

ment validation from four agencies (Police: “no crime occurred”; DCYF: no adverse findings; DOH: investigating therapist conduct; Court: mother “majority of day-to-day child-rearing”); children’s documented preference: **“She does want to go back and live with mom”** (therapy records).

3. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would testify competently thereto.

II. CHILDREN’S EXPRESSED PREFERENCES

3. THERAPY DOCUMENTATION OF CHILDREN’S WISHES: The therapy records that Respondent relies upon in his motion contain documented statements from the children expressing their preferences:

- a. May 1, 2025 Therapy Session: The child stated “She does want to go back and live with mom” during the therapy session with Danielle Smith, LMHCA.
- b. This statement was made after 27 days of separation from me, demonstrating the child’s consistent desire to maintain our relationship despite the circumstances.
- c. **Constitutional Violation:** The children have now been separated from their court-identified primary caregiver for 143 consecutive days as of the August 25, 2025 hearing

date—representing a 2,040% violation (20.4x) of this Court’s guidance that “children should not be away from their mother for more than one week.”

4. IMPACT OF EXTENDED SEPARATION: During this 143-day period, I have observed concerning changes when I have had limited contact with the children:

- a. Evidence of developmental regression, including resumed thumb sucking in the youngest child
- b. Expressions of missing our daily routines and activities
- c. Questions about when they can return home

III. FINANCIAL IMPACT OF REPETITIVE LITIGATION

5. DOCUMENTED LITIGATION COSTS: The pattern of repeated legal proceedings has resulted in substantial financial burden:

- a. 2020 Motion Defense: Approximately \$8,000 in attorney fees and costs (resulted in \$8,500 sanctions awarded against Respondent)
- b. 2025 DVPO Defense: Approximately \$7,000 in attorney fees and costs (police investigation found “no crime occurred”)
- c. Current Motion Defense: Approximately \$10,000+ in attorney fees and costs (ongoing

proceedings)

d. Total Defensive Costs: Over \$25,000 in legal expenses over the five-year period

6. FINANCIAL CIRCUMSTANCES: These repeated legal proceedings have created significant financial hardship:

- a. I have exhausted my savings defending against these proceedings
- b. I have incurred debt to pay legal fees and costs
- c. The financial burden has affected my ability to maintain the family home and provide for the children's needs

7. SANCTIONS HISTORY: Court records reflect that Respondent has been sanctioned \$8,500 for previous similar proceedings, yet the litigation pattern has continued.

IV. TIMELINE ANALYSIS

8. SEPARATION DURATION COMPARISON:

Current Situation (as of August 25, 2025):

- Separation Duration: 143 consecutive days
- This Court's Previous Guidance: Children should not be away from mother "for more than one week"

- Duration Comparison: 143 days compared to 7 days represents 2,040% longer than established judicial guidance (20.4 times the maximum duration)

9. TIMELINE OF PROCEEDINGS:

April 4, 2025: Carnation Police investigated allegations and concluded “no crime occurred”

April 25, 2025: Protection order filed (21 days after police investigation) July 11, 2025:

Strategic Coordination Evidence: Protection order expired by operation of law; exact same day Respondent filed three simultaneous motions, suggesting coordinated legal strategy to maximize custody leverage during protection order transition August 25, 2025: Scheduled hearing date (143 days total separation)

10. PROFESSIONAL EVALUATION TIMELINE:

November 28, 2021: Dr. Michael R. Oreskovich completed comprehensive psychiatric evaluation Conclusion: “There is no reason to preclude her having sole custody of her children”

Current Status: This professional recommendation remains unchanged and uncontradicted

11. DR. STACY BOWKER, ND PROFESSIONAL DECLARATION: Dr. Stacy Bowker, ND, Washington License #NT00001309, has served as the children’s primary care provider for over 5 years. In her declaration under penalty of perjury dated May 22, 2024, Dr. Bowker

stated: “Veronika has consistently demonstrated responsibility and attentiveness in managing her children’s healthcare needs. She has been the primary parent who schedules medical appointments, seeks medical advice, and communicates and coordinates care plans.” Dr. Bowker documented multiple instances of Respondent excluding mother from medical decisions and failing to follow treatment protocols.

12. DCYF PROFESSIONAL ASSESSMENT: DCYF professional team investigation documented that “the father has fabricated stories to the courts, medical providers, and the school about the mother.” Specific professional evidence includes Respondent telling family nurse practitioner L. Miller at EvergreenHealth that “the mother Veronika was deceased,” forcing mother to prove she “had joint custody and was not dead and active in the children’s lives.”
13. GOVERNMENT PROFESSIONAL FINDINGS: Despite Respondent’s claims of “18+ CPS intakes,” professional analysis confirms NO trained child protective services professional ever interviewed these children. All DCYF cases were closed with no adverse findings, confirming government professional validation of mother’s fitness.

V. GOVERNMENT AGENCY VALIDATION

14. MULTIPLE AGENCY INVESTIGATIONS: Four independent government agencies have investigated the allegations and circumstances:

- a. Carnation Police Department: Concluded “no crime occurred between Ralidak and Goodnight”
- b. DCYF: Three separate investigations closed with no findings against me
- c. Department of Health: Investigating therapeutic professional conduct (not maternal fitness)
- d. This Court: Previously found I performed “the majority of day-to-day child-rearing”

15. PROFESSIONAL MISCONDUCT INVESTIGATION: The Department of Health is actively investigating License #MC61294206 regarding documented court order violations during the May 1, 2025 therapy session, including failure to address violations of the Final Parenting Plan’s “Monikers” provision.

2025 STATE DISCIPLINARY CONTEXT: The Washington State Department of Health actively monitors and disciplines mental health professionals, with multiple 2025 disciplinary actions against therapy providers. DOH recognizes that “complaints from unhappy parents are commonplace” regarding therapists crossing lines in family court cases, validating the institutional nature of these concerns and supporting the legitimacy of our professional misconduct complaint.

VI. PERSONAL TESTIMONY: SYSTEMATIC EXCLUSION FROM CHILDREN’S THERAPEUTIC CARE

13. I provide the following personal testimony regarding my direct experience with the systematic exclusion from my children's therapeutic process:

- a. **Attempts to Participate Blocked:** I repeatedly requested to participate in my children's therapy sessions as is my right under joint legal custody and Washington State law (RCW 71.34). These requests were systematically denied based on false claims that Matthew had unilateral authority over therapeutic decisions, violating state statutory requirements that "all behavioral health care providers shall assure that minors' parents are given an opportunity to participate in the treatment decisions for their minor children."
- b. **Consent Violations Witnessed:** I provided written notice revoking my consent for continued therapy when I became aware that court orders were being violated during sessions. Larch Counseling ignored this revocation, claiming falsely that "both parents must agree to discontinue therapy" - a requirement that exists nowhere in Washington law and directly violates RCW 71.34 parental participation requirements.
- c. **Direct Observation of Changed Child Behavior:** After therapy sessions at Larch Counseling, I observed my children using sophisticated vocabulary that was impossible for their developmental levels. Most notably, my 10-year-old daughter used the term "white knuckling" to describe emotional states - terminology I had never heard her use

and which is clearly therapeutic jargon inserted by adults.

- d. **Systematic Information Denial:** Despite my repeated requests and my rights under joint legal custody, I was systematically denied access to therapy notes, treatment plans, and progress reports. This exclusion prevented me from understanding what was being discussed with my children and from exercising my constitutional rights as a parent to direct their care.
- e. **Impact of Systematic Exclusion:** The systematic exclusion from my children's therapeutic process prevented me from:
 - (i) Providing crucial context about family dynamics to therapeutic team
 - (ii) Correcting false information or misunderstandings
 - (iii) Ensuring therapeutic neutrality rather than advocacy for one parent
 - (iv) Protecting my children from leading questions or inappropriate content
 - (v) Exercising my fundamental constitutional rights as a parent
- f. **Evidence of Manipulation Pattern:** I directly witnessed the following manipulation pattern:
 - (i) **Before Therapy:** Children had normal vocabulary and age-appropriate concerns

- (ii) **After Therapy:** Children returned using sophisticated adult language (“white knuckling”)
- (iii) **New Fears:** Concerns that had never existed before sessions emerged
- (iv) **Timing Pattern:** Adult language/concepts particularly pronounced during active legal proceedings
- (v) **Developmental Impossibility:** 10-year-old using therapeutic jargon beyond any child’s capacity

g. Attempts to Address Professional Misconduct:

- (i) **When I Contacted Larch Management:** Told Matthew had “sole authority” over decisions
- (ii) **Legal Reality:** Direct contradiction of joint legal custody under Washington law
- (iii) **Consent Revocation:** Written revocation ignored with false “both parents must agree” policy
- (iv) **No Legal Basis:** No Washington statute requires both parents’ agreement to discontinue treatment

h. Constitutional and Statutory Rights Violations: This systematic exclusion violated my fundamental constitutional and Washington state statutory rights:

- (i) **Medical Decision Participation:** Meaningful involvement in children's therapeutic care as required by RCW 71.34
- (ii) **Consent Authority:** Provide/revoke consent as required under joint legal custody and state law
- (iii) **Information Access:** Challenge false or misleading information provided to professionals
- (iv) **Child Protection:** Protect children from professional misconduct and systematic bias
- (v) **Due Process:** Equal treatment under law without systematic discrimination
- (vi) **Washington State Statutory Rights:** Participate in treatment decisions under RCW 71.34

VII. SYSTEMATIC LITIGATION PATTERN EVIDENCE

14. COURT RECORDS DOCUMENTATION: King County Superior Court records document Respondent's systematic litigation abuse pattern spanning 5 years with 28+ motions filed with less than 5% success rate, including 2025 escalation of 6 motions in 4 months:
 - a. Document #374 (05/05/2025): Counter modification petition filed by Respondent
 - b. Document #380 (06/05/2025): Temporary orders motion filed by Respondent

- c. Document #409 (06/24/2025): Second temporary orders motion filed by Respondent
 - d. Document #425 (07/11/2025): Adequate cause motion filed by Respondent
 - e. Document #427 (07/11/2025): Third temporary orders motion filed by Respondent
 - f. Document #440 (08/15/2025): Additional motion filed by Respondent
 - g. Document #443 (08/15/2025): Court order denying Respondent's motion same day
15. **FORCED PRO SE STATUS:** As of July 21, 2025, my attorney filed Notice of Intent to Withdraw (Document #438) due to financial exhaustion from defending Respondent's systematic litigation pattern. After spending over \$50,000 in attorney fees over 5 years defending 40+ motions, I am now forced to represent myself pro se in these critical proceedings while Respondent continues the systematic litigation abuse with maintained legal representation.
16. **FINANCIAL IMPACT:** This documented pattern has cost our family over \$50,000 in defensive legal fees while Respondent ignores \$8,500+ in court-imposed sanctions from previous frivolous litigation. August 15, 2025: Most recent contempt motion denied same day, confirming ongoing systematic litigation pattern.
17. **CONSTITUTIONAL SEPARATION DURATION:** Current 143-day separation represents 20.4x violation of this Court's guidance that children "should not be away from their mother for more than one week" while this systematic litigation abuse continues.

VIII. REQUEST FOR RELIEF

18. Based on the evidence presented in this supplemental declaration, I respectfully request this

Court:

- a. Consider the children's expressed preferences as documented in the therapy records
- b. Address the extended separation that substantially exceeds established judicial guidance
- c. Recognize the financial impact of the repetitive litigation pattern
- d. Implement the professional psychiatric recommendation for custody restoration
- e. Award attorney fees and costs under applicable statutes for the burden of defending against multiple proceedings

VIII. CONCLUSION

15. The evidence demonstrates that the children have expressed their preference to return to their primary caregiver, multiple government agencies have found no basis for continued separation, and the extended duration substantially exceeds this Court's established guidance. The financial burden of repeated defensive litigation has been significant, while the professional recommendation for custody restoration remains uncontradicted.

16. I respectfully request this Court deny Respondent's motion and order custody restoration

based on the overwhelming professional and governmental validation supporting such relief.

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

EXECUTED this _____ day of August, 2025, at Seattle, Washington.

VERONIKA GOODNIGHT Pro Se Petitioner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon the following parties by the method indicated:

Petitioner's Counsel: Jennifer Miller, WSBA #31600 Mukilteo Divorce & Family Law LT PLLC PO Box 681, Mukilteo, WA 98275 Email: jennifer@legalbymiller.com and camdyn@familylawlt.com

☐ U.S. Mail, postage prepaid ☐ Hand delivery

☒ Electronic service via Washington Courts eService

Date: 8/20/25



Veronika Goodnight

VERONIKA GOODNIGHT Pro Se Petitioner