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FILED
JUL 20 2007
THOMAS R. FALLOQUIST
SPOKANE COUNTY CLERK

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

In Re:)	
)	NO.
LISA SHEA,)	07301743-5
)	
Petitioner,)	DECLARATION OF
)	LISA SHEA
and)	
)	
MATTHEW T. SHEA,)	
)	
Respondent.)	

LISA SHEA, being first duly sworn upon oath, deposes and says:

I am the Petitioner in the above referenced matter. I make this declaration of my own personal knowledge.

Matthew and I were married June 8, 2002. Prior to the marriage, I could not, or perhaps chose not, to see his temper. Looking back now I can see the signs of it clearly.

Once we got married his whole attitude changed. He no longer had to court me; I belonged to him as a possession. I was there to serve and wait upon him. He has a vision of how everything is supposed to be and everyone, especially me, is supposed to act. His beliefs are purportedly Bible based. If things do not go according to "the" plan, his anger

DECLARATION OF LISA SHEA - 1

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1 erupts. He wanted me to look pretty when we went out, but would become jealous if I was
2 noticed. When we went out to dinner, if I responded to a question that the wait person
3 might ask, he would become immediately upset saying that I was not letting him "lead."
4 If he could not find something of his, I was accused of intentionally moving it to make his
5 life "hell."

6 I could not get out of bed before him, because as the "man of the house" he was to
7 decide what time we should get up. I had to walk on his left side, not his right side, because
8 a soldier would wear his sword on the right side and he would be able to protect me (even
9 though he does not wear a sword). In a discussion with his brother about the Terri Schiavo
10 case, I disagreed with his opinion. I was severely reprimanded for it later, because if I
11 really loved him, I would agree with him and support his view no matter what. When I did
12 not agree on his landscaping desires, he decided to no longer help with any of the yard
13 work, except to mow the lawn. After he mowed the lawn, he made me wheel barrel the
14 clippings away as he did not want to do that part. During two of these two arguments, he
15 grabbed me hard enough to leave bruises on my arms. One occasion he raised his fist, but
16 did not hit me.

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20 In the middle of his last year of law school, February of 2004, he was deployed to
21 Iraq with the National Guard. Without me being around, he focused on his men and his
22 hatred for the upper command. We were able to share nice emails and I truly hoped that
23 things would be different when he got home. I so wanted our marriage to work. He talked
24 about how much he missed me and how he wanted to be a better husband and being over
25 there made him appreciate me more. Having a family is the only thing I ever really wanted

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28 DECLARATION OF LISA SHEA - 2

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and I was willing to give this marriage everything.

1 My Mom passed away on August 24, 1984. On February 16, 2005 my Dad died of
2 cancer to be followed by his Mother's death in a matter of days. I still had a biological
3 Uncle in California and a foster family in Arizona that I was close to, but I felt truly and
4 utterly alone in this world. I was so thankful when on the 18th of February 2005 Matthew
5 came home on emergency leave.
6

7 With the death of my Father, I inherited the home I grew up in Arizona and with my
8 Grandmother's death I inherited some money. Matthew immediately wanted the Arizona
9 house transferred into both our names. He stated that he had this horrible feeling I was
10 going to die before him someday. He explained that he had learned in law school that if
11 something happened to me, my biological sister would be entitled to half of the property
12 and I needed to protect it. I resisted at first, but wanting to avoid a fight and possibly being
13 assaulted again, I gave into him and deeded the property into both our names.
14
15

16 It did not take long for things to return to the way they had been prior to his
17 deployment. He explained that it was just the stress of adjusting to civilian life again and
18 that he needed to take a few months off where he could just relax, read and work on writing
19 a book.
20

21 The time off did not seem to help. He was still angry about everything and nothing
22 at all. All of the old rules still applied. I was no longer allowed to have my own bulletin
23 at church as I was "wasting paper." I was not allowed to drive the Jeep my Dad had given
24 me (and that I had learned to drive in when I was in the sixth grade). He deemed it unsafe
25 for me to drive in town . He would take the Jeep out for long drives on the back roads
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28 DECLARATION OF LISA SHEA - 3

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behind our house with no one knowing where we were and without any cell service.

1 When it came time for him to register for law school again, he could not find his
2 PIN number. Again it was my fault and I was a “stupid, lazy bitch”.

3 He came home one day from a Boy Scout camping trip. I thought it would be nice
4 to help him unload his truck. He was not ready to unload the truck. He stood in the kitchen
5 with his hands balled into fists screaming that he “is the man of the house,” not me and he
6 would decide when the truck would be unloaded.
7

8 When we bought a new mattress he spend days researching bed sheets. He then gave
9 me the choice of the top six. When I picked the wrong one, I was screamed at for not
10 knowing him well enough to pick the one he wanted. If I “really loved him” I would have
11 know which one to pick, he said.
12

13 Matthew had expressed how he wanted a big party when he graduated from law
14 school this year. My foster family agreed to come up for it. I wanted their trip to be special;
15 I wanted them to enjoy Washington while they were here. Matthew and I had been
16 kayaking before and Matthew loved it. I discovered that you could rent kayaks from the
17 State Park and all you had to do was hook up a pre-loaded trailer and take it to the Little
18 Spokane River. I tried to keep it as simple as possible as I did not want to make Matthew
19 mad in the process. My family had to stop at Wal-Mart on the way to kayaking. Their stop
20 upset him and then when it came time to unload the kayaks, it took too long for him. This
21 upset him even more. He called me to the other side of the vehicle. He told me how
22 “fucked up” it all was. I apologized. I told him how sorry I was and would try to make it
23 better. When I turned to leave, he again grabbed me so hard that it brought tears to my eyes
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28 DECLARATION OF LISA SHEA - 4

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and left bruises.

1 His apologies were always so sincere. He said if I just didn't push him so much and
2 create these situations, everything would be fine. He said all of it really was my fault, but
3 because he had promised to love me forever, he would stand by me and we would have a
4 family someday.
5

6 I was no longer so sure about the family though, and when he would talk of his great
7 fear of me dying before him, I actually started praying for it. After passing the Bar, he felt
8 called to do full time volunteer work. He pleaded for my opinion, but having been down
9 that road (of not having the "right" opinion), I was reluctant to comment. Again I yielded
10 to his pleading and his promising that I would not suffer any repercussions and would not
11 "be in trouble." I tried to carefully explain that maybe I was wrong, but that he had
12 promised that if I had supported him through law school, he would get a good job and
13 support us. I reminded him we now had his student loans to pay. Luckily enough for me
14 we had the conversation over the phone. When we met later at Zips, he was so angry that
15 I thought he would hit me. I believe the only thing that saved me from another assault was
16 the fact of other people being present.
17
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20 There are many, many more examples of his treatment of me, but the exact same
21 pattern is involved . He erupts in anger, yells at me until I'm in the fetal position on the
22 bed, crying and fearful. Then he holds me and tells me how much he loves me. He says
23 and what a special gift I am to him and he can't figure out why I do things to make him
24 treat me the way he does.
25

26 Matthew now appears to be cycling up as he loses more and more control over me.
27

28 DECLARATION OF LISA SHEA - 5

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In a phone conversation July 19, 2007 at 12:09 p.m. Matthew stated to my friend that "I got a very concerning phone call this morning that makes me very concerned about Lisa." When my friend asked Matthew whether she should be concerned about me, Matthew said, "yes, you should be very concerned about her. The phone call I got this morning was very concerning". Filed herewith is a declaration written by my friend verifying this phone call.

I am afraid of Matthew. He has hurt me physically in the recent past. I believe his abuse of me is escalating. I asked the court for protection, in any form possible, from Matthew.

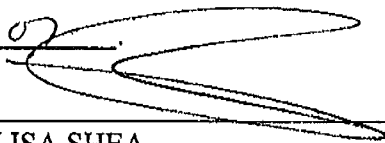
Additionally, I left the house out of fear. I am living with a friend, and I do not wish to disclose my whereabouts. I have asked Matthew to leave the house. He will not leave. He insists, however, that I continue to make the mortgage payment of \$1,185 a month. He still refuses to work in a profitable manner, despite the fact he is now a lawyer.

The funds which paid off the 2nd mortgage to our house came entirely from my inheritance. I am the only one of us who can afford to maintain the house. I asked the court to order Matthew out of the house, and return the house to me. I will continue to make timely payments on the house pending the outcome of this litigation.

Finally, I ask that each of us be responsible for our own future debts. I asked the court for any and all relief which the Court deems to be just and equitable.

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

Signed at Spokane, WA on 7-20-07



LISA SHEA

DECLARATION OF LISA SHEA - 6

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THOMAS R. FALLQUIST
SPOKANE COUNTY CLERK

**SUPERIOR COURT OF WASHINGTON
COUNTY OF SPOKANE**

07 301743-5

In re:

LISA SHEA,

Plaintiff,

and

MATTHEW T. SHEA,

Defendant.

NO.

DECLARATION OF
BARBARA AGNEW

(OPTIONAL USE)
(DCLR)

Barbara Agnew being first duly sworn on oath deposes and says I make this declaration of my own personal knowledge.

I became friends with Lisa Shea when her husband and my husband were in Iraq in 2004. My husband served under Matthew Shea. While they were in Iraq, we had nearly daily contact in one form or another. I have great regard for Lisa as a person.

I have a daughter who was injured in an apartment complex accident. At Matthew Shea's insistence, we became involved with two other lawyers in the personal injury matter regarding my daughter.

On July 19, 2007 at 12:09 p.m. I was talking to Matthew about my daughter's case. Sort of out of the blue he said, "I got a very concerning phone call this morning that makes me very concerned about Lisa." I asked Matthew if I should be concerned about her. Matthew said, "Yes, you should be very concerned about her. The phone call I got

1 this morning was very concerning." I asked about the phone call and all he would say was,
2 "I don't want to say anymore because I don't want to put anyone in a compromising
3 situation."

4 Since Matthew's return from Iraq, he has taken steps which, in my opinion, are
5 aimed at isolating Lisa from me and our friendship. Also, since their separation in late
6 June, she and I have reconnected. At that time, I learned for the first time about
7 Matthew's treatment of her. Based on this background, and my observation, I was
8 particularly alarmed at the phone call I received from Matthew. I found his demeanor
9 quite alarming and he appeared to be very agitated.

10
11 I declare under penalty of perjury under the laws of the state of Washington that the
12 foregoing is true and correct.

13 Signed at Spokane, [City] WA [State] on July 20, 2007
14 [Date].

15 Barbara Agnew
16 Signature

Barbara Agnew
Print or Type Name

17 DO NOT ATTACH FINANCIAL RECORDS TO THIS DECLARATION. FINANCIAL
18 RECORDS SHOULD BE SERVED ON THE OTHER PARTY AND FILED WITH THE
19 COURT SEPARATELY USING THE SEALED FINANCIAL SOURCE DOCUMENTS
20 COVER SHEET (WPF DRPSCU 09.0220). IF FILED SEPARATELY USING THE
21 COVER SHEET, THE RECORDS WILL BE SEALED TO PROTECT YOUR PRIVACY
(ALTHOUGH THEY WILL BE AVAILABLE TO THE OTHER PARTIES IN THE
22 CASE, THEIR ATTORNEYS, AND CERTAIN OTHER INTERESTED PERSONS. SEE
23 GR 22 (C)(2)).