

FILED
FEB 16, 2017
Court of Appeals
Division III
State of Washington

NO. 330133

COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

In re the Custody of: Hadyn Anay Reynolds

BRIEF OF RESPONDENT

Jeremy John Reynolds
Pro Se
415 E. Broadway Ave.
Ritzville, WA 99169

FEB 16 2017

COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON
By _____

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|------------------------|---|--------------------------|
| In re the Custody of: |) | |
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| H.A.R. |) | No. 33013-3-III |
| |) | |
| PAMELA and THEODORE |) | |
| SUCHLAND, |) | Response to the BRIEF OF |
| |) | APPELLANTS |
| Appellants, |) | |
| |) | |
| and |) | |
| |) | |
| AMANDA MARIE SUCHLAND, |) | |
| (Mother); JEREMY JOHN |) | |
| REYNOLDS, (Father) |) | |
| |) | |
| Respondents. |) | |

COMES NOW, Jeremy Reynolds in Response to the Appellants Brief.

I. IDENTITY OF MOVING PARTY

This response is to deny the Appellants action to reverse the dismissal of the de facto parentage action and the dismissal of the non-parental custody petition.

II. ASSIGNMENTS OF ERROR

1 and 2 – Deny: The Courts have not erred by dismissing the Suchland’s non parental custody petition and the de facto parenting action. The Courts have upheld the law in that grandparents have no rights.

3 - Deny: The Courts have never found that Petitioner Jeremy Reynolds has not met his burden of proof by preponderance evidence.

4 - Deny: The Courts did not err in dismissing the nonparental custody petition. All abuse allegations evidence has been submitted and taken by the grandparents (pictures and claims). There are no law enforcement, teachers, other medical professionals or other mental health professionals (besides those who the grandparents have hand selected) who are all mandated reporters make a report to CPS or law enforcement.

5 - Deny: The Courts did not err by using a preponderance standard instead of the clear and convincing evidence in the nonparental custody action.

III. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

A. Deny –The Courts did not err in dismissing the Suchland’s de facto parentage action. These grandparents have gone to the extreme in trying to destroy my reputation and have attacked my character of who I am as a person. They have tried to withhold and alienate my child from me. These grandparents request has been denied in the Superior Court, Supreme Court and the Court of Appeals numerous of times. Afterwards, instead of attempting to build a relationship with me they keep pursuing these frivolous attempts to take my child for their own and to keep her from me.

B. Deny – The Courts did not err by dismissing the nonparental custody petition when substantial evidence did not support its determination. If the Suchland’s

failed to prove by the requisite quantum of proof that I am unfit, it certainly was not without them trying. Even to the extent of them fabricating stories, making false abuse claims, and most alarming is subjecting their granddaughter (H.A.R) who they claim to love to pictures, videos and unnecessary medical examinations.

IV. STATEMENT OF THE CASE

Amanda and I were together for 5 years before we separated. H.A.R was born in 2009 and moved with Amanda in 2012. During those 3 years that H.A.R was with the both of us there were no domestic violence reports towards Amanda or H.A.R. In fact there were “no” accusations of any sorts during the time Amanda and I were together for 5 years.

In 2012 Amanda Suchland and I separated and she moved to Odessa to her parent’s residence. I had brought action at Adams County Superior Court against Amanda seeking a residential schedule in 2012. In 2013 a temporary order was ordered by the courts. During this time I fulfilled my visitations and followed all requirements set by the court. I have always been involved in my daughter’s (H.A.R) life.

The courts set visitations of every second and fourth weekend with H.A.R started in February 2013. February and March 2013 were half days and progressed to full days from April to May 2013. Starting in June 2013 visitations were increased to full weekends with over nights. (Exhibit-E pg. #2).

During the course of February 2013 to May 2013 there were “no” claims of any sort to CPS. “No” visits to the doctor at the Odessa Clinic in that time frame also. (Exhibit-A pg. #3). All of my visitations were exercised and followed all rules. The absurd accusations to CPS began in June of 2013, the time the overnight visitations began. (Exhibit-E pg. #2).

In 2014 the grandparents filed a Shelter Care hearing and for a Third Party Custody. During the course of the grandparent’s actions for the nonparental custody petition and de facto parentage action, a number of issues happened. The grandparents purposely did not notify me that the mother (Amanda Suchland) abandoned our child (H.A.R) with them. The grandparents had no intentions to notify me (Exhibit-D pg. #8). The grandmother even admits to witnessing the mother (Amanda Suchland) abandoning H.A.R and did not and would not notify me of the situation. (Exhibit-D pg. #7). The grandparents have continuously worked on alienating my child from me, trying their hardest to destroy us and essentially kidnapping my child.

During this time the grandparents are calling in CPS reports to build their case. (Exhibit-D pg. #2 & #3); and secretly taking H.A.R to the Odessa Clinic to see M.D. Linda Powell. They were also having M.D. Linda Powell bill them directly and not through my insurance so I would not know about these visits. (Exhibit-A pg. #2). In preparation for the doctor visits the grandparents were taking photos, and videotaping H.A.R. (Exhibit-D pg. #4 & #5). The doctor expressed her concerns to the grandparents of the detrimental impact this has on a small child. (Exhibit-A pg. #4 & #5).

CPS set forth allegations of neglect due to the amounts of photos, videotaping and over excessive exams against the grandparents. (Exhibit-B pg. #5). The grandmother, even after being spoken to by CPS of the allegations set forth regarding their concerns, she continued taking excessive photos, videos, and repetitive exams on my daughter (H.A.R). (Exhibit-D pg. #5 & #6).

The grandparents also took my daughter to a psychologist by the name of Dr. Teresa McDowell, without notifying me. At no point in time did Dr. McDowell notify or try to contact me about concerns with my daughter nor did she involve me in H.A.R sessions. (Exhibit-D pg. #11). This was another tactic of malicious attempts that the grandparents used in trying to build their case in alienating and robbing me of my child.

Susan Elg, a licensed mental health professional was appointed by the court. H.A.R and I had meetings together with her for a total of (4) 1 hour sessions. During the course of all these visitations and malicious attempts at my character the grandparents still continued to make any and all frivolous accusations in an attempt to get custody of my child (H.A.R).

V. ARGUMENT

I deny (Appellants Brief pg.18 paragraph 2) the Court made the right decision in dismissing the Suchland's de facto parentage action. There was no evidence because I never consented to, or fostered the grandparent's parent-like relationship with H.A.R. (Exhibit-E pg. #3 thru #5).

I deny (Appellants Brief pg. 19 paragraph 2) the grandparents had with malicious intent tried to alienate my child from me by criminally hiding the fact that the mother (Amanda) abandoned our child with them. (Exhibit-D pg. #7).

I deny (Appellants Brief pg.20 paragraph 2) I did have legal representation while trying to attain custody of my child. Due to the fact I was not representing myself, I could not control the timelines of attorneys involved or the scheduling of dates in a rural courthouse. In such an unconventional case like this, every little process took longer than all parties involved expected. When the court realized I had not been allowed to see my daughter (H.A.R) for 6 months they ordered visitations to start immediately.

I deny (Appellants Brief pg.21 thru pg. 23) the Court made the right decision in dismissing the Suchland's non-parental custody action by the preponderance of evidence that I (Jeremy Reynolds) in fact posed no danger to my daughter and was found fit. The court heard all the overwhelming evidence presented by all matters that showed how the grandparents used malicious intents towards me in the act of trying to attain custody of my child. (Exhibit-F pg. #2 & #3).

Dr. Powell, the physician stated that the grandparents wanted to pay for the visits privately to hide the clinical visitations from me so I would not know. (Exhibit-A pg. #2).

Dr. Theresa McDowell, a psychologist, also stated how the grandparents and mother asked to bill them directly instead of using my insurance. (Exhibit-D pg. #9 & #10). This again was another malicious attempt to hide the fact that they

subjected her to therapy sessions to build there case. All these professional opinions have been shaped by information provided by the grandparents for this case. This case is riddled with evidence proving I am “no” danger to my daughter. The grandparents just do not want me involved in H.A.R life. (Exhibit-F pg. #4).

Susan Elg, a licensed mental health professional, was fully aware she was not allowed to review my case document until all sessions were completed. Ms Elg was caught on the stand lying in an attempt to mislead the court to believe that she had waited until after our final session. After a quick questioning by the Court it was revealed, the grandmother’s attorney intentionally supplied and discussed my case with Ms. Elg before my final session. (Exhibit-B pg. #2 thru #4). This resulted in the Court justly refused to use anything Ms. Elg testified to. The Court found no credibility at all. The Court also determined that she had her mind made up and was extremely biased. (Exhibit-E pg. #6 & #7). In addition all CPS reports have been investigated and they have all been closed as “UNFOUNDED”.

Throughout H.A.R’s life prior to moving to Odessa, there have never been any reports of abuse or neglect. Never has there been a report that came from outside the grandparent’s direct social circle. They have not been able to supply a single unbiased or unsolicited professional to prove any abuse or neglect by the father. Yet inadvertently, they have shown detrimental abandonment by the mother, and the grandmother’s unhealthy need to mother my child (H.A.R) rather than be a grandmother. The grandparent’s intent was to ruin my character and reputation to gain custody of H.A.R. It did not matter to them it was hurting

H.A.R or gave forethought to the impact it would have on a small child. They mercilessly continue and are not willing to stop at anything. As you read previously that Dr. Powell expressed her concerns of detrimental impact to H.A.R about the grandparents taking scantily clad photos and videos, still they continued knowing the harm it could do to a young girl. (Exhibit-A pg. #4 & #5). This is the type of abuse H.A.R has had to endure through this whole situation from the grandparent's. I have been tirelessly trudging through all the legalities to get visitations and continue to try to get custody of H.A.R. Which I should have had the very moment the mother (Amanda) abandoned her. And again when she stated in court she wanted to give custody to her parents. (Exhibit-C pg. #2).

Kenneth Kato "Attorney for Appellants" is asking me to have a relationship with the grandparents. I have provided evidence that the grandparents have malicious and damaging intentions. They have been out to damage my reputation and alienate my daughter (H.A.R) from me. I would never alienate them from (H.A.R) only because I know how damaging it would be to her, but as her father I feel I would need to remind them that only I can be her father and their place is to be grandparents only. I would feel the need to be extremely selective and protective of my child when around them to protect her from any further physical intrusion such as barely clothed photos and mental abuse. They have made numerous attempts to rob me of my child legally and rob me of my Constitutional rights to be a parent.

Throughout this case I have had to fight for my Fourteenth Amendment Constitutional Rights which have been repeatedly violated, in Troxel, etvir. V.

Granville-No. 99-138 (2000), provides heightened protection against government interference with certain fundamental rights and liberty interests. *Washington v. Glucksberg*, 521 U.S. 702, 720, including parent's fundamental right to make decisions concerning the care, custody, and control of their children, e.g. *Stanley v. Illinois*, 405 U.S.645,651. Pp. 5-8.

On April 7, 2005 the Washington State Supreme Court upheld the United States Supreme Court decision agreed that Grandparent's rights unconstitutionally interfere with fundamental parental rights. I have been disregarded as a parent throughout this whole case and I am asking this Court to put a stop to the interference of my Fourteenth Amendment Constitutional Rights and allow me to parent my child without anymore court interference or interference from the grandparents.

VI. CONCLUSION

Based on what was previously stated, I am respectfully asking this Court to deny the Appellants action to reverse the dismissal of the de facto action and dismissal of the non-parental custody petition.

Submitted this 13th day of February, 2017


Jeremy Reynolds, Pro Se

EXHIBIT A

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COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION III

In Re Custody of:)
H.A.R.,)
Child,)
PAMELA AND THEODORE SUCHLAND,)
Petitioners,) LINCOLN COUNTY
and) SUPERIOR COURT
) NO. 14-3-02215-2
AMANDA MARIE SUCHLAND) COURT OF APPEALS
(Mother); JEREMY JOHN) NO. 330133
REYNOLDS (Father),)
Respondents.)

VERBATIM REPORT OF PROCEEDINGS
VOLUME 1, PGS. 1 - 194
OCTOBER 15, 2014; NOVEMBER 25, 2014
DECEMBER 2, 2014, MORNING SESSION

The above-entitled matter was heard before the Honorable David Frazier, Superior Court Judge for the State of Washington, County of Lincoln, on October 15, 2014; November 25, 2014; December 2, 2014; December 3, 2014; December 4, 2014; December 23, 2014; December 30, 2014; January 8, 2015.

APPEARANCES:

For the Petitioners: GLORIA FINN PORTER
Attorney at Law
1309 W. Dean Ave., #100
Spokane, WA 99201

For the Respondent
Mother: TAMARA C. MURRAY
Attorney at Law
505 W. Riverside Ave., #521
Spokane, WA 99201

1 BY MR. HUBERDEAU:

2 Q. So I'll rephrase it or I'll restate the question,
3 Dr. Powell. Is it your understanding that Mrs. Suchland,
4 the grandmother, brought Hadyn to you because she didn't
5 want Mr. Reynolds to know that she was -- that the child
6 was seeing a medical provider?

7 A. Are you basing that on the notes from the clinic?

8 Q. It's just a question. I'm not basing it off anything.

9 A. So Mrs. Suchland did not want the child to be -- her care
10 to be sent to the -- her dad's insurance because she
11 wanted her seen so he wasn't sure that she -- so she was
12 paying privately for her care because she wanted her to
13 be able to be seen without her father necessarily knowing
14 that she was being seen at the clinic.

15 Q. Okay. So she was paying privately as opposed to -- so --
16 strike that.

17 She specifically requested that these visits weren't
18 sent through the child -- the insurance for the child,
19 correct?

20 A. That is correct.

21 Q. Okay. And it was for the sole purpose that Mr. Reynolds
22 would not know that the child was there?

23 A. That she had been seen.

24 Q. Okay. And you agreed to that request?

25 A. People bring their people -- they -- if someone is coming

1. if there was another visit between the timeframe of June
2 to October that's not represented here?

3 A. I don't believe so.

4 Q. Okay. So there's a period of three months where this
5 child had been going to visits with her father and the
6 grandmother hadn't brought the child in to document any
7 bruising, scratches, or anything of that nature, correct?

8 A. Apparently.

9 Q. Okay. I think P43 would be the next one in line. You
10 mention in the report that grandmother was the guardian
11 for the child. What gave you that impression?

12 A. Where did I say that grandmother was the guardian of the
13 child?

14 Q. I don't see it off the top of my head in this exhibit.
15 Let me rephrase this question.

16 During your direct examination with Ms. Porter, and I
17 wrote this down as a quote, referring to the maternal
18 grandmother, she is the guardian of the child. Do you
19 remember saying that just not ten minutes ago?

20 A. I guess if you wrote it down, I said the guardian.

21 Q. Okay. And how did you come to that conclusion, that at
22 the time of these visits the grandmother was the guardian
23 of this child?

24 A. So in that context, the guardian is the person with them
25 in the office. So she's the guardian of -- I mean, the

1 Q. Okay.

2 A. I have to type these myself, so sometimes I make
3 mistakes. Because the timestamp on the record is 11-26.

4 And so --

5 Q. Okay.

6 A. -- as soon as it's --

7 Q. It's a clerical mistake, you're sure?

8 A. Yes.

9 Q. At least you don't have to write them out by hand,
10 correct?

11 A. That's true.

12 Q. Makes life a little easier.

13 Okay. Let's jump ahead down to Exhibit 58, please.
14 Over the course of these reports, isn't it true that you
15 had some concerns over the volume of the videotaping and
16 the photographs that Hadyn was being subjected to,
17 correct?

18 A. I was more concerned about them being done and how it
19 would stress the child, not so much that they were being
20 done. But a child that age, the more they were done, the
21 more that would stress her in terms of how do I -- why is
22 all this happening. So it was more that it was stressing
23 her.

24 Q. Okay. So to be clear, the consistent videotaping and
25 photographs done by grandmother, you had some concerns

1 about and you expressed those concerns to the
2 grandmother, correct?

3 A. Yes.

4 Q. Okay. You also had some concerns about Hadyn no longer
5 being able to discern fact from fiction as a result of
6 this constant scrutiny, correct?

7 A. I'm not sure where you got "fact from fiction." I was
8 concerned that Hadyn was different on that exam, that
9 she --

10 Q. Well, let me ask you the question generally. Don't focus
11 on this exhibit. Is that something you had a concern
12 about, that she was struggling over the course of these
13 numerous visits, numerous photographings, numerous
14 videotaping that she was having a difficult time telling
15 fact from fiction?

16 A. I don't know how to answer that. I don't know -- I don't
17 think I ever really thought about -- I was more worried
18 about the stress that being asked the questions and being
19 picked -- taking pictures would put on her.

20 Q. Okay. So on the last page and -- that I shared my
21 concern with the grandmother that the visits here may be
22 stressing Hadyn as this is the first time her description
23 of the injuries does not really match the findings. So
24 when you're referring to "visits here," talking about the
25 visits and the consistent trips to the doctor's office to

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EXHIBIT B

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COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION III

| | | |
|-------------------------------|---|------------------|
| In Re Custody of: |) | |
| H.A.R., |) | |
| Child, |) | |
| PAMELA AND THEODORE SUCHLAND, |) | |
| Petitioners, |) | LINCOLN COUNTY |
| |) | SUPERIOR COURT |
| and |) | NO. 14-3-02215-2 |
| AMANDA MARIE SUCHLAND |) | COURT OF APPEALS |
| (Mother); JEREMY JOHN |) | NO. 330133 |
| REYNOLDS (Father), |) | |
| Respondents. |) | |

VERBATIM REPORT OF PROCEEDINGS
VOLUME 2, PGS. 195 - 351
DECEMBER 2, 2014, AFTERNOON SESSION

The above-entitled matter was heard before the Honorable David Frazier, Superior Court Judge for the State of Washington, County of Lincoln, on October 15, 2014; November 25, 2014; December 2, 2014; December 3, 2014; December 4, 2014; December 23, 2014; December 30, 2014; January 8, 2015.

APPEARANCES:

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|----------------------|---|
| For the Petitioners: | GLORIA FINN PORTER Attorney at Law 1309 W. Dean Ave., #100 Spokane, WA 99201 |
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| For the Respondent Mother: | TAMARA C. MURRAY Attorney at Law 505 W. Riverside Ave., #521 Spokane, WA 99201 |
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1 A. -- good parents? I mean, again, it depends on the
2 individual defining the word.

3 Q. Okay.

4 A. Not all parents are -- parents can be adequate, parents
5 can be great, parents can be fabulous. So are they okay?
6 That's one level. That's what you look at, is are they
7 minimally adequate, can they do the required things for
8 the child. Then you have a whole range of above and
9 below that.

10 Q. Sure. Because all parents are different, correct?

11 A. Correct.

12 Q. I mean, how I may raise my kids may be completely
13 different than how you raised your kids. I think we all
14 acknowledge that, right?

15 A. Right.

16 Q. It doesn't mean that my way's better than your way. Just
17 depends on the subjective perspective of who's looking at
18 it, right?

19 A. Okay. Yes.

20 MR. HUBERDEAU: Okay. Thank you.

21 MS. MURRAY: Nothing further.

22 THE COURT: I have a question. I believe you
23 testified that you talked to Mr. Reynolds about Facebook
24 postings by his older daughter.

25 THE WITNESS: I did.

1 THE COURT: When did you have that conversation?

2 THE WITNESS: It was after Hadyn left -- or no, it was
3 before she arrived -- I'm sorry -- one day. He and I
4 were sitting, waiting for her to arrive in the room with
5 the door open so we could see her arrive, and I brought
6 it up to him.

7 THE COURT: Do you remember which day?

8 THE WITNESS: I think it was the last day, actually.

9 THE COURT: And how did you know about these Facebook
10 postings?

11 THE WITNESS: Because I looked at that document that
12 day. It was sitting in my office.

13 THE COURT: Was it part of the -- how did you obtain
14 that?

15 THE WITNESS: It came with the information that
16 Ms. Porter gave me.

17 THE COURT: I thought you testified that you didn't
18 look at them until all of the sessions were over.

19 THE WITNESS: That session was over that day. That
20 was the last session.

21 THE COURT: So you talked about it after the session?

22 THE WITNESS: Yes.

23 THE COURT: So you had the session and then read the
24 material and then talked to him?

25 THE WITNESS: Yes. And I had him stay in my office

1 after all the sessions because I didn't want them to have
2 to interact after they went downstairs together and left.
3 He and I waited for a while after Hadyn left to allow
4 them time to --

5 THE COURT: That's when you read all the material
6 Ms. Porter had provided?

7 THE WITNESS: There was a brief -- brief little bit of
8 material that she provided to me and she also talked to
9 me about it, the Facebook postings. So I brought it up
10 to Jeremy that day, yes.

11 THE COURT: So you had seen it before that session?

12 THE WITNESS: I had seen it before that session, yes.

13 THE COURT: All right. Counsel, any follow-up?

14 THE WITNESS: I'm sorry.

15 MR. HUBERDEAU: I don't think so, Your Honor. Thank
16 you.

17 MS. PORTER: I just have one question.

18 FURTHER REDIRECT EXAMINATION

19 BY MS. PORTER:

20 Q. Ms. Elg, did you happen to have an opportunity to talk to
21 Mr. Huberdeau before you testified here today?

22 A. I did. He called me the week before Thanksgiving, I
23 think, yeah.

24 Q. Okay. And did he contact you at any point during your
25 sessions to talk to you about any information that you

1 pronounce your last name because I've heard it like three
2 different ways this morning. Is it Suchland?

3 A. We say it Suchland.

4 Q. Suchland. Okay.

5 A. But we answer to everything.

6 Q. Fair enough. I'll try to be -- I'll try to get it right,
7 all right. Excuse me.

8 So I understand that there's been numerous CPS
9 investigations regarding Hadyn, correct?

10 A. Yes.

11 Q. Okay. In fact, not all of them were against Jeremy
12 Reynolds though, correct?

13 A. Correct.

14 Q. In fact, if I understand correctly, you and your wife
15 were named in CPS allegations, regarding neglect and
16 excessive amount of physical exams, by CPS, correct?

17 A. I believe so, yes.

18 Q. Okay. You haven't personally witnessed Mr. Reynolds
19 being abusive towards Hadyn, have you?

20 A. No.

21 Q. These abuse allegations -- strike that.

22 Mr. Reynolds had some gradually increased visitation
23 time since he and your daughter split. Does that sound
24 correct?

25 A. Increased?

EXHIBIT C

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COURT OF APPEALS OF THE STATE OF WASHINGTON

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| H.A.R., |) | |
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| Child, |) | |
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| PAMELA AND THEODORE SUCHLAND, |) | |
| |) | LINCOLN COUNTY |
| Petitioners, |) | SUPERIOR COURT |
| |) | NO. 14-3-02215-2 |
| and |) | |
| |) | |
| AMANDA MARIE SUCHLAND |) | COURT OF APPEALS |
| (Mother); JEREMY JOHN |) | NO. 330133 |
| REYNOLDS (Father), |) | |
| |) | |
| Respondents. |) | |

VERBATIM REPORT OF PROCEEDINGS
VOLUME 3, PGS. 352 - 483
DECEMBER 3, 2014, MORNING SESSION

The above-entitled matter was heard before the Honorable David Frazier, Superior Court Judge for the State of Washington, County of Lincoln, on October 15, 2014; November 25, 2014; December 2, 2014; December 3, 2014; December 4, 2014; December 23, 2014; December 30, 2014; January 8, 2015.

APPEARANCES:

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| | |
| For the Respondent | TAMARA C. MURRAY |
| Mother: | Attorney at Law |
| | 505 W. Riverside Ave., #521 |
| | Spokane, WA 99201 |

1 A. Well, just because I look at them doesn't mean I'm not
2 going to make my decision.

3 Q. I just want to be clear.

4 A. It's a very emotional thing that -- you know.

5 Q. It should be emotional. I expect it to be emotional.
6 And I want to hear your answer, your response because
7 this is an important issue.

8 MS. MURRAY: Your Honor, I believe he heard her
9 response. She said yes.

10 THE COURT: I'm going to (inaudible). It's uncertain
11 (inaudible).

12 MR. HUBERDEAU: Yeah.

13 BY MR. HUBERDEAU:

14 Q. So, Amanda, I want to make sure this testimony is very
15 clear and we get on the record what you want. Are you
16 consenting to your parents being legal guardians
17 immediately, a final order?

18 A. Yes.

19 Q. Okay. So you admit that you can't care for Hadyn on your
20 own, right?

21 A. At the time it would be hard.

22 Q. Okay. So you can't care for her on your own right now?

23 A. Well, if I had to, I'm sure I could do it, but it would
24 be difficult.

25 Q. Okay. That's why you're consenting to your parents?

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EXHIBIT D

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COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION III

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| In Re Custody of: |) | |
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| PAMELA AND THEODORE SUCHLAND, |) | |
| Petitioners, |) | LINCOLN COUNTY |
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| AMANDA MARIE SUCHLAND |) | NO. 14-3-02215-2 |
| (Mother); JEREMY JOHN |) | |
| REYNOLDS (Father), |) | |
| Respondents. |) | COURT OF APPEALS |
| |) | NO. 330133 |

VERBATIM REPORT OF PROCEEDINGS
VOLUME 4, PGS. 484 - 646
DECEMBER 3, 2014, AFTERNOON SESSION

The above-entitled matter was heard before the Honorable David Frazier, Superior Court Judge for the State of Washington, County of Lincoln, on October 15, 2014; November 25, 2014; December 2, 2014; December 3, 2014; December 4, 2014; December 23, 2014; December 30, 2014; January 8, 2015.

APPEARANCES:

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 Spokane, WA 99201

For the Respondent TAMARA C. MURRAY
Mother: Attorney at Law
 505 W. Riverside Ave., #521
 Spokane, WA 99201

1 A. Amanda was a good mother until our current situation
2 occurred, which may include drug abuse.

3 Q. Okay. So at one point in time you believed there was
4 drug abuse?

5 A. No, I did not believe in my heart. There's always a
6 possibility.

7 Q. So --

8 A. But I do not believe that she -- in my heart I do not
9 believe that she was doing it. There's a possibility.

10 Q. Okay. Well, Ms. Suchland, what I'm trying to get clear
11 here is which statement is correct, the one you have
12 today or the one you signed under penalty of perjury
13 saying, Which may include drug abuse?

14 A. You know, it says it may include drug use.

15 Q. Okay. Now, is it fair to say that you filed numerous
16 allegations with CPS against Mr. Reynolds in the past
17 year?

18 A. This past year?

19 Q. Let's say the past two years.

20 A. Numerous?

21 Q. Umm-hmm.

22 A. Meaning myself --

23 Q. Yes.

24 A. -- that I called CPS? Is that what you're asking me?

25 Q. How many times have you personally called CPS?

- 1 A. I don't remember.
- 2 Q. Okay. Under five? Over five?
- 3 A. Under.
- 4 Q. Okay. And that doesn't include the reports to CPS made
5 by, say, Dr. Powell or other individuals, correct?
- 6 A. No.
- 7 Q. Okay. Do you recall how many times you've taken Hadyn to
8 the doctor following visits with her father Mr. Reynolds?
- 9 A. Number off my head?
- 10 Q. Do you believe it's over five or under five?
- 11 A. Probably over. Between five to eight. I don't ...
- 12 Q. Okay. Did you have a standing appointment with
13 Dr. Powell for Mondays after Jeremy Reynolds' visitation
14 weekends?
- 15 A. You know what, we tried to set up an appointment, but it
16 did not work.
- 17 Q. You mean you tried to set up a standing appointment?
- 18 A. I -- I think I had one that I know of.
- 19 Q. Okay. I want to be clear on your testimony. Did you try
20 to set up a standing appointment but that Dr. Powell said
21 that wouldn't work?
- 22 A. No.
- 23 Q. Okay. Who said it wouldn't work?
- 24 A. You know what, we had tried to make an appointment and
25 she would have it -- she had an emergency. There was one

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1 time that I did and there was an emergency and she was
2 not there, that I can recall.

3 Q. Okay. How many times do you believe you've taken
4 photographs of Hadyn regarding abuse allegations?

5 A. How many times? I don't know.

6 Q. Okay. Have you taken more photographs than what's been
7 admitted as evidence as exhibits during this trial?

8 A. Yes.

9 Q. How many more?

10 A. I don't know.

11 Q. Okay. Over five or under five?

12 A. Over five.

13 Q. Over?

14 A. Over.

15 Q. Okay. Over ten or under ten?

16 A. Over ten.

17 Q. Okay. Over or under 20?

18 A. I don't know.

19 Q. Okay. But a fair amount of time?

20 A. What's that?

21 Q. Let me rephrase that. To be clear, you've taken
22 photographs of Hadyn a minimum of ten times outside of
23 the pictures that have been admitted as evidence?

24 A. Yes.

25 Q. Okay. Where do you keep those pictures?

1 A. On my phone.

2 Q. Okay. What about videotaping Hadyn, how many times have
3 you videotaped her?

4 A. I don't know.

5 Q. Over five or under five?

6 A. Probably over five.

7 Q. Okay. You can probably guess the next question.

8 A. Probably.

9 Q. Okay. Do you have an idea -- is it over ten?

10 A. I don't think so, no.

11 Q. Okay. In fact, your reason for the videotapes and the
12 photographs is because you were informed -- and I'm not
13 asking you by whom -- to document these alleged abuse
14 allegations, correct?

15 A. Yes.

16 Q. Okay. Isn't it true that CPS named you and your husband
17 for excessive examinations and documenting incidents?

18 A. I believe so, yes.

19 Q. Okay. Did they ever speak to you about that, anybody
20 from CPS?

21 A. Say that again.

22 Q. Okay. Did anybody from CPS ever speak to you about the
23 concern that you were over-videotaping and photographing
24 Hadyn?

25 A. Yes.

1 Q. Okay. And what was the outcome of that investigation?

2 A. I believe that it was unfounded, as far as I know.

3 Q. Okay. Had -- was that something you had thought of as a
4 concern before CPS brought it to your attention?

5 A. No.

6 Q. Okay. After that, did you stop taking photographs and
7 videotaping Hadyn?

8 A. No.

9 Q. Okay. So you didn't see it as a concern at all?

10 A. No.

11 Q. You still don't see it as a concern?

12 A. No.

13 Q. Okay. Isn't it true that you have never witnessed Jeremy
14 Reynolds being physically or emotionally abusive to
15 Hadyn?

16 A. I've never seen it, no.

17 Q. But it's true that you've witnessed your daughter Amanda
18 abandoning her, correct?

19 A. Excuse me?

20 Q. Isn't it true that you have --

21 A. Sorry. Excuse me one second. Can you go back to the
22 question before that.

23 Q. No. But can you answer this question.

24 A. Excuse me. Excuse me.

25 MS. PORTER: Wait a minute.

1 THE WITNESS: I'm sorry.

2 BY MR. HUBERDEAU:

3 Q. If your attorney would like to ask questions, she can.

4 A. Okay.

5 Q. Can you please answer this question. In fact, let me
6 restate it so that we make sure we're answering the same
7 question, okay?

8 A. Okay.

9 Q. You have personally witnessed your daughter Amanda
10 abandon Hadyn though, correct?

11 A. Yes.

: 12 Q. Okay. One thing I want to be clear on is this timeline.
13 I understand both you and your husband have said Amanda
14 has come and gone. There's no dispute about that.

15 A. Umm-hmm.

16 Q. But we also understand that she's abandoned and left
17 Hadyn with you and your husband. When would you say that
18 occurred? When do you classify the abandonment to be as
19 far as timeframes?

20 A. Like after this July 6th, for those two months, for the
21 couple months.

22 Q. Okay. So prior to July 6th she hadn't abandoned your
23 home?

24 A. She was in and out.

25 Q. Okay. Isn't it true that you filed the dependency action

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1 better. That's, in fact, what you hope happens, right?

2 A. You always want someone to get better, yes.

3 Q. Okay. What is she getting better from? That's what I'm
4 trying to understand. In your mind, what does she need
5 to get better from?

6 A. Well, from her medical issues that she has.

7 Q. Okay. Can you describe -- I want to be clear what you
8 believe her medical issues are that prevents her from
9 taking care of her daughter.

10 A. You know what, we don't know what those medical -- all
11 those medical issues are. She's going to a doctor right
12 now to try to find out what they are.

13 Q. Okay.

14 A. So I cannot tell you that.

15 Q. Okay. Well, maybe -- I think that answers the confusion.
16 I just want to be clear. You're unsure what these
17 medical issues are. So let me ask you this question. If
18 you're unsure what these medical conditions are, a year
19 from now, ten years from now, how are you going to know
20 if these unknown conditions are better?

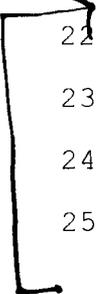
21 A. To go to a doctor and find out if they are.

22 Q. Okay. During these comings and goings of Amanda, did you
23 ever contact Mr. Reynolds and tell him that Amanda was
24 officially gone, she abandoned Hadyn in your care?

25 A. No.

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right?
A. I would disagree.
Q. Okay. You know, I got to ask you -- and I apologize in advance -- I have to ask you -- because it's an uncomfortable question. But you're being paid for your testimony today, right?
A. I am not, actually.
Q. You're not?
A. I am not.
Q. Okay. You're being paid for your sessions?
A. I was paid for my sessions, yes.
Q. Okay. What do you charge per session?
A. Oh, that's a question for my billers. They tell me not to talk about this. I know there's a standard rate that insurance will pay and then you negotiate with the insurance.
Q. I promise I'm not calling the insurance company.
A. I know. I just -- honestly I know that the rate is somewhere between 75 and \$150 depending -- an hour depending on whether you do an evaluation, you know, or you do just a session.
Q. And are your sessions been, in this particular incident, submitted to insurance for payment?
A. No, actually they haven't.
Q. Grandmother's been paying that directly?



1 A. That is what the mother and the grandmother asked me to
2 do was to submit those bills to them.

3 Q. And initially was that so that Mr. Reynolds didn't know
4 that the child was seeing you?

5 A. That is -- that was never said. I have no --

6 Q. You have no idea?

7 A. Yeah, I don't ...

8 Q. Okay. Have you set, for lack of better terms, an end
9 date for Hadyn when you think that she no longer needs to
10 go to counseling every week?

11 A. No, I have not.

12 Q. Okay. I get the impression this isn't your first time
13 testifying in court?

14 A. No, it's not.

15 Q. Okay. How often do you testify in court?

16 A. When I worked for Child Protective Services, quite a
17 bit --

18 Q. Okay.

19 A. -- when we had cases in that context. Not so -- not as
20 much after that. Although as the director of the program
21 that I talked about, we would do a lot of practice with
22 graduate students, and so ...

23 Q. How often are you hired private -- by private attorneys
24 for domestic cases?

25 A. I don't think I've ever been hired by a private attorney

1 sessions.

2 Q. Okay. So during the course of the last year and a half
3 of your weekly sessions, you haven't spoken or met with
4 Mr. Reynolds, correct?

5 A. Correct.

6 Q. Okay. Now, you did indicate that you requested that to
7 be done with CPS, but you don't know if that was conveyed
8 to Mr. Reynolds or not?

9 A. I do not, no. I recommended it.

10 Q. Okay. For all intents and purposes, this is the first
11 he's hearing of it?

12 A. Could be.

13 Q. Okay. Along those same lines, you don't know whether or
14 not Mr. Reynolds was aware that Hadyn was even going to
15 these sessions initially, do you?

16 A. I do not.

17 Q. Any information provided to you regarding these abuse
18 allegations have solely come from one of three sources,
19 and tell me if I'm wrong, the grandparents, the mother,
20 or the child?

21 A. Correct.

22 Q. Okay.

23 A. Now, there was another person.

24 Q. Who was that other person?

25 A. A family friend. Shelly.

EXHIBIT E

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COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION III

| | | |
|-------------------------------|---|------------------|
| In Re Custody of: |) | |
| H.A.R., |) | |
| Child, |) | |
| PAMELA AND THEODORE SUCHLAND, |) | |
| Petitioners, |) | LINCOLN COUNTY |
| and |) | SUPERIOR COURT |
| |) | NO. 14-3-02215-2 |
| AMANDA MARIE SUCHLAND |) | |
| (Mother); JEREMY JOHN |) | COURT OF APPEALS |
| REYNOLDS (Father), |) | NO. 330133 |
| Respondents. |) | |

VERBATIM REPORT OF PROCEEDINGS
VOLUME 5, PGS. 647 - 791
DECEMBER 4, 2014

The above-entitled matter was heard before the Honorable David Frazier, Superior Court Judge for the State of Washington, County of Lincoln, on October 15, 2014; November 25, 2014; December 2, 2014; December 3, 2014; December 4, 2014; December 23, 2014; December 30, 2014; January 8, 2015.

APPEARANCES:

| | |
|-------------------------------|---|
| For the Petitioners: | GLORIA FINN PORTER Attorney at Law 1309 W. Dean Ave., #100 Spokane, WA 99201 |
| For the Respondent Mother: | TAMARA C. MURRAY Attorney at Law 505 W. Riverside Ave., #521 Spokane, WA 99201 |

1 BY MR. BEVIER:

2 Q. Did you have visitation under that parenting plan?

3 A. Yes.

4 Q. What visitation did you have?

5 A. I had second and fourth weekends of the month. It first
6 started out as the introduction of -- like February and
7 March was Saturday and Sunday, noon to 4:00, second and
8 fourth week. April, May was 9:00 to 6:00, Saturday and
9 Sunday, second and fourth week. And then June on was the
10 second and fourth week, full weekends from Friday night
11 at 6:00 till Sunday night at 6:00. I pick her up, bring
12 her back.

13 Q. And did you exercise your visitations under that
14 residential schedule?

15 A. Yes.

16 Q. Now, Mr. Reynolds, over the course of the last two days
17 we've heard about numerous allegations against you of
18 child abuse and neglect. Are you aware of these
19 allegations?

20 A. Yes.

21 Q. When did they start?

22 A. Oh. The last time I could actually think, if I remember
23 right, when CPS had notified me of the situation, I'm
24 going to say June of '13. June or July of '13 I was
25 notified by CPS.

1 Q. Was that around the time that the overnight visitations
2 were to begin under the residential schedule?

3 A. Yes.

4 Q. Can you say if the allegations began after the first
5 overnight visit?

6 A. I don't know. I couldn't say. I don't remember the CPS
7 (inaudible).

8 Q. At some point in time you were contacted by CPS?

9 A. Yes. Yes, I was.

10 Q. And made aware of the allegations against you?

11 A. Yes, they came to my house (inaudible).

12 Q. Do you know who has made the allegations against you?

13 A. Her parents.

14 Q. Has there been any other individuals who have made
15 allegations against you?

16 A. Not that I'm aware of.

17 Q. Were you aware that Hadyn was seeing a Dr. Linda Powell
18 over the course of the past year?

19 A. Yes.

20 Q. What point in time did you become aware that Hadyn was
21 seeing Dr. Powell?

22 A. When CPS let me know.

23 Q. I'm sorry, can you speak up.

24 A. CPS told me that she was seeing a doctor.

25 Q. Did you consent to Hadyn seeing Dr. Powell?

1 A. No.

2 Q. Did you ever sign any kind of form consenting to medical
3 treatment to be ...

4 A. (No audible response.)

5 Q. Were you aware that Hadyn was seeing Dr. McDowell?

6 A. Dr. McDowell. Is that the therapist?

7 Q. I'll get her first name.

8 A. (Inaudible.)

9 Q. Is it Teresa?

10 A. Yeah.

11 THE CLERK: Pull that microphone down (inaudible).

12 THE WITNESS: Okay. No problem.

13 BY MR. BEVIER:

14 Q. Restate my question again. Were you aware that Hadyn was
15 seeing Dr. Teresa McDowell?

16 A. Is that the therapist?

17 Q. I believe so. Psychiatrist, therapist.

18 A. Yes. Yes, I was.

19 Q. At what point in time did you become aware that she was
20 seeing Dr. McDowell?

21 A. In the fall I'm going -- September, October.

22 Q. Of which year?

23 A. What is this, '14? '13.

24 Q. How did you become aware that Hadyn was seeing
25 Dr. McDowell?

- 1 A. They -- they let me know.
- 2 Q. Who is "they"?
- 3 A. Ana Schultz, CPS.
- 4 Q. So the grandparents never told you that they were taking
5 Hadyn to Dr. McDowell?
- 6 A. No.
- 7 Q. The grandparents never told you that they were taking
8 Hadyn to Dr. Powell?
- 9 A. No.
- 10 Q. Did you sign a consent to treatment with Dr. McDowell?
- 11 A. No.
- 12 Q. I want to go back to the allegations. Are you aware of
13 the number of allegations that have been made against
14 you?
- 15 A. The -- not the approximate number, no.
- 16 Q. More than five?
- 17 A. Yes.
- 18 Q. More than ten?
- 19 A. I'm going to say yes.
- 20 Q. More than fifteen?
- 21 A. I have no idea after that.
- 22 Q. But certainly more than ten?
- 23 A. Yes.
- 24 Q. Has CPS informed you of the results of their
25 investigations?

1 the cases of -- of the little tiny bruise on the leg.
2 Glad nobody took a close look at my daughter when she was
3 five years old. She always had bruises of those type.
4 But you didn't have the things that I saw on the face.
5 And I heard a lot of other allegations. So I'm taking an
6 extremely close look at that evidence.

7 And I think I'll comment. I heard so much about, and
8 we heard her testify twice, Ms. Elg. At the end of the
9 day, regardless of what I decide in the case, I'm going
10 to tell you this right now, it's not going to be based on
11 anything that Ms. Elg testified to. I found no
12 credibility with that lady at all. She was lobbied by
13 the grandmother here very effectively. She had her mind
14 made up and she was extremely biased. What did she say
15 about that keep-away issue with the ball? Controlling
16 and it was karate chops and these things. I found her
17 testimony unbelievable. I found it absurd.

18 So she's no help to resolving the issues that I found
19 in the case. And she very clearly went into the case
20 with an agenda and she was provided with one side of the
21 story. And despite her testimony here, she ...

22 (inaudible) that stuff. She was pretty clear. She was
23 going to let Dad know that ... (inaudible). And she
24 testified one time she didn't read it; the other time she
25 did. So that's -- that lady is -- has no influence in

1 this case over the Court, not at all helpful. But there
2 was a lot of other good witnesses, believable witnesses
3 from both sides here.

4 So, Counsel, my timeframe is not good, but I'm going
5 to try to get on this as fast as I can. I'd like to look
6 at it tonight, spend some time, but I have motion docket
7 tomorrow and I believe I have a trial Monday. But I'm
8 going to get on it as soon as I can. And I think what
9 I'll do is have my administrator try to call everyone up
10 and I'll give you a decision by telephone. Sometimes I
11 do written decisions. It just takes time writing.

12 And everyone here, particularly Hadyn, needs a
13 decision right away. And if there's a decision in favor
14 of the grandparents here, that resolves a lot of things
15 for Hadyn in that the Adams County matter is over. If I
16 don't find for them, find for the father in the case
17 here, I don't think that will resolve part of the
18 problem. You're back to Adams County. There's no change
19 in the present custodial situation. You're under that
20 order in Adams County, which I think is important. But
21 I'm going to decide this case, okay.

22 Again, Counsel, thank you very much, thank all of the
23 parties. Thank you for listening to me here, putting up
24 with me the last few days. And, again, we'll try and get
:25 in touch with you with a decision as soon as we can,

EXHIBIT F

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COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION III

In Re Custody of:)
 H.A.R.,)
 Child,)
 PAMELA AND THEODORE SUCHLAND,)
 Petitioners,) LINCOLN COUNTY
 and) SUPERIOR COURT
) NO. 14-3-02215-2
)
 AMANDA MARIE SUCHLAND) COURT OF APPEALS
 (Mother); JEREMY JOHN) NO. 330133
 REYNOLDS (Father),)
 Respondents.)

VERBATIM REPORT OF PROCEEDINGS
 VOLUME 6, PGS. 792 - 850
 DECEMBER 23, 2014; DECEMBER 30, 2014
 JANUARY 8, 2015

The above-entitled matter was heard before the Honorable David Frazier, Superior Court Judge for the State of Washington, County of Lincoln, on October 15, 2014; November 25, 2014; December 2, 2014; December 3, 2014; December 4, 2014; December 23, 2014; December 30, 2014; January 8, 2015.

APPEARANCES:

For the Petitioners: GLORIA FINN PORTER
 Attorney at Law
 1309 W. Dean Ave., #100
 Spokane, WA 99201

For the Respondent Mother: TAMARA C. MURRAY
 Attorney at Law
 505 W. Riverside Ave., #521
 Spokane, WA 99201

1 in Adams County that essentially gave the father what
2 I'll call visits with the child, starting out on a
3 limited, graduated basis and then building up to
4 overnights on every other weekend.

5 The circumstances here made it very clear to me that
6 the grandparents very much did not want and do not want
7 the father involved in Hadyn's life. And it was pretty
8 clear to me that they didn't want him involved in any
9 respect whatsoever. I'm convinced that they sincerely
10 believe he's bad and a danger and abuses the child. But,
11 again, the Court has reviewed all of the evidence and,
12 again, has to put the evidence in the context here.

13 The grandmother began her efforts to document what she
14 considered was abuse here about the time that the
15 overnight visits started occurring. And then about four
16 months into the overnight visitation schedule, then
17 photos and complaints of -- from the child here as to
18 being hit by the father came out. The grandmother took
19 the child to the doctor; did that without the father's
20 knowledge. She took the child to a counselor without the
21 father's knowledge or involvement. And I think it's very
22 significant here the mother, during this time, was having
23 very severe problems, problems that affected her ability
24 to parent. And the grandparents essentially hid this
25 from the father, didn't tell him about the mother's

1 lengthy absences from Hadyn's home -- from their home
2 here.

3 Now, we do have photos that show bruising, and the
4 bruising was observed and documented by Dr. Powell. And
5 Dr. Powell inquired as to the cause of the bruising, and
6 the child gave a number of explanations relating to what
7 would be physical abuse by the father if, in fact, it is
8 true.

9 Looking at the photographs, there's some bruising,
10 some injuries that appear relatively serious, but most of
11 the bruises, most of the injuries that I observed here
12 from the photographs here and even as explained by the
13 doctor appeared to me to be the type of scrapes and
14 bruises that a three- and four-year-old child encounters
15 in everyday life.

16 But in point, Hadyn gave to the doctor varying
17 explanations, and I do believe Hadyn told the doctor
18 these things. She said things like her dad hits her with
19 a fist, that Dad hits her with an open hand, Dad kicks
20 her; gave examples in the leg and in the back to explain
21 some of the bruising. They interpreted the scratch on
22 the child's nose as abuse. And the Court had a picture
23 of a very small scratch that may have been from a
24 fingernail, may have been from a cat. The child
25 attributed that to the father, interpreted it as being

1 be concerned and can't help but be suspicious. But,
2 again, the advantage I've had in the case here is I've
3 heard all of the evidence. And, again, the grandparents
4 have the burden of proof. If it's a tie situation or if
5 the Court is no more persuaded one way or the other, the
6 parent prevails.

7 But importantly in this case, after I've heard all of
8 the evidence, considered all of the evidence, while the
9 father has no burden here, I do believe more likely than
10 not that he has not physically abused his daughter and
11 that this -- he does not pose a danger to his daughter.

12 I'm concerned that the reports of abuse of the child
13 are most likely the result of an environment that she's
14 been growing up under for the last couple of years here
15 created by grandparents that, again, very much do not
16 want the father involved in the life of his daughter.
17 And we have a lot of, again, professional opinions in the
18 case from the grandparents' standpoint, but I do believe
19 that those opinions have been very much shaped by
20 discussions and reports that they've received from the
21 grandmother and information that has been provided from
22 the grandparents' perspective in the case here.

23 I previously made findings here with respect to
24 concerns I have as far as the fitness of the mother. And
25 that primarily relates to her inability to independently

CERTIFICATION OF SERVICE

I HEREBY certify that on February 13th, 2017, I served a true and correct copy of the foregoing document as follows:

| | |
|---|--|
| <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> U.S. MAIL <input type="checkbox"/> FAX TRANSMISSION <input checked="" type="checkbox"/> EMAIL | <i>Attorney for Appellants, Pamela and Theodore Suchland Gloria Finn Porter Attorney at Law 1309 W. Dean Ave., Ste 100 Spokane, WA 99201</i> |
| <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> U.S. MAIL <input type="checkbox"/> FAX TRANSMISSION <input checked="" type="checkbox"/> EMAIL | <i>Attorney for Appellants, Pamela and Theodore Suchland Kenneth H Kato Attorney at Law 1020 N. Washington St. Spokane, WA 99201</i> |
| <input type="checkbox"/> HAND DELIVERY <input checked="" type="checkbox"/> U.S. MAIL <input type="checkbox"/> FAX TRANSMISSION <input type="checkbox"/> EMAIL | <i>Amanda Marie Suchland 208 W 4th Ave. P.O Box 171 Odessa, WA 99159</i> |

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

Signed at Ritzville, Washington, on February 13th, 2017.



Jeremy Reynolds, Pro Se