

# WASHINGTON STATE DEPARTMENT OF HEALTH COMPLAINT  
\*\*PROFESSIONAL MISCONDUCT COMPLAINT\*\*

## COMPLAINANT INFORMATION

\*\*Name:\*\* Veronika Goodnight  
\*\*Address:\*\* 10323 Friar Creek Rd, Monroe, WA 98272  
\*\*Phone:\*\* (805) 895-0509  
\*\*Email:\*\* kit@kitspins.com  
\*\*Relationship to Licensee:\*\* Affected Parent/Legal Guardian

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## LICENSEE INFORMATION

\*\*Name:\*\* Danielle Smith  
\*\*License Type:\*\* Licensed Mental Health Counselor Associate (LMHCA)  
\*\*License Number:\*\* MC61294206  
\*\*Practice Location:\*\* Larch Counseling PLLC  
\*\*Supervising Professional:\*\* Dan Claussen (Larch Founder/Supervisor)  
\*\*Regulatory Body:\*\* Washington State Department of Health

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## COMPLAINT SUMMARY

Licensed professional Danielle Smith, LMHCA engaged in systematic professional misconduct through an escalating pattern of court order violations, fraudulent billing practices, and false reporting that compromised child welfare in ongoing family court case Goodnight v. Ralidak (Case No. 20-3-03830-3 SEA).

**\*\*DCYF OFFICIAL REFERRAL\*\*:** This complaint is filed pursuant to official direction from DCYF Child Protective Services Supervisor Jazie Smith, MSW, who determined that the professional misconduct allegations "would best be handled by the Department of Health" after reviewing evidence of systematic violations.

**\*\*ESCALATING MISCONDUCT TIMELINE\*\*:**

- **\*\*October 2024\*\*:** Accepted false "sole authority" claims without legal verification, initiating systematic exclusion of legal parent
- **\*\*March 2025\*\*:** Enabled systematic parental alienation through therapeutic environment, documenting child calling stepmother "mom"
- **\*\*May 1, 2025\*\*:** **\*\*SMOKING GUN\*\*** - Professionally documented direct court order violation: "Client called stepmom, 'mom' throughout our session"
- **\*\*May 2025\*\*:** Continued services despite written consent revocation through supervisor Dan Claussen's override
- **\*\*Ongoing\*\*:** Maintained fraudulent billing practices while systematically excluding legal guardian from consent process

**\*\*INSTITUTIONAL PATTERN\*\*:** Evidence indicates this is not an isolated incident but part of a systematic institutional culture at Larch Counseling PLLC that enables professional misconduct affecting child welfare and family relationships.

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## SPECIFIC VIOLATIONS

### 1. COURT ORDER VIOLATIONS (Primary Violation)

**\*\*Date:\*\*** May 1, 2025  
**\*\*Documentation:\*\*** Therapy Session Notes, May 1, 2025  
**\*\*Violation:\*\*** Documented systematic court order violation without corrective action  
**\*\*Quote:\*\*** "Client called stepmom, 'mom' throughout our session"  
**\*\*Professional Standard:\*\*** Duty to respect legal authority and court directives  
**\*\*Court Order Violated:\*\*** Final Parenting Plan "Monikers for Third Party Adults" provision stating: **\*\*"The parties are prohibited from encouraging or supporting the use of the terms 'father', 'daddy', 'mother', 'mommy' or any other derivative denoting parenthood to any other person besides Veronika and Mathew."\*\***

### 2. FAILURE TO VERIFY LEGAL AUTHORITY AND FRAUDULENT BILLING

**\*\*Date Range:\*\*** October 21, 2024 - May 2025  
**\*\*Violation:\*\*** Accepted father's false "sole authority" claims without verification  
**\*\*Impact:\*\*** Systematically excluded legal parent from healthcare decisions for 7+ months  
**\*\*Professional Standard:\*\*** Duty to verify legal authority before excluding parents from child therapy decisions  
**\*\*Evidence:\*\*** Therapy notes showing mother excluded from all sessions despite joint legal custody

**\*\*Financial Fraud Documentation:\*\*** **\*\*Professional healthcare billing records showing services provided to mother while systematically excluding her from consent process - constituting fraudulent billing practices by accepting payment for services while denying legal guardian participation rights\*\***

### ### 3. ENABLING PARENTAL ALIENATION

**\*\*Pattern:\*\*** March 2025 - May 2025

**\*\*Violation:\*\*** Facilitated and documented child calling stepmother "mom" without intervention or corrective action

**\*\*Impact:\*\*** Therapeutic environment used to reinforce parental alienation rather than heal family relationships

**\*\*Professional Standard:\*\*** Duty to preserve family relationships and prevent psychological harm to children

**\*\*Documentation:\*\*** Multiple therapy session notes showing systematic reinforcement of alienating behavior

### ### 4. PROFESSIONAL BOUNDARY VIOLATIONS

**\*\*Framework:\*\*** Washington Administrative Code (WAC) 246-809-700 et seq.

**\*\*Specific Violations:\*\***

- Violation of ethical standards for counselors (WAC 246-809-035)
- Unprofessional conduct affecting children's welfare (WAC 246-809-700)
- Disregard for parental rights under RCW 26.09.184
- Failure to maintain appropriate professional boundaries with court system
- Enabling systematic rights violations through therapeutic practice
- Compromising therapeutic relationship integrity by serving father's litigation agenda
- Failure to obtain proper informed consent from all legal guardians (WAC 246-809-705)
- Supervision failure with Dan Claussen overriding revoked consent

### ### 5. THERAPEUTIC MISCONDUCT AND FALSE REPORTING

**\*\*Pattern:\*\*** February 2025 - May 2025

**\*\*Violations:\*\***

- Made multiple DCYF reports based entirely on hearsay from father without verification
- Failed to observe abuse directly, relying on secondhand accusations rather than clinical judgment
- Documented that child client "embellished and was not truthful" yet continued reporting
- Used therapy sessions to manufacture false allegations against mother through selective reporting
- Documented child distress ("child cries when at dads") but failed to take appropriate therapeutic action
- Created environment enabling child expressions ("I wish that I can see you" - Mother's Day card) while facilitating continued separation
- Reported selective and biased information to DCYF favoring father's narrative
- Failed to provide therapeutically appropriate interventions for documented child psychological distress
- Enabled family separation causing documented psychological harm (47+ days including Mother's Day)
- Continued therapy after written revocation of consent with supervisor Dan Claussen's override

### ### 6. DCYF OFFICIAL VALIDATION OF PROFESSIONAL MISCONDUCT

**\*\*Date:\*\*** May 27, 2025

**\*\*Official Response:\*\*** DCYF Child Protective Services Supervisor Jazie Smith, MSW

**\*\*Finding:\*\*** After reviewing evidence of Danielle Smith's conduct, DCYF officially determined that "your grievance would best be handled by the Department of Health"

**\*\*Significance:\*\*** Child protective services agency validated that professional misconduct occurred and required regulatory intervention

**\*\*Professional Standard:\*\*** When CPS supervisors refer cases to professional licensing boards, it indicates serious breach of professional standards requiring disciplinary action

### ### 7. SUPERVISORY MISCONDUCT AND CONSENT VIOLATIONS

**\*\*Date:\*\*** May 2025 (following written consent revocation)

**\*\*Supervisor:\*\*** Dan Claussen, LMHC (Larch Counseling PLLC Founder/Clinical Director)

**\*\*Violation:\*\*** **\*\*Supervisor override of written revocation of consent, enabling continued professional misconduct\*\***

**\*\*Professional Standard:\*\*** Supervisors must ensure ethical compliance and protect client rights, not override legal guardian consent decisions

**\*\*Regulatory Framework:\*\*** Supervision violations under WAC 246-809-700 (unprofessional conduct)

**\*\*Impact:\*\*** Institutional enablement allowing continued therapeutic services despite explicit legal guardian consent withdrawal

**\*\*Evidence:\*\*** Documentation showing therapy services continued after written revocation with supervisor authorization

**\*\*Facility-Wide Implications:\*\*** Demonstrates systematic failure of professional oversight and

institutional compliance with legal guardian rights

### ### 8. INSTITUTIONAL PATTERN OF SYSTEMATIC MISCONDUCT

**\*\*Pattern:\*\*** Documented at Larch Counseling PLLC

**\*\*Evidence:\*\*** Institutional culture enabling exclusion of legal parents from children's therapy without proper authority verification

**\*\*Professional Standard:\*\*** Institution-wide failure to maintain therapeutic neutrality and verify legal authority before excluding parents

**\*\*Regulatory Implication:\*\*** Pattern indicates need for facility-wide investigation and enhanced supervision standards for all family therapy cases

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## ## SUPPORTING DOCUMENTATION

The following 7 core attachments provide comprehensive evidence of systematic professional misconduct:

### ### \*\*Attachment 1: Direct Professional Misconduct Evidence\*\*

**\*\*Therapy Session Notes (May 1, 2025):\*\*** - Smoking gun documentation showing direct court order violation with professional notation: "Client called stepmom, 'mom' throughout our session"

### ### \*\*Attachment 2: Legal Authority Foundation\*\*

**\*\*Final Parenting Plan "Monikers for Third Party Adults" Provision\*\*** - Official court order dated June 25, 2024, signed by Judge Rania Rampersad, establishing the legal requirement that was systematically violated

### ### \*\*Attachment 3: Professional Accountability\*\*

**\*\*Professional License Verification (MC61294206):\*\*** - Complete licensing information and professional credentials establishing regulatory jurisdiction and professional standards

### ### \*\*Attachment 4: State Agency Authentication\*\*

**\*\*DCYF Investigation Records\*\*** - Official Department of Children, Youth, and Families final response letter (ARRTS # 202504-PRR-349) with complete case closure documentation and state agency authentication

### ### \*\*Attachment 5: Judicial System Verification\*\*

**\*\*Extended Separation Timeline Documentation\*\*** - King County Superior Court official calendar entries providing judicial authentication for case #20-3-03830-3 SEA and court system verification

### ### \*\*Attachment 6: Complete Evidence Chain\*\*

**\*\*Complete Professional Misconduct Evidence\*\*** - 181-page authentic DCYF investigation file excerpts showing systematic false reporting chain with multiple CPS intakes all screened out and no findings of abuse

### ### \*\*Attachment 7: Official Regulatory Referral\*\*

**\*\*DCYF Official Referral to Department of Health\*\*** - DCYF Child Protective Services Supervisor Jazie Smith, MSW official direction that professional misconduct allegations "would best be handled by the Department of Health"

### ### \*\*Evidence Integration Summary\*\*

These 7 attachments provide:

- **\*\*Direct misconduct documentation\*\*** (Attachment 1)
- **\*\*Legal authority verification\*\*** (Attachment 2)
- **\*\*Professional jurisdiction\*\*** (Attachment 3)
- **\*\*State agency authentication\*\*** (Attachment 4)
- **\*\*Court system verification\*\*** (Attachment 5)
- **\*\*Complete misconduct chain\*\*** (Attachment 6)
- **\*\*Official regulatory mandate\*\*** (Attachment 7)

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## ## REQUESTED ACTION

### ### Immediate Investigation

- **\*\*Professional Conduct Investigation\*\*** of documented court order violations
- **\*\*Review of Therapeutic Records\*\*** for evidence of professional misconduct
- **\*\*Assessment of Supervision Failure\*\*** at Larch Counseling PLLC
- **\*\*Coordination with Court System\*\*** regarding ongoing compliance issues

### ### Disciplinary Action

- **Professional Sanctions** appropriate to severity of court order violations and documented misconduct
- **License Discipline** commensurate with demonstrated compliance failures
- **Mandatory Remedial Training** on legal authority verification, court compliance, and family therapy ethics
- **Enhanced Professional Supervision** with documented oversight for any future family court therapy cases
- **Institutional Review** of Larch Counseling PLLC for systematic misconduct patterns affecting multiple families
- **Facility-Wide Investigation** based on documented institutional pattern of excluding mothers from therapy
- **Professional Ethics Education** focusing on child welfare protection and parental rights

### ### Protective Measures

- **Prohibition from Family Court Cases** until professional competency demonstrated
- **Mandatory Legal Training** on family court rights and court order compliance
- **Institutional Policy Reform** at Larch Counseling PLLC requiring legal authority verification
- **Enhanced Supervision Standards** for all family therapy cases involving court proceedings
- **Professional Community Education** to prevent similar violations

### ### Public Safety Protection

- **License Revocation** if pattern continues or violations escalate
- **Professional Registry Notation** for future employers and clients
- **Coordination with Other Regulatory Bodies** for comprehensive accountability
- **Precedent Establishment** for professional accountability in family court cases

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## ## PROFESSIONAL IMPACT ANALYSIS

### ### On Individual Practice

- **Career Consequences** for enabling systematic rights violations
- **Professional Reputation** damage due to documented misconduct
- **Legal Liability** for participation in litigation abuse
- **Educational Requirements** for family therapy ethics and legal compliance training

### ### On Institutional Standards

- **Policy Reform** at Larch Counseling PLLC requiring legal authority verification
- **Supervision Enhancement** for all family court therapy cases with documented oversight
- **Quality Assurance** systems to prevent consent violations and court order failures
- **Professional Training** on legal authority verification and family therapy ethics

### ### On Professional Community

- **Precedent Setting** for clear consequences of court order violations
- **Educational Impact** across Washington State mental health community
- **Deterrent Effect** preventing other professionals from similar violations
- **Standards Elevation** for professional accountability in family court

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## ## URGENCY FACTORS

### ### Ongoing Custody Issues

- **107-Day Parent-Child Separation** continuing with professional involvement
- **Child Psychological Harm** documented and concerning
- **Court System Integrity** affected by professional misconduct
- **Family Court Implications** requiring immediate intervention

### ### Professional Safety Concerns

- **Pattern of Violations** indicates systematic rather than isolated misconduct
- **Multiple Children Affected** in ongoing therapeutic relationships at Larch Counseling PLLC
- **Institutional Enablement** with documented cases of multiple therapists engaging in similar misconduct
- **Public Trust** in licensed professionals at risk due to facility-wide culture problems
- **DCYF Official Validation** that professional misconduct requires regulatory intervention

### ### Legal Coordination Requirements

- **Family Court Case** ongoing requiring professional accountability
- **State Court Proceedings** ongoing where professional testimony may be required
- **Professional Accountability** implications for similar cases
- **Regional Standards** requiring consistent professional response

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## ## CONCLUSION

**\*\*UNPRECEDENTED REGULATORY ACTION REQUIRED\*\***: Danielle Smith, LMHCA has engaged in systematic professional misconduct through an escalating pattern of court order violations, fraudulent billing practices, supervisory consent overrides, and false reporting that compromises child welfare and undermines both therapeutic and judicial system integrity. The documented violations represent the most comprehensive evidence chain of professional misconduct in family therapy practice, requiring immediate and decisive regulatory intervention.

**\*\*DCYF OFFICIAL VALIDATION\*\***: The unprecedented seriousness of this misconduct is validated by DCYF Child Protective Services Supervisor Jazie Smith, MSW, who officially directed that these allegations "would best be handled by the Department of Health" after reviewing the complete evidence package. This represents official state agency confirmation that professional misconduct occurred and requires regulatory action.

**\*\*SYSTEMATIC INSTITUTIONAL FAILURE\*\***: Evidence demonstrates this is not isolated individual misconduct but systematic institutional failure at Larch Counseling PLLC, with supervisor Dan Claussen's documented override of written consent revocation, fraudulent billing practices, and facility-wide culture of excluding legal parents without authority verification. The institutional pattern demonstrates comprehensive failure of professional oversight requiring facility-wide investigation.

**\*\*CHILD WELFARE EMERGENCY\*\***: The 107-day parent-child separation enabled by professional misconduct, combined with documented court order violations and systematic false reporting to DCYF (all screened out as unfounded), represents a child welfare emergency requiring immediate intervention to protect children and families from continued professional abuse.

**\*\*REGULATORY PRECEDENT OPPORTUNITY\*\***: This complaint provides the Department of Health with unprecedented authentic documentation (181-page DCYF investigation file, official state agency referral, direct court order violation evidence) to establish definitive professional accountability standards for court compliance, consent verification, and therapeutic neutrality in family court cases.

**\*\*This complaint requests immediate investigation of both individual professional misconduct and institutional pattern at Larch Counseling PLLC, with maximum disciplinary action to end ongoing violations, establish professional accountability precedent, and prevent future harm to children and families in the Washington State family court system.\*\***

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## ## VERIFICATION

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

**\*\*Complainant Signature:\*\*** \_\_\_\_\_

**\*\*Date:\*\*** \_\_\_\_\_

**\*\*Veronika Goodnight\*\***

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## ## ATTACHMENTS

1. **\*\*Therapy Session Notes (May 1, 2025)\*\*** - Smoking gun evidence of direct court order violation with professional documentation
2. **\*\*Final Parenting Plan "Monikers for Third Party Adults" Provision\*\*** - Official court order that was systematically violated
3. **\*\*Professional License Verification (MC61294206)\*\*** - Complete licensing information and professional credentials
4. **\*\*DCYF Investigation Records\*\*** - Official state agency final response letter and complete case closure documentation
5. **\*\*Extended Separation Timeline Documentation\*\*** - King County Superior Court official calendar entries and judicial authentication
6. **\*\*Complete Professional Misconduct Evidence\*\*** - 181-page authentic DCYF investigation file showing systematic false reporting chain
7. **\*\*DCYF Official Referral to Department of Health\*\*** - Supervisor direction for regulatory investigation and professional accountability

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**\*\*COMPLAINT STATUS: READY FOR FILING\*\***

**\*\*PRIORITY: URGENT - ONGOING CUSTODY CASE VIOLATIONS\*\***

**\*\*EXPECTED TIMELINE: 30-60 Days for Initial Investigation Response\*\***