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**FILED**  
**SEP 13 2024**  
**TRACIA A. GANTS**  
**LINCOLN COUNTY CLERK**

**SUPERIOR COURT OF WASHINGTON, COUNTY OF LINCOLN**

In re:

JUDITH KUENNIGER-GUINN,

Petitioner,

v.

WILLIAM KUENNIGER,

Respondent.

Case No.: 24-3-00791-22

DECLARATION OF JUDITH GUINN

My name is Judith Guinn, I am the Petitioner in this matter, and I am submitting this statement in support of my motion for a temporary family law order to include my request for spousal support and assistance in coordinating the return of my personal property.

I filed the Summons and Petition for Divorce, along with my financial declaration in this matter, on June 14, 2024. The Respondent, Bill Kuenniger ("Bill"), was personally served these documents on July 2, 2024. We have not yet received a response.

The Respondent, Bill, and I have been in a relationship for nearly 30 years. We got married in December 2006, nearly 18 years ago. We met in Gold Hill Oregon in 1995. I was familiar with Bill socially, and I helped his mother occasionally working at the second-hand store she owned. Our relationship began around June 1995. Shortly after, Bill moved in with me and my two children. We do not have children of our own together, but Bill was a decent husband and

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1 stepfather, and a good provider. Although, he has always been somewhat controlling, and often  
2 became verbally abusive. These behaviors escalated over the years.

3           In the beginning of our relationship, we were both working and contributing to the  
4 household. Bill was working as a logger and I was getting my certification through the Union to  
5 become a flagger, which I continued with through approximately 1998-1999. I was making a  
6 good living as a flagger and had great benefits through the Union.  
7

8           In January 1999, I had a medical emergency. While at the hospital, I was diagnosed with  
9 Diabetes 1. I was categorized as a “full-blown” diabetic and had no idea. I immediately became  
10 insulin dependent. Bill was supportive and encouraged me to prioritize my health. He assured me  
11 he would provide for us financially, which he did. Bill paid for almost everything from this time  
12 forward, while I was a stay-at-home wife. I did odd jobs, doing house cleaning, and was an in-  
13 home caretaker for my mother for 6 months out of the year from 2012 through 2019. I wanted to  
14 continue contributing to the household and earn whatever income I could with the limitations I  
15 had. Bill earned enough to support us financially. I managed all the daily tasks of running the  
16 household. Bill has historically worked jobs that included housing at little-to-no cost, so our  
17 financial situation was manageable on one income. I was a signer on all the bank accounts,  
18 debit/credit cards with Key Bank. I had access to funds whenever necessary but was diligent to  
19 maintain a budget and I did not make extravagant purchases.  
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22           We moved to Washington around 2007. Bill was working for Granite Construction at the  
23 time, and we traveled often, staying in places temporarily, living on job sites, wherever the work  
24 was. Sometime around 2014, we settled down in Lilliwaup, Washington. He started working for  
25 the Lilliwaup Falls Generating Company, which is a small hydroelectric plant. I also worked for  
26 the owner’s of this company from June 2014 until I left in October 2022. My duties included  
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1 maintaining and cleaning a 5-bedroom 4-bathroom home, yardwork, etc. I was paid \$500 per  
2 month, and I had my own medical insurance. Just prior to my turning 65, I was informed that they  
3 were no longer going to be paying my medical insurance and that I needed to file for Social  
4 Security so I would be eligible for Medicare. Bill helped me complete the application for Social  
5 Security online and I started receiving my benefits shortly thereafter. My employment ended in  
6 October 2022, when I came to California. Currently, Bill is the only employee at this location and  
7 has been employed with this company for approximately 10 years. He lives on-site and his  
8 housing, utilities, and other expenses are paid for by the company.  
9

10  
11 As stated, I started receiving what I thought was Social Security when I turned 65, which  
12 was 4 years ago. However, I recently went into the local Social Security office in-person and was  
13 informed I'm not actually receiving Social Security benefits. My monthly income is coming from  
14 a retirement program instead. I am currently waiting for additional information on exactly what  
15 program I am receiving these benefits from, and what the next steps are with regard to Social  
16 Security. Currently, my benefit amount is \$620.00 each month, however, the monthly premium  
17 for my Medicare insurance is automatically deducted, so the amount I receive monthly is \$465.00.  
18 I do also receive approximately \$200 in EBT benefits, which I use to contribute toward the  
19 household meals. My monthly medical supplies, insulin, and prescription co-pays total  
20 approximately \$1,500.00 per month. My clothing, specialized shoes for diabetes, and personal  
21 hygiene supplies cost approximately \$1,000.00 per month. My phone is \$65.00 per month, and  
22 my monthly vehicle maintenance is approximately \$500.00 per month. I am requesting these  
23 amounts, in addition to \$1,000.00 for housing, and funds for discretionary spending.  
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26 In October 2022, I came to California to visit my daughter and grandchildren. The initial  
27 plan was to stay through Thanksgiving. When I contacted Bill and expressed my desire to stay  
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1 through Christmas, he became more verbally abusive and insisted I come home to take care of  
2 him and his mother. During my time in California, I had come to the realization this wasn't the  
3 life I wanted to live anymore. I did not want to return home and continue living with Bill. He did  
4 not understand that I was no longer happy in our marriage, and I wanted to be with my family. I  
5 have not been back to our home since October 2022.

7 Bill continued to support me financially throughout all of 2023. I still had access to our  
8 bank accounts and cards. My monthly benefit checks were deposited into the joint account. I was  
9 still very mindful of my spending and would consult with him about purchases I made. I was on  
10 the account(s) for approximately one year before Bill removed me without any discussion prior.  
11 I had to jump through several hoops to open a new bank account and contact the Social Security  
12 office to get my deposits transferred.

14 Around February or March of 2024, Bill sent me a Summons & Petition for Divorce.  
15 However, it was never filed with the Court. I reached out to him to discuss what the plan was and  
16 how we were going to arrange for me to get my personal belongings from the home, and what  
17 sort of financial support he was going to be able to provide going forward. This is when the  
18 dynamic between us shifted. Previously, he was overall understanding and willing to assist me  
19 financially when needed. Since then, I have made every effort to stretch my funds as far as  
20 possible. With my limited ability to work and my minimal monthly income, I have been struggling.

23 In June, I reached out to Bill and asked for financial assistance. He sent me \$1,000.00.  
24 This was the first time I had received any type of assistance in several months. Around the  
25 beginning of August, I reached out again and asked Bill to send me my vehicle, which he did. He  
26 had it transported to me in California. I am currently in the process of changing my Washington  
27 driver's license to California and will be getting the vehicle registered in my name and licensed  
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1 in California. Once those are taken care of, I plan to get my own auto insurance. I appreciate him  
2 sending me my vehicle. Since I now have reliable transportation, I will be seeking some sort of  
3 employment so I can help financially contribute to my daughter's household, as this is where I  
4 intend to reside long-term.  
5

6 I have been speaking with my primary care provider here in California about the issues I  
7 have been dealing with physically and mentally since my separation from Bill. I am going to be  
8 engaging in services with a mental health professional who will help me address and deal with  
9 the past abuse and trauma I have experienced throughout my marriage.  
10

11 I am requesting the Court order monthly spousal support in the amount of \$5,000.00 while  
12 we work through the divorce process. This will provide me with financial security and will allow  
13 me to contribute toward the household expenses. As it stands now, if my daughter was not willing  
14 to assist me, I would have not have sufficient income to afford any type of housing. Based on the  
15 information I know about Bill's financial status, he has the means and ability to pay the amount  
16 of support requested, he was able to do so throughout our marriage, and for an entire year after I  
17 left. Throughout our marriage, we have had financial stability, and have had the benefit of  
18 minimal monthly expenses as his employers have contributed to most, or all our housing costs. We  
19 each own our vehicles with no monthly car payments, and I believe the only other expenses he  
20 has are a few credit cards, insurance, and other normal expenses of daily living.  
21

22 I am also asking requesting assistance in coordinating a mutually agreeable date for me to  
23 come to Washington to retrieve my personal property from the home. I am currently compiling a  
24 list of the items I am requesting and am hopeful we can come to an agreement about the division  
25 of property without Court intervention.  
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1 I declare under the penalty of perjury under the laws of the State of Washington that the  
2 foregoing is true and correct.

3 DATED this 10  
4 of September 2024.

5  
6 Judith Guinn

Judith Guinn (Sep 10, 2024 18:37 PDT)

7 JUDITH GUINN, PETITIONER  
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# declaration of JUDITH GUINN

Final Audit Report

2024-09-11

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## "declaration of JUDITH GUINN" History

-  Document created by Ricci K (riccik@maxeylaw.com)  
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