above in 1) through 12) be issued immediately, without prior notice to the respondent, to be effective until the hearing.
- ☒ I also request temporary surrender all firearms, other dangerous weapons, and any concealed pistol licenses without notice to the other party because irreparable injury could result if an order is not issued until the hearing.

What irreparable harm would result if an order is not issued immediately without prior notice to the respondent?

Much of my property is still in his custody, some of which is of very high monetary and personal value or is irreplaceable and irreproducible. Given that he has a history of arbitrarily destructing objects in the household out of anger or frustration, as well as that he has intentionally denied me access to my belongings (medical equipment that I depend on necessary), it is very possible that he could destruct or conceal my property in retaliation of this legal action taken against him.

**Request for Special Assistance from Law Enforcement Agencies:**

I request the court order the appropriate law enforcement agency to assist me in obtaining:

☐ Possession of my residence. ☐ Possession of the vehicle designated above.

☒ Possession of my essential personal belongings at ☐ the shared residence

☒ respondent's residence

☐ other location \_\_\_\_\_.

☐ Custody of ☐ the minors named in paragraph 5 above ☐ these minors only (if applicable):

\_\_\_\_\_  
\_\_\_\_\_.



[ ] Other: \_\_\_\_\_.

"Domestic violence" means physical harm, bodily injury, assault, including sexual assault, stalking, Or inflicting fear of imminent physical harm, bodily injury or assault between family or household members.

**Statement:** The respondent has committed acts of domestic violence as follows. (Describe specific acts of domestic violence and their approximate dates, beginning with the most recent act. You may want to include police responses.)

Describe the most recent violent act, fear or threat of violence, and why the temporary order should be entered today without notice to the respondent: \_\_\_\_\_

On September 8, 2019, in our exchange of text messages and emails as shown in Exhibit #1 (found at the end of this petition), Respondent called my friend and me his "enemies" — along with groundless accusations that I was somehow "threatening" him — and implied that I had yet to see what actions (the possibility of violence cannot be ruled out) he may take next.

On August 13, 2019, Respondent contacted me around midnight and insisted in an intimidating tone that I immediately go to his apartment; I complied, fearful of what could potentially happen to my property (which was still in his custody), my child or me had I not done so. Upon my arrival, however, he began to demand that I must leave at once — a rather inexplicable and absurd change of mind, indeed — and proceeded to push me outside. Stunned and confused, I started retreating, only to find part of my hand and leg trapped in the doorway as he continued to aggressively force the door shut; as a result, still jammed in the door, my finger and foot sustained injuries, including bruises shown in Exhibit #2.

On July 24, 2019, Respondent and I — still residing together in his apartment at this point — engaged in a verbal confrontation, which was nevertheless escalated when he forcibly gripped onto and pulled my arm, resulting me falling on the ground. As a result, my arm sustained bruises shown in Exhibit #3.

Describe the past incidents where you experienced violence, where you were afraid of injury or where the respondent threatened to harm or kill you: \_\_\_\_\_

There have been numerous instances in which Respondent demanded that I perform sexual acts that I personally find anomalous and unpleasant. Such demands, though not accompanied by direct physical violence, were essentially coercive in nature, for that he threatened to cut off financial support to me and my child had I not complied, while being well aware that I would not perform such sexual acts on my free will, but that I had no choice without compromising my — and more importantly, my child's — well-being.

Emotional abuse, unfortunately, has also been too commonplace throughout our relationship. Respondent had constantly and persistently called me "a monster," "useless," "stupid," "dumb" and "ignorant," among countless other degrading names, causing me to suffer substantial emotional and psychological pain, distress and torment.



Describe any violence or threats towards children: \_\_\_\_\_

Describe any stalking behavior by respondent, including use of telephonic, audiovisual or electronic means to harass or monitor: \_\_\_\_\_

Respondent has not ceased his attempts in contacting me through phone calls, text messages and emails, both directly and indirectly (through a friend of mine), despite my repeated request that he stop doing so.

Describe medical treatment you received and for what: \_\_\_\_\_

I did not receive any medical treatment for the injuries sustained in the assaults described on Page 5 of this Petition due to my initial belief that medical attention did not appear necessary at the moment, and also to my concerns and uncertainties regarding whether my health insurance — which was under his name — is still active and usable.

Describe any threats of suicide or suicidal behavior by the respondent: \_\_\_\_\_

I have no knowledge of whether Respondent has previously made threats or attempts of suicide.

Does the respondent own or possess firearms? ☐ Yes ☐ No Unknown.

Does the respondent use firearms, weapons or objects to threaten or harm you? Please describe:

I have no knowledge of whether or not Respondent is in possession of any firearms or other dangerous weapons, nor do I have memory of other incidents in which Respondent threatened or harmed me with objects, aside from the assaults described on Page 5 of this Petition.

Has the respondent used, displayed, or threatened to use a firearm or other dangerous weapon in a felony? Please describe:

I have no knowledge of whether Respondent has previously committed a felony with a firearm or other dangerous weapon.

Is the respondent ineligible to possess a firearm under the provisions of RCW 9.41.040? Please describe:

I have no knowledge of whether Respondent is eligible to legally possess a firearm.

Does possession of a firearm or other dangerous weapon by the respondent present a serious and imminent threat to public health or safety, or to the health or safety of any individual?

Please describe:

Given his past history of violence, threats and intimidation, I believe that possession of a firearm or other dangerous weapon by Respondent does present a serious and imminent threat to my and my child's safety and well-being.

If you are requesting that the protection order lasts longer than one year, describe the reasons why:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Continue on separate page if necessary.)

Check box if substance abuse is involved: ☐ alcohol ☐ drugs ☐ other

☐ Personal service cannot be made upon respondent within the state of Washington.

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

Dated: 9/9/2019 at Bellevue, Washington.

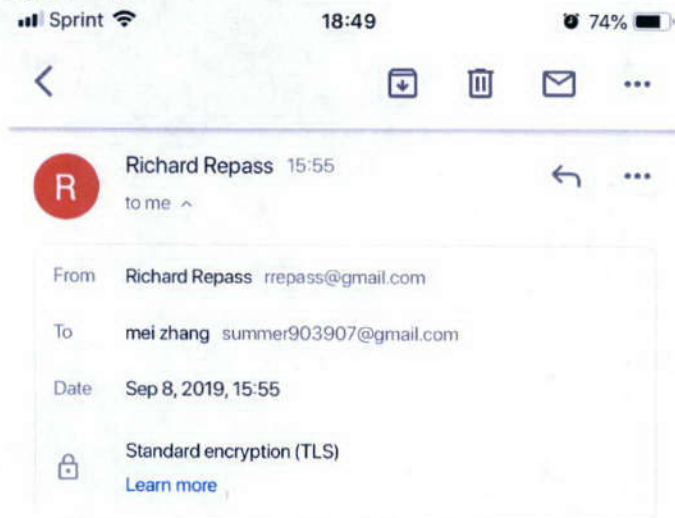
  
Signature of Petitioner

You have a right to keep your residential address confidential. If you have one, please provide an address, other than your residence, where you may receive legal documents: \_\_\_\_\_

Chunmei Zhang c/o Chengtao Hua, 5209 15th Ave NE Apt 302, Seattle WA 98105



# Exhibit #1



If you take me to court, I will fight with all my life to not pay you a cent, and for you to pay legal fees. I will fight the rest of my life. You will lose, because you are wrong. Go for it and see. I will spend all I have on lawyers if I have to. You are now the enemy of me and my children because you threatened me and your friend said the same.

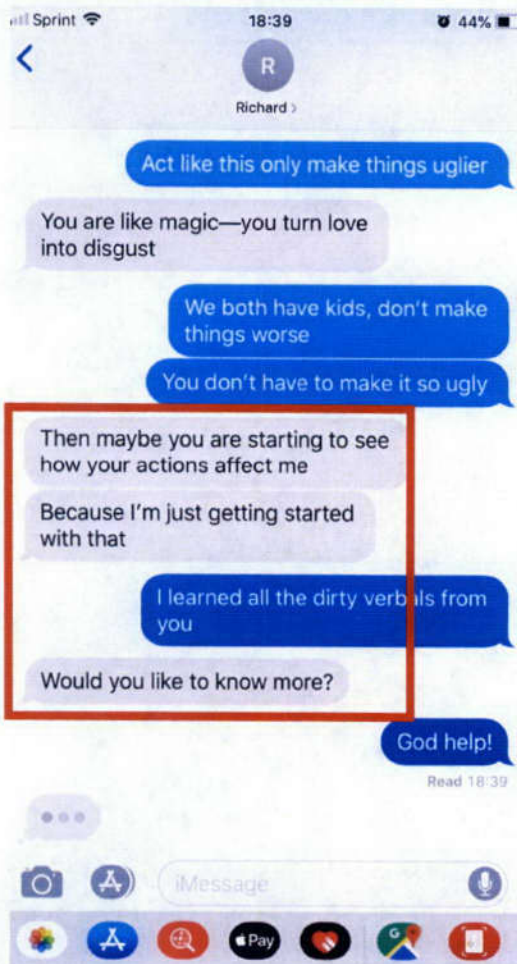




Exhibit #2

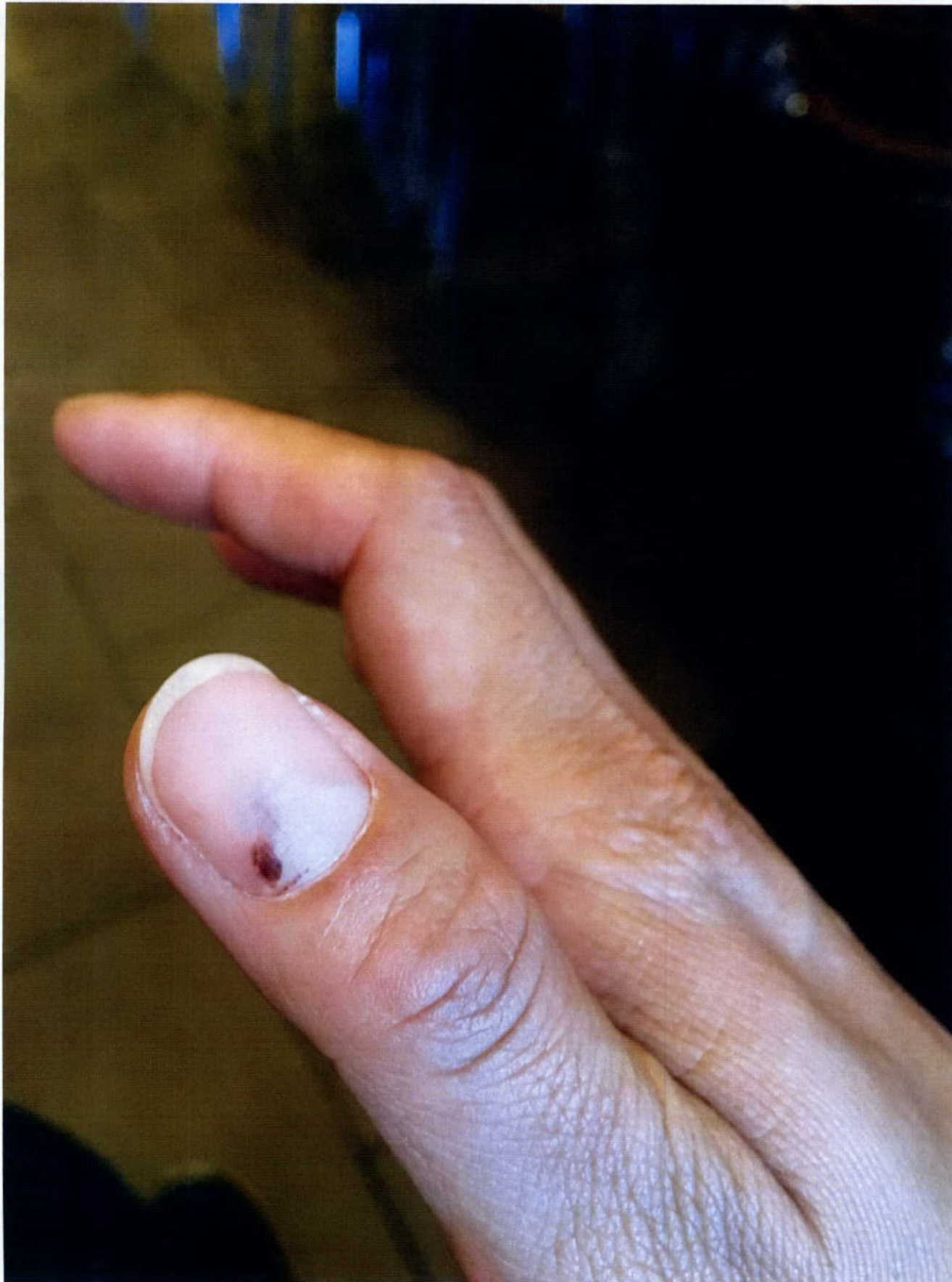




Exhibit #3

