



OGDEN MURPHY WALLACE, PLLC
1 FIFTH STREET, SUITE 200
P.O. BOX 1606
WENATCHEE, WA 98807

T 509.662.1954
F 509.663.1553

OMWLAW.COM

ANDREA M. PETERS
apeters@omwlaw.com

November 23, 2020

VIA U.S. MAIL

Spokane County Clerk's Office
County Courthouse, Room 300
1116 W Broadway Avenue
Spokane WA 99260-0090

FILE COPY

Re: Banner Bank v. Reflection Lake Community Association, et al.
Spokane County Cause No. 20-2-03199-32

Dear Clerk:

Enclosed for filing in the above-caption matter is Plaintiff's Amended Complaint. Upon completion of filing, please conform the enclosed face page copy and return to our office via US mail in the postage paid envelope provided.

If you have any questions, please contact me. Thank you for your assistance in this matter.

Very truly yours,

OGDEN MURPHY WALLACE, P.L.L.C.

Andrea M. Peters

Enclosures

cc: Client (w/encls. via email only)
Tyler Lloyd (w/encls. via email only)
William C. Schroeder (w/encls. via email only)

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

BANNER BANK, a Washington corporation,

Plaintiff,

v.

REFLECTION LAKE COMMUNITY ASSOCIATION, a non-profit corporation; JAMES POWERS; and RICK SMITH

Defendants.

NO. 20-2-03199-32

AMENDED COMPLAINT
FOR INTERPLEADER

Plaintiff Banner Bank alleges the following complaint against Defendants Reflection Lake Community Association, James Powers, and Rick Smith:

I. JURISDICTION AND VENUE

1.1. Plaintiff Banner Bank (the "Bank") is a Washington corporation doing business within Spokane County, Washington. It maintains bank accounts in the name of Defendant Reflection Lake Community Association, which account numbers are as follows with the following balances (the "Accounts"):

Deposit Account No. ***5311	\$12,585.99
Deposit Account No ***5507	\$24,504.67
Deposit Account No. ***3417	\$5,675.41
Certificate of Deposit Account No. ***0454	\$25,763.66
Certificate of Deposit Account No. ***0462	\$5,082.59

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III. CLAIM AND CAUSE OF ACTION FOR INTERPLEADER

3.1. At present, the Bank understands that a controversy exists as to whether Smith or Powers is the President of RLCA and to whom the Bank should permit to access to the Accounts or to whom the Bank is required to pay all or any portion of the proceeds of the Accounts.

3.2. The Bank is entitled to a judicial decree establishing the rights of the Defendants to the proceeds of the Accounts and establishing the Bank's obligations, if any, to pay any, some or all of the proceeds to one or more of the Defendants, if any.

3.3. The Bank seeks to interplead the money in the Accounts into the Registry of the Court.

IV. REQUEST FOR RELIEF

Plaintiff requests that judgment be entered as follows:

1. Declaring that the Bank may discharge its obligations to the Defendants and as to the Accounts with regard to the proceeds of the Accounts by paying the proceeds of the Accounts into the Registry of the Court.

2. Requiring that the Defendants be interpled and settle between themselves their rights to the proceeds of the Accounts.

3. Dismissing Plaintiff as a party to the interpleader action between the Defendants.

4. Enjoining Defendants from further legal proceedings against the Bank concerning the Accounts.

5. Awarding the Bank its statutory costs and attorney fees.

