

No. 47214-7-II

COURT OF APPEALS, DIVISION TWO
OF THE STATE OF WASHINGTON

In re the Marriage of:

Ceslee Ritchey, Respondent

v.

Frank Ritchey, Appellant.

BRIEF OF APPELLANT

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ASSIGNMENTS OF ERROR

Assignment of Error No. 1 - The trial court erred in entering the January 16, 2015 “Temporary Order” restricting Mr. Ritchey’s lawful use of firearms with his children which was an improper modification of the June 26, 2014 Final Parenting Plan.

Assignment of Error No. 2 – The trial court erred in entering the January 16, 2015 “Temporary Order” restricting Mr. Ritchey’s lawful use of firearms with his children as it was not reasonably calculated to address the identified harm.

Assignment of Error No. 3 – The trial court erred in entering the January 16, 2015 “Temporary Order” restricting Mr. Ritchey’s lawful use of

firearms with his children as the restriction was imposed *sua sponte* by the trial court.

ISSUES

1. Does the trial court have the authority to impose a parenting restriction on a parent after the final parenting plan has been entered without findings pursuant to RCW 26.09.260(10)?
(Assignment of Error No. 1)
2. Can the trial court impose a parenting restriction on a parent after the final parenting plan has been entered without finding a substantial change of circumstances?
(Assignment of Error No. 1)
3. Can the trial court impose a restriction on a parent after the final parenting plan has been entered without identifying a harm that the restriction is suppose to address?
(Assignment of Error No. 2)
4. Can the trial court impose a restriction on a parent after the final parenting plan has been entered that is not reasonably calculated to address an identified harm?
(Assignment of Error No. 2)
5. Can the trial court impose a parenting restriction *sua sponte* on a parent after the final parenting plan has been entered?
(Assignment of Error No. 3)
6. Can the trial court use information from a Guardian Ad Litem report and impose a restriction that impacts a parent's ability to parent and that impacts the parent's legal right to use firearms with their children when no party motioned for the restriction?
(Assignment of Error No. 3)

Statement of the Case

1. Dissolution and Final Parenting Plan

In April 2010, the parties filed a Petition for Dissolution of Marriage. (CP Sub No. 12). A multi day trial regarding the dissolution of marriage began May 7, 2014 regarding issues of the parenting plan, child support, and division of assets. (CP Sub No. 259). At the conclusion of

trial, Mr. Ritchey was named the primary residential parent. (CP Sub No. 260). The trial court entered the Final Parenting Plan in June 27, 2014 that did not state any restrictions on Mr. Ritchey's right to use firearms with the children, as permitted under the law. (CP Sub No. 267, pg. 6, sec. 3.12).

2. First Hearing Regarding Reconsideration and GAL Report

After the trial, the Respondent, Ceslee Ritchey, filed a Motion for Reconsideration for New Trial and to Reopen the Judgment and a Declaration in Support on July 7, 2014. (CP Sub No. 268). At this time, Mr. Ritchey decided to retain legal counsel to address the reconsideration motion. (CP Sub No. 272). There was a hearing regarding the Motion for Reconsideration on July 18, 2014 where Mr. Ritchey was granted a continuance to August 5, 2014. (CP Sub No. 272). Additionally, the Guardian Ad Litem (GAL), that was previously used for the trial, was asked to investigate the claims being made by Ceslee Ritchey, in her motion. (CP Sub No. 272). Ceslee Ritchey's Motion for Reconsideration never raised any concerns regarding Mr. Ritchey's firearm use with the children. (CP Sub No. 268).

The GAL filed an updated report on August 1, 2014, and suggested that Mr. Ritchey "should use discretion regarding hunting with the children, as most of the children are too young and lack adequate responsibility and judgment for hunting. Father should comply with all the laws regarding hunting or gun use. At minimum, anyone hunting should

take and pass a hunter's safety course". (CP Sub No. 278, pg. 2 lines 11 thru 13). The GAL's concerns were only based on a statement from one of the children who mentioned going shooting with Mr. Ritchey. (CP Sub No. 278). The child stated to the GAL that "Dad goes over gun safety, every time even before they go camping". (CP Sub No. 278, pg. 12, lines 1 thru 3).

3. Second Hearing on Reconsideration and Firearm Concerns

During the August 5, 2014 hearing on reconsideration the trial court raised concerns regarding Mr. Ritchey's use of firearms with the children upon reviewing the GAL's report. (CP Sub No. 279). The trial court decided to review the issue regarding the firearms at the next hearing on October 24, 2014, and restricted Mr. Ritchey's ability to engage in firearm use with the children in any capacity until that review. (CP Sub No. 279). The trial court stated, "So at this point in time, I'm going to put in, based upon my review of report, that we'll have some firearms restrictions on the children until I hear further information from both parties". (RP pg. 16, lines 16 thru 19).

4. Previous Ex Parte Restriction

Prior to the October 24, 2014 hearing, there had been no reports or incidents of improper firearm use however during the August 5, 2014 hearing the trial court mentioned a previous gun restriction in a ruling dealing with an ex parte restraining order by a previous judge, Judge Poyfair. (CP Sub No. 13). The trial court states, "So this is Judge Poyfair

making a ruling that, obviously he was preventing father from getting his firearms back at that point in time". (RP pg. 9 lines 21 thru 23). Counsel for Mr. Ritchey clarified that the gun restriction was part of an ex parte restraining order and once Mr. Ritchey was afforded due process and allowed to represent himself substantively, the restriction was lifted. (RP pg. 15, lines 9 thru 18).

5. Hearing on Reconsideration and the Firearm Restriction

At the October 24, 2014 hearing, issues of child support and the restriction of the children's use of firearms were before the court. (CP Sub No. 292). In preparation for the October 24, 2015 hearing, Mr. Ritchey, by and through his attorney of record, prepared the Motion and Declaration for Reversal of Children's Firearms Restriction and Amendment of Parenting Plan filed on October 10, 2014. (CP Sub No. 285). This declaration detailed Mr. Ritchey's extensive background with handling firearms in the military, as a firearms trainer, and with his current employment as well as the safety procedures and protocol Mr. Ritchey follows when using firearms with his children. (CP Sub No. 285). Additionally there was a Memorandum of Law Re Children Permissible Firearm Possession filed on August 10, 2014. (CP Sub No. 284). Counsel for Mr. Ritchey made oral arguments reflecting the filed motion and declaration and the memorandum of law (CP Sub No. 292).

After the review of Mr. Ritchey's declaration, the GAL's concerns raised in the GAL report filed August, 1 2015 were alleviated. (RP pg. 56, lines 8 thru 20). The GAL states:

"Well I do want to clarify one thing. I think Mr. Ritchey made a good point in that, in my report I was talking about well, I was talking about my shooting and hunting. But in Mr. Ritchey's clarification, it appears he does not take the children hunting. So I that alleviates a little bit of concern, in that I think probably shooting is more safe than hunting. I do think he does he puts safety measures in place [sic]. But I, I mean, gun use for children as a GAL is not my favorite thing to see". (RP pg. 56, lines 8 thru 20).

Ceslee Ritchey also did not have or raise an issue with Mr. Ritchey's use of firearms with the children except for maybe using smaller caliber guns for the younger children. (RP pg. 55, lines 18 thru 22). Ceslee Ritchey states:

"My take on it is the younger ones, Frank and Joshua are older, and I can understand that. But it's the younger ones that I'm concerned about. Maybe beebee guns only for the younger ones". (RP pg. 55, lines 18 thru 22).

After hearing all parties and the GAL, the trial court stated:

"As I stated previously, I have grave concerns about both parents and their ability to parent. In fact, I brought it up previously regarding their ability to provide a safe environment for these children that has been the subject of litigation for the last several years.

I've been involved in this case, I believe, since June or July 2012. And I've heard nothing but criticism of each parent. I've heard nothing but criticism of the other parent's ability to provide a safe and secure environment.

Each party has challenged the other party as to whether or not they can actually function as a parent. And again, I've stated many times and I don't recall every single instant where I've had this case where I've had concerns about each parent's ability to parent their children, period, let alone these extracurricular or recreational activities." (RP pgs. 58 thru 59, lines 7 thru 25, 1)

The trial court further states, “I don’t believe, for these particular children, access to guns is appropriate at this point in time. I believe, I may have indicated at this point in time, at the last hearing, I believe these parents need to function as parents and stop worrying about these other activities.”¹ (RP at pg. 59, lines 14 thru 20). The trial court also states, “So, again, there’s so many issues that come into play regarding this particular case. And I take these matters on a case by-case basis. And the factual basis is that father needs to focus on parenting these children pursuant to RCW 26.09.004.” (RP at pg. 63, lines, 2 thru 7). The trial court then addresses issues the trial court would like remedied, “But I believe the focus should be on parenting these children, to ensure that their daily needs are met. That they’re provided adequate food, clothing and shelter. That they’re provided the love, companionship and parental guidance that is required under 26.09.004”. (RP at pg. 63, lines 20 thru 25).

Counsel for Mr. Ritchey then attempted to clarify the ruling made by the trial court, “Is the trial court making any rulings regarding any concerns or safety with father’s approach, previous approach? Because now there’s the restriction that has been. But is the court making any rulings regard or findings regarding father’s previous exercise of that right, and that there’s any [sic]”. (RP pg. 64, lines 7 thru 13). The trial court responds, “I have no idea. All I know is that the father’s demeanor has been deplorable at times in my courtroom, period. The father’s attitude toward the court. The father’s attitude toward the mother. The father’s

attitude toward this entire matter has been deplorable, as mother's attitude has been as well". (RP pg. 64, lines 14 thru 22). The trial court later continues, "But at this point I'm just so concerned about father's emotional stability, as I am concerned about mother's, that I don't believe it's appropriate to have these children around guns". (RP pg. 65, lines 7 thru 10). At the conclusion of the hearing, the trial court ordered that Mr. Ritchey was restricted from using firearms with his children despite RCW 9.41.042¹ and after neither party had ever motioned the trial court to review the firearms or ever stating they were an issue. (CP Sub No. 292)

The Temporary Order resulting from the October 24, 2014 hearing That restricted Mr. Ritchey's use of firearms with his children was entered on January 16, 2015. (CP Sub No. 301). The Temporary Order states, "The court does not feel it is necessary or appropriate that the children have access to guns at this time. The court did not base its decision off any findings regarding the father's ability to teach the children proper gun safety or any issue with their prior use of guns". (CP Sub No. 301, pg. 2, sec. 3.3). The Temporary Order further states:

"The court denied the father's request for the children to use firearms despite the GAL stating she was not opposed to the older children using certain types of firearms for shooting, if certain safety requirements were met. The GAL indicated she thought the father was taking adequate safety precautions, and noted Mr. Ritchey's extensive professional experience and certifications while serving in the armed forces both using and training with firearms". (CP Sub No. 301, pg. 2, sec. 3.5).

¹ RCW 9.41.042. Statute allows children under the age of 18 to possess and use firearms in limited circumstances.

Due to the restrictions placed on Mr. Ritchey's use of firearms with his children, a Notice of Appeal was filed on February 9, 2015. (CP Sub No. 304). A Motion for Discretionary Review was filed on March 6, 2015. Oral argument regarding the Motion for Discretionary Review was heard on April 15, 2015. Opposing party never filed a response to the Motion for Discretionary Review and failed to appear at the oral argument. A Ruling Granting Review was filed on May 12, 2015.

Argument

i. Standard of Review

A trial court's decision on the provisions or restrictions placed on a parent as part of the parenting plan is reviewed for an abuse of discretion. *In re Marriage of Littlefield*, 133 Wn.2d 39, 940 P.2d 1362, 1366 (1997). A trial court abuses its discretion in one of three ways, "if its decision is manifestly unreasonable or based on untenable grounds or untenable reasons". *Id.* First, "a court's decision is manifestly unreasonable if it is outside the range of acceptable choices, given the facts and the applicable legal standard". *Id.* Second, a court's decision is based on untenable grounds if, "the factual findings are supported by the record". *Id.* Third, a court's decision is based on untenable reasons "if it is based on an incorrect standard or the facts do not meet the requirements of the correct standard". *Id.* "A court abuses its discretion if it fails to follow the statutory procedures or modifies a parenting plan for reasons other than

the statutory criteria". *In re Custody of Halls*, 126 Wash.App. 599, 109 P.3d 15, 19 (2005).

1. **The trial court erred in entering the January 16, 2015 "Temporary Order" restricting Mr. Ritchey's lawful use of firearms with his children which was an improper modification of the June 26, 2014 Final Parenting Plan.**

There is a well-established history, both with the United States Constitution² and the Revised Code of Washington allowing an individual to possess and use firearms. There are circumstances and situations that this fundamental right may be limited or found to be unlawful for an individual to possess firearms. Under RCW 9.41.040(C)(iv)³, there are specific exceptions allowing for children to lawfully possess and use firearms.

Specifically RCW 9.41.042 states:

"RCW 9.41.040(C)(iv) shall not apply to any person under the age of eighteen who is:

(5) In an area where the discharge of a firearm is permitted, is not trespassing, and the person is under the supervision of a parent, guardian, or other adult approved for the purpose by the parent or guardian;

(7) On real property under the control of his or her parent, other relative, or legal guardian and who has the permission of the parent or legal guardian to possess a firearm."

Both Mr. Ritchey and his children fall under the RCW statutes allowing for lawful possession and use of firearms and this right was restricted due to error by the trial court.

² U.S. Const. amend. II. A well regulated militia being necessary to the security of a free state, the right of the people to keep and bear arms shall not be infringed.

³ RCW 9.41.040(C)(iv). If the person is under eighteen years of age, except as provided in RCW 9.41.042.

Pursuant to RCW 26.09.260(10), the trial court is permitted to modify nonresidential aspects of a parenting plan after finalization so long as there is a “showing of a substantial change of circumstances of either parent or of a child, and the adjustment is in the best interest of the child”. Modifications to a parenting plan are “any increase or reductions to the rights originally granted to a party”. *In re Marriage of Coy*, 160 Wn. App. 797, 248 P.3d 1101, 1105 (2011). “A modification occurs when a party’s rights are either extended beyond or reduced from those originally intended in the decree”. *In re Marriage of Christel and Blanchard*, 101 Wn. App. 13,1 P.3d 600, 606 (2000). “Any modification, no matter how slight, requires an independent inquiry by the trial court”. *In re Marriage of Coy* at 1105.

The trial court never actually changed or modified provisions in the parenting plan in this matter, however the trial court did make an order that affected the parenting rights and actions of Mr. Ritchey after a Final Parenting Plan had been entered with the court on June 27, 2014. (CP Sub No. 267). RCW 26.09.260(10) states that for the modification of the parenting plan to occur there must be a “showing of a substantial change of circumstances of either parent or of a child, and the adjustment is in the best interest of the child”. In this matter, the trial court failed to make express findings showing a substantial change in circumstances and that the modification would be in the best interest of the children allowing for the modification under RCW 26.09.260. The order entered on January 16,

2015 clearly states, "The court did not base its decision off any findings regarding the father's ability to teach the children proper gun safety or any issue with their prior use of guns". (CP Sub No. 301, pg. 2, sec. 3.3).

The modification of the parenting plan and restriction placed on Mr. Ritchey stemmed from the issue the trial court took with the GAL report. The GAL report merely mentioned that Mr. Ritchey "should use discretion regarding hunting with the children" and that Mr. Ritchey "should comply with all laws regarding hunting or gun use". (CP 278, pg. 2, lines 11 thru 13). The GAL felt obligated to bring this to the attention to the trial court and even stated in general that "gun use for children as a GAL is not my favorite thing to see". (RP pg. 56, lines 19 thru 20). From this report, at the August 5, 2015 hearing, the trial court immediately stated "These children should not be handling, with these two parents in their emotional state, they and including stepmother, they shouldn't be handling guns of any type. And that will be the order of the court". (RP pg. 6, lines 7 thru 11). This trial court statement and order was made before any party even had an opportunity to present their side of the issue or an opportunity to explain the firearm use. And without any evidence or findings that Mr. Ritchey was or has ever misused firearms with the children. All evidence in the record suggests that Mr. Ritchey uses firearms appropriately and within the guidelines of RCW 9.41.042.

Further, Mr. Ritchey had been using firearms with his children for years and even during Mr. Ritchey's marriage with Ceslee Ritchey, well

before the GAL filed the report. (CP Sub No. 285). Over the course of four years of the dissolution and family law related proceedings, the issue of the children's safety or use of firearms was never addressed or mentioned. Therefor as required by RCW 26.09.260, the trial court erred by failing to show a substantial change of circumstances, regarding the firearms, of either parent or of a child, and the adjustment is in the best interest of the child as there was no substantial change in the use of firearms.

Firearms had been used by the Ritchey family well before the dissolution proceedings began in April of 2010. The child even states in the GAL report that, referring to shooting firearms with Mr. Ritchey, "And he told me he enjoys, I mean, he brought it up very positively that he enjoys going to dad's house, because, because of the hunting".⁴ (RP pg. 5, lines 19 thru 21). The trial court abused its discretion by not following the statutory standard defined in RCW 26.09.260 when the parenting plan was modified by the restriction placed on Mr. Ritchey to use firearms with his children.

2. The trial court erred in entering the January 16, 2015 "Temporary Order" restricting Mr. Ritchey's lawful use of firearms with his children as it was not reasonably calculated to address the identified harm.

The Washington Court of Appeals, Division One addressed restrictions in the parenting plan in *In re the Marriage of Katare [I]*. When addressing RCW 26.09.191(3) restrictions that limit the actions or

⁴ "Hunting" here refers to shooting firearms, which the GAL later clarifies.

involvement of a parent with a child, the court concluded, “the court may not impose limitations or restrictions in a parenting plan in the absence of express findings under RCW 26.09.191.” *In re Marriage of Katare [I]*, 125 Wn. App. 813, 826, 105 P.3d 44 at 50 (2004). Moreover the court also concluded that, “any limitations or restrictions imposed must be reasonably calculated to address the identified harm.” *Id.*

The trial court judge, during the October 24, 2014 hearing that restricted the children’s use of firearms, consistently referenced RCW 26.09.004 that defines the “parenting functions” of the parent-child relationship. (RP pg. 59 line 4 and RP pg. 63 lines 7 and 25). RCW 26.09.004 “parenting functions” states:

"Parenting functions" means those aspects of the parent-child relationship in which the parent makes decisions and performs functions necessary for the care and growth of the child. Parenting functions include:

(a) Maintaining a loving, stable, consistent, and nurturing relationship with the child;

(b) Attending to the daily needs of the child, such as feeding, clothing, physical care and grooming, supervision, health care, and day care, and engaging in other activities which are appropriate to the developmental level of the child and that are within the social and economic circumstances of the particular family;

(c) Attending to adequate education for the child, including remedial or other education essential to the best interests of the child;

(d) Assisting the child in developing and maintaining appropriate interpersonal relationships;

(e) Exercising appropriate judgment regarding the child's welfare, consistent with the child's developmental level and the family's social and economic circumstances; and

(f) Providing for the financial support of the child.

The trial court judge has been presiding over this case since May 2012 and has seen the interaction and parenting of both parties during that time frame. Regardless of how the trial court judge feels about the parenting style or parenting functionality of Mr. Ritchey, there was no basis or findings to restrict Mr. Ritchey's and Mr. Ritchey's children the right to possess and shoot firearms. In fact, if there is a gap between Mr. Ritchey and the children in regard to their appropriate interaction with one another, extracurricular activities such as shooting firearms recreationally is the type of activity and interaction that should be encouraged by the court. The restrictions limiting Mr. Ritchey's use of firearms with the children imposed by the court does not reasonably address the identified harm or concern of "parenting functions".

Further, Mr. Ritchey has known and used firearms the majority of his life, including the entirety of his professional career in the armed forces and working for the government. Firearm experience, expertise, and service in the armed forces is something Mr. Ritchey is proud to share with his children and wishes to show his children the proper safety procedures and use of firearms. Shooting firearms is a recreational activity, which if all safety procedures and protocol are followed, can be a bonding experience between Mr. Ritchey and his children; the very type of experience the trial court judge believes needs to occur. The trial court essentially is concerned with the "parenting functions" of Mr. Ritchey

however at the same time is restricting an activity and hobby Mr. Ritchey and the children have enjoyed, bonded over, and experienced together for the past several years without incident or problem.

The GAL assigned to this matter did initially have issue with Mr. Ritchey shooting firearms with the children. However, these concerns were alleviated when the GAL was served a copy of the Motion and Declaration for Reversal of Children's Firearm Restriction and Amendment of Parenting Plan. This declaration detailed extensively Mr. Richey's experience and expertise with firearms and the safety procedures and protocol Mr. Ritchey follows when shooting firearms with the children. By the October 24, 2014 hearing, the GAL had changed her position on the firearms as reflected in the Temporary Order entered January 16, 2015 that states:

"The court denied the father's request for the children to use firearms despite the GAL stating she was not opposed to the older children using certain types of firearms for shooting, if certain safety requirements were met. The GAL indicated she thought that father was taking adequate safety precautions, and noted Mr. Ritchey's extensive professional experience and certifications while serving in the armed forces both using and training with firearms." (CP Sub No. 301, pg. 2, sec. 3.5).

Additionally, Mr. Ritchey has been recognized by the trial court as the primary residential parent. Mr. Ritchey therefor has enough "parenting functionality" to be recognized by the court to be the primary residential parent, however is baselessly restricted from engaging in firearm use with his children. Mr. Ritchey has been using firearms with his children for years, teaching them the safe and proper way to handle such an instrument

and wishes to continue this family activity. There is no evidence, over the course of over four years of litigation involving the parties, to suggest any misuse or misconduct by Mr. Ritchey or his children to support the court's restriction limiting the freedom of Mr. Ritchey to act or engage in the use of firearms with his children without identifying or addressing an identified harm.

3. The trial court erred in entering the January 16, 2015 "Temporary Order" restricting Mr. Ritchey's lawful use of firearms with his children as the restriction was *imposed sua sponte* by the trial court.

The court in *In re Marriage of Wastson* held "the [trial] court lacked authority to modify the parenting plan *sua sponte* on grounds that neither party had contemplated or argued". *In re Marriage of Watson*, 132 Wn. APP. 222, 130 P.3d 915, 920. Neither Mr. Ritchey nor Ceslee Ritchey ever motioned the trial court to modify the parenting plan due to concerns or issues with the children's use of firearms. The original motion for reconsideration brought by Ceslee Ritchey dealt with parenting issues other than firearms or use of firearms. Ceslee Ritchey declared she had concerns with Mr. Ritchey's strict parenting style that had previously been addressed by the court. There were no new "substantial changes of circumstances".

No party to the case, including the GAL, were opposed to the children possessing and shooting firearms as long as the proper safety protocol and procedures were taken. Mr. Ritchey filed with the trial court on October 10, 2014, a declaration clearly detailing his own extensive and

professional experience with firearms as well as the safety protocol and procedures he conducts when shooting firearms with his children. Mr. Ritchey has served in the United States armed forces, serving two terms in Iraq. Mr. Ritchey has held positions as a weapons and firearms trainer and has all proper certifications for firearm use and possession. Even Mr. Ritchey's current employment with the government as a security officer with Social Security Administration requires Mr. Ritchey to possess a firearm.

The trial court acted in this matter, seeing the GAL report and having issues with the overall general parenting style of both parties, and issued a restriction of firearm use by the children. However, the trial court is not to act as the third parent and bring restrictions and issues that are not motioned for by the parties. The trial court judge and GAL may not agree with firearm use by these children or children in general but this is permitted pursuant to RCW 9.41.042 and Mr. Ritchey has clearly demonstrated his compliance with the statute and no party has shown any reason to believe otherwise. The trial court erred by *sua sponte* imposing parenting plan restrictions.

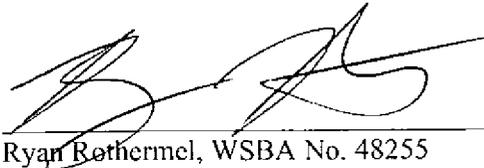
CONCLUSION

Mr. Ritchey asks this court to reverse the trial court's "Temporary Order" entered on January 16, 2015 that was an improper parenting plan modification and restriction of firearm use with Mr. Ritchey's children. The trial court abused its discretion by not following the

statutory standard defined in RCW 26.09.260, when the parenting plan was modified by the restriction placed on Mr. Ritchey to use firearms with his children. Further, there was not an identified harm by the trial court and even if an identified harm is found, the restriction does not reasonably address the harm. Additionally, the trial court imposed this restriction *sua sponte* as neither party to the case motioned for a firearm restriction and over the course of four years of legal proceedings, firearms had never been a concern of the court or either party. The trial court erred in placing a restriction of firearm use on Mr. Ritchey and his children and the trial court's decision should be reversed.

August 10, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ryan Rothermel', is written over a horizontal line.

Ryan Rothermel, WSBA No. 48255
Attorney for Appellant

CERTIFICATE OF SERVICE

I, Alina Bazhok, certify that I served the foregoing document by the method, on the date, and on each attorney(s) and/or person(s) identified below.

Method of Service:

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 By **faxing** a full, true and correct copy thereof to the party or attorney at the fax number shown below, which is the last known fax number for the party or attorney on the date set forth below. The receiving fax machine was operating at the time of service, and the transmission was properly completed, according to the attached confirmation report.

Person or Persons Served:

Ceslee Ritchey
113 Corduroy Rd. #7
Kelso, WA 98626

DATED this 10th day of August 2015.



Alina Bazhok, Legal Assistant

THE PETERSEN LAW GROUP

August 10, 2015 - 2:25 PM

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