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RCW 70.123

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*In re Marriage of Littlefield*, 133 Wn. 2d 39, 46, 940 P.2d 1362 (1997).

*In re Marriage of Watson*, 132 Wn. App. at 232.

## I. INTRODUCTION

Mr. Reno filed a petition for dissolution of marriage January 15, 2008. The case docket shows 296 documents have been filed since the initial filing. There have been a total of two Guardian Ad Litem reports, one from the original petition seeking dissolution and custody and the current one from Stan Kempner filed March, 14th 2013.

The parties' daughter, Karli was born May 22<sup>nd</sup>, 2007, and has been in Mr. Reno's care since she was 7 months old. She was officially placed in his care after he obtained an ex parte restraining order on January 15, 2008. Throughout the history of this matter there have been substantial concerns about Mrs. Banik's (fka) Reno drug use and domestic violence.

A decree of dissolution and Parenting plan was entered on June 2, 2009. Restrictions were imposed in the parenting plan on Mrs. Banik (fka) Reno based upon: 1) Neglect or substantial non-performance of parenting functions; 2) Long-term or physical impairment which interferes with the performance of parenting functions; and 3) a long term impairment resulting from drugs and alcohol or other substance abuse. This plan was finalized and Mrs. Banik (fka) Reno was given supervised visitation, 2 hours weekly at Fulcrum, and she was to complete treatment for her drug addiction. This was what the court had ordered. After she had completed treatment and conditions of the court, Mr. Reno entered into mediation on May, 20<sup>th</sup> 2010 and expanded the visitations.

Mr. Reno was at that time doing what he thought was best for their daughter with the information he had. It appeared as if Mrs. Banik (fka) Reno was in compliance and working on getting through the addictions and other issues. That plan allowed Mrs. Banik (fka) Reno to go from supervised to unsupervised visitation. Mr. Reno through mediation expanded the visitations to unsupervised visits 2 days each week for 5 hours on Tuesdays and Thursdays. The plan was to last for six months and be reevaluated by the parties. There were other conditions but the expansion was not court ordered, it was adopted through mediation due to Mr. Reno's willingness to try and expand time in the best interest of their daughter.

On December, 1<sup>st</sup> 2010 Mr. Reno and Mrs. Banik (fka) Reno adopted another mediation agreement to modify the parenting plan. This modification was to be in force for 1 year. The main provisions in this modification was to expand Mrs. Banik's (fka) Reno time to start getting overnights and Mr. Reno at that time was not aware of any reason not to enter mediation and expand time for their daughter to start getting a more normal visitation schedule.

At the point when Mr. Reno had become aware that Mrs. Banik (fka) Reno was engaging in Domestic Violence with her boyfriend (now husband). Mr. Reno was provided information about domestic violence at that time from one of Mrs. Banik's (fka) Reno friends. He was told about the domestic violence, but was later lied to and made to believe in that mediation that Mrs. Banik feared for her life (mislead Mr. Reno that she was a victim),

that she had removed herself from that relationship, and agreed to never bring their daughter around Mr. Banik and continue to disassociate with him. She was very convincing in mediation.

This is what brings us to the March, 21<sup>st</sup> 2012 petition for a new modification of the parenting plan. Mr. Reno filed petition for modification of the parenting plan. In his declaration that he had evidence of her violating the mediated agreement and was in fact not in compliance with the provisions to continue the disassociation with Mr. Banik and that she had numerous domestic violence altercations with Mr. Banik. Mrs. Banik (fka) Reno admitted to Mr. Reno's council Bevan Maxey that not only had she broke the mediated agreement due to the domestic violence, *but that she had recently used Methamphetamine*, Mrs. Banik's (fka) Reno drug of choice, also she admitted to the allegations of engaging in prostitution. The Domestic violence and prostitution were the main reasons for Mr. Reno to seek help from the courts, but then with her admission in court of her recent use of Methamphetamine, that brought in a full 3 issue situation that did not put their daughter in a safe environment. Mr. Reno sought support to modify as this was more than an issue they could resolve through mediation, due to Mrs. Banik's (fka) Reno neglect and risk she put their daughter in. Mr. Reno was not fully aware of the seriousness of the domestic violence until Mr. Banik provided him with many police reports and information about what was going on with Mrs. Banik (fka) Reno concerning domestic violence. Mr. Reno was left with several issues that all needed to be addressed and felt that the court was the only place to decide

how to handle this. But I want to be clear to the Court of Appeals that the main reason for this request to modify and seek help from the court was the seriousness of the Domestic violence and the prostitution. It was not until after the petition was filed that he became aware of her continued drug use.

So on April, 12<sup>th</sup> 2012 a temporary order was entered requiring Mrs. Banik (fka) Reno to have supervised visits on Saturdays for 2 hours at Fulcrum. She was to enroll in drug treatment and participate in random UA testing. The order also stated that Mr. Banik was not to be present during any of the visits.

SPARC submitted a report dated May, 4<sup>th</sup> 2012 that Mrs. Banik (fka) Reno was in compliance with the drug program. But there was still no weight though the courts being put upon the initial filing for Mr. Reno seeking support because of Domestic Violence.

So this was when the court on July, 16<sup>th</sup> 2012 entered an order on motions that allowed unsupervised visitations on Saturdays from 3:30 p.m. to 8:00 p.m. These visits were to be unsupervised and only individuals approved by the Guardian Ad Litem were allowed to attend.

This is when Mr. Reno requested the visits to go back to supervised in fear that she had not complied with previous court orders and that the risk was greater than not that Mrs. Banik (fka) Reno would violate the order. The fears became reality and on July, 31<sup>st</sup> 2012 the court signed an order of contempt finding that Mrs. Banik (fka) Reno allowed unapproved individuals to be present at the visitation on July, 7<sup>th</sup> 2012. That temp order moved

the visits back to supervised, but for only a month and at the end of August she was able to purge the contempt. The visits again moved back to unsupervised and the order had not addressed the condition Mr. Reno had originally filed the petition for--which was the serious conditions of Domestic violence which she had subjected their daughter to on more than one occasion.

With the current issues that Mr. Reno was seeking for the courts to address and that shortly after his petition to the court for support, Mrs. Banik (fka) Reno was convicted of Domestic Violence and on a 2 year deferred prosecution for DV and put on probation. This was not a drug charge but domestic violence and her court ordered drug treatment was all that the courts had imposed, leaving her domestic violence still unaddressed. Mr. Reno had to get this addressed which led him to continue all the way to trial to finally get this addressed.

Mr. Reno is the custodial parent of their now 6 year old daughter and had plenty of evidence that supported Mrs. Banik (fka) Reno get her domestic violence issues addressed, it was his obligation to make sure that this history that had been uncovered through this petition was addressed and properly documented as well as Mrs. Banik (fka) Reno get the help that the domestic violence perpetrator evaluation and then complete the program recommended. The GAL recommended this and the court adopted this language.

Here lies the error the court made. It ordered Mrs. Banik (fka) Reno to complete a domestic violence evaluation and all recommended treatments both as a perpetrator and as a victim, but

the court sent her to the YWCA for that evaluation and treatment. The YWCA is not certified to do what the court ordered. It is not certified to do evaluations. It is not certified to do treatment for perpetrators. This is what Mr. Reno is seeking for the Court of Appeals to correct in this Parenting plan. A ruling that none of the provisions in sections 3.2 through 3.9 is to go into effect until Mrs. Banik (fka) Reno has completed a certified Domestic Violence perpetrator evaluation and any treatment programs recommended by the evaluation.

The Guardian Ad Litem referred to Mrs. Banik's (fka) Reno police records "GAL Report" page 7, last paragraph. "I have reviewed police records involving Ms. Banik encompassing years 2002-2012. There are numerous records where her name appears. (The stack of records I received was almost nine inches tall.)"

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"PVRP" stands for Partial Verbatim Report of Proceedings (Courts Oral Decision), and represents the date of trial (May 6th, 2013) referred in designation of clerks papers as pages 26-37-- "GAL Report" stands for document in designation of clerks papers as pages \*1-15 -- "PP" represents Parenting Plan entered on designation of clerks papers index to pages 56-65-- "INX" refers to the designation of clerks papers.

## **II. ASSIGNMENTS OF ERROR/ISSUES**

1. The Trial The court erred when the court referred Mrs. Banik (fka) Reno to a program at the YWCA that is not certified to treat Domestic Violence Perpetrators.

Is it error for the trial court to acknowledge a party's long history of domestic violence and her abuse of children and then fail to limit that party's residential time pursuant to RCW 26.09.19

2. The trial court erred when it referred Mrs. Banik (fka) Reno to the YWCA for an Evaluation as they do not do domestic violence evaluations. (RCW 70.123)

Is it error for the court to order a condition to seek a domestic violence evaluation from an advocacy based shelter for Victims of Domestic Violence? The YWCA is not a certified perpetrator program and is not certified to do evaluations and is not certified to treat perpetrators.

### III. STATEMENT OF THE CASE

“PP” Section 2.1 Parental Conduct (RCW 26.09.191 (1), (2)) states: “The Mothers residential time with the child shall be limited or restrained completely, and mutual decision-making and designation of a dispute resolution process other than court action shall not be required, because this parent has engaged in the conduct which follows:

Pattern of emotional abuse of a child.

A history of acts of domestic violence as defined in RCW 26.50.010(1) or an assault or sexual assault which causes grievous bodily harm or fear of such harm.”

“PP” Section 2.2 Other Factors (26.09.191(3)) states: “The Mothers involvement or conduct may have an adverse effect on the child’s best interests because of the existence of factors which follow:

Neglect or substantial nonperformance of parenting functions.

A long-term emotional or physical impairment which interferes with the performance of parenting functions defined in RCW 26.09.004.

A long-term impairment resulting from drug, alcohol, or substance abuse that interferes with the performance of parenting functions.

The above quotes are to point out that there are many reasons the visitations are limited and domestic violence was added to the current parenting plan and (domestic violence) was not in the previous plan when Mr. Reno was awarded by the court to be the custodial parent in the parenting plan entered on June 2, 2009. I point this out because in the first parenting plan Mr. Reno was not aware of such a long history of domestic violence that Mrs. Banik (fka) Reno had been involved in. "GAL Report" page 13 starting with the second opening paragraph on this page the GAL says that "Mr. Reno has raised a valid concern about the potential for domestic violence with Ms. Banik." (fka) Reno "Her life has been peppered with domestic violence both as a perpetrator and a victim." Also in the same paragraph the GAL says "while I have seen no evidence of since the incidents in 2011, I am concerned that it might not be uncommon that once the glow of Ms. Banik's recent marriage and new baby wear off compounded by the stresses of a newborn, that Mrs. Banik could easily resort to past behaviors." Mr. Reno originally filed this petition to seek help from the courts to address the specific issue of domestic violence.

The trial court addressed this, but since Mr. Reno filed the designation of clerk's papers wrong, he was unable to make reference to the points in the trial Verbatim Report

of Proceedings and the presentment hearing Verbatim Report of Proceedings. With this error Mr. Reno made by accidentally labeling the Verbatim Report of Proceedings from the trial as Trial Minutes, this leaves a lot of things Mr. Reno could quote to give the Court of Appeals a better understanding of the history and admissions of Mrs. Banik (fka) Reno. Mr. Reno apologizes for this, and if he was financially able to have representation for this Appeal, he would have. But this specific topic was addressed in the trial, and Mrs. Banik (fka) Reno had apologized for the continued non-compliance and financial burden to Mr. Reno to have to keep up with the violations and non-compliance. Although this can't be quoted, I can assure the Court of Appeals this is true.

“PP” Section 3.10 Restrictions: directs the Court of Appeals to the error the court made and the basis for the Appeal and asking for the Court of Appeals for a ruling to clarify the conditions. Here lies the error the court made. The second #3 [Please note there are two (2) Number 3's in this section. I am referring to the #3 that is second under this section. It should be number 5] It states:

“The Mother shall undergo an Domestic Violence evaluation and follow through on recommended treatment through the YWCA Domestic Violence Program. This shall include both the mother as a victim and as a perpetrator.”

That condition Mrs. Banik (fka) Reno to complete a domestic violence evaluation and all recommended treatments both as a perpetrator and as a victim, is a condition that is impossible to fulfill and fails to protect our daughter RCW 26.09.191. The YWCA is not certified to do what the court ordered. It is not certified to do evaluations. It is not certified to do treatment for perpetrators. This is what Mr. Reno is seeking for the Court of Appeals to correct in this Parenting plan. A ruling that none of the provisions in sections 3.2 through 3.9 is to go into effect until Mrs. Banik (fka) Reno has completed a certified Domestic Violence perpetrator evaluation and any treatment programs recommended by the evaluation.

*“PP” section 3.10 Restrictions second #3[Please note this is the second number 3 and should be numbered 5] also says:*

*“The Father shall have the ability to speak to the evaluator and provide him/her with whatever information necessary for a complete evaluation. The evaluation shall include police records, CPS records, a copy of the GAL report and all collateral information for a complete evaluation.”*

This is also a condition that is impossible to fulfill and fails to protect our daughter RCW 26.09.191. Because

the YWCA advocate victim based program claims confidentiality privilege of their clients because there program is for victims/survivors of domestic violence only. By not allowing Mr. Reno to be able to provide information is not the only concern here. The YWCA is not certified to comply with the order and WAC 388.60 rules for Domestic Violence evaluations. Furthermore the provisions to be able to provide this information are in large because of Mrs. Banik's (fka) Reno previous evaluation history. "GAL REPORT" page 13 the GAL said "My concern is that it appears that Ms. Banik purposely presented falsehoods to put herself in a better light to the Serenity evaluator. Is she doing the same thing to me?" the YWCA relies on self-reporting, and due to their confidentiality to protect victims, the order is impossible to enforce and leaves Mr. Reno unable to determine what his rights and duties are and fails to protect their daughter RCW 26.09.191.

These restrictions were put in to ensure that Mrs. Banik (fka) Reno was to undergo a Domestic Violence Perpetrator Evaluation refer to the letter from the GAL date filed April, 09<sup>th</sup> 2013 "INX" page 17. This letter was very specific to address that the investigation of the GAL he found only (4) state certified DV Perpetrator programs in Spokane. And just as the language in the "PP" that allowed Mr. Reno to be able to provide information and have the

ability to speak to the evaluator. Mr. Reno has asked that S.T.O.P. do the evaluations because they previously have done an evaluation on Mrs. Banik (fka) Reno in the past, and they already have a baseline of her history.

The trial court's ruling was necessarily left in effect when the remarks of Mrs. Banik's (fka) Reno Council represented in presentment hearing held on May, 17<sup>th</sup> 2013 that Mrs. Banik had completed a Domestic violence evaluation at the YWCA and was in treatment there. [This is impossible] Mr. Reno's Council during trial expressed to the court that was not possible that they do not do such treatment at the YWCA. Mr. Reno's council Mr. Robert Cossey had expressed to the court that he should have known upon entry of the order but was sure after further investigation through phone he calls made to the YWCA that they do not do evaluations or perpetrator treatment— under the belief that Mrs. Banik (fka) Reno had complied to an evaluation as her council testified to during the presentment hearing and that the YWCA was treating Mrs. Banik as both a victim, and perpetrator [impossible under the YWCA's own policies] — which they are not certified to do and goes against their current policies. Yet since that implied conclusion that the YWCA had done an evaluation and she was in treatment the court would not consider the objection from Mr. Reno's council. That was an error the court made that allowed Mrs.

Banik to continue with treatment at the YWCA without fulfilling the provisions set in 3.10 of the "PP" to get an evaluation and the treatment at the YWCA is not certified to address perpetrators. "PVRP" page Indexed in the Clerks papers as pages 26-37. On page 6 of that document the court said Lines 2 through 9. "So I am going to indicate that she should be directed there for an evaluation and do whatever the follow-up treatment may be that they direct. That evaluation, of course, needs to be honest and openly made with all the information they need to have; background, criminal history, all that stuff. Then a report on the evaluation can be generated and given to the Mr. Stoa and Mr. Cossey; then do the program."

The court upheld this ruling even under objection by Mr. Reno's council to allow Mrs. Banik to attend the YWCA even though it acknowledged that the incidents of domestic violence involved with Mrs. Banik (fka) Reno were not all victim related. That it was even clearer that Mrs. Banik (fka) Reno was more the perpetrator in many of the domestic violence police reported incidents, also her oral testimony confirmed that she was the perpetrator.

First let me point out to the Court of Appeals. Due to the large expense which has been a huge financial burden on Mr. Reno and was recognized in trial by Mrs. Banik (fka) Reno and even she apologized for this burden she placed on

Mr. Reno as well as the effect this has had on their daughter. For Mr. Reno, that the long history of court hearings are all due to Mrs. Banik (fka) Reno and her non-compliance to several court orders forcing Mr. Reno to have to spend money he really didn't have. Mr. Reno exhausted all his resources on several occasions including selling the only vehicle that he owned prior to trial at wholesale to retain council to help him get through the trial to try and get representation to handle the issues he was forced back to court to address from Mrs. Banik's (fka) Reno actions.

Mr. Reno has to represent himself Pro Se in this Appeal but wants the court of Appeals to forgive him for not having council. He was just unable to retain council with the resources he has. He was advised from the entry of this "PP" that he would have an Appeal and should file one to correct specifically the issue of the YWCA that the court ordered which changed the entire outcome of Mrs. Banik (fka) Reno to comply with a DV Perpetrator Evaluation and all recommended treatment. So he is trying to get the error of the court because that the entire visitation schedule is based on this evaluation/treatment.

Mr. Reno apologizes to the court if the Opening Brief is not done exactly as it should and any other errors he may have in trying to express the laws and error of the court.

This appeal followed.

#### IV. ARGUMENT

1. The Trial The court erred when the court referred Mrs. Banik (fka) Reno to a program at the (YWCA) which is not certified to treat Domestic Violence Perpetrators.

Is it error for the trial court to acknowledge a party's long history of domestic violence and her abuse of children and then fail to limit that party's residential time pursuant to RCW 26.09.19

2. The trial court erred when it referred Mrs. Banik (fka) Reno to the YWCA for an Evaluation as they do not do domestic violence evaluations. (RCW 70.123)

Is it error for the court to order a condition to seek a domestic violence evaluation from an advocacy based shelter for Victims of Domestic Violence? The YWCA is not a certified perpetrator program and is not certified to do evaluations and is not certified to treat perpetrators.

The trial court erred in this case in one overarching way – with regard to ordering a domestic violence perpetrator evaluation and all recommended treatment due to the overwhelming evidence of Mrs. Banik's (fka) Reno history, but refusing to consider the letter by the GAL "INX" Page 17 that the Guardian Ad Litem says "there are (4) state certified DV perpetrator programs in Spokane. As well as the argument from Mr. Reno's council to make the courts aware that the YWCA was not certified to comply with the order. But since the opposing council made argument at the presentment when this issue was addressed and mislead the court to believe that the YWCA had already done an evaluation and she had already started treatment the court error here was simply not take into account its own ruling that once an evaluation was

completed it needed to allow Mr. Reno the right to have access to the evaluator as well as provide any documents, the court allowed this as proof, and there lied error of the court, because the courts own ruling “PVRP” pages 2 through 9 of that document, claimed Mrs. Banik was to need to get an evaluation, then do follow-up treatment as well as a report needed to be generated from that evaluation and given to both councils. This condition was the language the court put in to ensure that the evaluation was done as well as meant to give Mr. Reno information on the program so he could be current and be informed though the treatment process.

Mrs. Banik (fka) Reno, the respondent and mother, who was an admitted drug abuser and had a long history of domestic violence. The evidence at trial was more than sufficient to make this finding and the trial court did, in fact, acknowledge this evidence including ordering Mrs. Banik (fka) Reno to comply to getting a Domestic Violence Evaluation and complete all recommended treatment. This was error because the court allowed the YWCA to do things that they do not do and are subject by law that they are not to do. Compounding that error was the trial court’s erroneous decisions to (a) Refer Mrs. Banik to the YWCA for that evaluation and treatment. The YWCA is not certified to do what the court ordered. It is not certified to do evaluations. It is not certified to do treatment for perpetrators. This is what Mr. Reno is seeking for the Court of Appeals to correct in this Parenting plan. A ruling that none of the provisions in sections 3.2 through 3.9 is to go into effect until Mrs. Banik (fka) Reno has completed a certified Domestic Violence perpetrator evaluation and any treatment programs recommended by the evaluation.

The court’s ruling, reflected the trial evidence — that Mrs. Banik (fka)

Reno "PRVP" Page 5 lines 2 through lines 5 " I think in fairness to Karli that at this particular point in her life we need to figure out if Ms. Banik can fulfill the role of mother to this child" This court action having to take this to the court of Appeals to correct was due to the fact that Mr. Reno's Council had asked the court to correct the YWCA. From the letter Mr. Reno has from his council, the court was not willing to make any changes to this "PP" which left Mr. Reno with no other option than to go to the Court of Appeals for help in giving him a ruling to clarify that if the YWCA cannot do what the court ordered, then Mrs. Banik (fka) Reno would need to seek the services from a State licensed program. That if the YWCA cannot comply, that does not give her an excuse to not seek the evaluation elsewhere and complete any recommended programs they refer. The parenting plan in section 3.10 #4 does say that no overnights are to be done, but Mrs. Banik (fka) Reno has already claimed that once the YWCA program, which let me add, is a completely voluntary program for victims only. She will be able to proceed into Phase 3 of the adopted visitation schedule. [This is not in the child's best interest].

If the Court of Appeals chooses to review the "Trial Verbatim Report of Proceedings" or the "Presentment Verbatim Report of Proceedings". Mr. Reno has purchased this document and had it sent to the court of Appeals, but did not properly list these on the designation of clerks papers, so he was not able to use this to give the Appeals a better understanding. Mr. Reno had he known would of filed something to allow this as this was very expensive to purchase and has a lot of information he feels the Court of Appeals would like to have.

A. Standard of Review

The determination of a parenting plan must be in the best interest of the child and based on the statutory criteria set forth in RCW 26.09.184, 26.09.187, and 26.09.191. Generally, a trial court's rulings on the provisions of a parenting plan are reviewed for an abuse of discretion. J re Marriage of Littlefield, 133 Wn. 2d 39, 46, 940 P.2d 1362 (1997). A trial court abuses its discretion if its decision is manifestly unreasonable or based on untenable grounds or untenable reasons. A trial court's decision is unreasonable if it is outside the scope of acceptable choices, given the facts and the acceptable legal standard. A decision is based on untenable reasons if it is based on an incorrect standard or if the facts do not meet the requirements of the correct standard. A decision is based on untenable grounds if the factual findings are unsupported by the record.

B. The court erred in sending the Respondent to the YWCA when the evidence showed that she had a history of domestic violence both as a perpetrator and victim and the YWCA is a victim only advocate based non-therapeutic program and does not fit into the provisions for her to get an evaluation and treatment.

Pursuant to RCW 26.09.191(2), a parent's residential time with a child in a parenting plan "shall be limited if it is found" that the parent has a history of domestic violence or if the parent "has engaged in," *inter alia*, physical abuse of a child or a pattern of emotional abuse of a child. RCW 26.09.191. RCW 26.09.191(1) requires no mutual decision-making when a parent has engaged in these activities. Thus, and as is clear from the statute, "RCW 26.09.191(1) and (2) require the court to restrict a parent's contact and involvement with the child if the court finds that a parent has ... abused a child, or if the parent has a history of domestic violence..." In re Marriage of Watson, 132 Wn. App. at 232

## V. CONCLUSION

For the foregoing reasons, Mr. Reno asks this Court to order that the condition for Mrs. Banik (fka) Reno to complete a domestic violence evaluation at the YWCA and all recommended treatments both as a perpetrator and as a victim is a condition that is impossible to fulfill and fails to protect our daughter RCW 26.09.191.

The YWCA is not certified to do what the court ordered. It is not certified to do evaluations. It is not certified to do treatment for perpetrators. This is what Mr. Reno is seeking for the Court of Appeals to correct in this Parenting plan. A ruling that none of the provisions in sections 3.2 through 3.9 is to go into effect until Mrs. Banik (fka) Reno has completed a certified Domestic Violence perpetrator evaluation and any treatment programs recommended by the evaluation.

In the case at hand the court did not properly review its own concerns about the long history of domestic violence of Mrs. Banik (fka) Reno both as a perpetrator and as a victim. The evidence was overwhelming that she needed extensive counseling and treatment. This is not in the child's best interest and, in fact, puts the child in harm's way. The statute and case law in the state of Washington is very clear that the best interest of the child is paramount and the court's decision in this case did not render a judgment pursuant to that law.

Mr. Reno is asking that the Court of Appeals recognizes that he has

tried to comply to the guidelines and tried to do the Opening Brief as best he can not having experience with doing such legal work. The error of the Court may be in this document more than it need be, but to make sure to put it in the designated area the Appeals court wants, It was repetitive, not to express to the Appeals that they can't understand, but to try and comply to the way the Appeals Court may need certain claims of error in certain parts of this document.

In closing, I just am asking that the Court of Appeals may find other errors within the Parenting plan, and I would ask if they can see a specific error that would need to be corrected, please do so in the child's best interest with the final ruling that will come from this Appeal.

I want to say that a ruling that Mr. Reno is seeking from the Court of Appeals he was advised to seek from his council at trial Mr. Robert Cossey. To clarify the evaluation and treatment from the YWCA to a certified Domestic Violence Program Preferably S.T.O.P. and take out the provisions that allow the YWCA to have any impact on her official evaluation and treatment, as they are not certified to even do. This will help in futher protecting their daughter until she has completed what the court intended and was also recommended by the GAL.

Respectfully submitted this 28<sup>th</sup> day of October, 2013.



Christopher Reno, Pro, Se for Appellant  
Christopher Reno

