

FL ALL FAMILY 135 - DECLARATION IN OPPOSITION TO TEMPORARY FAMILY LAW
ORDERS

KING COUNTY SUPERIOR COURT FAMILY LAW DIVISION

VERONIKA GOODNIGHT (Pro Se), Petitioner, v. No. 20-3-03830-3 SEA MATTHEW RALIDAK,
Respondent.

DECLARATION IN OPPOSITION TO TEMPORARY FAMILY LAW ORDERS (FL All Family
135)

I. DECLARATION SUMMARY

I, Veronika Goodnight, declare under penalty of perjury under the laws of Washington State that the following is true and correct:

NUCLEAR PROFESSIONAL EVIDENCE: Dr. Michael R. Oreskovich, MD, board-certified psychiatrist in General Psychiatry and Addiction Psychiatry, court-appointed neutral evaluator, following comprehensive 3-hour clinical evaluation and 210-document review using SCID-5 diagnostic interview, concluded: **“There is no reason to preclude [mother] having sole custody of**

her children.”

UNANIMOUS GOVERNMENT VALIDATION (4-0 AGENCIES): • **Police Investigation:** “No crime occurred” (Officer Kellogg, April 4, 2025) • **DCYF:** All investigations closed with no adverse findings

• **Department of Health:** Investigating therapist conduct (confirms system integrity) • **This Court:** Mother performed “majority of day-to-day child-rearing” (March 3, 2022)

CONSTITUTIONAL EMERGENCY: Children separated 143 consecutive days vs. Court guidance “not more than one week” = **2,040% constitutional violation** under Due Process Clause requiring immediate judicial remedy.

BASIS FOR OPPOSITION: Professional psychiatric evaluation and unanimous government validation directly contradict all requests in Respondent’s motion, requiring denial and custody restoration.

II. SPECIFIC OPPOSITION TO EACH REQUEST

A. Mental Health Evaluation Request - SHOULD BE DENIED - ALREADY COMPLETED

RESPONDENT’S CLAIM: Mother needs mental health evaluation to determine fitness

EVIDENCE IN OPPOSITION: - **Dr. Oreskovich (Board-Certified Psychiatrist):** Completed comprehensive 3-hour evaluation with 210-document review - **PROFESSIONAL CONCLUSION:**

“No reason to preclude [mother] having sole custody” - **STATUS:** Evaluation completed, recommends **opposite** of Respondent’s requests

GROUND FOR DENIAL: Request is moot—professional evaluation already completed and supports sole custody to mother.

B. Children Remain with Father - SHOULD BE DENIED - CONTRADICTED BY EVIDENCE

RESPONDENT’S CLAIM: Children unsafe with mother, must remain with father

EVIDENCE IN OPPOSITION: - **Professional Psychiatric Evaluation:** Recommends sole custody to mother - **Dr. Stacy Bowker, ND:** 5+ year primary care provider declared under penalty of perjury that mother demonstrates “responsibility and attentiveness in managing her children’s

healthcare needs” - **DCYF Professional Assessment:** Official investigation found father “has fabricated stories to the courts, medical providers, and the school about the mother” - **Police Investigation:** “No crime occurred” (official finding) - **This Court’s Previous Finding:** Mother performed “majority of day-to-day child-rearing” - **Children’s Voice:** Child states “She does want to go back and live with mom”

GROUND FOR DENIAL: All professional evidence supports custody restoration to mother.

C. Mental Health Classes Request - SHOULD BE DENIED - NO FACTUAL BASIS

RESPONDENT’S CLAIM: Mother needs “parenting classes specifically addressing child abuse”

EVIDENCE IN OPPOSITION: - **Police Finding:** “No crime occurred”—no abuse substantiated - **DCYF Investigation:** Despite Respondent’s claims of “18+ CPS intakes,” NO trained CPS professional ever interviewed children - all investigations closed with no findings against mother (confirmed by DCYF Supervisor Jazie Smith). Four government agencies (Police, DCYF, DOH, Court) have unanimously found no issues with mother’s fitness. - **Professional Assessment:** Dr. Oreskovich found no concerns warranting such classes - **Medical Professional Validation:** Dr. Bowker documented mother’s consistent responsible healthcare management - **Strategic Litigation Pattern:** Court records document escalating abusive litigation: 28+ motions over 5 years with

less than 5% success rate and 2025 escalation (9 motions in 4 months); three simultaneous motions filed July 11, 2025 (same day DVPO expired—strategic coordination); latest contempt motion filed August 15, 2025 and denied same day (Document #443) for procedural defects, demonstrating litigation management incompetence vs. Petitioner’s full King County GR 14 compliance

GROUND FOR DENIAL: No factual or professional basis for child abuse-related classes.

D. Restraining Order Continuation - SHOULD BE DENIED - STRATEGIC LITIGATION

RESPONDENT’S CLAIM: Emergency protection order necessary for safety

EVIDENCE IN OPPOSITION: - **Timeline Analysis:** 21-day delay between police clearance (April 4) and filing (April 25) - **Emergency Standards:** Courts act “within hours” for genuine emergencies - **Systematic Pattern:** Court records document 40+ motions over 5 years with less than 5% success rate for Respondent - **Recent Court Action:** Respondent’s August 15 motion denied same day (Document #443) due to procedural filing defects - **Pattern Evidence:** \$8,500 previous sanctions for similar litigation. **August 15, 2025:** Most recent motion denied same day due to procedural filing errors

GROUND FOR DENIAL: Delay proves strategic rather than emergency nature.

III. OVERWHELMING PROFESSIONAL EVIDENCE SUPPORTING MOTHER

A. Dr. Oreskovich Psychiatric Evaluation (Primary Evidence)

PROFESSIONAL CREDENTIALS: Board-certified psychiatrist, court-appointed neutral evaluator

EVALUATION PROCESS: 3-hour comprehensive assessment with 210-document review

CONCLUSION: “There is no reason to preclude her from having primary residential care”

RECOMMENDED ARRANGEMENT: Sole custody to mother **LEGAL IMPACT:** Directly contradicts every request in Respondent’s motion

B. Government Validation Matrix (4-0 Support)

POLICE DEPARTMENT: - Investigated same April 4 incident Respondent relies upon - **Official**

Finding: “No crime occurred” - Status: Complete clearance

DCYF (CHILD PROTECTIVE SERVICES): - All investigations regarding mother completed -

Official Finding: No findings against mother - Status: All cases closed with mother cleared

DEPARTMENT OF HEALTH: - Currently investigating therapist who aided separation - **Pro-**

fessional Misconduct Complaint: License #MC61294206 under investigation - Status: Active

investigation of professional violations

THIS COURT: - Judge Rampersad's March 3, 2022 findings - **Official Finding:** Mother performed "majority of day-to-day child-rearing" - **Guidance:** "Children should not be away from their mother for more than one week"

CONCLUSION: Unanimous government validation supports mother vs. unsubstantiated allegations.

C. Children's Documented Preferences

THERAPY NOTES EVIDENCE: - Despite therapeutic pressure, child expressed authentic voice -

Documented Statement: "She does want to go back and live with mom" - **Professional Context:**

Licensed therapist documented child's preference

CONSTITUTIONAL SIGNIFICANCE: - Washington courts consider children's preferences in custody determinations - Children's voice supports mother despite systematic alienation attempts

IV. CONSTITUTIONAL ANALYSIS

A. Excessive Separation Duration

CURRENT SEPARATION: 143 consecutive days since April 4, 2025

JUDICIAL STANDARD: This Court's previous guidance of "one week" maximum

MATHEMATICAL VIOLATION: - **Court Standard:** 7 days maximum separation - **Current**

Reality: 143 days ongoing

- **Violation Ratio:** $143 \div 7 = 20.4x$ the judicial guidance - **Percentage Excess:** 2,040% longer than deemed appropriate

CONSTITUTIONAL IMPACT: Prolonged separation without substantive hearing violates due process and requires immediate remedy through custody restoration to the professionally validated primary caregiver

B. Emergency Standards Violation

WASHINGTON STANDARD: Courts act "within hours" for genuine child safety emergencies

ACTUAL TIMELINE: 21-day delay between police clearance and protection order filing **LEGAL**

CONCLUSION: Delay proves strategic litigation, not emergency protection

V. EVIDENCE QUALITY COMPARISON

A. Mother's Evidence (Transparent & Professional)

- **Board-certified psychiatric evaluation** (comprehensive professional assessment)
- **Government agency investigations** (official findings, public record)
- **Police reports** (verifiable public record)
- **Court determinations** (judicial findings on record)

B. Respondent's Evidence (Legally Insufficient)

- **Sealed therapeutic reports** obtained through RCW 71.34 violations
- **Professional misconduct investigation** of therapist currently active following **DCYF official referral to Department of Health for professional licensing violations** after documented violation of statutory parental participation requirements during May 1, 2025 session where child was documented calling stepmother 'mom' throughout session, violating court orders without therapeutic intervention
- **Impossible child vocabulary** ("white knuckling"—adult therapeutic language)

- **Statutory violations** in parental participation requirements for children’s mental health decisions
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VI. WASHINGTON STATE LAW VIOLATIONS

A. RCW 71.34 Systematic Violations

STATUTORY REQUIREMENT: “All behavioral health care providers shall assure that minors’ parents are given an opportunity to participate in the treatment decisions for their minor children”

ACTUAL PRACTICE: Systematic exclusion of mother from all therapeutic processes **LEGAL**

CONSEQUENCE: Evidence obtained through statutory violations should be excluded **REMEDY**

REQUIRED: Therapeutic process must restart with both parents participating

B. Parental Rights Violations

CONSTITUTIONAL FRAMEWORK: Fundamental right to parent-child relationship **VIOLA-**

TION: 143-day separation without substantive hearing **LEGAL STANDARD:** Compelling state

interest required for such separation **REALITY:** No compelling interest established—police found

“no crime occurred”

VII. REQUEST FOR RELIEF

WHEREFORE, I respectfully request this Court:

1. **DENY** all temporary family law order requests as contradicted by professional evidence
 2. **ORDER** immediate custody restoration per Dr. Oreskovich psychiatric recommendation
 3. **FIND** RCW 71.34 violations invalidate therapeutic evidence obtained without proper consent
 4. **RECOGNIZE** 143-day separation constitutes constitutional violation requiring remedy
 5. **AWARD** reasonable attorney fees for defending against motion based on discredited evidence
 6. **ESTABLISH** safeguards preventing future therapeutic system manipulation
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VIII. DECLARATION CONCLUSION

PROFESSIONAL CONSENSUS ESTABLISHED: Dr. Oreskovich's recommendation for sole custody to mother, supported by unanimous government validation, creates overwhelming evidence contradicting all of Respondent's requests.

STRATEGIC PATTERN EVIDENCE: The 21-day delay between police clearance and protection order filing, combined with three simultaneous motions filed on DVPO expiration day (July 11, 2025), plus August 15 contempt motion denied same day for procedural defects, demonstrates escalating pattern of strategic litigation using discredited evidence and procedural violations, contrasted with Petitioner's full legal compliance.

CONSTITUTIONAL REMEDY REQUIRED: The 143-day separation representing 20.4x violation of this Court's guidance demands immediate correction through custody restoration to the professionally validated primary caregiver.

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

DATED this _____ day of August, 2025.

VERONIKA GOODNIGHT Petitioner, Pro Se

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Declaration was served upon Respon-

dent's counsel via email as agreed:

Jennifer Miller, WSBA #31600 Mukilteo Divorce & Family Law LT PLLC Email: jennifer@legalbymiller.com and camdyn@familylawlt.com

VERONIKA GOODNIGHT