No. 95031-8

SUPREME COURT
OF THE STATE OF WASHINGTON

In re the Marriage of:

AMEENA AAMER,

Respondent,

v.

SHARIEF YOUSSEF,

Petitioner.

ANSWER TO PETITION FOR REVIEW

SMITH GOODFRIEND, P.S.

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A. Relief Requested by Respondent.

Ameena Aamer asks this Court to deny Sharief Youssef's petition for review of an unpublished decision affirming a parenting plan that imposed no restrictions on petitioner's residential time with the parties' daughter, now age 2-½. The trial court's discretionary parenting decision was not based on cultural bias, implicit or otherwise. Instead, as is clear from the record, the trial court made its reasoned decision in the daughter's best interests, based on the testimony of the parties and their witnesses, including the father's experts who critiqued the parenting evaluation of the experienced evaluator appointed by the trial court on the parties' agreement, Dr. Marsha Hedrick. There are no grounds under RAP 13.4(b) warranting review of the unpublished decision affirming the trial court's discretionary decision and, just as Division One did, this Court should award attorney fees to the mother/respondent. RAP 18.1(j).

B. Restatement of the Case.

Respondent Ameena Aamer, age 30, and petitioner Sharief Youssef, age 39, both devout Muslims, married on June 14, 2014 after a six-month engagement. (RP 199, 201; CP 1, 2) They separated three months later, on September 10, 2014. (CP 2) Aamer, who had

learned she was pregnant a month before the separation, left the marriage because she no longer felt safe with Youssef, who had become increasingly aggressive during arguments. (RP 334-36, 342-43, 524) Aamer filed for dissolution on February 15, 2015. (CP 1) The parties' daughter was born a month later, on March 10, 2015. (RP 528) Youssef received access to their daughter immediately after her birth, and a temporary parenting plan was subsequently entered giving Youssef six 3-hour visits and three 2-hour visits every 14 days. (RP 350-52; CP 11) Youssef's parenting time was later increased to three 8-hour visits per week. (CP 404)

The parties agreed to Dr. Marsha Hedrick as parenting evaluator to assist the court in developing a final parenting plan. (CP 525-28) Dr. Hedrick's March 4, 2016 report recommended that Aamer be designated the primary residential parent. (Ex. 1, CP 800-14)

Dr. Hedrick did not recommend any RCW 26.09.191 limitations on Youssef's residential time, acknowledging that he was a "very capable" parent and the daughter viewed him as a "secure, reliable attachment figure." (RP 79-80) Dr. Hedrick did recommend that overnights be delayed for a year, during which Youssef participate in group therapy to improve his ability to communicate

with Aamer and improve his "interpersonal functioning," in order to better "relate empathically to [the daughter's] needs." (Ex. 1, CP 813)

Dr. Hedrick was concerned with what she saw as Youssef's "hyper focus" on the daughter, and his inability to empathize with Aamer and communicate with her in a non-judgmental manner. (RP 30, 37) Dr. Hedrick concluded that Youssef "appears to avoid areas that require affective skills (empathy, for example) in favor of intellectual activities, where he feels more adept." (Ex. 1, CP 811) This was consistent with Aamer's description of Youssef, who (as an example) signed up for classes after work rather than spend time alone with Aamer after the parties married. (RP 346-48) Youssef seemed more focused on "learning to be a father" by reading books and attending classes than in developing a bond with, and responding to the actual needs of, his daughter, whom he treated as a "textbook baby." (CP 530, 536; RP 348-49; Ex. 1, CP 811-12)

Dr. Hedrick testified that Youssef's "focus" on the daughter's development went "well beyond" anything she had ever seen in 30 years of practice and 580 parenting evaluations. (RP 53) Dr. Hedrick testified to her concern that Youssef's "investment" in the daughter and her development may "take on an importance that will be burdensome to this child" (RP 53, 120-21), impacting her ability

to interact with the larger world if Youssef remained "hyper-focused" on the daughter's development. (Ex. 1, CP 812)

At trial, Youssef presented two expert witnesses, Dr. Gary Weider and Dr. Daniel Rybicki, to critique Dr. Hedrick's report and opinion. (RP 221-22, 395) Neither expert had spoken to the parties or the individuals Dr. Hedrick interviewed or observed the parties with the daughter. (RP 262-63, 395, 432, 438) The experts' criticism was largely directed toward Dr. Hedrick's use (or non-use) of certain tests and parenting inventories, her interpretation of psychological test results, her decision to not interview additional collaterals, and the length of her parent-child observations and of the (15-page) parenting report itself. (RP 223-26, 241, 243, 398, 405, 406-07, 410, 412) Youssef's experts opined that the claimed flaws in Hedrick's evaluation created an "appearance of bias" (RP 226), was an "indicator of potential bias" (RP 237), "may have been biased" (RP 238), did not "guard against confirmatory bias" (RP 400), and "failed to list and show what she did to minimize confirmatory bias." (RP 409) Youssef's experts expressed concern that Dr. Hedrick had not adequately considered "alternative hypotheses" and "cultural connections" for some of her conclusions regarding Youssef in her evaluation. (RP 238, 417, 423)

Dr. Hedrick acknowledged that while there are "difficulties inherent in evaluating across significant cultural and religious lines," she was "careful" and considered cultural issues in her evaluation. (Ex. 1, CP 810; RP 58) Dr. Hedrick testified that she had some understanding of Muslim culture, as she had recently lived in a Muslim village in Africa for two years. (RP 58) Dr. Hedrick also explained that she had conducted interviews with those with the "best insight" into how a "practicing Muslim" might relate to others, including Imam Shaker, who had known Youssef and his family for many years, and Youssef's former therapist, Salma Abugideiri. (RP 134) Dr. Hedrick testified that, regardless of cultural differences, the "main issue" was that it was important for Youssef to have "interactional skills, the ability to empathize with someone else's position, to understand that, to resolve conflict. . . . [I]t certainly plays into the co-parenting arrangement." (RP 109)

In concluding that Youssef had difficulties with interpersonal skills, Dr. Hedrick also considered Aamer's description of her "interactions with [Youssef] when things weren't going well" (RP 100), and how Aamer found Youssef's behavior during these conflicts "very distressing and frightening." (RP 32) Dr. Hedrick found Aamer's description of events leading to her decision to leave

Youssef, including Youssef's disrespectful and dominating behavior, credible. (Ex. 1, CP 810)

Youssef criticized Dr. Hedrick's conclusion that he had "significant difficulties in [his] interpersonal skills, including deficits in his ability to deal maturely with conflict" because it was based, in part, on the fact that this was his third short marriage that had ended in divorce. (*See* Ex. 1, CP 810) Youssef's expert Dr. Weider testified that Dr. Hedrick's conclusion could be "a sign of bias," because Dr. Hedrick "never talks about the cultural implication, the cultural connections, that maybe the marriages were brief because his first wife never lived in the United States before. Maybe because the second marriage was never consummated. Maybe the third marriage, because it was pretty much arranged." (RP 237-38)

Dr. Hedrick responded to this "primary example" of her alleged "cultural insensitivity and confirmation bias" (Petition 8); she testified that she had indeed considered these points, but other information gathered during her evaluation suggested "that these difficulties were not merely situational in nature, or the result of culture issues around legal versus religious marriage." (Ex. 1, CP 810; RP 29, 114-16, 136) Petitioner's claims that Dr. Hedrick was "unaware" or "failed to consider" certain aspects of these marriages

(Petition 9) is unsupported by his citations to the record, which are to his own testimony or that of his expert witness.

For instance, Dr. Hedrick spoke with the imam who had mediated disputes in Youssef's first marriage, who told Dr. Hedrick that the first wife described Youssef as "not treating her well, that he was not kind." (Ex. 1, CP 809; RP 38-39) Although not directly involved in Youssef's second marriage, the imam reported that the second wife's family had contacted him because of Youssef's "strange behavior" during that marriage. (Ex. 1, CP 809; RP 38, 116) And Youssef himself had contacted the imam after the parties separated; the imam believed the failure of Youssef's (now third) marriage was a "reflection of his inability to take responsibility and keep commitments." (Ex. 1, CP 809; RP 38)

Dr. Hedrick also spoke with Youssef's therapist, who had treated Youssef at the end of each of his marriages. The therapist described Youssef as tending "to catastrophize and have paranoid thoughts arising out of trust issues related to the divorces" and "alluded to [Youssef's] interpersonal difficulties." (Ex. 1, CP 808; RP 100) The therapist reported that she had treated Youssef for "multiple episodes of depression," and that the end of his third

marriage to Aamer left him "terrified that he was going to lose his child." (Ex. 1, CP 808)

Youssef's other expert Dr. Rybicki challenged Dr. Hedrick's interpretation of Youssef's psychological test results, which Dr. Hedrick believed suggested that Youssef had a "tendency to deny personal shortcomings and minimize problems." (Ex. 1, CP 807; RP 417) Dr. Rybicki criticized Dr. Hedrick for failing "to grasp the fact that coming from a fairly traditional Muslim-world approach, where mothers tend to be primary caregivers, that in a Western cultural approach, such as we have here, where fathers may have a more balanced input, that that – it would not be a surprise at all for someone to work real hard to present themselves as a favorable parent." (RP 417)

But Dr. Hedrick's interpretation of the test results was consistent with other information she gathered during the evaluation. Aamer reported her concerns that Youssef was "not being straightforward with her" and withheld "relevant information if he believes it reflects badly on him or his time with" their daughter. (Ex. 1, CP 812) For example, Aamer testified that during one exchange the daughter was returned to her crying, and it was clear that she been crying for a while. (RP 361) When Aamer asked about

the daughter, Youssef refused to say anything more than "she was a happy, cuddly and smiley baby" during their time together. (RP 361) Aamer testified that she recognized that babies "cry for some reason or no reason," but Youssef's insistence that their daughter is "always happy with him" caused Aamer to be concerned that she is not "always getting the straightforward information." (RP 361-62) Dr. Hedrick noted that it was important that Youssef work on his tendency to minimize problems because it is "apt to interfere with co-parenting in that Ameena perceives him as potentially not being straightforward with her about [the daughter]. [ ] If he does not make this focus, he will likely create a situation where there is more and more distrust with Ameena, making parenting more difficult for both of them." (Ex. 1, CP 812)

Dr. Hedrick experienced Youssef's efforts to deny personal shortcomings and minimize problems herself. Youssef told Dr. Hedrick that there was no "time I was questioned by authorities, detained, arrested, or taken to Court," but Dr. Hedrick discovered that Youssef had once been arrested for sexual solicitation. (Ex. 1, CP 811) Youssef also denied having a mental health history, but Dr. Hedrick learned from his former therapist that he had past episodes

of depression for which he was prescribed anti-depressants. (Ex. 1; CP 811)

After a five-day trial, and after considering the criticisms of Youssef's experts, as well as the testimony of the parties and their witnesses, the trial court found "the parenting evaluation of Marsha Hedrick, Ph.D. to be complete and reliable" and "adopt[ed] her recommendations with minor revisions on some issues." (CP 787) The trial court rejected Youssef's proposed 50/50 parenting plan for the parties' daughter, who was then 14 months old, but declined Dr. Hedrick's recommendation that Youssef have no overnights for one year. The trial court instead ordered that Youssef begin overnights after he completed three months of counseling, unless the counselor recommended that overnights begin sooner or later. (CP 787) The trial court also ordered Youssef to participate in six months of group therapy to "explore and improve" his interactional skills with adults. (CP 793, 798) The trial court found the therapy was necessary to "assist the father to develop long-term methods, expectations and attitudes that will lead to positive cooperation with the mother concerning the child and to develop positive means in his own parenting." (CP 787)

In an unpublished decision, Division One affirmed the trial court's decision and awarded Aamer half her attorney fees and all of her costs on appeal. Youssef now petitions for review.

C. Grounds for Denial of Review.

1. This Court should deny review because the record does not support petitioner's allegation that the lower courts' decisions were biased.

As a Muslim-American, respondent recognizes the importance of avoiding stereotypes, rejecting discrimination of any kind, and the necessity of bias-free judicial decision-making. However, indulging dissatisfied litigants fishing for signs of bias solely to upend discretionary decisions does nothing to protect the integrity of the judicial system. Instead, we as a society properly presume "that a trial judge properly discharged [his or] her official duties without bias or prejudice. The party seeking to overcome that presumption must provide specific facts establishing bias." *In re Davis*, 152 Wn.2d 647, 692, 101 P.3d 1 (2004); *see also Ritter v. Bd. of Comm'rs of Adams Cty. Pub. Hosp. Dist. No. 1*, 96 Wn.2d 503, 513, 637 P.2d 940 (1981) (party alleging bias bears the burden of affirmatively showing that the judge's decision was based on bias).

This Court should reject petitioner's demand for a complete "do-over" of the trial court's discretionary parenting decision by

granting review of the Court of Appeals' decision affirming it, which would needlessly extend the litigation between these parents who were married for only three months before separating. Because of the father's appeal and petition to this Court, the parties have now been locked in litigation for longer than their daughter was alive when the trial court entered its final orders. The record simply does not support petitioner's claim that the trial court's discretionary parenting decision was the product of anything other than a careful assessment of the best interests of their daughter. Review of the Court of Appeals' unpublished decision is not warranted under RAP 13.4(b)(4) to address the undisputed claim "that our judicial system must be vigilant to guard against implicit bias that threatens the administration of justice." (Petition 13)

This Court squarely recognized and addressed the problem of "implicit bias" in *State v. Saintcalle,* 178 Wn.2d 34, 309 P.3d 326, *cert. denied,* 134 S.Ct. 831 (2013), the criminal case on which petitioner so heavily relies. (Petition 10-13, 19-20) In *Saintcalle,* this Court addressed the concern of "unconscious bias and implicit bias" in peremptory strikes during jury selection, holding that courts must "seek to eliminate this bias altogether or at least move us closer to that goal." 178 Wn.2d at 54, ¶ 43. Review of the decision here will

do nothing to further that goal, which has in any event been recently addressed by this Court's decision in *City of Seattle v. Erickson*, 188 Wn.2d 721, 398 P.3d 1124 (2017), which adopted a framework to better secure against the threat of implicit racial prejudice in jury selection that the *Saintcalle* Court found was missing.

To the extent that a holding in a criminal case on peremptory challenges in jury selection has any relevance in a domestic relations case addressing parenting decisions by an experienced trial judge, the Court of Appeals unpublished decision is wholly consistent with *Erickson*. To ensure that jury selection proceedings are free from racial prejudice, this Court in *Erickson* held that when faced with a prima facie case of discriminatory purpose, such as when "the sole member of a racially cognizable group is removed" using a peremptory strike, "[t]he trial court must then require an explanation from the striking party and analyze, based on the explanation and the totality of the circumstances, whether the strike was racially motivated." *Erickson*, 188 Wn.2d at 734, ¶ 32.

Here, upon allegations by petitioner and his experts that Dr. Hedrick was biased in her evaluation, Dr. Hedrick provided an explanation for her conclusions. After considering the "totality of the circumstances," including the testimony of both parents and their

witnesses, the trial court rejected petitioner's claims of bias, finding that Dr. Hedrick's evaluation was "complete and reliable." (CP 787) In affirming the trial court, the Court of Appeals noted that the "record demonstrates Dr. Hedrick's awareness of and sensitivity to cultural issues in this case," and that Dr. Hedrick "addressed most, if not all, of the alleged deficiencies in her testimony and explained why she took or did not take various actions in preparing her report." (Opinion 22)

Thus, contrary to petitioner's claim, the trial court indeed "dealt fully and properly" with the "parties' religion and culture" and the allegations that Dr. Hedrick's "report suffered from confirmation bias." (Petition 18-20) First, both parents are of the same religion and culture; they do not disagree how their daughter should be raised within their shared religion and culture. Second, in light of the extensive testimony from Dr. Hedrick squarely addressing the allegations of "confirmation bias" and the mother's testimony fully supporting Dr. Hedrick's conclusions, the finding that Dr. Hedrick's report was "complete and reliable" clearly reflects that the trial court "dealt" with the allegations. As the Court of Appeals held, "[t]he record sufficiently demonstrates the court's consideration of the statutory factors" in making its parenting plan. (Opinion 25)

The Court of Appeals' deference "to the trial court's decision regarding the weight and persuasiveness of conflicting expert testimony" (Opinion 22) raises no cognizable issue under RAP 13.4(b)(4). Review of this unpublished decision is not necessary as a further guard against implicit bias in judicial decision-making because the courts below effectively addressed the concerns of any implicit bias by Dr. Hedrick in her parenting evaluation, or by the trial court in its discretionary parenting decision.

2. This Court should deny review because the Court of Appeals decision does not conflict with any of this Court's cases.

Review of the Court of Appeals decision is also not warranted under RAP 13.4(b)(1) because it does not conflict with *Marriage of Black,* 188 Wn.2d 114, 392 P.3d 1041 (2017), or *Marriage of Chandola,* 180 Wn.2d 632, 327 P.3d 644 (2014). (Petition 14-18) In *Black,* this Court reversed a trial court's decision placing the children primarily with the father and imposing restrictions on the mother, who had come out as a lesbian prior to the parties' separation. "In addition to the trial court's written ruling and final parenting plan, the record indicate[d] that improper bias influenced the trial court's decision," 188 Wn.2d at 132-33, ¶ 33; "the trial court did not remain neutral when it considered [the mother]'s sexual orientation as a

factor for determining provisions in the parenting plan." *Black,* 188 Wn.2d at 131, ¶ 31.

Petitioner claims that the Court of Appeals decision conflicts with *Black* because the trial court relied heavily on Dr. Hedrick's evaluation, which he alleges was permeated by bias, thus "cast[ing] doubt on the entire parenting plan." (Petition 17) But "bald accusations" of bias are inadequate. *Marriage of Meredith*, 148 Wn. App. 887, 903, ¶ 31, 201 P.3d 1056, *rev. denied*, 167 Wn.2d 1002 (2009). There is a strong presumption that the trial court properly discharges its "official duties without bias or prejudice," and the party alleging bias "must provide specific facts establishing bias" to rebut that presumption. *Davis*, 152 Wn.2d at 692.

Unlike here, the petitioner in *Black*, presented "specific facts" establishing that the parenting evaluator and trial court were biased due to the mother's sexual orientation. The parenting evaluator in *Black* testified that the mother's "lifestyle choice" might cause "significant controversy" for the children and recommended "broad prohibitions" on the mother's ability to discuss religion and sexual orientation with her children. *Black,* 188 Wn.2d at 122, ¶ 14, 124, ¶ 15. The bias of the parenting evaluator permeated the trial court's ruling in *Black* because in adopting her recommendation, the trial

court found that the father was the "more stable parent" because "he is better suited to maintain the children's religious upbringing, which includes certain beliefs about same-sex relationships." 188 Wn.2d at 131, ¶ 31

Here, however, the petitioner failed to present "specific facts" establishing bias by Dr. Hedrick or the trial court. As the Court of Appeals concluded, "[t]here is no evidence that Dr. Hedrick was biased against Youssef because of his religion or culture," and "[c]ontrary to Youssef's assertions, nothing in this case shows the type of affirmative bias the court encountered in *Black*." (Opinion 23) Unlike in *Black*, the record does not support that the trial court would have found the parties here to be equally "capable parents" "but for" the fact that the petitioner was Muslim. *See* 188 Wn.2d at 126, ¶ 21. Bias did not "permeate the proceedings" here, as it did in *Black*, thus the Court of Appeals decision does not conflict with *Black*.

The Court of Appeals decision also does not conflict with this Court's decision in *Chandola*, which affirmed limitations on the father's residential time under RCW 26.09.191(3)(g) based on concerns that the father's "obsessive compulsive, over-protective parenting style" could impact the daughter's "fundamental human needs: sleep, nutrition, and socialization." 180 Wn.2d at 650, ¶ 36,

651, ¶ 39. This Court did reverse a provision restraining the father's parents from being present for more than 20% of the father's residential time, concluding that the trial court's finding that the father, "an only child of Indian cultural history, relies too much on extended family to help him raise his child" was inadequate to support its restriction. Absent a finding of harm, the limitations placed on the involvement of the father's parents was not justified, but this Court went out of its way to disavow any reliance on claimed bias by the trial court: "[w]e do not mean to imply that the trial court here was motivated by bias or cultural insensitivity; we conclude only that it did not justify the restriction on grandparent contact with the finding of relatively severe harm required by RCW 26.09.191(3)(g)." *Chandola,* 180 Wn.2d at 655-56, ¶ 54.

Here, unlike in *Chandola,* no limitations on the petitioner's residential time was entered under RCW 26.09.191 despite the similar "hyper focus" of the fathers on their child in both cases. The only "limit" on the petitioner's residential time was a delay of three months before commencement of overnights. As this residential schedule was established under RCW 26.09.187, rather than RCW 26.09.191, the trial court was not required to make a finding of harm, and it properly supported the short delay in overnights by finding

that the petitioner needed to first participate in counseling to assist him in developing "long-term methods, expectations and attitudes that will lead to positive cooperation with the mother concerning the child and to develop similarly positive means in his own parenting." (CP 787) This finding is consistent with the dictates of RCW 26.09.187 requiring that the trial court "make residential provisions for each child which encourage each parent to maintain a loving, stable, and nurturing relationship with the child" and in doing so, consider "each parent's past and potential for future performance of parenting functions." RCW 26.09.187(3)(a)(iii).

In any event, the trial court's decision was also supported by evidence that the father's "interpersonal difficulties and intense focus" on the daughter could be harmful to the daughter and her ability to interact "with the larger world." (Ex. 1, CP 812) This is wholly consistent with this Court's decision in *Chandola* recognizing that a child's "socialization" is a "fundamental human need" that warrants protection by imposing limits on a parent's residential time. 180 Wn.2d at 650-51, ¶¶ 36-37, ¶ 39.

Review of this unpublished decision is not warranted under RAP 13.4(b)(1) because the Court of Appeals decision does not conflict with any decision from this Court.

3. This Court should award respondent her fees for having to respond to this petition.

The Court of Appeals awarded attorney fees to respondent based on her need and petitioner's ability to pay under RCW 26.09.140. (Opinion 27-28) This Court should also award respondent her attorney fees for having to respond to his petition in this Court. RAP 18.1(j).

D. Conclusion.

This Court should deny review of the Court of Appeals decision and award respondent her attorney fees.

Dated this 6th day of November, 2017.

SMITH GOODFRIEND, P.S.

By: _____
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DECLARATION OF SERVICE

The undersigned declares under penalty of perjury, under the laws of the State of Washington, that the following is true and correct:

That on November 6, 2017, I arranged for service of the foregoing Answer to Petition for Review, to the court and to the parties to this action as follows:

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DATED at Seattle, Washington this 6th day of November, 2017.

Peyush Soni

SMITH GOODFRIEND, PS

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