

FILED
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KING COUNTY
SUPERIOR COURT CLERK
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CASE #: 20-3-03830-3 SEA

Superior Court of Washington
County of KING

In re the Parentage of:

Elora Ralidak
Aidan Ralidak
Raina Ralidak

Veronika Goodnight

Petitioner,

And

Mathew Ralidak

Respondent.

No. 20-3-03830-3 SEA

Declaration of Mathew Ralidak in
Support of Motion for Temporary
Orders and Appointment of
GAL/Parenting Evaluator

Mathew Ralidak, the Respondent herein, certifies to the Court as follows:

Veronika and I have three children together, Elora, age 5, Aidan, age 4, and Raina, age 2.
We separated in mid-January 2020 and since that time we have alternated weeks with the children.

I am requesting of the Court the following Relief:

1. That the Court enter my Proposed Temporary Parenting Plan.
2. That the Court enter my Proposed Temporary Order of Child Support.
3. That the Court Appoint a GAL/Evaluator.
4. That the Court enter a Restraining Order against the Petitioner.

Background.

DECLARATION - 1

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1 I am 34 years old and Veronika is 38. We met in 2014 when I was on a business trip to
2 Seattle. I was living in Philadelphia and I was working for an Event Technology company called
3 IMS Technology Services. We exchanged information and began a relationship and lived together
4 in Kennett Square, PA in a home that I rented. Veronika became pregnant approximately 4 months
5 after we first met.

6 It was not long after Veronika and I began residing together that I started to recognize
7 unhealthy patterns. When I would try to discuss my concerns with her, she became increasingly
8 hostile, which resulted in her verbally attacking me, name calling, and breaking items around the
9 house in rage, example: smashing the glass top stove while holding an infant Raina and busting the
10 wood door and lock to the master bedroom. As our relationship continued to deteriorate, she sought
11 attention outside of the relationship, both at her place of employment and on online dating app, while
12 at the same time accusing me of being the one that was having affairs. She would break up with
13 me, then "love bomb" me when I was ready to walk away, and I would take her back. This pattern
14 repeated numerous times over the years until ultimately, I was no longer interested in continuing
15 with the relationship or being treated in such a demeaning manner and told her that the relationship
16 was over. It was at this point, that she contacted DCS to make a child support claim against me,
17 although she had no intention of moving out. It was not until after I filed an objection with DCS,
18 because I was already supporting the children, as well as Veronika, that she then moved out. DCS
19 eventually entered a support order attached as **See Sealed Financial Source Documents**. Then they
20 entered a second support order for my youngest because I had not signed an Acknowledgment of
21 Paternity at her birth so we had to establish parentage first before they could include her. **See Sealed**
22 **Financial Source Documents**

23 Having three (3) children together, I had hoped that things would work for us. However,
24 after learning that she was seeking out other relationships, her constant need for attention from

1 others, her excessive drinking habits, her choices when it came to finances, and her anger issues and
2 blow-ups, it was something that I knew that would not be good for anyone, most of all the children,
3 which is why I finally ended the relationship. It was not an easy decision..

4 After Veronika moved from the home, she refused to provide me with an address where
5 she would be living with the children. She would only give it to my attorney and asked that my
6 attorney not give me the information. She also started making social media posts that claimed she
7 had been in an abusive relationship which was very distressing for me as it was completely untrue.

8 **Proposed Temporary Parenting Plan.**

9 **A. The children are in an unstable environment.**

10 **B. The children are not in a healthy environment while in the care of Veronika**

11 **C. Veronika engages in Abusive Use of Conflict.**

12 **D. Veronika has mental health issues, excessively drinks alcohol and perhaps has**
13 **drug issues as well.**

14 I am attaching under seal, the first five (5) pages of Veronika's "Adult Mental Health
15 Assessment" records dated September 2019, although the full Assessment appears to be twenty-
16 two (22) pages. **Sealed Medical File.** As reflected by the attached first five (5) pages that I do
17 have, Veronika states that she needs therapy or medication, or hospitalization to cope with her self-
18 diagnosed Pre-menstrual Distress Disorder, PMDD. She states that "If it's 10 days before my
19 period, I should be hospitalized. It's super hard to mother. I'm either sleeping too much or not
20 all. I'm either eating or not eating" She reports that she has had suicidal thoughts and that she is
21 so irritable and angry that she has to wear bracelets so that she does not yell at the children. She
22 states that "The depression is so severe. I don't even want to connect with my children... but I
23 have so much love for them. The depression is really severe." Regarding her anxiety she states
24 that "It's so bad my fingers bleed. I have panic attacks. I have to leave work. I can't take care of

1 my kids.” She reports that if it is not the 10 days before her period that she is “Numb or just sad.
2 And really angry.” If it is within 10 days of her period she states “I have no energy. I’m also
3 exhausted from hysterically crying” and that “It will be really *ucking weird. I’ll think that I see
4 things or hear things.” The Assessment also reflects that she was in in-patient treatment at Santa
5 Barbara Cottage Hospital for Mental Health Treatment and was in in-patient treatment in Walnut
6 Creek, CA “due to cutting”.

7 Further the Mental Health Assessment reflects that Veronika was hospitalized at ages 17
8 and 23 because she overdosed and that “she reports drinking 2-3 bottles of champagne. She reports
9 being sober for 1 month now.” From my own observations while we were together, she would
10 drink a least a bottle and up to two (2) bottles of champagne every night and she would drink
11 during her pregnancy with our youngest child. Not every night during the pregnancy, but
12 frequently which was extremely concerning. When I would confront her about it, she would
13 become very defensive and angry. The Assessment is dated September 2019 and although it
14 reflects that she was sober for one (1) month by that time, I witnessed her drinking the champagne
15 after September 2019 through the time that she moved out in January 2020. In addition to her
16 mental health issues and excessive alcohol use, she always had a supply of pain killers from her
17 ex mother-in-law that she would take. She also admitted me to me her past use of meth, although
18 I do not believe that she used meth during our relationship.

19 On page 5 of the Mental Health Assessment “Assessing Risk Level” the Assessment
20 reflects: Current: “It’s not so present in the normal month. In the 10 days, I’ll be driving ... a
21 van or school bus will pass and think it would be amazing if it hit me. Just *ucked up *hit that I
22 don’t want to think about. She states: “I don’t want it in my head.” Veronika reports calling
23 friends or the crisis line lately when this became more severe.”

1 Veronika and I had previously agreed that while the COVID Pandemic continues our oldest
2 daughter, Elora, and our son, Aiden, would stay home if the option was given by the school for
3 Zoom, rather than having them attend in-person classes. I had expected that Veronika would sign
4 them up with the school district for the Zoom option. However, Veronika later told me that she
5 would be home-schooling them her way and without involvement of the school district, although
6 that is NOT what I agreed to. When I asked Veronika about the status of Elora with the Carnation
7 School District, she did not even know that Elora was already registered. Veronika then informed
8 Elora's teacher that she would be home schooling her, although after much arguing between us,
9 she did allow Elora to participate with the Zoom classroom.

10 As I watched our daughter's 1st day in the Zoom classroom, I received a message from a
11 friend that shows Veronika was posting on social media that "*I can tell you right now Zoom school*
12 *is NOT going to work with my kids week home-school schedule*" And she was further posting
13 comments such as: "I miss performing" (she was an exotic dancer) "I miss the thousands of people
14 screaming my name" "I miss making those people feel happy with my performance" and "I miss
15 Canada". She made zero mention of the milestone that it was our daughter's first day of
16 Kindergarten. **See attached Exhibit 1.**

17 I want my children to be properly educated. I am not even certain that Veronika graduated
18 from High School. Veronika's tactics by unilaterally removing the children from school to "home-
19 school" them has been extremely upsetting. She does not have the skills, the patience, ability or
20 tools to home-school. She is having enough difficulty trying to care for herself.

21 Veronika has anger issues, as is verified in her Mental Health Assessment. A more recent
22 example is when Veronika told me that Elora wanted to spend some additional time with me outside
23 of our 50/50 window and I said "great" and that since our other daughter and I both needed a
24 prescription, I told her I would pick them both up at the pharmacy so that she did not have to get the

1 kids out of the car and take them into the “germy” pharmacy, and then she could bring Elora by and
2 I would give her Raina’s prescription. Veronika then told me that she would wait for me in my
3 house. However, when I told her that I did not want her to go to my house without me being there,
4 she yelled “*uck you” at me and said she was not going to bring Elora over after all. Veronika went
5 to the Safeway to get the medicine herself, even though she knew I was going to be there to pick up
6 the prescriptions. I believe that she did this in order to cause a public display, in hopes she could
7 fabricate something to label me as an “abuser” like she had painted me to be online. Luckily, I saw
8 her car in the parking lot and waited for her to leave before I went in to pick up my personal
9 prescription because I was afraid she would create a scene and then maybe call the police. This event
10 caused distress to poor Elora who wanted to spend extra time with me. I was excited to spend the
11 time with my daughter, but when Veronika was not allowed unaccompanied time inside of my
12 home, she used our daughter as a weapon, with the purpose of upsetting me, while completely
13 disregarding how this would effect Elora. (**Exhibit 2.**)

14 During our relationship, although I worked full-time and Veronika only periodically
15 worked, I cared for the children approximately fifty (50%) of the time. I work for a company called
16 Freeman. They contract with Microsoft and other companies to help them manage events. Before
17 Covid, I worked exclusively on Microsoft events that occurred about 4 times per year. I was the guy
18 who made sure that the technology ran smoothly during the event. After Covid I was put on a reduced
19 salary and then my job changed so that I now manage digital events for Microsoft as well as other
20 companies. All of my work is remote and I am home during the day. When Microsoft was my only
21 client and I worked from home, I was very involved with the daily care of the children. I have been
22 interviewing nannies because my schedule is less flexible now that I work for other clients as well,
23 although it is all digital and I can do it from home.

1 When were together Veronika would more often feed the children during the day and did
2 their laundry and I would do the cooking and clean-up in the evenings after work, as well as give
3 them baths and put them to bed and we equally shared in the cleaning of the house. She typically
4 took the children to their medical appointments so that I would not miss work. Since she moved
5 out in January, we have been on a week on/ week off schedule which I was able to do since I
6 worked from home and had a great deal of flexibility to care for the children.

7 I had not wanted to engage in litigation because of the potential for conflict and the cost so I
8 forwarded a final Parenting Plan in January that memorialized our week on/week off schedule. She
9 responded with a lot of demands. Since that time I have become braver about fighting for what
10 would be best for the children, particularly as I see how conflict driven and unstable
11 Veronika is. I am asking that the Court enter my Proposed Parenting Plan. I am proposing that the
12 children primarily reside with me and that Veronika have the children every other weekend from
13 Friday afternoon to Monday morning. I am asking that I be given sole decision-making, as Veronika
14 has mental health, alcohol and perhaps drug use issues and has demonstrated substantial abusive use
15 of conflict and an outright unwillingness to make decisions that are in the best interest of the children.

16 Another of Veronika's ridiculous demands include that Amisha Zuber, a friend of the family
17 (prior friend of Veronika's), is not allowed to be around the children or see them. Veronika has
18 borrowed money from Amisha in the past without paying her back as well as causing other issues
19 within their relationship. Because Amisha cares for the safety of the children she has repeatably told
20 Veronika she needs to change her ways. After Amisha informed Veronika that she has an
21 incriminating video of how Veronika acts with the kids, Veronika tried to cut all ties with Amisha
22 and attempted to keep her away from myself and the kids. Amisha has been a great support system
23 for our family and has gone above and beyond for the children. They love her very much, and she
24

DECLARATION - 7

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1 has only ever behaved in a loving and supportive role in their lives. There is no reason whatsoever
2 that Amisha not be allowed to see the children when I have them.

3 Just this week, September 16th, Veronica texted me to tell me that she had a conversation
4 with our little five year old and she said: "I just had a long conversation with Elora about how she's
5 afraid to tell the truth. She know I am not made at her, amisha or you, we learned in homeschool
6 about respect and boundaries. I shared what you and amisha are doing is disrespectful and unkind
7 but I am not mad and I told her it's important to always share the truth. With that said, I am too
8 exhausted and sad to have any more conversations." (Exhibit 3) I think it is so problematic for her
9 to have a conversation with a five year old and describing her father are disrespectful.

10 Veronika clearly appears to be struggling with mental health and anger issues and most
11 likely with alcohol and drug consumption as well. In order to ensure the children's safety and that
12 they are in the best environment possible, it would be best for them, as well as for Veronika, if I
13 were the primary residential parent.

14 As reflected in my Proposed Parenting Plan, I am asking that Veronika undergo a mental
15 health, alcohol and drug assessment within twenty (20) days, with collateral contacts, and provide
16 me with copies of those assessments. She should additionally be required to follow all
17 recommendations. If she does not undergo the mental health and alcohol and drug assessments
18 within twenty (20) days, then all visitation should cease until she has done so. If she does not follow
19 all recommendations of the assessments then again all visitation should cease as well, until such time
20 that she is in compliance.

21 **Proposed Temporary Order of Child.**

22 In mid-December 2019 Veronika contacted the WA State DCS to open a claim for child
23 support from me, although she and the children were residing with me in my home at that time.
24 Because she had applied in mid-December, DCS was seeking back support from me for the period

1 from December 13, 2019 through December 31, 2019. DCS assigned imputed income to Veronika
2 at a rate that was not the standard amount, based on testimony during the hearing. During this same
3 time period, Veronika created a Go Fund Me account for herself, in addition to collecting child
4 support, food stamps and cash payments from the State. Her Go Fund Me account collected almost
5 \$6,000.

6 There was an Administrative Hearing and the end result was that I was to pay \$1248.30 per
7 month for Elora and Aiden. Months later, in May 2020, I received another notification from DCS
8 reflecting that I needed to pay \$493.00 per month for our third child, Rainia, and that I owed back
9 child support in the amount of \$2,465. **See Sealed Financial Source Documents.**

10 I am asking that the Court enter my Proposed Order of Child Support if they change the
11 Parenting Plan to make me the primary residential parent. I do not know what Veronika's present
12 income is and therefore have assigned her imputed income. Although, I do know that she receives
13 food stamps and other assistance from the State of Washington as well. **See sealed Financial**
14 **Source Docs.** In the past, she worked at Trader Joes and has worked as an Exotic Dancer, at a tea
15 shop, as a bartender, sold for MLM companies for health foods and essential oils, driven for Uber
16 Eats and has done gig work as an entertainer. I do not know whether or not she is working at this
17 time. Although, when she and I separated, she moved to a farm that is owned by one of her friends.
18 My understanding that in lieu of rent, she does chores on the farm.

19 My monthly net salary had been \$6,510 per month at Freeman. I was then forced to take a
20 20% salary reduction at the beginning of the Pandemic in March and then in April I was furloughed
21 with no pay and was collecting unemployment in the amount of \$1,390 per week or a gross amount
22 of \$6,023 per month. Last month, I accepted another position with the Freeman Company, which
23 does not require that I travel and allows me to work remotely. My current net monthly income is
24 \$5,915.28. I am asking for a downward deviation from the standard monthly transfer payment which

1 Veronika would owe me to make because I want to ensure that the children are taken care of while
2 they are in her care.

3 Appointment of Parenting Evaluator

4 I have provided a Proposed Order Appointing a Parenting Evaluator. I am requesting that
5 Matt Jolly be appointed. I understand that I may have to pay the entire amount of the GAL fee. I
6 will literally do whatever it takes to make sure that my children have the best opportunity to thrive.

7 Request for Restraining Order.

8 Veronika has a history of retaliatory behavior that causes me fear in how she will respond to
9 this Motion. She has had a pattern of lashing out when things don't go her way. Recently this has
10 manifested in either smearing me online immediately after she hears something she doesn't like (my
11 starting a new relationship, having differing opinions on Elora's education, not allowing Amisha to
12 see the children), or a pattern of harassment over text. The things that have caused her to escalate
13 in the past have been minor in comparison to filing this Motion, so something of this gravity worries
14 me. There haven't been direct threats against my personal safety, only threats of making my life hell.
15 However, she has threatened suicide in the past, as well as keeping my children from me, which is
16 very frightening. She has also spread malicious lies about me being an abuser around the community
17 and online, and I worry what sort of help she will seek in retaliation against me.

18
19 I declare under penalty of perjury under the laws of the State of Washington that the
20 foregoing is true and correct.

21
22 Signed at Duvall, WA this 17th day of September 2020

23
24 
Mathew Ralidak

DECLARATION - 10

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EXHIBIT 1

MARGARET R. BENDER



Veronika Petra is feeling frustrated.

9m ·

...

I can tell you right now zoom
school is NOT going to work
with my kids week homeschool
schedule.

Like

Share



Veronika Petra

I miss performing

I miss the thousands of people screaming my name

I miss making those people feel happy with my performances

I miss Canada

I miss performing at the Bell Centre

I miss being pregnant

I miss performing at the Bell Centre

I miss performing at the Bell Centre

EXHIBIT 2

MARGARET R. BENDER

2:53



Veronika >



New name and photo available

Veronika Goodnight Update Contact...



I can't believe you did that to her

Just because you got upset you couldn't be in the house? Seriously?

You never told me you were leaving and you can't just show up here. So please respect some things in this process Veronika

No. YOU did this Mathew. My main priority is Co parenting. You're the one that can't co parent. You're the one that breaks hearts.

You flips a switch as soon as I said no to being in here... like what?

I never said she couldn't be here

This is how this should have happened. I have prescriptions. You let me know you left. You drop Elora and I give you prescription... what happen Veronika..



iMessage



EXHIBIT 3

MARGARET R. BENDER

2:34



Veronika >



New name and photo available

Veronika Goodnight Update Contact...



Elora's glue for school was hidden and I didn't get it in the bag. I have it here with me

If it works in your timing today to bring some things you could bring the glue.

Would you like to talk about what's going on after Elora's class today?

Today 12:17 PM

I just had a long conversation with Elora about how she's afraid to tell the truth.
She knows I am not mad at her, amisha or you, we learned in homeschool about respect and boundaries.
I shared what you and amisha are doing is disrespectful and unkind but I am not mad and I told her it's important to always share the truth.
With that said.
I am too exhausted and sad to have anymore conversations.
I understand I can not control who



iMessage

