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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF WHATCOM

In re the Parenting of:
ZOOEY ADAMS-GALINDO,
Child,
MANUEL GALINDO,
Petitioner,
and,
ELILE ADAMS,
Respondent.

NO. 14-5-00085-2
**MOTION FOR DECLARATORY
RELIEF PURSUANT TO THE
UNIFORM CHILD CUSTODY
JURISDICTION AND
ENFORCEMENT ACT, CHAPTER
26.27 RCW**

I. RELIEF REQUESTED

Elile Adams moves the Court for an order pursuant to the Uniform Child Custody Jurisdiction and Enforcement Act ("UCCJEA"), Chapter 26.27 RCW, which declares that the Whatcom County Superior Court retains exclusive and continuing jurisdiction over custody matters pertaining to Zooey Adams-Galindo ("Z.-A.G." or "Child") after this Court entered a parenting plan on May 8, 2015.¹ Ms. Adams also moves the Court for an order that declines to recognize orders issued in a subsequent parenting plan action commenced *sua sponte* by Nooksack Tribal Court Chief Judge Raymond Dodge under CR 82.5(c), over Ms. Adams' objection that this Court had exclusive and continuing jurisdiction.

¹ "If a question of existence or exercise of jurisdiction under this chapter is raised in a child custody proceeding, the question, upon proper motion, must be given priority on the calendar and handled expeditiously." RCW 26.27.071.
MOTION FOR DECLARATORY RELIEF
PURSUANT TO THE UNIFORM CHILD
CUSTODY JURISDICTION AND
ENFORCEMENT ACT, CHAPTER 26.27 RCW - 1

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1 **II. BACKGROUND**

2 Elile Adams and the Child are enrolled members of the Lummi Nation. Declaration of
3 Elile Adams (“Adams Decl.”), ¶2. Manuel Galindo is a non-Indian. *Id.*

4 **A. WHATCOM COUNTY SUPERIOR COURT MAKES THE INITIAL CUSTODY
5 DETERMINATION REGARDING THE CHILD.**

6 On January 13, 2015, this Court determined that Mr. Galindo is the biological father of Z.
7 A.-G. and that it had jurisdiction over Z. A.-G., Mr. Galindo and Ms. Adams. Findings of Fact
8 and Conclusions of Law (Parentage) (Jan. 13, 2015). On April 17, 2015, Mr. Galindo filed a
9 petition for a residential schedule and parenting plan as well as a motion for a temporary order
10 regarding Z. A-G. Petition for Residential Schedule/Parenting Plan (Apr. 17, 2015); Motion for
11 Temporary Order (Apr. 17, 2015). The Court entered a temporary visitation order (“Superior
12 Court Parenting Order”) on May 8, 2015, which maintained Ms. Adams as the primary custodian
13 and granted Mr. Galindo visitation with Z. A.-G. three times per week from 12:00 p.m. to 3:00
14 p.m. Ms. Adams and Mr. Galindo generally adhered to the Superior Court Parenting Order until
15 March of 2017. Adams Decl., ¶3.

16 **B. NOOKSACK TRIBAL COURT CHIEF JUDGE RAYMOND DODGE IMPROPERLY EXERCISES
17 JURISDICTION OVER CUSTODY MATTERS INVOLVING THE CHILD.**

18 On March 17, 2017, Ms. Adams filed a petition for an order of protection against Mr.
19 Galindo in the Nooksack Tribal Court. Adams Decl. ¶4. Mr. Galindo had a history of physically
20 and verbally abusing Ms. Adams, causing property damages to their former home together,
21 expressing suicidal ideation, and threatening to take Z.A.-G. back to Mexico with him. *Id.* The
22 Nooksack Tribal Court issued a Temporary Ex Parte Order for Protection on March 17, 2017,
23 that suspended Mr. Galindo’s visitation with Z. A-G. until a hearing scheduled for April 30,
24 2017. *Id.*, Ex. A.

1 **1. The Nooksack Tribal Court Initiates A Parenting Plan Case *Sua Sponte* And**
2 **Issues A Parenting Plan And Visitation Schedule.**

3 Prior to the hearing set for April 30, 2017, however, Nooksack Tribal Court Chief Judge
4 Raymond Dodge himself initiated a parenting plan action *sua sponte*; he issued a temporary
5 parenting plan on March 30, 2017. *Id.*, Ex. B. That same day, Ms. Adams filed the Superior
6 Court Parenting Plan with the Nooksack Tribal Court in an effort to inform the Nooksack Tribal
7 Court that Washington retained jurisdiction over the matter. *Id.* ¶7, Ex. C.

8 The Nooksack Tribal Court Chief Judge Raymond Dodge² initiated the parenting plan
9 action and issued the temporary parenting plan *sua sponte*, even though he knew or should have
10 known that he lacked jurisdiction under Washington’s priority of action rule. *See id.* ¶7, Exs. B,
11 C. The Nooksack Tribal Court took those actions *sua sponte* without providing Ms. Adams
12 notice or an opportunity to be heard. *Id.* ¶6. The Nooksack Tribal Court assumed jurisdiction
13 over custody matters pertaining to Z.-A.G. despite its lack of jurisdiction. *See id.* ¶7, Exs. B, C.

14 **2. Nooksack Tribal Court Chief Judge Dodge Persecutes Ms. Adams.**

15 Since March 30, 2017, Mr. Dodge has ordered Ms. Adams to appear at least twenty times
16 in either the Tribal Court custody case, or its related criminal matter—by which Mr. Dodge has
17 endlessly harassed Ms. Adams through the abuse of judicial process. *Id.* ¶8. Mr. Dodge has
18 initiated at least two Tribal Court cases *sua sponte* against Ms. Adams. *Id.*

19 In the Tribal Court custody case, between March 30, 2017, and July 31, 2019, Mr. Dodge
20 issued no less than twenty Orders *against* Ms. Adams, many of which he issued “*sua sponte.*”
21 *Id.* Then, on February 20, 2019, at the Mr. Dodge’s direction, the Nooksack Police Department

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² Because Raymond Dodge’s status as Nooksack Tribal Court Chief Judge was rejected by the United States in March 2016, Ms. Adams refers to him as “Mr. Dodge.” *In re Gabriel S. Galanda, et al. v. Nooksack Tribal Ct.*, No. 16-2-01663-1 (Whatcom County Sup. Ct.), Dkt. No. 55 (refusing to “recognize as lawful or carrying any legal effect the actions or decisions of the Nooksack Tribal Court after March 24, 2016.”).

1 criminally cited Ms. Adams with “TEN COUNTS” of custodial interference in *Nooksack Indian*
2 *Tribe v. Elile Adams*, No. 2019-CR-A-004. *Id.*

3 On April 9, 2019, Elile Adams obtained citizenship with the Lummi Nation for herself
4 and Z.A.-G., after relinquishing each of their enrollments with the Nooksack Tribe on January
5 31, 2019. Adams Decl. ¶2. In her own words, she “was seeking asylum in the Lummi Nation”
6 as a result of persecution from Mr. Dodge. *Id.* Then, on May 14, 2019, Elile Adams filed a
7 “Voluntary Non Suit of Elile Adams” with the Tribal Court in the Tribal Court custody case,
8 again informing the Nooksack Tribal Court that it lacked subject matter jurisdiction and personal
9 jurisdiction over the Parties and the Child. *Id.* ¶9, Ex. D.

10 **3. Ms. Adams Files Suit Against Raymond Dodge.**

11 On July 19, 2019, Mr. Dodge prepared, signed, and issued a Warrant of Arrest against
12 Elile Adams in *Nooksack Indian Tribe v. Elile Adams*, No. 2019-CR-A-004, describing the
13 underlying charges as “Interference w/custody x4/contempt x1” and listing a “Reason or
14 Issuance of Warrant: FTA [Failure to Appear].”³ *Id.* ¶10; *see also* Complaint at 10, *Adams v.*
15 *Dodge*, No. 19- (Whatcom Cty. Super. Ct. Aug. 9, 2019).

16 On the morning of July 30, 2019, Ms. Adams, her father and the Child were asleep or
17 relaxing at home when Nooksack police officers arrived to the Adamses’ home and assaulted,
18 battered and falsely detained, arrested and/or imprisoned them. *Id.* ¶10; *see also* Complaint at
19 10, *Adams v. Dodge*, No. 19- (Whatcom Cty. Super. Ct. Aug. 9, 2019). That afternoon, Mr.
20 Dodge denied Elile Adams’ “Voluntary Non Suit of Elile Adams” in *Nooksack Indian Tribe v.*
21 *Elile Adams*, No. 2019-CR-A-004. Adams Decl., Ex. E. Mr. Dodge issued the denial order three
22 months *after* Ms. Adams filed the motion and only after he had orchestrated her arrest. *See id.*,
23

24 ³ The Nooksack Tribal Court lacks criminal jurisdiction over Ms. Adams’ residence pursuant to P.L. 280, Chapter
32.12 RCW.

1 Exs. D, E (“On this date a warrant for Ms. Adams [sic] arrest in a pending criminal matter was
2 executed. Ms. Adams is currently in custody.”). *Id.*, Ex. E.

3 On August 7, 2019, Mr. Dodge caused undersigned counsel’s appearance notice for Ms.
4 Adams in *In re the Matter of Z. A.-G.*, No. 2017-CI-PP-001, to be “REJECTED” by the
5 Nooksack Tribal Court, thereby denying Ms. Adams her due process right to counsel of her
6 choosing. *Id.* ¶12, Ex. F.

7 III. EVIDENCE RELIED UPON

8 This Motion relies upon the accompanying Adams Decl. and its exhibits, as well as the
9 files and pleadings herein.

10 IV. AUTHORITY AND ARGUMENT

11 Washington has adopted and codified the UCCJEA at Chapter 26.27 RCW. The
12 UCCJEA is “a pact among states limiting the circumstances under which one court may modify
13 the child custody orders of another.” *In re Ruff*, 168 Wn. App. 109, 114-15, 275 P.3d 1175
14 (2012) (citing *In re Custody of A.C.*, 165 Wn.2d 568, 574, 200 P.3d 689 (2009)). Under that law,
15 Washington courts treat an Indian “tribe as if it were a state of the United States for the purposes
16 of applying Articles 1 and 2” of the Act. RCW 26.27.041(2).

17 “[T]he UCCJEA aims to prevent conflicting custody orders by determining when a state
18 can modify a custody order entered in another state.” *In re Ruff*, 168 Wn. App. at 114. The
19 intent of that law is to limit jurisdiction, thus Washington courts have “embrac[ed] the notion
20 that the UCCJEA is a limit on subject matter jurisdiction.” *Id.* at 118 (citing UCCJEA § 201
21 cmt. 2.9 pt. 1A U.L.A. at 673; *In re Marriage of Hamilton*, 120 Wn. App. 147, 148-49, 84 P.3d
22 259 (2004); *In re Marriage of Susan C.*, 114 Wn. App. 766, 60 P.3d 644 (2002)). The
23 procedural requirements of the UCCJEA are jurisdictional in nature. *Id.* Parties to a child
24

1 custody proceeding cannot “waive the jurisdiction of one state in favor of another by their
2 conduct or agreement.” *Id.*; *see also In re Custody of A.C.*, 165 Wn.2d at 577.

3 **A. THIS COURT RETAINS EXCLUSIVE, CONTINUING JURISDICTION OVER CUSTODY**
4 **MATTERS INVOLVING THE CHILD.**

5 The UCCJEA conferred jurisdiction on this Court to make the initial child custody
6 determination regarding the Child. RCW 26.27.201; *see* Motion for Temporary Order (Apr. 17,
7 2015), Findings of Fact and Conclusions of Law (Parentage) (Jan. 13, 2015). Following the
8 initial Superior Court Parenting Order entered on May 8, 2015, the Court continued to possess
9 “exclusive, continuing jurisdiction over the determination” of child custody until

10 (a) A court of this state determines that neither the child, the child’s parents, and
11 any person acting as a parent do not have significant connection with this state
12 and that substantial evidence is no longer available in this state concerning the
13 child’s care, protection, training, and personal relationships; or

14 (b) A court of this state or a court of another state determines that the child, the
15 child’s parents, and any person acting as a parent do not presently reside in this
16 state.

17 RCW 26.27.211(1); *see also In re Marriage of Susan C. and Sam E.*, 114 Wn. App. 766, 777, 60
18 P.3d 644 (2002) (“Jurisdiction to modify a custody decree continues with the decree state so long
19 as one of the parents or other contestants continues to reside in the decree state and the child
20 continues to have more than slight contact with the decree state.”). The Washington Supreme
21 Court has held “that the decree state ‘has continuing jurisdiction to modify its own order and
22 other states must decline to modify until the until the decree state loses or declines jurisdiction.’”
23 *In re Marriage of Susan C. and Sam E.*, 114 Wn. App. 766, 777, 60 P.3d 644 (2002); *see also In*
24 *re Marriage of Greenlaw*, 123 Wn.2d 593, 600-01, 604, 869 P.2d 1024 (1994).

25 This Court has never found that the Child or the Parties do not have a significant
connection to Washington or that they live in another state, and it has never declined jurisdiction.
See RCW 26.27.211(1)(a), (b); *In re Marriage of Susan C. and Sam E.*, 114 Wn. App. at 777.

1 The Nooksack Tribal Court has never found that the Child or the Parties do not have a significant
2 connection to Washington or that they live in another state. *Id.*; *see* Adams Decl., Ex. B. To the
3 contrary, the Child and the Parties have remained Washington residents since this Court entered
4 the Superior Court Parenting Order in 2015. Adams Decl. ¶2. The Parties’ appearance and
5 participation in the Tribal Court proceedings also does not divest this Court of its continuing and
6 exclusive jurisdiction. *In re Ruff*, 168 Wn. App. at 118; *see also In re Custody of A.C.*, 165
7 Wn.2d at 577.

8 Even assuming the Nooksack Tribal Court properly exercised temporary emergency
9 jurisdiction over custody matters involving the Child on March 17 and March 30, 2019, the
10 Tribal Court lacked authority to enter further permanent orders because its conduct failed to
11 divest this Court of jurisdiction under the UCCJEA. *See* RCW 26.27.231; *see also In re Ruff*,
12 168 Wn. App. at 123-24. “The UCCJEA requires that the Court assuming temporary jurisdiction
13 communicate and coordinate with the court that made the initial custody order.” *In re Ruff*, 168
14 Wn. App. at 122. The Tribal Court did not follow the procedure set forth in RCW 26.27.231
15 required to divest this Court of jurisdiction and enter further permanent custody orders. *See*
16 Adams Decl., Ex. B. There is no evidence the Tribal Court communicated with this Court, *see*
17 RCW 26.27.231(4); none of the Tribal Court orders have an expiration date, *see* RCW
18 26.27.231(3). *See id.* Strict compliance with the procedural mandates of the UCCJEA is
19 required. *In re Ruff*, 168 Wn. App. at 123.

20 **B. CR 82.5(c) DOES NOT REQUIRE THIS COURT TO RECOGNIZE THE NOOKSACK**
21 **TRIBAL COURT ORDERS.**

22 Under CR 82.5(c), this Court is not required to recognize tribal court orders when the
23 superior court finds the tribal court that rendered the order, judgment or decree (1)
24 lacked jurisdiction over a party or the subject matter, (2) denied due process as
provided by the Indian Civil Rights Act of 1968, or (3) does not reciprocally

1 provide for recognition and implementation of orders, judgments and decrees of
2 the superior courts of the State of Washington.

3 In this case, the Court is not required to recognize the custody orders issued by the
4 Nooksack Tribal Court under CR 82.5(c) because the Tribal Court has denied Ms. Adams due
5 process, and the Tribal Court does not reciprocally recognize and implement Washington court
6 orders, including the Superior Court Parenting Order.

7 **1. The Nooksack Tribal Court Denied Ms. Adams Due Process Guaranteed By
8 The Indian Civil Rights Act.**

9 Procedural due process requires a fair hearing, which includes an unbiased tribunal, the
10 right to counsel, and public attendance. *Nguyen v. State, Dept. of Health Medical Quality
11 Assurance Comm'n*, 144 Wn.2d 516, 544-45, 29 P.3d 689 (2001) (citing Harry J. Friendly,
12 “*Some Kind of Hearing*,” 123 U. PA. L.REV. 1267, 1279-95 (1975)). The Nooksack Tribal Court
13 is a biased tribunal, has denied Ms. Adams her right to counsel, and refused to permit her family
14 and supporters to attend her most recent hearing.

15 An unbiased tribunal for the purposes of procedural due process requires “an impartial
16 and disinterested tribunal.” *Marshall v. Jerrico, Inc.*, 446 U.S. 238, 242 (1980); *see also In re
17 Davis*, 152 Wn.2d 647, 692, 101 P.3d 1 (2004) (“At a minimum, due process ‘requires a fair trial
18 in a fair tribunal,’ before a judge with no actual bias against the defendant or interest in the
19 outcome of his particular case.”) (citing *Bracy v. Gramley*, 520 U.S. 899, 904-05 (1997)). Ms.
20 Adams and her father, George Adams, have over the past three years publically challenged the
21 authority of the Nooksack Tribe, the Tribal Court, and Mr. Dodge. Adams Decl. ¶13. Ms.
22 Adams and her father also have staunchly and publically defended Nooksack members that Mr.
23 Dodge has persecuted while acting as Tribal Court Chief Judge. *Id.* Ms. Adams’ civil tort suit
24 against Mr. Dodge, which is predicated on actions he has taken in the Nooksack Tribal Court

1 custody case, remains pending in this Court. *Adams v. Dodge, et al.*, No 19-2-01552-37
2 (Whatcom Cty. Super Ct.).⁴

3 Mr. Dodge is neither impartial nor disinterested in Nooksack Tribal Court matters
4 involving Ms. Adams based on her pending state and federal court actions against or involving
5 him, the Nooksack Tribal Court and the Nooksack Police Department. *Adams v. Dodge, et al.*,
6 No 19-2-01552-37 (Whatcom Cty. Super Ct.); Petition for Writ of *Habeas Corpus*, Dkt. # 2,
7 *Adams v. Elfo*, No. C19-1262-JCC-MLP (W.D. Wash. Aug. 9, 2019). Mr. Dodge thus possesses
8 a personal interest in the outcome of Ms. Adams' cases. *Id.* He also has refused to recuse
9 himself from matters involving Ms. Adams. Adams Decl. ¶14. Accordingly, because Ms.
10 Adams has been denied an impartial and disinterested tribunal, she has been deprived of the
11 procedural due process guaranteed to her by ICRA. 25 U.S.C. § 1302(a)(8); *Marshall*, 446 U.S.
12 at 242. This Court therefore cannot recognize any order issued by Mr. Dodge in the Nooksack
13 Tribal Court pertaining to child custody matters involving Ms. Adams. CR 82.5(c).

14 Procedural due process also requires the opportunity to be represented by counsel.
15 *Nguyen*, 144 Wn.2d at 545. The Nooksack Tribal Court has refused to allow Mr. Galanda to
16 represent Ms. Adams in the custody proceeding. Adams Decl., ¶¶12, 15, Ex. F. Ms. Adams has
17 been forced to proceed pro se. *Id.* ¶12, 15.

18 Finally, Washington courts have held that procedural due process requires the public to
19 have the opportunity to attend the proceedings. *Nguyen*, 144 Wn.2d at 545. On September 12,
20 2019, Mr. Dodge precluded Mr. Galanda and anybody other than Ms. Adams, her father, and her
21 public defender from attending a hearing in *Nooksack Indian Tribe v. Elile Adams*, No. 2019-
22 CR-A-004. Adams Decl. ¶15.

23
24 ⁴ Ms. Adams also filed a habeas corpus petition against Whatcom County Sheriff Bill Elfo based on the unlawful
arrest and detention ordered by Mr. Dodge on July 30, 2019. See Petition for Writ of *Habeas Corpus*, Dkt. #2,
Adams v. Elfo, No. C19-1262-JCC-MLP (W.D. Wash. Aug. 9, 2019).

1 This Court is not required to recognize the orders issued by the Nooksack Tribal Court in
2 the child custody proceeding. CR 82.5(c). The Tribal Court denied Elile Adams due process
3 guaranteed by the Indian Civil Rights Act of 1968. The Tribal Court does not reciprocally
4 provide for recognition and implementation of Washington Superior Court orders.

5 Once Ms. Adams seeks the relief she seeks under the UCCJEA, she intends to modify the
6 Superior Court Parenting Order pursuant to RCW 26.09.260.

7 DATED this 13th day of September, 2019.

8 GALANDA BROADMAN, PLLC

9 

10

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14 Email: gabe@galandabroadman.com
15 bree@galandabroadman.com

16 Attorneys for Respondent Elile Adams

1 **CERTIFICATE OF SERVICE**

2 I, Wendy Foster, declare as follows:

3 1. I am now and at all times herein mentioned a legal and permanent resident of the
4 United States and the State of Washington, over the age of eighteen years, not a party to the
5 above-entitled action, and competent to testify as a witness.

6 2. I am employed with the law firm of Galanda Broadman PLLC, 8606 35th Avenue
7 NE, Ste. L1, Seattle, WA 98115.

8 3. Today, I served the foregoing document via U.S. Mail on the following:

9 Manuel Galindo
6383 Braker Way
Lynden, WA 98246

10 The foregoing statement is made under penalty of perjury and under the laws of the State
11 of Washington and is true and correct.

12 Signed at Seattle, Washington, this 13th day of September 2019.

13 

14 _____
15 Wendy Foster

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GR-17 Declaration

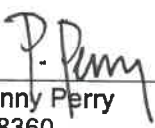
Elile Adams,

I DECLARE THAT:

1. I am over the age of 18 years, competent to be a witness, and not a party to this action.
2. I received, by electronic means, a document for filing in the above captioned case.
3. I have examined said document, found it clear and discernible, and attached this Declaration thereto.
4. I received said document on: 09/13/2019
5. The name of said document was: Motion for Declaratory Relief Pursuant to he Uniform Child Custody Jurisdiction and Enforcement Act, Chapter 26.27 RCW
6. The number of pages in said document, including this Declaration, was: 13

I declare under the penalty of perjury, under the laws of the State of Washington, that the foregoing is true and correct to the best of my knowledge.

Signed on 09/13/2019



Penny Perry
338360

4th Corner Network, Inc.
110 Prospect St.
Bellingham, WA 98225
360-671-2455



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WHATCOM COUNTY
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