SUPERIOR COURT OF WASHINGTON

COUNTY OF KING

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| VERONIKA ELICIA GOODNIGHT, Plaintiff, | Case No. \_\_\_\_\_\_\_ |
| v.  MATHEW RALIDAK, Defendant. |  |

COMPLAINT AND DEMAND FOR JURY TRIAL

## INTRODUCTION

I, Veronika Elicia Goodnight (“Plaintiff”), am over the age of 18 and competent to testify. I bring this action against Defendant Mathew Ralidak for violations of my fundamental constitutional rights, including my right to due process, equal protection, and parental integrity, arising from his willful, malicious, and abusive misuse of judicial process.

## JURISDICTION AND VENUE

1. This Court has jurisdiction under the laws and Constitution of the State of Washington.  
2. Venue is proper in King County, Washington, where the parties reside and where the wrongful acts complained of occurred.

## FACTUAL BACKGROUND

3. Plaintiff is the natural mother and primary caregiver of her three minor children.  
4. Defendant has repeatedly misused the judicial system by filing false and malicious claims, including Case No. 25-2-11308-6 SEA, which has unlawfully deprived Plaintiff of contact and custodial rights to her children.  
5. Defendant relied on unverified, inadmissible, and third-party documents, without any firsthand knowledge, contrary to Washington State Evidence Rule 602.  
6. Defendant’s conduct has caused Plaintiff severe and ongoing emotional distress, financial hardship, reputational damage, and deprivation of constitutionally protected parental rights.

## CLAIMS FOR RELIEF

Count I – Violation of Due Process Rights (U.S. Const. amend. XIV; Wash. Const. art. I, § 3)  
7. Defendant deprived Plaintiff of liberty and parental rights without due process of law by misusing protection orders and family law proceedings.  
  
Count II – Deprivation of Fundamental Parental Rights  
8. The U.S. Supreme Court and Washington law recognize the parent-child relationship as a fundamental right. Defendant has intentionally interfered with that right absent lawful justification.  
  
Count III – Abuse of Process / Malicious Prosecution  
9. Defendant acted willfully, knowingly, and maliciously to misuse court processes for the purpose of depriving Plaintiff of her children and causing harm.

## TRIAL BY JURY DEMAND

Pursuant to the Seventh Amendment to the United States Constitution, Plaintiff demands a trial by jury on all issues triable by jury.  
  
The Seventh Amendment provides: “In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.”  
  
Plaintiff invokes this right because:  
1. The value in controversy exceeds twenty dollars.  
2. Plaintiff asserts violations of her fundamental constitutional rights, including parental rights, due process, and equal protection.  
3. Only a jury of Plaintiff’s peers has the constitutional authority to determine the facts and award just relief.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court empanel a jury pursuant to the Seventh Amendment of the United States Constitution and enter judgment in her favor and against Defendant as follows:  
  
1. Declaration of Rights  
- That Plaintiff’s fundamental constitutional rights as a parent have been violated through Defendant’s malicious misuse of legal process.  
- That Plaintiff’s right to due process of law has been infringed.  
  
2. Restoration of Custodial Rights  
- That all orders and proceedings unlawfully obtained in Case No. 25-2-11308-6 SEA be declared void.  
- That Plaintiff’s full custodial rights to her minor children be restored.  
  
3. Compensatory Damages  
- For general damages in an amount to be proven at trial, including emotional distress, pain and suffering, reputational harm, and loss of parent-child relationship.  
  
4. Punitive Damages  
- For punitive damages in an amount sufficient to punish Defendant and deter further abuse of process.  
  
5. Costs and Fees  
- For costs of suit, including reasonable attorney’s fees if applicable, and such other relief as the Court and jury deem just and proper.

DATED: \_\_\_\_\_\_\_\_\_\_\_\_\_

Respectfully submitted,

VERONIKA ELICIA GOODNIGHT  
Plaintiff, Pro Se

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