

Superior Court of Washington, County of King

In re:

Petitioner:

VERONIKA GOODNIGHT,

And

Respondent:

MATHEW RALIDAK.

No. **20-3-03830-3 SEA**Sealed Confidential Report
(Cover Sheet)

(SEALRPT)

☒ Clerk's action required.*For use in Family Law and Guardianship cases.***Sealed Confidential Report (Cover Sheet)**

Check the reports you are attaching to this cover sheet to be sealed. Only the following parts of these reports are confidential and should be attached:

- Detailed descriptions of material, or information gathered or reviewed;
- Detailed descriptions of all statements reviewed or taken;
- Detailed descriptions of tests conducted or reviewed; or
- Analysis to support the conclusions and recommendations.

(A public version of the report without the confidential parts may be filed separately.)

- ☒ Parenting evaluations
- ☐ Domestic Violence Assessment Reports (from Family Court Services or a court-appointed expert)
- ☐ Risk Assessment Reports (from Family Court Services or an expert)
- ☐ CPS Summary Reports (from Family Court Services or directly from CPS)
- ☐ Sexual abuse evaluations
- ☐ Report from a Guardian ad Litem (GAL) or Court Appointed Special Advocate (CASA)
- ☐ Other (*specify*): _____

Submitted by: ☐ Petitioner or lawyer ☐ Respondent or lawyer ☒ Other: Parenting Evaluator

▶ Matthew Jolly 4/30/2021

52D36C399BA6445...
Sign here

Matthew Jolly, WSBA #23167

Print name (if lawyer, also provide WSBA #)

Important! The other person and the lawyers in your case can see your **sealed** documents. If you need to keep your address information private for safety reasons, you may cross out or delete your address information.

1
2
3
4
5
6 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
7 **FOR KING COUNTY**

8 In re the Marriage of:

NO. 20-3-03830-3 SEA

9 Petitioner:

PARENTING EVALUATION

10 VERONIKA GOODNIGHT,

[SEALED DOCUMENT]

11 And Respondent:

12 MATHEW RALIDAK,

13
14 **I. APPOINTMENT AND BACKGROUND**

15 This is an action to establish a parenting plan for the parties' three children:
16 Elora (age 6), Aidan (age 4) and Raina (age 2). The children's parents, Veronika
17 Goodnight and Mathew Ralidak, resided together from 2014 to 2020. After Veronika
18 moved out in January 2020, the parties agreed to a residential schedule of alternate
19 weeks for the children. In the summer of 2020, Veronika filed an action to establish a
20 formal parenting plan confirming the shared schedule. In response, Mat sought a
21 temporary order placing the children primarily with him. The court maintained the
22 schedule of alternate weeks as a temporary parenting plan. In addition, the court
23 appointed the undersigned to complete a parenting evaluation. The order requests
24 investigation into all issues related to making a parenting plan for the children as well
25 as mental health and substance abuse issues for Veronika.

Mat relocated from Duvall to Everett while this matter was pending. He is seeking a parenting plan that places the children primarily in his care and has them attend school in Everett. He argues that Veronika is emotionally and economically unstable, suffers from an alcohol problem, and should not have primary care of the children. He proposes Veronika have residential time three weekends a month from Thursday to Sunday so that the children can spend most of their schooldays in his care.

PARENTING EVALUATION
Page 1 of 37

Law Offices of
Matthew Jolly
2737 77th Avenue SE
Suite 206
Mercer Island, WA 98040
(425) 462-9394

Veronika resides in Carnation, Washington. She proposes that the children continue to alternate residential weeks between the parents' home. In part because of the geographic distance between the parents' homes, she proposes that the children be home schooled. She alleges that Mat is controlling and emotionally abusive, that he abuses marijuana, and that his employment requires him to travel too much for the children to reside primarily in his care.

II. INFORMATION FOR THE REPORT

This Parenting Evaluation is based on the following information:

- A. Video Interview with Mathew Ralidak – April 12, 2021
- B. Video Interview with Veronika Goodnight – April 13, 2021
- C. Document Review (see below)
- D. Telephone Interview with Diana Muggli – April 16, 2021
- E. Telephone Interview with Monica Galarneau – April 16, 2021
- F. Telephone Interview with Larisa Ignacio – April 19, 2021
- G. Telephone Interview with Deborah Oaks – April 19, 2021
- H. Telephone Interview with Amisha Zuber – April 21, 2021
- I. Telephone Interview with Marcus Berley, MA, LMHC – April 23, 2021
- J. Telephone Interview with Ann Ralidak – April 26, 2021

III. INTERVIEW WITH MATHEW RALIDAK

Mathew Ralidak was interviewed via Zoom on April 12, 2021. The following is based upon his self-report.

Family History

Mat is 34 years old. He grew up in New Jersey. His mother and father separated when he was 2 years old. He lived primarily with his mother but maintained regular contact with his father. In high school, he split time equally between his parents. His mother was a stay-at-home parent who worked occasionally. His father was an iron worker. Both of his parents remarried and Mat has 3 half-siblings: a half-sister on his father's side and 2 half-brothers on his mother's side.

Mat described his childhood as "fun." It was difficult having parents in different households. However, he got to go on lots of trips and do fun things his father. His mother liked to do art projects with him and was supportive of his activities. He had a good relationship with both parents.

1 Mat's mother was addicted to pain medications. She eventually died to an
2 overdose about 10 years ago. His father was an alcoholic (he got sober after Mat
3 was an adult). Both of his stepparents also have a history of substance abuse. Mat
4 reported that his stepfather was violent with him at times when Mat was young.

4 *Education and Employment*

5 Mat graduated from high school in New Jersey in 2004. He then went to
6 college at Full Sail University. He completed an associate degree in show production
7 and touring in 2007.

8 Mat is currently unemployed. He was last employed in January 2021 with
9 Freeman. He worked for Freeman since January 2017. Freeman had a contract with
10 Microsoft and Mat managed Microsoft's events. After COVID, he was furloughed for
11 a time and then asked to manage digital events. When he asked for help with the
12 digital skills needed for his new job responsibilities, he was laid off.

13 Mat reports his work hours at Freeman were typically 40 hours a week working
14 from home. In addition, he had to travel to manage events or tour event sites. There
15 were 4 major Microsoft events each year and he traveled for 2 weeks for each event.
16 He also had some shorter trips (1 or 2 days) to tour potential event sites. The busiest
17 time for events (and the most travel) was in summer and fall.

18 Mat is interviewing for a replacement job in the same industry. If he gets the
19 job, he reports it is a similar position with similar travel demands. If he travels while
20 responsible for the children, he anticipates leaving the children with his girlfriend,
21 Monica, or with a nanny. He said he used to leave them with Veronika but she
22 began to ask for money if she was going to care for the kids so he no longer thinks
23 that is an option.

24 *Medical History*

25 Mat reported no significant medical history. He is not taking any prescription
medications. He is not attending counseling. He did attend counseling with Veronika
for a few sessions near the end of their relationship but counseling ended when
Veronika declined to continue.

Mat believes Elora is in "some kind of counseling." However, he did not know
any of the details and reports that Veronika arranged it and did not involve him in the
process.

Substance Use

Mat reports drinking a glass of wine twice a week. He has never been diagnosed or treated for alcoholism. He has never been arrested for DUI. He does not believe he has ever had an alcohol problem. Mat uses marijuana twice a week but does not use marijuana when the children are living with him. He used more heavily before the children were born. Mat does not believe his use of marijuana has ever been problematic. He reported no criminal or treatment history related to his marijuana use. Mat denied any history of using cocaine, heroin, and meth. He denied any use of prescription medications other than as prescribed.

Mat reported that Veronika drank nearly every day during their relationship. She would typically drink champagne, consuming 2 bottles a night. When drinking, it would impact Veronika's behavior. She would become short-tempered and easily angered. She would say negative or hurtful things to Mat when she was under the influence. Mat reports confronting Veronika about her drinking but she downplayed his concern. He said she would sometimes drive while under the influence and he believes she did so with the children in the car. However, he is not aware of any DUIs or treatment history.

Veronika used marijuana but only infrequently. She also disclosed that she used to have an issue with meth prior to their relationship and Mat thinks she might have gone to some kind of treatment when she was young either for substance abuse or for mental health issues (i.e. cutting). During their relationship, Veronika regularly used pain medications (Valium, Percoset and others) without having a prescription. She had a bag of different pills she would take and talk about taking. He did not precisely monitor how much she was using these pills. But there were definitely times when she seemed under the influence and "zonked out." He estimated that occurred about twice a month.

Criminal History

Mat reports he has never been arrested, charged, or convicted of a crime.

Relationship History

Mat met Veronika in March 2014 at a strip club where Veronika was working as a dancer. The two began dating long distance. Mat lived in Pennsylvania and Veronika lived in Seattle. In the summer of 2014, Veronika became pregnant with their first child. She moved to Pennsylvania at that time and the couple began living together. Mat described the early period of his relationship with Veronika as "fun." He visited her in Seattle and she flew to visit him. They also went on trips together. He did not feel like they had any significant problems at that time.

1 Elora was born on March 21, 2015. She was not a planned child. There were
2 no complications during the pregnancy or delivery. Elora has no unusual health
3 problems or special needs. Aidan was born on August 16, 2016. By that time, the
4 family had moved to Florida due to a job transfer that Mat had with his employer.
5 Aidan was a planned child and was born healthy and with no special needs. Raina
6 was born on June 3, 2018. The family moved to Washington prior to Raina's birth.
7 They left Florida because Veronika was not happy there so Mat looked for a new job
8 and found a position in Seattle. Raina was not planned and was born healthy and
9 without special needs.

10 Since the birth of their first child, Veronika was a stay-at-home parent while
11 Mat worked and supported the family. However, Mat reports being an involved
12 parent when he was not working outside the home. He helped with meal
13 preparation, was the parent who put the children to bed, gave the children baths,
14 read them stories, and made them breakfast in the morning. He described himself as
15 a hands-on and participatory parent.

16 Veronika was increasingly unhappy in the relationship after Aiden was born.
17 The family moved to Seattle in part due to her unhappiness in Florida. Veronika
18 complained that Mat was not providing sufficiently for the family and that he did not
19 treat her like he did when they were first dating. She also complained that Mat was
20 not giving her enough money for her MLM businesses. Beyond that, Veronika
21 seemed depressed. She would discuss thoughts of suicide. Veronika had a history
22 of cutting (she has scars on her arms) and often threatened to engage in cutting
23 behavior (Mat is not aware of her following through with this threat during their
24 relationship). She often talked of taking the kids and leaving the relationship. The
25 couple was never engaged and never married in part because the relationship felt so
insecure with Veronika's expressions of unhappiness and threats to leave.

17 In November 2018, Veronika moved to a different bed in the same home.
18 However, the two of them continued to live in the same home until January 2020.
19 Mat continued to be the sole source of financial support. Veronika did get a job for a
20 couple months at Trader Joe's but was let go. In November of 2019, Veronika
21 requested that DCS set child support even though Mat was paying for her and the
22 children's expenses. Mat wanted Veronika to move out. In January of 2020,
23 Veronika did move out and did so without any warning (she did it while Mat was
24 traveling for work).

22 After Veronika moved out in January 2020, the couple agreed to a schedule of
23 alternate weeks for the kids. If Mat needed to travel for work, the children would stay
24 with Veronika. At that time, Mat was living in the former family home in Duvall and
25 Veronika was living on a property in Carnation so they lived close together. Mat
described the alternate week schedule as working fine at that time and the kids
seemed fine with it.

1
2 Mat complained that Veronika would make unilateral decisions about the kids.
3 For example, she dyed Elora's hair and pierced her ears without talking to him. She
4 also commenced home schooling Elora rather than sending her to Zoom classes and
5 Mat only found out about it when the school contacted him.

6
7 In February 2021, Mat sold the Duvall home and moved to Everett to move in
8 with his girlfriend, Monica. He said he made this decision because he could not
9 afford to keep the Duvall home and Monica had a home in Everett. Monica is 36
10 years old. She has no children. She works as an event producer (a job that is similar
11 to Mat's). She gets along well the children and Mat plans to continue living with
12 Monica for the foreseeable future.

13
14 Mat denies Veronika's claim that he was verbally or emotionally abusive. He
15 never physically intimidated Veronika nor threatened her. She would try to instigate
16 fights and poke at him in an effort to get a reaction. Generally, Mat does not yell or
17 raise his voice, which is not to say he never did so. Both parents had phone tracking
18 enabled on their cell phones. Mat did check where Veronika was on one occasion
19 when he thought she was lying to him (she was). However, that is the only time he
20 ever did that.

21 *Current Circumstances*

22
23 Mat resides in Everett, Washington in a 4-bedroom home. He lives with his
24 girlfriend, Monica, and his three children. Aidan has his own bedroom and the girls
25 share a bedroom. He estimates that the home is 1400 square feet. He reports that it
has a big yard with play equipment and is 5 blocks from Monroe Elementary.

Elora is 6 years old and is attending kindergarten in Carnation but attends
classes online. Mat speaks to her teacher regularly who reports Elora is doing well in
school. Elora is outgoing and flamboyant. She likes to play outside, to read, and to
do art projects.

Aidan is 4 years old. He is not in pre-school due to COVID. He likes to play in
the dirt and dig for worms. He is outgoing once he is comfortable but can be shy. He
loves dinosaurs and Lego.

Raina is 2 years old. She is the comedian of the family and loves to make
people laugh. She is rambunctious and loves Disney characters. She enjoys playing
outside in the dirt with her brother.

When asked what he wanted, Mat said he wants "primary care" of the children.
He would like to be the parent in charge of their schooling as he does not trust
Veronika to make good decisions. He proposes the children live with him most

1 school nights and see Veronika on the 1st, 2nd, and 3rd weekends of each month from
2 Thursday to Sunday. He does not think that the old schedule of alternate weeks
3 should remain in place. This is partly because of the distance between their homes
4 and his concerns about school (he wants the kids in public school and not home
5 schooled). It is also because he thinks Veronika is not reliable and cannot be trusted
6 to act in the best interests of the children. For example, she has made negative
comments to the kids about Mat and about Monica. Elora is feeling stressed by
Veronika's comments. Mat said that he and Monica never talk negatively about
Veronika in front of the children. He also says that the children report that Veronika
frequently leaves them in the care of others (primarily her neighbor).

7 Mat reported that there was a dispute in January 2021 when Veronika did not
8 return the children on time. She ignored his calls and texts. Eventually, Mat called
9 the police. When Elora did not show up for class, the police conducted a well child
check (the kids were fine). Veronika claimed it was her week but it was not. The kids
were eventually returned to him after the attorneys got involved.

10 In a later email, Mat reported that Aidan stated that his mother had told him he
11 is not allowed to tell Monica he loves her (Aidan did it anyway). Mat also complained
12 that Veronika had flown the children to Las Vegas for a wedding without telling him.

13 IV. INTERVIEW WITH VERONIKA GOODNIGHT

14 Veronika Goodnight was interviewed via Zoom on April 13, 2021. The
15 following is based upon her self-report.

16 *Family History*

17 Veronika is 39 years old. She grew up in New York and California. She lived
18 with both her parents during her childhood (they separated after she was an adult).
19 She reports her father lived off social security disability income. He was a musician
20 and actor. Her mother worked as a medical scheduler (she is now retired). Veronika
21 has two younger sisters.

22 When asked to describe her childhood, Veronika said her parents did the best
23 they could. Her father was an alcoholic and drug addict (pills and opioids). Her
24 mother was an alcoholic. She described her parents as not establishing boundaries
25 or being good about discipline. Her father was often absent. He was verbally and
physically abusive towards her. Veronika moved out at the age of 16.

Veronika's father is currently living in Santa Barbara. They are not close
though he has some contact with the kids. Her mother lives in North Carolina. She
described her mother as "narcissistic" and she reported she has no current
relationship with her mother. Her sisters live in California and Nevada.

Education and Employment

Veronika graduated from high school in Santa Barbara, California in 1999 (one year early). She then attended Santa Barbara City College with the plan of becoming a drug and alcohol counselor but later dropped out of school. Veronika became a performer with the Cirque Du Soleil (a dancer with flaming hoops) and was successful for a while. She stopped performing when she became pregnant with Elora.

Veronika is not currently employed. She has worked various jobs for short periods of time or on a part-time basis. She also has operated a multi-level marketing business. Veronika said she worked part time for Trader Joe's from December 2018 to September 2019. When asked why she left, she said, "I could not focus" and that she had missed shifts because Mat was late coming home to watch the kids. She hopes to be working as a bus driver for the Riverview School district and reported she was hired last June. When asked if she was currently working as a bus driver, Veronika responded "yes and no." She said, "the amount of responsibility is really intense" and that it was "daunting." She then said that the school district released her because the court proceedings were too stressful.

Veronika picks up some part-time work for Uber Eats. However, she then reported she was not really driving much because she was exhausted after working on the farm where she lives and did not feel safe driving. She reported she is not paid for her farm work but she does get reduced rent and utilities in exchange for her labor.

Veronika stated she was also hoping to earn money as a surrogate. She said that agencies would not work with her because of information available about her online. Accordingly, she has worked as an independent surrogate. She got pregnant in November 2020 but lost the baby. She is currently trying again but has not yet gotten pregnant.

When asked what her future employment plan was, Veronika said she hoped to resume driving a school bus. She anticipated working part-time (as a substitute driver) until her children were in school and then full-time.

Medical History

Veronika reported that she was mis-diagnosed with Borderline Personality Disorder at age 17. She was placed on 6 different medications (which she later stopped using). However, she believes that diagnosis was in error.

1 Veronika reports she suffers from Premenstrual Dysphoric Disorder (PMDD).
2 According to the U.S. Department of Health and Human Services, PMDD is a health
3 problem that is similar to premenstrual syndrome (PMS) but is more serious. PMDD
4 causes severe irritability, depression, or anxiety in the week or two before your period
5 starts. Symptoms usually go away two to three days after your period starts.
6 Veronika reports that she was diagnosed with PMDD in 2019. She is not prescribed
7 any medications but manages this condition through supplements.

8 Veronika was hospitalized at age 17 at a hospital in Santa Barbara. She
9 reports that she had an abusive boyfriend who dosed her orange juice and tried to
10 poison her. She went to the hospital and nearly died. It was during this
11 hospitalization that she was diagnosed with Borderline Personality Disorder.

12 Veronika was hospitalized again at age 23. She reported she was on a phone
13 call with her boyfriend (whom she also described as abusive – different from the one
14 at 17). He called her names and “I don’t know what happened, I blacked out.” When
15 she came to, she had cut herself on her arm with a sharp knife. She called 911 and
16 went to the hospital. Veronika denies this was a suicide attempt.

17 Veronika states she saw a counselor named Dina (she did not know the last
18 name) at Seamar for PTSD. She stopped seeing her in February 2021. She also
19 attends a support group called “Betrayal Trauma Recovery.” She reports that she
20 attends these support groups 3 or 4 times a day when she does not have the
21 children. She also sees someone named Heidi Haun, who is “not a therapist or
22 anything” but who facilitates Zoom group exercises for people who have suffered
23 trauma.

24 The children have seen Marcus Barley for counseling. Veronika said she
25 wanted a place where the kids could talk. She said the children know not to say Mat
or Monica’s name around her or she will start crying. She estimated that the kids
saw Marcus about once a month if she had the money to pay for it.

Substance Use

Veronika reports she is not currently drinking alcohol. She estimates she last
drank alcohol “a few months ago.” She acknowledged she was drinking regularly
before she and Mat separated. She stated she was “depressed and in an abusive
relationship” and that she needed “to numb myself out.” She would drink 1 to 2
bottles of champagne a few times a week. Veronika has never been arrested for DUI
and has never been diagnosed or treated for alcoholism.

Veronika stated she does not currently use marijuana. However, she has
used it in the past “for pain.” She reported that she frequently “pops out” ribs and

1 sometimes managed the pain with marijuana. She also seeks treatment from a
2 chiropractor. Her last use of Marijuana was February 2021.

3 Veronika used illegal drugs regularly between the ages of 18 and 21. She
4 attended raves and took drugs including meth amphetamine. However, she reports
5 she has not used meth or other illegal drugs since she was approximately 21 years
6 old.

7 Veronika initially said she has not used prescription medications other than as
8 prescribed. However, she then said she took Vicodin in February of 2018 or 2019
9 (she was not sure). She denied ever taking Valium.

10 Veronika reported that Mat was a regular drinker of alcohol but she was never
11 concerned about his alcohol use. However, she was concerned about his use of
12 marijuana. He used marijuana every day. He spent a lot of money on it even when
13 bills were unpaid (such as when their water was shut off). He left his bong and
14 paraphernalia out in the house where the kids could access it. He would often be
15 "stoned", disinterested, and unengaged because he was high on marijuana. She did
16 not report Mat has having issues with illegal drugs or prescription medications.

17 *Criminal History*

18 Veronika reported that she has never been arrested, charged, or convicted of
19 a crime.

20 *Relationship History*

21 Veronika was married from 2010 to 2012. She reported she left the marriage
22 because her husband was abusive. She had no children from this marriage.

23 Veronika met Mat in March 2014 when she was working as a dancer at a strip
24 club. The two of them hit it off though Mat did not disclose he had a fiancé at the
25 time. He later accused his fiancé of being crazy and bi-polar. She and Mat had a
good relationship initially. Veronika found out she was pregnant in July 2014 and she
moved to Pennsylvania to live with Mat. She described this as the best year of her
life.

Elora was born on March 21, 2015. She was a planned child (the parties
appear to disagree about this). Mat was working full time though not traveling as
much back then. Veronika worked part time but would take Elora with her to work.
She was primarily a stay-at-home parent to Elora.

Shortly thereafter, Mat's job got transferred to Florida and the couple moved.
Veronika got pregnant again and gave birth to Aidan (DOB 8/16/16). Veronika did

1 not have friends in Florida and was not happy there. Further, Mat began traveling as
2 much as 70% of the time leaving Veronika to take care of their two children alone.

3 In December 2016, Mat got a job offer in Seattle and the family moved again.
4 The new job required a lot of travel and Veronika felt like Mat was never home.
5 When he was home, he was frequently stoned. The couple eventually bought a
6 home in Duvall, Washington. Veronika got pregnant a third time and Raina was born
7 on June 3, 2018. Because Mat traveled so much, Veronika reports she did virtually
8 all the parenting for all 3 children.

9 The relationship grew increasingly strained. Veronika reported learning that
10 Mat was cheating on her with Monica in May of 2019 and that she moved into a
11 spare bedroom in June 2019. Veronika then said that Mat had raped her. She
12 stated that she would drink and black out. She then woke up to find Mat having sex
13 with her.

14 Veronika "fled" the home in January of 2020. She tried to move to a shelter
15 but could not get into one. She asked for support online and was offered a place to
16 stay at a farm owned by a Mormon couple in Carnation. She moved to the farm while
17 Mat was away on a work trip.

18 Veronika described Mat as abusive. She reported he talked down to her,
19 controlled her financially, and controlled her body. He never struck her. She
20 described Mat as engaging in "post separation abuse" since she moved out and that
21 he is more abusive now than he was when they lived together. She described one of
22 the worst incidents as when Mat yelled "shut the fuck up" and raised his hand as if to
23 hit her. On another occasion, he told her to "get the fuck out of the house" and had
24 the kids pack a bag for her.

25 The couple did not have a joint bank account. Veronika talked about trying to
manage the couple's finances but that bills went unpaid including car and utility
payments. When asked how she paid expenses, Veronika said that Mat would send
her money when she asked for it. She said in the Summer of 2019, she applied for
and received food stamps. She complained that Mat would not voluntarily pay child
support and she was not able to get child support until May of 2020.

After Veronika moved out in January 2020, Mat initially only wanted to see the
kids on weekends. However, Veronika proposed he have them every other week
because she thought it was better for the kids. They began following an alternate
week schedule in March 2020. Veronika said she befriended Monica for a time and
that Monica gave her money to help move. However, in May 2020 Monica moved in
with Mat. Veronika noted that the kids seem to like Monica.

Veronika filed an action with the court in August of 2020. In her court filing, she proposed the court adopt the alternate week residential schedule. Mat then proposed that he be given full custody and that Veronika pay child support. He accused Veronika of being a drug addict and alcoholic. The court ordered the schedule of alternate weeks should continue as the temporary parenting plan.

Current Circumstances

Veronika is living on a farm property in Carnation. Mat sold the Duvall home and moved in with Monica in Everett. Part of Veronika wants to ask for full custody of the kids. She believes she is the more stable parent. However, she thinks the kids should spend an equal amount of time with both parents. Therefore, she proposes that the children reside with the parents on a schedule of alternate weeks. If Mat has to travel for work, she would like the plan to have a first right of refusal giving her the option to care for the kids.

We discussed the school issue given Mat's move to Everett. Veronika would like the children to participate in a home-schooling program in the Riverview School District (the Parade Program). In this program, they would only have in person classes twice a week. She does not think the children should have to drive between Everett and Carnation 2 hours every day to attend school. When asked if she would be proposing home schooling if Mat still lived nearby, Veronika said no and that she would then expect the kids to attend school in person in the Riverview School District.

V. DOCUMENT REVIEW

I reviewed all the documents provided to me. The following outline is not intended to summarize the information from every single individual document provided but rather to provide what I see as central information gleaned from documents and general trends noted.

A. Court Orders and Pleadings

Order Appointing Parenting Evaluator. This order appoints Matthew Jolly as parenting evaluator for Elora (age 5), Aidan (age 4), and Raina (age 2). The order requests investigation into all issues related to making a parenting plan for the children as well as mental health and substance abuse issues for Veronika. It is noted that this order anticipated a report by the end of April 2021. However, the parties delayed commencing the evaluation and did not retain the evaluator until April 2021. Counsel for both parents were advised that this would result in a delay.

Temporary Parenting Plan (11/24/20). This parenting plan declines to make findings under RCW 26.09.191 for either parent or impose limitations on either parent. The court orders the parents to make major decisions for the children jointly.

The court orders the children to alternate weeks between the parents with exchanges occurring on Wednesdays at 8 a.m. The court further ordered that neither parent shall use alcohol or non-prescription drugs while the children are in their care and that the mother must comply with the treatment recommendations of her mental health providers and physicians.

Petition for Parenting Plan (8/4/20). Veronika completed this without an attorney. She does not request a protection order or restraining order. The proposed parenting plan includes no restrictions and proposes a residential schedule of alternate weeks.

B. Parent Questionnaires

Mother Questionnaire. Veronika identifies her primary concerns as Domestic Abuse, Decision-Making, Drug/Alcohol Issues, Neglect, Relocation and Mental Health. She reports she was diagnosed with PMDD (Premenstrual Dysphoric Disorder) in 2019 but that she manages this condition with supplements and counseling. Veronika states she wants to retain a schedule of alternate weeks for the children and wants the children to remain in the Riverview School District but be home schooled. She proposes the parents make major decisions for the children jointly. Veronika states she loves being a mom and describes a system of wrist bands she states she uses to avoid negative interactions with the children (i.e. controlling her own anger). She states that Mat is selfish and makes bad decisions and can be rough with the children (e.g. he once threw a child onto a couch).

Father Questionnaire. Mat identifies his primary concerns as which parent the children live with, decision making, neglect, mental health, and the amount of time Veronika has with the kids. Mat reports that he is living in Everett with his girlfriend, Monica, and the children. He reports that Veronika has discussed a history of treatment for mental health, self-harm, and meth addiction. He proposes that the children reside with him and see their mother on the 1st, 2nd, and 3rd weekend of each month from Thursday to Sunday. He wants the children to attend school near his home to ensure the children are attending. He proposes that he make education decisions for the children. He describes himself as an intuitive parent who prioritizes his children but says he can be overprotective. He describes Veronika as being creative with activities but that she prioritizes herself and has "issues with rage."

Timeline. This timeline was submitted by Veronika and represents her point of view. The following is a summary:

- 3/28/14. Mat and Veronika meet
- May 2014. Veronika travels to PA and couple decides to have children.
- July 2014. Veronika learns she is pregnant and moves in with Mat in PA.
- March 2015. Elora born.

- 1 • Oct 2015. Couple moves to FLA.
- 2 • Aug 2016. Aidan born.
- 3 • Dec 2016. Couple moves to WA. Veronika reports that Mat starts smoking pot every day and spends money on inessentials despite having unpaid bills. Veronika reports verbal and emotional abuse.
- 4 • June 2018. Raina is born. 9 Days later Mat leaves for Grateful Dead concert.
- 5 • Jan 2019. Veronika moves into spare bedroom.
- 6 • May 2019. Veronika examines Mat's phone and reports she discovered evidence Mat was having affair with Monica.
- 7 • Jan 2020. Veronika moves out with kids.
- 8 • May 2020. DSHS sets child support.
- 9 • June 2020. Monica moves in with Mat which upsets Veronika.
- 10 • Aug 2020. Monica files for a parenting plan with court.

9 **C. Supportive Declarations Submitted by Mother**

10 *Declaration of Heidi Stafford (11/14/20).* Heidi is a long-time friend of Veronika. She speaks positively about Veronika's parenting of the children.

11
12 *Declaration of Joseph Stanton (11/12/20).* Joseph has known Veronika for 2 years. He reports that she has been happier and less anxious and depressed since she separated from Mat. He speaks positively about her parenting of the children.

13
14 *Declaration of Lisa Patrick (11/13/20).* Lisa is a friend of Veronika's who resides out of state. She speaks positively about Veronika's parenting of the children.

15
16 *Declaration of Bethany Carson (11/13/20).* Bethany has known Veronika and Mat since Aidan was born. She speaks positively about Veronika's parenting and reports she observed Mat not to provide much help and support with the kids. She states that Veronika reported emotional and verbal abuse from Mat.

17
18
19 *Declaration of Lori Flynn (11/12/20).* Lori has known Veronika since 2005 and describes her as a loving and attentive mother.

20
21 *Declaration of Heather Fineren (11/13/20).* Heather has known Veronika for a year and speaks positively about Veronika's parenting of the children.

22 *Declaration of Heather Turner (11/13/20).* Heather has known Veronika for 10 years and describes Veronika as an organized and attentive parent to her children.

23
24 *Declaration of Amanda Cowie (11/12/20).* Amanda has been friends with Veronika for 27 years. She speaks positively about Veronika's parenting. She never met Mat or observed any arguments although Veronika reported some verbal abuse.

1 *Declaration of Emma Montalvo (11/13/20).* Emma has known Veronika for 10
2 years and speaks positively about Veronika's parenting.

3 *Declaration of Alicia Martinez (11/13/20).* Alicia describes Veronika as a stable
4 and fit mother.

5 *Declaration of David Litt (11/13/20).* David resides in Colorado. He describes
6 Veronika as a loving and caring mother.

7 *Declaration of Britt Sheflin (11/11/20).* Britt has known Veronika for 10 years
8 and speaks positively about Veronika's parenting of the children.

9 *Declaration of Alexandra Forbes Thierjung (11/11/20).* Alexandra has known
10 Veronika since they were both children. She describes Veronika as a loving and
11 attentive mother who is concerned about nutrition.

12 *Declaration of Celeste Blair (11/17/20).* Celeste reports that Veronika texted
13 requesting that Celeste pick her up because she was afraid of Mat. When she
14 arrived, she describes Mat as yelling and being hostile towards her and Veronika.
15 She reports Mat stood between Veronika and doors, stood over Veronika in a
16 threatening manner and made verbal threats to leave her homeless.

17 *Declaration of Deborah Oakes (11/12/20).* Deborah has known Veronika for 3
18 years. She speaks positively about Veronika's parents. She observed Mat to be
19 gone from the household for work a lot. Deborah reports her son described Mat as
20 someone who "yells too much."

21 *Declaration of Larisa Ignacio (11/12/20).* Larisa is Veronika's landlord and
22 neighbor. She describes Veronika as a good tenant and states Veronika works hard
23 to provide a good environment for her children. She comments positively on
24 Veronika's parenting and relationship with her children.

25 *Declaration of Stacey Erdman (11/13/20).* Stacey has known Veronika for 2
years and speaks positively about her parenting, describing Mat as "mostly absent."

Declaration of Kelly Clifford (11/13/20). Kelly has known Veronika for 3 years
as a friend and co-worker. She speaks positively about Veronika's parenting and her
relationship with her children.

D. Police Reports

Duvall Police Report (3/26/19). The officers were dispatched to a verbal
domestic dispute between the parties. Veronika reported she was upset that Mathew
threatened to remove her from his phone plan and that she wanted a roommate
agreement. Mathew is described as "calm." He said they had been arguing over

1 Veronika wanting a rental agreement and that he told her he was going to take her
2 off his phone plan after which she called the police.

3 *Duvall Police Report (12/17/19)*. Officers responded to report of a couple
4 arguing. Veronika was crying and reported an argument with Mathew. She reported
5 no physical altercation but described Mathew as verbally abusive because he had
6 told her to "get the fuck out of the house" and told the children to pack a bag for her.
7 Mathew is described as "calm and agreeable" and the police advised him he could
8 not force Veronika to leave.

9 *Duvall Police Report (1/1/20)*. Mat made a missing person's report when he
10 had not heard from Veronika for several hours. The officer was able to contact
11 Veronika by telephone who was fine and at a friend's house.

12 *Police Report (1/6/21)*. Mat requested a welfare check when the children were
13 not returned when he expected and when Elora did not attend class. The officer
14 spoke with Veronika and children who were all fine.

15 **E. Medical Records**

16 *Hair Follicle Test (11/4/20)*. This test is for Veronika and was negative for
17 alcohol. It does not appear any other substances were screened for in this test.

18 *Letter from Stacy Bowker, MD (11/13/20)*. Dr. Bowker states that she has
19 been seeing the children since November 2018 and that Veronika has been the
20 parent primarily involved in the children's medical care. She is aware that Veronika
21 has been diagnosed with PMDD and states Veronika manages that condition without
22 medications. She has never had any concerns about Veronika's parenting or
23 medical decision-making.

24 *Sea Mar Mental Health Assessment (9/25/19)*. This is a copy of a mental
25 health assessment of Veronika by Rachel Hersman, LHMCA at Sea Mar Community
Health Center. Veronika reports that she has recently diagnosed herself with PMDD.
She states that if it is 10 days before her period, she should be hospitalized and it is
difficult to parent. During that 10-day window, she reports hysterical crying and lack
of focus. She reports drinking a bottle or 2 of champagne a night and that she has
suicidal thoughts (and has called crisis lines). She states, "I am so irritable I have to
wear these bracelets so I don't yell at my kids." She reports feeling severely
depressed and having panic attacks. She describes Mat as narcissistic and
emotionally abusive but "no physical abuse whatsoever." Her last reported self-harm
is 10 years prior to the evaluation. Veronika discloses a history of inpatient mental
health treatment at Santa Barbara Cottage Hospital. She states she went to the
hospital for an overdose at age 17 and 23. Veronika reports suicidal thoughts and
ideation and that she had suicide attempts in the past. She is assessed as being at a
low risk for suicide. Veronika reports has been emotionally abused by Mat. The

report recommends psychiatric assessment and a possible Substance Use assessment if she is not able to maintain abstinence from alcohol.

Sea Mar Record (10/1/19). This record diagnoses Veronika with depressive disorder and Premenstrual Dysphoric Disorder. She reports being depressed and angry to the point of not wanting contact with her children. She reports having hysterical crying and panic attacks at work. This report notes that Veronika was diagnosed with Borderline Personality Disorder in the past and states that an assigned clinician will monitor to see if she meets the criteria for this diagnosis.

Sea Mar Discharge Summary (12/9/19). It appears that Veronika chose to leave her treatment at Sea Mar (i.e. her providers did not recommend she cease treatment). This discharge summary diagnoses her with "unspecified depressive disorder" and "premenstrual tension syndrome." Veronika reports a history of abuse from her father and other intimate relationships. She experiences depression and suicidal thoughts 10 days before her menstrual cycle. She reported a history of alcohol abuse.

F. Text Communications

Text Exchange (Jan 2020). In this text exchange, Mat reports that Elora is crying and complains that Veronika has been gone for over 24 hours and that he had no idea where she was. He reports calling the police to file a missing person's report, stating "there will be a report of you not showing up for your children." In a series of texts he asks if Veronika is coming home and asks why she is not answering calls from him or the police officer.

Texts/Communications Between Parents. Mat provided copies of some text exchanges. The following was noted:

- 5/9/14. Veronika discusses taking a Vicodin. She later states "I took 3 kinds of pills. I save them in case I hurt myself and can't get to the hospital."
- Aug 2015. Veronika states "I am feeling today like I want to cut myself." She reports having the urge to throw her phone and punch a glass door and cut herself. She describes going outside and screaming and hysterically crying.
- July 2017. Veronika expresses frustration with managing the children. She states "I want to cut. I want to run away. I feel no support from you." Later she states, "I'm hurting so bad that suicide is thought about 22 hours a day. But the other 2 is thought about my babies."

- 1/15/19. Veronika mentions that she “lost it on Elora.” She talks about fainting from rage.
- 8/20/19. Veronika writes “I need you to come home. I cannot properly take care of our kids. I keep crying. I need to take a Valium and sleep.” When Mat says he is tied up at work and cannot leave immediately, Veronika states she is having panic and anxiety attacks and suggests she might call 911.
- 4/14/21. Mat texted Veronika and stated the children were sick and asked if they had been around anyone sick or had been feeling sick when with her. Veronika responds that they were not around anyone other than Ignacio and did not have fevers when with her. Travis then states that the kids said that they went to the aquarium with her and talked of spending time with other third parties (i.e. he accuses her of lying). Veronika then acknowledges that she did those things but that she believes she did so safely.

G. Video Tours of Parent’s Homes

Video Tour of Mother’s Home. This video begins outside. There is a set of play equipment in what appears to be the front yard where the children are playing. There is a visible pen in which there is a pig (this is a farm). There is a large main farmhouse where the landlords live. Across a gravel drive is a small, free-standing building where Veronika resides next to another playset for the kids. There is a chicken coop behind the residence. Veronika tours parts of the farm and explains she works cleaning up, etc. Veronika reports that the detached unit where she resides with the children is 600 square feet. It is a small space but has been set up with the children in mind including places for them to hang their coats and store art supplies. The main room includes a kitchen and table. There are two small bedrooms: one for Veronika and another for the children. The children’s bedroom has a set of bunkbeds and a toddler bed and plastic bins for the children’s belongings.

Video Tour of Father’s Home. The video starts outside a rambler style single-family-home. Inside, there is a living room to the right of the front door with a comfortable couch and a TV. The video next shows a medium sized kitchen and dining area next to a home office space. To the left of the entrance is a hall leading to the bedrooms. Aidan had his own bedroom with a set of bunkbeds. Elora and Raina share a bedroom with another set of bunkbeds. Some toys and artwork were visible in the video of the girls’ room. Out back, there is a nice deck and patio and a large backyard with a children’s play set and what looked like a badminton net.

H. School Information

School Information. Schooldigger.com ranks Monroe Elementary as the 439th best elementary school in the state. Everett School District is ranked 47th in the State. Carnation elementary is ranked 304th by the same web site. Riverview School District is ranked 16th.

Report Card (Winter 2020-2021). This is a report card for Elora who is attending Carnation Elementary. Elora is consistently meeting expectations (the middle of three potential scores) on both her social skills and her academic skills. In an accompanying email, Elora's teacher states "Elora is doing very well and is strongly at grade-level at this time."

I. Miscellaneous

Calendar of Work Travel. Veronika provided a calendar of Mat's work travel for 4 months in 2019 (May – Sept). The calendar appears to reflect Mat was away approximately 60 days during this period.

Cell Phone Video. This cell phone video was forwarded by Veronika. She appears to have filmed an argument between the parents near the time of separation. Mat is packing with the children present. The parents are arguing with some raised voices but no outright yelling, no threats, and no evidence of violence. Veronika then approaches Elora and asks, "Elora, do you understand what you're doing? Your daddy is having you put all my things in a box to kick me out of the house." Mat complains about Veronika having sought child support while still living in the house. Veronika explains that she would leave once she has child support. Mat says that he will be the one who dictates custody of the children because he is the one making the money. Veronika intended this to be evidence of Mat involving the children in conflict but it appears that both parents are guilty of involving the children in their fight: Mat for having the children help pack, Veronika for directly asking Elora about what she is doing in what appeared to be an effort to make Elora feel guilty, and both parents for arguing about child support and custody in front of the children.

Google Maps. According to Google Maps, the distance between the parent's homes is 32 miles. The travel time was estimated at just under an hour at 3 p.m. on a weekday.

VII. COLLATERAL CONTACTS

A. Diana Muggli – Friend of Mother

Diana Muggli is a friend of Veronika's. I spoke to her by telephone on April 16, 2021.

1 Diana has known Veronika for about 4 years. They met through a parent
2 group. Diana has two children ages 7 and 4. She is a stay-at-home parent. She has
3 daily contact with Veronika. She estimates they see each other in person once or
twice a week. Their time together often includes the children.

4 Diana said that Veronika has an “awesome” relationship with her children and
5 that she is a fantastic mom. Veronika is good about giving her kids lots of
6 experiences and showing them love. She puts the children’s needs first. For
7 example, it is impressive that she still wants the kids to see their father half the time
despite her own problems with Mat. Diana has no concerns about Veronika’s
parenting. She is comfortable leaving her own children in Veronika’s care.

8 Diana has seen Veronika drink alcohol once in a while. For example, she has
9 seen her drink a glass of champagne. However, she has never had any concerns
10 about Veronika’s drinking. When asked if she ever had any concerns about
Veronika’s emotional health, Diana said “not necessarily.” She then explained that
Veronika has lots of tools she uses to help and that she is good about self-care.

11 Diana has had only limited contact with Mat. She recalled meeting him when
12 she went over to care for Veronika when Veronika had a burst ear drum. Mat was
13 leaving for a work meeting which seemed strange to Diana since Veronika was in
pain and needed help. She has never had an opportunity to see him interact with the
14 children. Nor has she ever seen him use marijuana or other substances. Veronika
complained prior to separation that Mat was not sufficiently supportive of her and
15 could be overcritical. She also complained he was emotionally abusive.

16 Diana has seen the children recently. They are doing “just great” and seem
17 happy and enjoy playing with her children. The only thing she noted was that Elora is
perhaps a bit more sensitive than she used to be and a little reactive. But generally,
the kids are doing well.

18 **B. Monica Galarneau – Father’s Significant Other**

19 Monica Galarneau is Mat’s girlfriend. I spoke with her by telephone on April
20 16, 2021.

21 Monica is 36 years old. She was previously married for 9 years and divorced
22 in 2016. She has no children of her own. Monica met Mat in November of 2018
because they both worked in the event industry. However, they were only casual
23 friends at that time. They began dating in May of 2020 and have been living together
since February of 2021. She is in the home when the children are living with their
24 father. She interacts with the children regularly and witnesses their interactions with
their father.

1
2 Monica described Mat as a hands-on father who loves his children more than
3 anything. He makes them breakfast, makes them lunch, helps Elora with school, and
4 gets directly involved with their activities. They do Friday movie nights together. He
5 plays and laughs with them and is very involved. She has never had any concerns
6 about his parenting.

7 Monica has seen Mat use marijuana but never when the children are in his
8 care. She has never had any concerns about his use of marijuana.

9 Monica first had contact with Veronika in May of 2018. At that time, Veronika
10 texted Monica and accused her of having an affair with Mat. The conversation was
11 strange because Veronika combined wild accusations with claims that it was "cool",
12 that she was broken up with Mat, and that she supported them having a relationship.
13 At the time, there was no intimate relationship between Monica and Mat. Monica
14 responded to the texts and struck up a friendship with Veronika. Veronika shared
15 negative statements about Mat which Monica assumed were true at the time. She
16 helped Veronika move out when she left Mat. However, Monica came to see
17 Veronika as dishonest and inconsistent.

18 Monica did later develop feelings for Mat and began dating him. Once she
19 was involved with Mat, he was nothing like the person Veronika had claimed. Mat is
20 a caring, helpful, and supportive partner who has been nothing but kind and
21 respectful to Monica.

22 Veronika can be a good parent at times. But she is not consistent. She often
23 leaves the kids largely to their own devices and they are just too little for that. Elora
24 told a story about almost drowning at a lake. She was helped by another little girl.
25 Elora said her mother was not watching because she was talking to someone.
Veronika also has the kids spend a lot of nights at her boyfriend's (Joseph Stanton).
Monica does not know Joseph but thinks it odd that Veronika seems to be hiding the
fact she has a boyfriend. She also had the kids watch a pig be slaughtered. Aidan
now does not want to eat meat, which she and Mat are happy to support. However,
he was frightened by the experience and has asked if someone will rip his skin off
and eat him when he dies.

When they were getting along, Veronika talked to Monica about drinking
champagne (though not at the farm) and going to bars. However, Monica has never
personally witnessed Veronika drinking alcohol.

Monica said she is afraid of Veronika. When asked why, she said she was
afraid that Veronika would make false, negative statements about her on social
media. She has already done so (for example calling her a "homewrecker").

1 Monica believes that Veronika says inappropriate things in front of the kids.
2 For example, the kids have said “you ruined mommy’s and daddy’s relationship” and
3 “mommy says you are really mean but I think you are nice.” They have said “Daddy,
4 why did you sell Mommy’s house?” and referred casually to “that time Mommy was
out of control.” They are given far too much adult information and put into the middle
of their parent’s dispute. Mat does not do that, only Veronika.

5 Monica is close to the kids and loves them. She believes that they enjoy
6 spending time with her and she enjoys spending time with them. The kids often talk
7 about how much they enjoy doing things with Monica. Transitions can be hard for the
8 kids going both directions. She has heard Elora say she wishes she was at the farm
so she could play with Lizzy (another child at the farm). She has also heard them
say that they do not want to leave and would prefer to stay with her and Mat.

9 Monica and Mat live in Monica’s home in Everett. The drive to Carnation is 45
10 minutes. She does not believe home school is a good option for the kids. She and
11 Mat work full time and cannot home school the children. She does not think Veronika
12 has the training or follow through to do it either. The kids would do better in regular
13 school where they have professional teachers and lots of peer interaction. She says
the couple would try to avoid any instances of simultaneous work travel when the
kids were with them. If it happened, they have discussed having a family member
come stay and watch the kids. They also have discussed having a part-time nanny
to help with the kids while they are working during the day.

14 **C. Larisa Ignacio – Mother’s Landlord**

15 Larisa Ignacio is the owner of the farm where Veronika resides with the
16 children. I spoke to her by telephone on April 19, 2021.

17 Veronika and the kids have been renting the mother-in-law unit on Larisa’s
18 property since January of 2020. The property is a hobby farm, not a commercial
19 farm, but it still takes quite a bit of work. Larisa is a stay-at-home mom with 4
20 children of her own (including 2 who are in the age range of Veronika’s kids).
21 Veronika is charged a rental rate of \$800 per month plus 35 hours a month of labor
on the farm (valued at a combined rent of \$1,500). She has not always been current
on rent but Larisa has been willing to work with her. There is a formal lease that is
coming due in June of 2021. Larisa intends to offer Veronika the option to extend the
lease if she wishes.

22 Veronika has been a great tenant in general. She fulfils her work obligations.
23 Larisa enjoys having her around and she considers Veronika a friend. Larisa’s
24 children also enjoy playing with Veronika’s children. She has seen Veronika interact
25 with her kids a lot. She is a loving and dedicated mom who goes out of her way to
make sure her children are well cared for and having a good experience. Veronika

1 does not ask Larisa to watch the children often (only a few isolated times) and seems
2 to spend her time with the kids during the weeks they stay with her. She is a positive
and hopeful person who is easy to like.

3 Larisa has never seen Veronika under the influence of drugs or alcohol. The
4 lease specifically prohibits drugs or alcohol on the premises.

5 The children seem to be doing great when with their mom. They are happy.
6 The kids enjoy the farm and spend their time playing or roller skating on the sport
court. Larisa has only seen Mat twice: once when she went with Veronika to pick up
7 things and once when Mat was dropping off the kids. Both interactions were short
and uneventful. She has not had an opportunity to see him interact with the children.

8 **D. Deborah Oaks - Mother's Friend**

9 Deborah Oaks is a friend of Veronika. I spoke to her by telephone on April 19,
10 2021.

11 Deborah is a stay-at-home mom and part-time realtor with children close in
age to Elora and Aidan. She met Veronika about 4 years ago through a parent's
12 group. She also lives in Duvall and Veronika and the kids used to reside close by.
She and Veronika frequently got the kids together for play dates over the course of
13 their relationship and became friends. She sees Veronika and the kids less since
COVID and Veronika's move to Carnation but still has regular contact. She has
14 spent time with Veronika and the kids since she moved including visiting Veronika's
farm.

15
16 Deborah describes Veronika as a fun and loving parent. Deborah has never
had any concerns about Veronika's parenting. She has left her own children in
17 Veronika's care on more than one occasion. Veronika is particularly good at having
fun activities for the kids to do. Deborah has never seen Veronika under the
18 influence of drugs or alcohol.

19 Deborah has not had many opportunities to see Mat with the children. She
never spent time with him and the kids without Veronika present and he was mostly
20 in the background. Deborah's son expressed reluctance to visit when Mat was there
because he felt that Mat yelled too much. Deborah observed Mat to have an "east
21 coast style" which included using a stern or raised voice but she never saw him
behave in a way she considered degrading or abusive.

22
23 Deborah noted that the children and the family seemed to exhibit stress,
tension and acting out when the family was together. Since the separation, the
24 children seem more relaxed and less stressed when she has seen them in Veronika's
care.

Veronika called in tears a few times while she was going through problems with Mat. She reported "a lot of yelling and accusations." According to Veronika, Mat wanted Veronika to work and seemed to view her as a financial drain on the family and accused her of being lazy. Deborah notes that Veronika was caring for 3 little kids. Further, Mat traveled a lot and was away from home about one week every month. When Veronika was working at Trader Joe's, she would miss shifts when Mat had to work or travel which resulted in Veronika getting fired. It is not clear how Veronika was realistically supposed to work under those circumstances.

Finally, Deborah noted that she saw Veronika as making child focused decisions. Veronika made sure not to move out of the school district. Despite her differences with Mat, she supports the kids seeing their Dad. In contrast, Mat moved to Everett which is a decision that seems almost designed to make co-parenting impossible. Mat's decision does not seem child-focused to Deborah.

E. Amisha Zuber – Friend of Father

Amisha Zuber is a friend of Mat. I spoke to him by telephone on April 21, 2021.

Amisha resides in California. She has known Veronika for 16 years and met Mat through Veronika in 2014. She works doing pilates, physical therapy and ceramics. She has no children of her own and is the godmother for Raina.

Amisha talks to Mat and the kids regularly (every week or two). This includes Facetime calls with the kids. She last saw Mat and the kids in person in September 2020 and has spent time with them on several occasions. Amisha describes Mat as a loving and patient parent who is delighted by his own children and is always holding them. She has never had any concerns about Mat's use of substances or about his emotional or mental health.

Amisha is no longer friends with Veronika. She said the relationship soured when Veronika repeatedly asked her for money despite several requests that she stop doing so. Their friendship ended at the end of 2018. Amisha witnessed Veronika consume alcohol quite a bit when they were friends. She was particularly disturbed to see Veronika drink 2 or 3 glasses a night while she was pregnant with Raina. She confronted Veronika about this who downplayed it as being no big deal.

Amisha reported that she has long had concerns about Veronika's mental or emotional health. She described Veronika as volatile, angry, manipulative, vicious and sometimes violent. She said that Veronika reported pushing her own mother down the stairs and expressed that she could not control her own violent impulses.

1 She would yell swear words at the kids like “shut the fuck up” and “what the fuck do
2 you want?” She also threw things (not at the children) to get the children’s attention.

3 The parents used to call Amisha when they were having fights and ask her to
4 mediate. They would yell at each other though Mat tended to yell less as he was
5 more even-tempered than Veronika.

6 Veronika was a stay-at-home mom during their marriage. Mat seemed to
7 travel quite a bit which left Veronika likely feeling overwhelmed. When Mat was
8 home though he was very engaged with the kids.

9 Amisha has spent some time with Monica and seen her with the children. She
10 is very good with the kids and you can tell she likes children. The kids really love her.
11 She is really good about engaging with the children’s curiosity. For example, she will
12 ask them “what made you smile today?”

13 Amisha closed by stating that Veronika loves her children but Amisha does not
14 think they are safe in her care. Veronika grew up in an abusive home with a drug
15 addicted father and a troubled mother. Veronika is not discriminating about who she
16 brings home and exposes to the children. The children are not “psychologically safe”
17 with her. During Facetime calls, Elora has complained she does not like going to the
18 farm because she is left in charge of the other children. This is consistent with what
19 Amisha observed in the past as Veronika does not typically engage with the children
20 and leaves them to their iPad or to play by themselves.

21 **F. Marcus Berley, MA, LHMC – Child Counselor**

22 Marcus Berley has been providing counseling for Elora. I spoke to him by
23 telephone on April 23, 2021.

24 Mr. Berley has been seeing Elora for counseling since January 19, 2021.
25 Veronika requested counseling services for Elora to help her adjust to the separation
of her parents. Mr. Berley has had 4 sessions with Elora since that time. Three of
those sessions included Veronika, Aidan and Raina. One session was Elora alone.
All of the sessions were in-person sessions.

Mr. Berley has diagnosed Elora with an adjustment disorder (unspecified).
When asked how Elora was managing, Mr. Berley stated that Elora was “trying to
figure it out.” He has not seen signs of stress in Elora beyond what might be typical
for a child dealing with parental separation.

Mr. Berley’s interactions with Veronika have been positive. She supports the
children and is open to feedback. Mr. Berley has no concerns about Veronika’s
ability to parent the children. Mr. Berley has not had any contact with Mat.

1 Mr. Berley does not have any specific recommendations for Elora going
2 forward. He is available to provide counseling support for Elora so long as Veronika
3 believes it is helpful.

4 **G. Ann Ralidak – Paternal Grandmother**

5 Ann Ralidak is Mat's step-mother and the children's paternal grandmother. I
6 spoke to her by telephone on April 26, 2021.

7 Ann is retired and living in Florida. She has contact with Mat a few times a
8 month including regular Zoom calls with the grandkids. She has not had much in
9 person contact recently, partly due to COVID. She saw Mat and Aiden about 2 years
10 ago. She last saw him with all the children 3 years ago.

11 Ann describes Mat as having a good relationship with the children. He is
12 attentive to the children and interested in spending time with them and doing things
13 with them. She saw Veronika as someone who loved the children but who struggled
14 as a stay-at-home parent, particularly when Mat had to travel for work. She would
15 yell at the children and blame Mat for being absent. Veronika was often busy online
16 and detached from the kids. She would get angry if the children interrupted her while
17 she was online. Ann never saw Veronika abusing alcohol.

18 Ann estimates that Mat traveled for work about once a month. She recalled
19 one time when he was away for 2 weeks but it was usually shorter trips. During the
20 marriage, Veronika's mother would come and help out with the kids when Mat
21 traveled. Veronika was always critical and negative about her mother which struck
22 Ann as sad given how much her mother was helping. She understands that Veronika
23 and her mother currently have no relationship.

24 Ann was not happy that Mat and Veronika elected to have a child when they
25 were so new in their own relationship.

Ann closed by stating that both parents love their children. However, she said
that Veronika has "mental issues" that worry her. She said she worried that Veronika
would hurt the children sometime while Mat was away for work. She is not aware of
this ever actually happening but Veronika seemed very unstable. She recounted an
incident when the family was together for Thanksgiving and an emergency came up
when they received a call that Ann's brother-in-law had a stroke. While dealing with
this family emergency, Veronika got hysterically upset over a dog chewing up a
pillow. Ann sees this as an example of Veronika being overly emotional and of her
being disconnected to other people and situations.

H. Other Attempted Contacts

The evaluator reached out several times to Veronika's counselor Dina Fix, but she declined to respond or participate in the evaluation.

VIII. IMPRESSIONS AND DISCUSSION

This is an action to establish a parenting plan for Elora (age 6), Aidan (age 4), and Raina (age 2). Elora, Aidan and Raina currently reside equally with both parents on a schedule of alternate weeks pursuant to a court ordered temporary parenting plan. The evaluator is tasked with making recommendations about a final parenting plan for the children. As part of that investigation, the evaluator looked into allegations that Veronika suffers from a mental health issue and that she has a substance abuse problem. In addition, the evaluator looked into allegations that Mat is emotionally abusive and abuses marijuana. In addition, Mat has relocated during the pendency of these proceedings and now resides in a different school district and approximately an hour away from Veronika. This report will examine each allegation in turn and then apply the statutory criteria for establishing a final parenting plan within the context of Mat's relocation.

A. Mental Health of Mother

RCW 26.09.191 provides that the court may impose limitations on a parent's residential time if the court finds that the parent suffers from a long-term emotional impairment that impacts parenting. The evaluation found evidence that Veronika suffers from a mental health issue as follows:

- Veronika completed a psychological assessment in the fall of 2019. In that assessment, she recounted a history of anger issues, depression, panic attacks, and suicide threats. The report recommended ongoing counseling, a psychiatric assessment, and a substance use assessment.
- Veronika seems to have a history of relationships becoming estranged. Examples include her relationship with her mother, her friendship with Monica Galarneau, and her friendship with Amisha Zuber. Her employment history is also inconsistent with her having been let go from Trader Joe's and as a school bus driver.
- Veronika was twice hospitalized as a young adult. During one of these hospitalizations she was diagnosed with Borderline Personality Disorder. However, it should be noted that the 2019 assessment did not diagnose Veronika with BPD and Veronika believes this diagnosis was in error.

- In text conversations with Mat over the 6-year relationship, Veronika has made threats of suicide and to cut herself. On one occasion, she stated she was too depressed to care for the children.
- There is some evidence that Veronika is leaning emotionally on the children. For example, she said the children know not to say Mat or Monica's name around her or she will start crying. Mat also reported that the children say that Veronika says negative things about him and Monica to them.

The evaluator was not able to consult with a current treatment provider for Veronika. Veronika is not currently in counseling with a trained professional. Instead, she participates (at an unusually high frequency) in a support group aimed at survivors of trauma and another Zoom group with someone who is "not a therapist." The evaluator tried to reach out to Veronika's most recent counselor but received no response to multiple messages.

In the end, the evaluator concludes there is sufficient evidence to raise a concern about Veronika's emotional health. This report will be recommending that Veronika obtain a psychiatric assessment (as was recommended by Sea Mar) and comply with any recommendations from that assessment.

It is less clear that Veronika's mental health issues have negatively impacted her parenting to a level sufficient to warrant placing limitations on her residential time with the children. Nor is there clear evidence that the children are at risk in her care. Mat's claimed concern about Veronika's mental health is contradicted by his own past behavior. During the relationship, Mat frequently traveled for his employment for periods as long as two weeks and chose to leave the children in Veronika's care. Similarly, when the couple separated, he agreed to a schedule of alternate weeks and reported in his interview that the schedule worked well. This history suggests that Mat did not believe that Veronika was incapable of caring for the children despite his concerns about her. Several third-party witnesses (including a large number of supportive written declarations) reported that Veronika is a safe and appropriate parent for the children. The children's pediatrician and Elora's therapist likewise stated that they had no concerns about Veronika's ability to be a safe and effective parent for the children.

In the end, the evaluator notes that a mental health issue is not a bar to effective parenting so long as the issue is well-managed. Accordingly, this report will recommend an updated assessment to determine whether additional counseling, medication or other measures should be put in place to assist Veronika. So long as Veronika follows through with those recommendations, the evaluator does not believe that Veronika is unable to safely care for the children.

B. Substance Abuse of Mother

The court may impose limitations in a parenting plan if it finds that a parent suffers from a long-term substance abuse problem that impacts the performance of parenting functions. RCW 26.09.191(3)(c). Mat reported that Veronika would drink two bottles of champagne a night and that she would take prescription medications without a prescription. Veronika acknowledged drinking at this level (though not every night) both in her interview with this evaluator and in the history she gave Sea Mar for its evaluation. Veronika further described incidents of blacking out from her use of alcohol. She has a history of abusing illegal drugs as a young adult (long ago) and a family history of substance abuse issues. In some of her texts, Veronika discusses using prescription medications as a means of coping (it is not clear whether she had a prescription for these medications). There were also reports of Veronika drinking alcohol regularly during her pregnancy with Raina. In the judgment of the evaluator, this history is sufficient to warrant requiring Veronika to complete a substance abuse evaluation.

As with the concerns about Veronika's mental health, it is less clear that Veronika's use of substances is currently interfering with her parenting of the children. Veronika reports she is no longer drinking alcohol and she passed a hair follicle test for alcohol (but not other substances). Mat left the children in Veronika's sole care frequently despite his stated concerns. Several witnesses denied any concerns about Veronika's use of substances. As with the issue of Veronika's mental health, there is insufficient evidence to reach a conclusion that her use of substances is currently impacting her parenting of the children.

C. Substance Abuse of Father

Veronika alleged that Mat abused marijuana by using the drug daily to the point of impairment. There was not significant additional evidence that Mat had a substance abuse issue outside of Veronika's report. None of the third-party witnesses interviewed had concerns about Mat's use of marijuana. Mat has no history of treatment, diagnosis, or legal problems related to his use of marijuana. Veronika supports a shared residential schedule for the children suggesting she does not think Mat's use of marijuana prevents him from safely caring for the children. Similarly, her initial petition and proposed parenting plan raised no concerns about Mat's use of marijuana and she only appeared to raise this concern after Mat raised concerns about her parenting. In the end, the investigation did not yield sufficient evidence to support a finding that Mat suffers from a substance abuse issue that impacts his parenting of the children.

D. Anger Management or Domestic Abuse by the Father

Veronika alleged that Mat had a history of anger issues and emotional abuse. She alleged that Mat was controlling about finances and that he would yell at her. She alleged that Mat had sex with her without consent after she had blacked out due to overuse of alcohol. One third party, Celeste Blair, said she had seen Mat yell at Veronika and block her passage. Veronika did not allege any violence, threats of violence or stalking behavior consistent with the statutory definition of domestic violence. While Veronika did call the police on two occasions following verbal arguments with Mat, both police reports describe Mat as calm and neither officer concluded that there was a basis for arrest. Several witnesses were supportive of Mat and reported no concerns about his anger. Monica described having initially believed Veronika's negative reports about Mat's behavior until she got to know him and discovered that they were not true. Amisha Zuber described Mat as patient and kind and contrasted that to Veronika's tendency to be volatile and angry. Mat has no history of criminal behavior. Just as with the marijuana issue, Veronika's initial filing raised no concerns about Mat being abusive and proposed no limitations on his parenting time. In the end, there was insufficient evidence to support any limitations on Mat's parenting based on allegations of abusive or controlling behavior.

E. Statutory Factors

In addition to the factors under RCW 26.09.191 examined above, this report will also address the statutory factors for establishing a final parenting plan.

(i) The relative strength, nature, and stability of the child/children's relationship with each parent:

The evidence generally suggested that the children have a strong and stable relationship with both of their parents. Collateral witnesses spoke highly of each parent's relationship with the children. The children have resided equally with each parent since January of 2020. Both parents described this schedule as working well although Mat did complain that Veronika did not share information about the children's school or about her travel plans with the children.

(ii) The agreements of the parties, provided they were entered into knowingly and voluntarily:

The parties do not agree on a parenting plan at this time. However, the parties did agree to a schedule of alternate weeks at the time of their separation in January of 2020. It is not clear why Mat later changed his mind. The concerns he raised (mental health and alcohol) were based on incidents that pre-dated the parties' separation and their prior agreement to share time. One possibility is that Mat's

1 decision to press for primary care was motivated by a desire to avoid paying child
2 support but it is not clear whether that was the case.

3 **(iii) Each parent's past and potential for future performance of parenting**
4 **functions as defined in RCW 26.09.004(3), including whether a parent has**
5 **taken greater responsibility for performing parenting functions relating to**
6 **the daily needs of the child(ren);**

7 It is undisputed that Veronika was a stay-at-home parent during the parties'
8 relationship. Further, Mat's employment required significant travel which meant
9 Veronika cared for the children on her own for extended periods of time while Mat
10 was working and supporting the family. The pediatrician notes that Veronika was
11 the parent who managed the children's health care. It is also noted that Veronika
12 was the parent who sought counseling for Elora. Several witnesses were supportive
13 of Veronika's parenting and her devotion to the children.

14 While acknowledging that he was working and supporting the family, Mat
15 reports that he was engaged and participatory as a parent during his non-work
16 hours. Several witnesses speak positively about his parenting of the children and
17 the strength of his relationship with the children. Mat has been the sole financial
18 support for the children whereas Veronika seems to have struggled to maintain
19 employment or come up with a clear plan on how she will support herself and the
20 children in the future. The evaluator notes, however, that it would have been quite
21 challenging for Veronika to work full time when she was home caring for 3 very
22 young children, sometimes while Mat was traveling for his job.

23 **(iv) The emotional needs and developmental level of the child(ren):**

24 Elora (age 6), Aidan (age 4) and Raina (age 2) are all very young and in need
25 of significant care and supervision from their parents. Elora has been seen in
individual counseling for support during her parents' separation. Elora's counselor
reports she is doing reasonably well and is not showing signs of stress beyond what
might be typical for a child her age dealing with such a transition. Her school reports
are generally positive as well. The evaluator has some concerns that Veronika has
a tendency to lean on the children emotionally or put them in the middle of disputes.
This concern is based on Veronika's own statements as well as reports from Mat
and Monica.

The evaluator notes that he would not typically recommend a schedule of
alternate weeks for children this young. A week is a long time for a 2-year-old to be
separated from either parent. A more typical shared schedule would be a schedule
of divided weeks and alternate weekends (sometimes called a 5/2 Schedule).
However, both parents report that the alternate week schedule has worked for the
children.

(v) The child's/children's relationship with siblings and with other significant adults, as well as the child's/children's involvement with his or her physical surroundings, school, or other significant activities:

The children are close in age and likely have close relationships with each other. Elora attends Carnation Elementary School and is reportedly doing well there. The kids also have some important peer relationships at the mother's home, particularly Elora who has a close friend she plays with. The children also appear to have a close relationship with Monica, the father's significant other.

One of the confounding problems of this case is Mat's decision to relocate to Everett. This decision created a significant distance between the parents and between Mat and Elora's school. This has made continuing the schedule of alternate weeks very impractical. The drive time between the parents is nearly an hour each way (perhaps longer in periods of heavy traffic). This means that if a parent needed to take a child to school near the other parent's home, it would involve 4 hours of driving between taking them in the morning and dropping them off in the evening. Both parents appear to recognize this is a problem but have different proposed solutions. Mat proposes changing the children's school by moving them from the Riverview School District to the Everett School District and reducing Veronika's residential time so that she sees the children mostly on non-school days. The evaluator is concerned about disrupting a school setting where Elora appears to be stable and doing well. Further, the evaluator notes that the Riverview School District is generally higher regarded than Everett. Veronika proposes home schooling the children so that no driving is required. However, the evaluator does not see this solution as being practical. The parents do not both support home schooling which is a nontraditional educational option. Mat works during the day and is not available to home school the children. Veronika will likely need to work as well. Neither parent has any training or expertise in providing instruction. Further, this solution would also result in removing Elora from her current, stable, school placement.

The evaluator does have some concerns about Veronika's housing situation. After interviewing her landlord, it does appear her housing is relatively stable. However, she is living in a very small space with three young children. While the children can share their small bedroom for now, it is likely not a good solution long term. The evaluator was concerned that he did not hear a clear plan on how Monica intended to support herself and the children which could mean she might struggle to find better housing. In contrast, there is plenty of space and multiple bedrooms available in Monica's Everett home. Mat is currently unemployed due to a lay-off but he has a significantly more consistent employment history than Veronika and will likely be in a better position to maintain adequate housing for the children.

(vi) The wishes of the parents and the wishes of a child who is sufficiently mature to express reasoned and independent preferences as to his or her residential schedule:

Mat proposes the children live with him most school nights and see Veronika on the 1st, 2nd, and 3rd weekends of each month from Thursday to Sunday. Veronika proposes that the children continue to alternate weeks between the parents' homes (and be home schooled). The children are too young to have reasoned, independent, and mature preferences and were not interviewed for this evaluation.

(vii) Each parent's employment schedule:

Both parents are currently unemployed. However, Mat has a steady history of employment managing corporate events and is looking for replacement employment in that field. He was able to work from home much of the time but also had significant travel obligations which required him to be away for extended periods of time. He expects those travel obligations to resume when he finds replacement employment.

Veronika has not worked consistently outside the home since Elora was born. She is therefore more available to the children at this time but less able to financially support them. It is presumed that Veronika will eventually need to find employment but whether her current plans of earning income as a surrogate or working part-time as a school bus driver will come to fruition remains to be seen.

F. Analysis and Evaluation

While the facts of this case are not unusually complex, it is debatable what parenting plan is in the best interests of Elora, Aidan and Raina. The investigation suggests that Mat is the more stable parent. He is more financially secure, less emotionally labile, and there are not the same concerns about his mental health or use of substances. He has better housing available for the children and has the advantage of a supportive partner that the children have bonded with. On the other hand, Veronika is the parent who has historically done the majority of the day-to-day parenting including managing the children's health care. She is available to care for the children consistently whereas Mat will likely have to travel significantly for his employment and this takes him away from the children.

Mat's proposal of placing the children in his primary care comes with significant draw backs. Elora would have to change schools and all the children would have to attend a somewhat less regarded school district. The children would also necessarily have to spend significantly less residential time with Veronika who is the parent who has historically done more of the day-to-day parenting tasks. Mat would have to find solutions to caring for the children while he traveled for work which might mean placing the children in the care of relatives or paid providers. Veronika's

proposal of keeping the current schedule strikes the evaluator as so impractical as to be effectively impossible absent one or the other parent relocating. Neither home schooling the children nor having them spend 2 hours a day driving to and from school (4 hours for the driving parent) makes much sense under the circumstances.

While a strong argument can be made for placing the children with either parent, the evaluator is required to make this difficult judgment call in order to fulfill his obligations under the order of appointment. The evaluator notes that when Veronika had to move out of the family home, she located housing that was reasonably close to the children's school and to their father. When Mat had to relocate out of the family home, he chose to move far from both Veronika and Carnation Elementary School. After careful consideration, this report will recommend that the children be placed in Veronika's primary care during the school year if, and only if, Veronika can complete the psychiatric and substance abuse evaluations recommended herein prior to the fall of 2021 and begin complying with their recommendations. Assuming she does so, the children should be placed in her primary care and spend residential time with their father for alternate long weekends. If she does not, then that schedule should be reversed and the children should live primarily with Mat. The parents should share time during the summer on a schedule of alternate weeks. Should one or the other parent relocate such that the parents reside within the same school district, then the parents should share residential time equally year-round.

XI. RECOMMENDATIONS

The Guardian ad Litem recommends the following:

- A. Substance Use Evaluation for Mother. The mother should complete a substance use assessment from a licensed provider such as Associated Behavioral Health. The evaluation should include a period of random UA testing and collateral contact with the father. The mother should abstain from all alcohol, marijuana, illegal drugs, and non-prescribed medications pending the results of the evaluation (and thereafter if recommended by the evaluation). A copy of the final evaluation should be provided to both parents. The mother should comply with any recommendations from the evaluation.
- B. Psychiatric Evaluation. The mother should complete a psychiatric assessment with Sea Mar Community Health Centers and comply with any recommendations from said assessment. The evaluator should be provided a copy of this parenting evaluation as well as the prior mental health assessment from Sea Mar. The father should be provided with a copy of the completed assessment. The mother should comply with the recommendations from that evaluation and provide written verification she has done so.

C. School Year Schedule. Assuming that the mother is in compliance with the requirements of Section A and B above, the children should begin residing in her primary care commencing with the start of the 2021-2022 school year. Under this outcome, the children should attend school in the Riverview School District (they should attend regular classes and not be home schooled unless otherwise agreed by both parents). The children should reside with the father on alternate weekends from Thursday after school until Sunday evening at 6 p.m. In addition, the father may travel to the mother's home and spend residential time on alternate Thursday evenings with the children from after school until 7 p.m. If the mother is not in compliance with the requirements of Section A and B above by the commencement of the 2021-2022 school year, the children should reside in the primary care of the father and the above residential schedule should be reversed with the children attending school at the public school associated with the father's residential address. In order to be deemed in compliance with Sections A and B above, the mother must have completed the evaluations but need not have completed any associated treatment recommendations (though she should immediately enroll). Should either parent relocate such that the parents reside within the same school district, the parent children should reside equally with both parents on a schedule of alternate weeks (i.e. same as the current temporary parenting plan).

D. Summer Schedule. During the summer, the children should reside equally with both parents in the summer on a schedule of alternate weeks (i.e. same as the current temporary parenting plan).

E. Transportation. Transportation should be provided by the receiving parent PROVIDED THAT the visiting parent should provide all transportation for the mid-week evening visit recommended on alternate Thursdays.

F. Holiday Residential Time: The children should spend Mother's Day with the mother and Father's Day with the father from 9:00 a.m. to 6:00 p.m. The parents should alternate having the children on holidays including Thanksgiving Weekend, Memorial Day Weekend, Labor Day Weekend, Halloween, and July 4th. If the schedule for Thanksgiving Weekend, Memorial Day Weekend, or Labor Day Weekend results in a parent having the children for two weekends in a row, the other parent should have the children for the following two weekends after which alternation should resume.

G. Winter Break. The parents should share residential time over Winter Vacation. The children should reside with the mother for the first half of Winter Vacation and with the father for the second half in even years. In odd years, this schedule should be reversed. The vacation should commence when school

lets out and end when school resumes with the dividing point occurring at noon on Christmas Day.

H. Spring Break. The children should spend Spring Vacation with the mother in even years and with the father in odd years. The vacation should be defined as commencing the Sunday after school lets out at 6 p.m. and ending the Friday before school resumes at 6 p.m. so as not to disrupt the alternating weekend residential schedule.

I. Mid-Winter Break. If the children's school district has a mid-winter break, the children should spend Mid-Winter Vacation with the mother in odd years and the father in even years.

J. Both parents should be restrained from making negative or derogatory comments about the other parent in front of the children, including negative comments about the other parent's relatives or significant other. Both parents should be restrained from discussing this litigation with the children. Neither parent should show any court documents or this report to the children or allow the children to have access to such documents. Both parents should be restrained from encouraging the children to make negative comments about the other parent or the other parent's significant other. Both parents should be restrained from discussing child support terms with the children.

K. The parents should make major decisions on behalf of the children jointly. Both parents shall have equal access to the children's school records, teachers, doctors, and other providers. Disputes about joint decisions or about what portions of the parenting plan mean should be submitted to mediation with a designated mediator.

L. Each parent shall provide the other parent promptly with receipt of any significant information regarding the welfare of the child, including physical and mental health.

M. Neither parent shall advise the children of the status of child support payments or other legal matters regarding the parental relationship and obligation.

N. Neither parent shall use the children, directly or indirectly, to gather information about the other parent or take verbal messages to the other parent.

O. Neither parent shall ask the child to make decisions or requests involving the residential schedule with the child except for plans which have already been agreed to by both parents in advance.

P. If a parent is traveling out of state with the children (or any of the children), he/she shall provide advance notice to the other parent including a general itinerary and contact information.

Date: 4/30/2021

DocuSigned by:

Matthew Jolly

Matthew Jolly, WSBA #23167
Parenting Evaluator