

Case Disposition Worksheet**Respondent:**

Date Presented: 08-17-2017

**Case Number:** 2016-1388LW

Presented by: Staff/Panel present:

Profession: Staff Attorney Pre-Assigned or Requested  
(circle one)<sup>1</sup>

Section: \_\_\_\_\_

Staff present at B/C Disposition: \_\_\_\_\_

<input checked="" type="checkbox"/> Slater	<input checked="" type="checkbox"/> Kellington
<input checked="" type="checkbox"/> Hager	<input type="checkbox"/>
<input checked="" type="checkbox"/> Chaney	<input type="checkbox"/>

<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>

**SEXUAL MISCONDUCT CASES**

For Board and Commission cases, panel should refer sexual misconduct cases to the Secretary when there are no clinical issues involved. (It is recommended to make this referral only after investigation; however, any pre-investigation referral should include a panel authorization for investigation.)

- Panel finds there are clinical issues, do not refer.
- No clinical issues, refer case to Secretary

**Complete Below Only If Case Is Referred to Secretary**

Print Name of Panel Chair: \_\_\_\_\_ per Program Staff (initials) \_\_\_\_\_ Reviewing Commission Member \_\_\_\_\_  
(if applicable) (if applicable)

Date referral authorized: \_\_\_\_\_

**A. REQUEST FOR LEGAL ACTION:**

- Notice of Agency Action (NOA) - Non UDA
- Summary Action:

Suspension  Practice Restrictions \_\_\_\_\_

- |                                                         |                                                   |                                                                    |
|---------------------------------------------------------|---------------------------------------------------|--------------------------------------------------------------------|
| <input type="checkbox"/> Statement of Charges           | <input type="checkbox"/> Withdrawal of SOC:       | <input type="checkbox"/> Compliance: Release from STID/Order       |
| <input type="checkbox"/> Statement of Allegations:      | <input type="checkbox"/> Withdrawal of SOA:       | <input type="checkbox"/> Compliance: Authorization for Fast Track  |
| <input type="checkbox"/> Notice of Correction:          | <input type="checkbox"/> SOC/if STID not accepted | <input type="checkbox"/> Compliance: Referral to Collection Agency |
| <input type="checkbox"/> Notice of Determination:       | <input type="checkbox"/> BAP (CIE/HCA .400 DSHS)  | <input type="checkbox"/> Cease and Desist                          |
| <input type="checkbox"/> Notice of Required Evaluation: |                                                   |                                                                    |

**Alleged Violations—RCW 18.130.180:**

- |                                                         |                                                                  |                                                                        |
|---------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> (1) Moral turpitude            | <input type="checkbox"/> (10) Aiding and abetting                | <input type="checkbox"/> (19) Treating by secret methods               |
| <input type="checkbox"/> (2) Misrepresentation of facts | <input type="checkbox"/> (11) Violation of rules                 | <input type="checkbox"/> (20) Betrayal of patient privilege            |
| <input type="checkbox"/> (3) False advertising          | <input type="checkbox"/> (12) Practice beyond scope              | <input type="checkbox"/> (21) Rebating                                 |
| <input type="checkbox"/> (4) Incompetence               | <input type="checkbox"/> (13) Misrepresentation or fraud         | <input type="checkbox"/> (22) Interference w/ investigation            |
| <input type="checkbox"/> (5) Out of state action        | <input type="checkbox"/> (14) Failure to supervise               | <input type="checkbox"/> (23) Current drug/alcohol misuse              |
| <input type="checkbox"/> (6) Illegal use of drugs       | <input type="checkbox"/> (15) Public health risk                 | <input type="checkbox"/> (24) Sexual contact/patient abuse             |
| <input type="checkbox"/> (7) Violated state or fed law  | <input type="checkbox"/> (16) Unnecessary or inefficacious drugs | <input type="checkbox"/> (25) Acceptance of more than nominal gratuity |
| <input type="checkbox"/> (8) Failure to cooperate       | <input type="checkbox"/> (17) Criminal conviction                |                                                                        |
| <input type="checkbox"/> (9) Failure to comply          | <input type="checkbox"/> (18) Criminal abortion                  |                                                                        |

Other Violations of Relevant State or Federal Law: \_\_\_\_\_

Or

RCW 18.130 .170:  Mental Impairment  Physical Impairment**B. FILE CLOSED:**

<input type="checkbox"/> No Jurisdiction	<input type="checkbox"/> No violation at the time the event occurred	<input type="checkbox"/> Conduct was within standard of practice	<input type="checkbox"/> No violation determined
<input checked="" type="checkbox"/> Evidence does not support a violation	<input type="checkbox"/> Risk minimal, not likely to reoccur	<input type="checkbox"/> Mistaken identity	<input type="checkbox"/> Care rendered was within standard of care
<input type="checkbox"/> No Whistleblower	<input type="checkbox"/> Complaint Unique	<input type="checkbox"/> Issues which have been otherwise resolved	<input type="checkbox"/> Credential Issued in Error
<input type="checkbox"/> Application Investigation Only- No Action to Deny			

Further explanation (if any): Expedited Legal Review

<sup>1</sup> Program may request a specific staff attorney who has prior experience with the file or the Respondent.

## CASE REVIEW FORM-SECRETARY PROFESSIONS

DATE: 8/17/2017

CASE 2016-13188LW

### ALLEGATIONS (from the original complaint):

The Respondent allegedly failed to properly evaluate the complainant's case and has made recommendations to the court based on her prejudice and discomfort with him. The Respondent is accused of abusive use of conflict, lying in her reporting, not following the GAL guidelines as court ordered, working outside the parameters of her job, discrimination and disregard of the parenting plan she had a duty to follow.

### SUMMARY OF CASE (ex. Criminal Conviction Dates, Classification of Crime, Pleadings, etc):

The dispute between complainant and his ex ranges over 5 years. The case manager previously assigned retired and R was appointed in June 2014 (she resigned after 10 mo). R was appointed by King Co Superior Ct as the Case Manager with the role to make recommendations regarding implementation, clarification, modification and enforcement of any term in the permanent parenting plan and to make recommendation on the day-to-day issues experienced by the parties. R provided an 11 page statement outlining her role with this issue. Much of the Complainant's issues were specifically re: his ex and took place prior to R being appointed to the case. Ultimately, on 4/17/15 the Court authorized the R's request for an additional retainer fee as well as her request to terminate her role if payment was not received. The complainant failed to remit payment and in accord with the Court authorization, R resigned.

There is a contentious on-going relationship between the Complainant and his ex but from the information provided does not reflect wrongdoing by the R.

### CREDENTIAL INFORMATION:

ISSUANCE: 01/28/10

EXPIRATION: 02/06/18

STATUS: Active

### COMPLAINT HISTORY:

PREVIOUS COMPLAINTS: No

BRIEF EXPLANATION (# of complaints, types, results):

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INITIAL RECOMMENDATION (To CMT) : Close, evidence doesn't support

AGGRAVATING FACTOR:

\*

MITIGATING FACTOR:

\*

CHARGING/CLOSURE RECOMMENDATION:

**CASE REVIEW FORM-SECRETARY PROFESSIONS**

**DISCUSSION** *(at CMT)*

**FINAL CHARGING/CLOSURE RECOMMENDATION** *(By CMT) :*

**Respondent:** **Jennifer Lee Keilin**

**Case #:** **2016-13188LW**

**Complainant:** 2 - Name - Whistleblower Regarding H...

**Contents:** **Thumb Drive of Documents**

**Evidence page:** **228**

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# Jennifer Keilin, MSW, LICSW

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6/29/17

Scott Bramhall, Investigator  
Washington State Dept. of Health  
20425 72<sup>nd</sup> Ave. S., Suite 310  
Kent, WA 98032

Re: File #2016-13188LW

Dear Mr. Bramhall:

I received your letter of 5/10/17 regarding Mr. [2 - Name - Whistleblower R...] complaint alleging professional misconduct. I take this complaint very seriously. I have been in private practice for 14 years and have been appointed as Case Manager (also known as Parent Coordinator) in over 30 cases. I have been a member of the Association of Family and Conciliation Courts (AFCC) since 2008 and regularly attend national and state conferences. Attached as EXHIBIT A is my curriculum vitae.

## 1. BACKGROUND INFORMATION

On 6/06/14, I was appointed by King County Superior Court as the Case Manager for [2 - Name...]  
[2 - Name - ...] and Christine Peddle-Cornish, regarding their child, Senna S. Duncan (dob: 11/30/09). My role was to **“make recommendations regarding implementation, clarification, modification and enforcement of any term in the permanent parenting plan, and to make recommendations on the day-to-day issues experienced by the parties in these areas (emphasis added).”** EXHIBIT B is the Order of Appointment.

Generally speaking, a Case Manager is appointed to oversee the implementation of the parenting plan in high conflict families. This is an alternate dispute resolution process focused on helping the parties' minimize conflict and avoid court. No statutory criteria governing Case Manager services exist in Washington State. However, I utilize methods consistent with the Association of Family and Conciliation Courts (AFCC) model guidelines for parenting coordination. EXHIBIT C is the AFCC Guidelines for Parent Coordination.

Relevant history of this family: Ms. Peddle-Cornish and the child reside in Arizona, while Mr. [2 - Name - ...] resides in the Seattle area. In 2012 Judge Downing issued the Final Parenting Plan, following a contentious trial. Notably, Judge Downing entered RCW 26.09.191 restrictions against both parents for the abusive use of conflict. EXHIBIT D is the Final Parenting Plan dated

10/17/2012. I was the second Case Manager for this family; the original Case Manager, Dr. Glassman, retired and terminated his role with the family in 01/2014.

## 2. CASE MANAGER PROCESS

On 06/06/2014 I was notified of my appointment as Case Manager in this matter. On 06/19/2014, I provided Mr. [2 - Name - ...] my introductory and consent forms, scheduled a meeting with him, and requested his portion of the retainer payment be paid at that meeting.

I also emailed Ms. Peddle-Cornish my introductory and consent forms, inquired about scheduling a meeting with her (in person or by phone depending on logistics as she resides in Arizona), and requested her portion of the retainer payment at her earliest opportunity.

I requested that counsels provide relevant materials, including the parenting plan.

On 06/26/2014, I held an initial meeting with Mr. [2 - Name - ...]. Mr. [2 - Name - ...] failed to provide his retainer as agreed; Ms. Peddle-Cornish also reported she was unable to provide her portion of the retainer. On 07/02/2014, I notified the parties I could not proceed further until the retainer was paid in full. Ms. Peddle-Cornish provided her retainer portion on 08/14/2014; Mr. [2 - Name - ...] provided his portion on 09/08/2014.

On 09/10/2014, I notified both parties that I was fully retained and ready to proceed with Case Manager services.

During my time as Case Manager, I had substantive contacts with the parties as follows:

Mr. [2 - Name - ...]:

06/26/2014, 1.5 hours, in office;  
09/25/2014, 0.5 hours, phone;  
12/18/2014, 0.5 hours, phone;  
01/06/2015, 0.5 hours, phone;  
02/25/2015, 0.5 hours, phone, and,  
03/13/2015, 0.1 hours, phone.

Ms. Peddle:

09/16/2014, 1.0 hours, phone;  
09/23/2014, 0.5 hours, phone;  
12/17/2014, 0.4 hours, phone;  
12/18/2014, 0.7 hours, phone;  
02/24/2015, 1.0 hours, phone; and,  
03/11/2015, 0.2 hours, phone.

In addition to these contacts, I had numerous email exchanges with each parent. Both parties also provided me with a significant amount of materials to review, related to past events and ongoing issues. I also had contact with the child's preschool in March of 2015 and attempted contact with Arizona Child Protective Services on several occasions in late February/early March.

Both parties raised numerous issues about the other throughout our work together. In accord with my role and duties set forth in the Order of Appointment, I endeavored to help them implement their parenting plan and resolve areas of conflict, with limited success, candidly.

I issued a Case Manager Report on 03/13/2015. EXHIBIT E. In my report I discussed concerns reported by the parties, my observations and efforts to resolve issues, and I made recommendations. I also requested an additional retainer be paid by 04/10/2015, and asked that the court discharges me as Case Manager if not paid by that date.

On 03/13/2015, Mr. 2 - Name - ... emailed that he was revoking “any and all releases of information” related to him. He further wrote, “Do not speak my name, do not write my name, do not communicate any information at any person other than myself from this point forward.” EXHIBIT F. I do not recall any further contact from Mr. 2 - Name - Whi...

On 04/06/2015, Ms. Peddle provided her portion of the requested retainer.

On 4/17/15, the court entered an order, noting, “The specific recommendations made by Ms. Keilin all strike the court as being sensible and practical. No objection has been lodged. Accordingly, pursuant to section VII[C] of the Order Appointing Case Manager, the Court will hereby approve and adopt those recommendations.” EXHIBIT G.

On 05/20/2015, I issued a formal letter, confirming my services were terminated as of 04/10/2015 due to Mr. 2 - Name - Whi... non-payment.

### **3. DUTIES AS CASE MANAGER**

On 06/06/14, I was appointed to a two-year term as Case Manager (See EXHIBIT B). I resigned after 10 months, effective 04/10/2015. The Order is 13 pages long and extensively detailed. I have copied some of the relevant portions below.

#### *Section II. Case Manager AUTHORITY*

*A. The Case Manager is authorized to make recommendations regarding implementation, clarification, modification and enforcement of any term in the permanent parenting plan, and to make recommendations on the day-to-day issues experienced by the parties in these areas.*

*B. The Scope Of The Authority Of The Case Manager Shall Be:*

- 1. To address and resolve all current and future disputes arising under the parenting plan, including but not limited to disputes over: schooling, daycare, or babysitting, medical and/or psychological care, activities of the child, discipline, daily routine, transportation and supervised transfer of the child, vacation and holiday scheduling or any other ‘parenting type’ issues, and any issue as the Court may from time to time direct;*

2. To determine and, as need be, to alter the terms of the present order to mutual 'no contact' between the parents. The parents should have no contact with one another and all information related to Senna, his health, major decisions, scheduling, child support and more shall be posted on OurFamilyWizard or some other place as directed by the Case Manager or go through the Case Manager.
3. To help create a common language between the parents regarding discipline, rules, diet, etc., at each house; make recommendations regarding treatment providers for parents and child when necessary; to select a new exchange supervisor if deemed necessary; and to have decision making ability for scheduling telephone calls from the nonresidential parent to Senna;
4. To determine and oversee the use of SKYPE or other online access to Senna including the time, duration and context of calls, standard of proof for attempting calls and being there to receive them, altering SKYPE times if mother's employment or father's employment so requires; altering the room of room content and location in with the call(s) occurs, and to suggest call content or activities to improve the experience for Senna.
5. To determine and oversee the use of Our Family Wizard including, but not limited to, how each party uses it and the timeliness of their responses to the other, limits to content that can be posted, whether they can alter or remove content posted by the other party and determining the access other professionals (such as the Visitation Supervisor) should have to the site.
6. The Case Manager shall follow and monitor both parent's compliance with the Parenting Plan, mediate emails and communications between the parents by providing ongoing parent coordination.
7. To have decision making abilities for minor deviations and/or changes to the plan or in other decisions regarding Senna and the schedule that the parents cannot make independently.
8. To resolve/decide any issues within the scope of authority of the Case Manager by any dispute-resolution method deemed reasonable by the Case Manager or which may be agreed to by the parties.
9. Lined out
10. To make decisions and formulate recommendations based upon what is in the child's best interest.
11. To interview all members of the immediate or extended family or household of both parents and the child;

12. To interview and request the participation of any and all persons who the Case Manager deems to have relevant information including the therapists used by each party and the healthcare providers and daycare providers for Senna.
13. To recommend or require that the Court order the parties and/or child to participate in ancillary services, including but not limited to: physical or psychological examinations and assessments, psychotherapy, counseling, and alcohol or drug monitoring and testing.
14. To allocate between the parties the cost of any ancillary service not ordered at the time of the Case Manager appointment.

### **SECTION III. TIME SENSITIVE ISSUES, AUTHORITY AND PROCEDURE**

*When short-term, emerging, and time sensitive situation or dispute with the scope or authority of the Case Manager arises that requires an immediate decision for the welfare or the child and the parties, a Case Manager may make a binding temporary decision...*

### **4. CONCERNS RAISED IN THE LETTER OF COOPERATION**

#### **I. Failed to address in your Case Manager Report Mr. [2 - Name - Whi...] allegation of sexually inappropriate actions by Ms. Peddle.**

In the Case Manager report, I detailed a number of concerns raised by each of the parties. In general, I endeavored to report both parties' primary concerns or themes and did not attempt to include all concerns reported given the number and content. I did not include Mr. [2 - Name - Whi...] allegation of sexually inappropriate actions by Ms. Peddle due to the lack of supporting data and the scurrilous nature of the report. Specifically, Mr. [2 - Name - ...] first raised concerns about Ms. Peddle's attire during Skype sessions in March of 2015, as I was preparing my report. He provided some undated screenshots to support his statements. My review of the photos and videotaped Skype sessions did not support his allegations.

#### **II. Skype Related Issues**

##### **a. Failed to address Ms. Peddle's noncompliance with the court ordered scheduled Skype sessions in your Case Manager Report.**

Records were provided by both parties relating to Skype. My review of the Skype sessions and supporting information did not support noncompliance by Ms. Peddle.

##### **b. Formulated a recommendation that the Skype sessions be supervised by Child & Family Support Services a facility recommended by Ms. Peddle which are costly to Mr. [2 - Name - W...]**

The Skype sessions were a source of significant conflict and distress between the parties and required them to continue to engage four times per week. Given the ongoing difficulties, I recommended Skype session facilitation by a third party agency. Ms. Peddle located the recommended agency, which is relevant because she was tasked with transporting the child to and from the agency for sessions. I understood both parties to be responsible for payment for services based on their child support proportions. Moreover, Mr. [2 - Name - ...] lodged no objection with the court regarding this recommendation.

- c. ***You agreed to join Mr. [2 - Name - ...] during Skype sessions and failed to show up without canceling and failed to reschedule as agreed.***

I made no plan to join Mr. [2 - Name - ...] during Skype sessions. On 12/01/2014 at 2:43 pm, I emailed Mr. [2 - Name - W...] with a tentative idea to remotely observe his Skype session with Senna, and asked for his thoughts. He replied at 4:02 pm that I could remotely observe that evening's Skype session at 6:45 pm. I had not anticipated this response and was not available that quickly.

I responded the following morning and asked for the next opportunity. Mr. [2 - Name - ...] did not respond to my specific question. EXHIBIT H is the aforementioned e-mails. Shortly afterward, Ms. Peddle offered to provide video recordings of the Skype sessions, which seemed the better way to "observe." At no other time did I suggest observing Skype sessions live.

- d. ***Formulated a recommendation that the Skype sessions be supervised by Child & Family Support Services in Arizona. You note in your report that this facility prohibits providing any records to any party unless the facility receives a subpoena. This facility is in Arizona and there is litigation with this case in Washington. You cite as reasons based upon what is in the best interest of Ms. Peddle's interest rather than Senna's.***

In my Case Manager report, I noted the proposed agency's policy about providing records. The litigation is based in Washington, but the mother and child are located in Arizona. Utilizing services in Arizona is practical and in the child's best interests. Mr. [2 - Name - ...] lodged no objection with the court regarding this recommendation.

- e. ***Wrote in your report that it is not clear why the Skype visits did not occur although you were provided with supporting documentation that Ms. Peddle simply didn't answer the phone.***

Records were provided by both parties relating to Skype. These records did not support Mr. [2 - Name - Whi...] contention.

- f. ***Proposed structured Skype sessions which are costly to Mr. [2 - Name - ...] reported that Mr. [2 - Name - ...] didn't showed up.***

I am unclear as to the meaning of this concern. I am happy to provide an explanation if the question were clarified.

**III. Reported to the court a need for reduced contact between the parties while as of the date of your report Mr. [2 - Name - ...] had not seen Senna for ten (10) months.**

Given the contentious relationship between the parties, I recommended limited direct contact between the parties, through reduced Skype sessions and communication through the Case Manager. Mr. [2 - Name - Whis...] in-person contact with Senna was not impacted by this recommendation.

In January of 2015, Mr. [2 - Name - ...] requested one visit during my tenure as Case Manager. At noted in my report on page 5, Mr. [2 - Name - ...] did not follow the court ordered protocols and the requested contact did not occur.

**IV. You were instructed by the court as Case Manager to help create a common language between the parents and to address and resolve disputes. In your Case Manager Report you state Mr. [2 - Name - Whist...] use of Our Family Wizard as "...a megaphone to broadcast his emotions."**

In January of 2015, I instructed both parties to follow a specific communication protocol, due to both parties' approach to communication. EXHIBIT I.

In my March 2015 report, I described both parent's styles of communication. I noted Ms. Peddle's communication could be "for the record" and "antagonistic." I noted Mr. [2 - Name - Whis...] use of OFW varied between nonresponsive and "almost as a megaphone to broadcast his emotions." Specifically, regarding Mr. [2 - Name - ...], I was referencing lengthy communications by Mr. [2 - Name - ...] in which he made emotional statements and pleas for Senna's rescue from Ms. Peddle, based on his perspective that something was terribly wrong.

**V. In your report, you refer to Mr. [2 - Name - Whi...] calling the school expressing concern about Senna's report that another student had punched him. You cite that Mr. [2 - Name - Whis...] concerns seem "inflated and overhyped," and were not supported by the school.**

In my report, I noted Mr. [2 - Name - W...] stated Senna reported being punched by another student, and also that Mr. [2 - Name - ...] further stated that he did not believe Ms. Peddle's report that Senna was rough housing with another student, and suggested possible abuse by Ms. Peddle. I contacted the child's school and they reported no concerns about Senna. Given the school information and the lack of other collateral information to support Mr. [2 - Name - Wh...] beliefs, I noted that Mr. [2 - Name - Wh...] concerns seemed inflated and overhyped. These beliefs are extensions of his allegations already adjudicated by the Court in 2012.

**VI. You report Mr. [2 - Name - ...] "increased his rhetoric" on about Senna being abused and mistreated in Ms. Peddle's care.**

Throughout my tenure as Case Manager, Mr. [2 - Name - W...] reported an escalating concern about Ms. Peddle mistreating Senna, in the phone and email communication. In the fall of 2014, Mr. [2 - Name - ...] reported a concern about psychological mistreatment. In March of 2015, Mr. [2 - Name - ...] reported seeing cuts and bruises on Senna throughout the last year and speculated Ms. Peddle

missed Skype calls so that Mr. [2 - Name - ...] would not see Senna's injuries. I noted this pattern in my Case Manager Report.

**VII. In your Case Manager Report to the court you describe the relationship between the parties in terms as: "...drama and toxic engagement ongoing, sometimes reaching a fever pitch." Without documenting facts supporting your reference.**

The 2012 permanent parenting plan included RCW 26.09.191 restrictions against both parents based on the abusive use of conflict. In my report to the court, I described the parties' Skype communication and reiterated the nature of their relationship. "The current frequency and nature of Skype (requiring parental supervision and help) creates a constant need for these parties (both of whom the court made abusive use of conflict findings against) to have routine contact, which keeps the drama and toxic engagement ongoing, sometimes reaching fever pitch."

**VIII. Report Ms. Peddle's goal was to provide Senna with access to Mr. [2 - Name - ...] "in a safe way" and Ms. Peddle is a "good communicator" while "this writer finds communication with Mr. [2 - Name - ...] a challenge."**

In my Case Manager Report, I briefly described communications and interactions with each party, for the court's information.

**IX. Interviews/Observations**

- a. Failed to interview all members of the immediate or extended family or household of both parents and the child as instructed by the court.
- b. Did not observe Ms. Peddle with the child as directed by the court.
- c. Did not observe Mr. [2 - Name - ...] with the child as directed by the court.

The Order Appointing Case Manager authorizes but does not require interviews of the family members or the child, or observations of the parents with the child, as per Section 2, #11 (See EXHIBIT B). In my term as Case Manager, interviews with extended family members or the child, or observations of the parties with the child, were not warranted.

**X. You report that Ms. Peddle's mother had to obtain a no contact order protecting her from Mr. [2 - Name - W...], Mr. [2 - Name - Whis...] allegations that Ms. Peddle's father interfered to the point that Mr. [2 - Name - ...] obtained a no contact order and Ms. Peddle's other proxies were fired or reprimanded at their employment because they used their positions to intimidate Mr. [2 - Name - ...] at Ms. Peddle's urging were not included in your report to the court.**

I noted concerns reported by both parents in my report. On page two, I noted Mr. [2 - Name - ...] stated: "Their family will follow me, harass me, fire them, etc. I've never had one smooth visit or transport ever." I am not aware that Mr. [2 - Name - ...] sought a protection order against Ms. Peddle's father.

**XI. Refer to Mr. [2 - Name - ...] denying filing the complaint with the Arizona Child Protective Services specifically three (3) different times in your eight (8) page report. Referring to a**

*denial appears that you are insinuating to the court that Mr. [2 - Name - ...] is lying while Ms. Peddle is sanctioned in this case for giving false testimony. Your report calls the referral a complaint against Ms. Peddle and does not reflect the nature referral such as a visible injury on Senna's face or your attempt to interview any potential mandatory reporters around Senna.*

In my Case Manager Report, I noted both parent's statements regarding the report filed with Arizona Child Protective Services. I identified that the report involved an allegation of physical abuse. I detailed that I spoke with Theresa Albright, Director of Phoenix Children's Academy, a mandated reporter. I further noted I contacted Lisa Livermore, CPS investigator, but my calls were not returned.

**XII. Failed to report Ms. Peddle previous history of losing custody of her daughter and lying to Mr. [2 - Name - ...] about her diagnosis of ovarian cancer.**

This information was known to the Court prior to my appointment; it was not relevant during my period as Case Manager.

**XIII. Did not include in your Case Manager Report that Ms. Peddle had a history of being found guilty of perjury when she self-inflicted injuries in an of accusations of domestic violence with a mandatory arrest against Mr. [2 - Name - ...]. You refer only to "courtroom drama."**

The information concerning Ms. Peddle had already been addressed in court prior to my appointment and was not relevant during my period as Case Manager.

**XIV. Reported to the court that Mr. [2 - Name - ...] drove drunk, drove suspended and had warrants in three (3) separate locations in your eight (8) page Case Manager Report without providing what steps you took to verify these allegations.**

In my Case Manager Report, I reported Ms. Peddle's statements regarding Mr. [2 - Name - Whi...] license and legal issues. Ms. Peddle provided court and docket information supporting these concerns. I made no recommendations, but asked the court to "consider addressing whether a lack of a valid license or outstanding warrants for either parent is relevant to parenting, and whether it should impact parenting access."

**XV. You did not address or attempt to resolve transportation and supervised transfer of the child as the court ordered in the task of walking Senna to Mr. [2 - Name - W...] from Ms. Peddle in January 2015 effectively denying Mr. [2 - Name - ...] his visit.**

I requested Mr. [2 - Name - W...] follow the relevant court orders, which tasked him with specific responsibilities. The court had addressed visitation and exchange protocols prior to my appointment. On 4/19/13, Judge Downing ordered Dr. Glassman's recommendations as follows: (1) It shall remain the visiting parent's responsibility to select the exchange supervisor [on the Supervised Visitation Directory or Maricopa County Family Court Roster] and communicate this via email to the Case Manager and post it on OFW; and, (4) Father shall provide Mother with a

minimum of 21 days advanced notice of his intent to exercise parenting time in Phoenix.  
EXHIBIT J.

On 10/30/13, Judge Downing further ordered, as per Dr. Glassman's updated recommendations: (2) Father shall provide Mother and the Case Manager with Senna's travel itineraries, including flight schedules and place of lodging directly through email; and, (3) All visitation exchanges shall continue being supervised with transfers occurring at the Surprise Police Department." EXHIBIT K.

Regarding the January 2015 visit, I emailed Mr. [2 - Name - ...] on 01/07/2015 with a request for Senna's travel itinerary and information regarding the exchange supervisor no later than 01/09/2015. On 01/09/2015, Mr. [2 - Name - W... ] emailed a request to change exchange location and to utilize an exchange supervisor not on the approved lists. I declined to deviate from the orders and asked for the requested information ASAP. Mr. [2 - Name - ...] did not respond. EXHIBIT L is the aforementioned communications. On 01/14/2015, I notified the parties the visit would not occur.

**XVI. *Wrote that there is a negative impact on the child for a 5-day visit in June with Mr. [2 - Name - ...] without providing supporting information.***

This does not accurately reflect my statements. I described circumstances surrounding Mr. [2 - Name - Whi...] visit in June of 2014; I did not describe impact to the child.

**XVII. *Did not report to the court that Ms. Peddle had used a protection program which prohibited Mr. [2 - Name - ...] from court ordered visitation. Did not identify information in the application documentation Ms. Peddle provided to enter the protection program as inconsistent with the facts before the court.***

I do not have knowledge of this issue.

**XVIII. *You reported to the court that Mr. [2 - Name - ...] failed to provide financial support although Mr. [2 - Name - Whi...] financial status was reported to you as bankruptcy. You did not report this to the court. The court orders the Case Manager is not authorized to make recommendations affecting child support. In your report you state: "This writer is sympathetic to Ms. Peddle's need for child support.***

In my report, on page 2, I wrote, "Mr. [2 - Name - ...] acknowledged he is behind in his financial support of Senna, including child support, health insurance, and reimbursing health/other costs." I referenced Mr. [2 - Name - Whi...] bankruptcy. I did not make any recommendations affecting child support.

**XIX. *Reported Mr. [2 - Name - ...] failed to pay you while Mr. [2 - Name - ...] did not see his son or know where his son was at for a year during your role as court assigned Case Manager.***

On 04/17/2015 the Court authorized my request for an additional retainer as well as my request to terminate my role if payment was not received. Mr. [2 - Name - ...] failed to remit payment. Subsequently, in accord with the Court authorization, I resigned.

## SUMMATION

I believe the aforementioned addresses the enumerated points in the letter. I am happy to provide any further information or clarification requested of me.

As requested, I am electronically submitting a copy of this letter and referenced exhibits, via a thumb drive.

Please do not hesitate to contact me if anything more is needed.

Best regards,



Jennifer Keilin, MSW, LICSW

# **Jennifer Keilin, MSW, LICSW**

1715 114<sup>th</sup> Ave. SE. Suite 210 Bellevue, WA 98004  
P/425.526.6556 F/425.270.1436 jkeilin@comcast.net

## **Curriculum Vitae**

### **Education**

University of Washington, Seattle, WA	Master of Social Work, 1998
Pacific Lutheran University, Tacoma, WA	Bachelor of Social Work, 1991
Pierce College, Lakewood, WA	Addiction Studies Courses, 1993

### **Clinical Experience**

**Clinical and Forensic Social Work Private Practice**, Seattle, WA                          4/03 – Present  
*Parenting Plan Evaluations; Parent Coordinator; Case Management; Consultation; Substance Abuse Assessment and Counseling; New Ways for Families Authorized Provider.*

**Dr. Stuart Greenberg, PhD, ABPP**, Seattle, WA                          3/01 – 4/03  
*Forensic Social Worker.* Provided case management services; co-conducted parenting, personal injury, and substance abuse examinations with Dr. Greenberg

**Division of Children and Family Services**, Seattle, WA                          11/00 – 3/01  
*Foster Parent Recruiter.* Developed and implemented a pilot program to recruit foster parents in King County.

**Child Protective Services, Division of Children & Family Services**, Seattle, WA 4/98-11/00  
*Social Worker 3.* Conducted child abuse investigations and family assessments. Provided case management services to children and families.

**Echo Glen Children's Center**, Snoqualmie, WA                          7/94 – 4/98  
*Juvenile Rehabilitation Counselor.* Provided assessments, counseling and case management services to incarcerated youth.

**Shared Health Services**, Puyallup, WA                          3/93-7/94  
*Qualified Chemical Dependency Counselor.* Performed substance abuse evaluations and provided individual and group counseling.

### **Clinical Internships**

Social Worker Intern, Child Welfare Services, DCFS.	9/97 – 4/98
Social Worker Intern, King County Family Court Services.	1/97 – 6/97
Chemical Dependency Counselor Intern, Shared Health Services.	12/92 – 3/93

**Licensure and Certificates**

Licensed Independent Clinical Social Worker (LW 60064966)	2010 - Present
Academy of Certified Social Workers	2003 - Present
Certified Chemical Dependency Counselor I	1994 – 2008

**Presentations**

Keilin, J (November 2016). When the Rubber Meets the Road: Drozd, Olesen, and Saini PPE Processes in Practice. Work presented at the AFCC 12<sup>th</sup> Symposium on Child Custody Evaluations. Atlanta, Georgia.

Keilin, J. & Wheeler, J.G. (March 2014). Using A Psychosexual Evaluator. Work presented at the Annual Conference, Association of Family and Conciliation Courts, Washington Chapter, Seattle. Washington.

Keilin, J. & Wheeler, J.G. (June 2013). Using A Psychosexual Evaluator. Work presented at the 50<sup>th</sup> Anniversary Conference, Association of Family and Conciliation Courts, Los Angeles. California.

Keilin, J. (December 2010). Drug And Alcohol Abuse 101. Work presented at the Continuing Legal Education presentation to the Washington State Bar Association, Seattle. Washington.

Keilin, J. (2011 – Present). Multiple presentations, given three times or more annually, to King County CASA (Court Appointed Special Advocate) on the topics of substance abuse and mental health. Seattle, Washington.

**Post Graduate Training**

Changing for Good: Practical Tips for Individual and Population-based Motivational Interviewing. Dr. Christopher Dunn. Seattle, WA. 11 hours. May 14 & 15, 1999.

Personal Injury Examinations. Stuart Greenberg, PhD. American Academy of Forensic Psychology. Vancouver, B.C. 7 hours. March 28, 2001.

Comprehensive Child Custody Evaluations. Marsha Hedrick, PhD. American Academy of Forensic Psychology. Vancouver, B.C. 7 hours. March 30, 2001.

Psychological Testing. Stuart Greenberg, PhD. King County Family Law CASA training. Seattle, WA. 1.5 hours. September, 2001.

Parenting Evaluation Training Program (PETP). Andrew Benjamin, J.D., PhD. University of Washington School of Psychology. October 2001 to July 2003.

A Survey of Forensic Psychology Practice: Issues & Applications. American Academy of Forensic Psychology. Seattle, WA. 24 hours. October 18 - 21, 2001.

Co-Occurring Disorders. Alcohol and Drug Studies. Bellevue Community College. Bellevue, WA. 15 hours. November 9-10, 2001.

Suicide: Information to Intervention. Alcohol and Drug Studies. Bellevue Community College. Bellevue, WA. 15 hours. November 16-17, 2001.

19<sup>th</sup> Annual Conference of the National Organization of Forensic Social Work: Social Work and the Law. National Organization of Forensic Social Work. St. Louis, MO. 14 hours. May 6-8, 2002.

The Use & Abuse of Psychological Experts in Family Law Litigation. King County Bar Association. Seattle, WA. 6.5 hours. October 18, 2002.

Ethical Issues in Forensic Psychology. American Academy of Forensic Psychology. Long Beach, CA. 7.0 hours. January 15, 2003.

Excusing and the New Excuses. American Academy of Forensic Psychology. Long Beach, CA. 7.0 hours. January 16, 2003.

Forensic Applications of the MMPI-2. American Academy of Forensic Psychology. Long Beach, CA. 7.0 hours. January 17, 2003.

Assessment of Psychopathy: An Overview of the Hare Scales. American Academy of Forensic Psychology. Long Beach, CA. 7.0 hours. January 18, 2003.

Forensic Consultation, Expertise & Testimony. American Academy of Forensic Psychology. Long Beach, CA. 7.0 hours. January 19, 2003.

Understanding Brain Development and Infant Mental Health. University of Washington School of Social Work. Sheri Hill, Ph.D. Seattle, WA. 21.0 hours. March 2003.

Increasing Skills in Working with Adolescents. University of Washington School of Social Work. Carol Barber, MSW. Seattle, WA. 21.0 hours. March 2003.

Title 26 Registry Family Law Guardian ad Litem Training. King County Bar Association. Seattle, WA. 29.25 CLE hours. February 2004.

The SASSI: Administration and Scoring. Tassi, Inc. Terry Sheneman. Seattle, WA. 3.5 hours. June 19, 2004.

The SASSI: Clinical Interpretation. Tassi, Inc. Terry Sheneman. Seattle, WA. 3.5 hours. June 19, 2004.

Assessing and Treating Child and Adolescent Mental Health Disorders. University of Washington School of Social Work. Sheri Hill, Ph.D. Seattle, WA. 21.0 hours. June 2004.

The Challenge of Child and Adolescent Substance Abuse. University of Washington School of Social Work. Stephen Bogan, MA, CDP, CMHC. Seattle, WA. 21.0 hours. June 2004.

Psychopathology for Addiction Counselors. Bellevue Community College. Paula Frederick, MEd, MS, CDP, LMHC. Bellevue, WA. 50.0 hours. December 2006.

DUI Assessment. Bellevue Community College. Sharon Fenton, BSW, CDP. Bellevue, WA. 7.0 hours. September 2007.

Children of Alcoholics: What Do We Know and What Are We Learning. National Association of Social Workers. Steve Hornberger, MSW. Teleconference. 1.0 hours. October, 2007.

From Case Management to Co-Parenting: Matching Interventions to Family Characteristics. Advanced Title 26 Family Law GAL Issues. King County Bar Association. Seattle, WA. 4.0 CLE hours. November 16, 2007.

Domestic Violence, Differentiation and Family Court: Tensions, Terminology and Collaboration. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 29, 2008.

Domestic Violence in Separating Families: Debates and Dilemmas in Developing Appropriate Parenting Plans. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 29, 2008.

Attachment in Child Custody: What You Always Needed to Know. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 29, 2008.

Listening to Children's Views in Disputed Custody and Access Cases. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 3.0 hours. May 29, 2008.

Fitting the Forum to the Family: The Evolution of Family Dispute Resolution. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 30, 2008.

Fitting the Forum to the Family: Meeting the Needs of Families in a Changing World. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 30, 2008.

Beyond Wingspread: Domestic Violence and Differentiation. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 3.0 hours. May 30, 2008.

Iatrogenic Effects of Treatment Programs for Batterers. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 31, 2008.

Understanding Substance Use Assessment in Parenting Disputes. Association of Family and Conciliation Courts, 45<sup>th</sup> Annual Conference. Fitting the Forum to the Family: Emerging Challenges for Family Courts. Vancouver, B.C. 1.5 hours. May 31, 2008.

Domestic Violence Screening and Assessment Protocols in Parenting Evaluations. Antioch University Antioch Center for Continuing Education. Anne Ganley, Ph.D. Seattle, WA. 12.0 hours. September 18 - 19, 2008.

Informed Advocacy in Parenting Plan Cases. American Academy of Matrimonial Lawyers. Joan B. Kelly, Ph.D., Marsha Kline Pruett, Ph.D., and Deborah Day, Psy.D. Seattle, WA. 6.5 hours. March 13, 2009.

Conducting Brief Assessments. Association of Family and Conciliation Courts, Regional Training Conference. Interventions for Family Conflict: Stacking the Odds in Favor of Children. Reno, NV. 6.5 hours. November 5, 2009.

Defining Standards of Practice in Child Custody Evaluations. Association of Family and Conciliation Courts, Regional Training Conference. Interventions for Family Conflict: Stacking the Odds in Favor of Children. Reno, NV. 3.0 hours. November 6, 2009.

Speaking for the Child: Using Attachment Theory to Design Child Custody Recommendations to Reduce Family Conflict. Association of Family and Conciliation Courts, Regional Training Conference. Interventions for Family Conflict: Stacking the Odds in Favor of Children. Reno, NV. 3.0 hours. November 6, 2009.

Ethical Issues in Child Custody Evaluation Consultation. Association of Family and Conciliation Courts, Regional Training Conference. Interventions for Family Conflict: Stacking the Odds in Favor of Children. Reno, NV. 3.0 hours. November 7, 2009.

Brief Focused Assessments: It's Not Just for Court Services Any More. Association of Family and Conciliation Courts, Regional Training Conference. Interventions for Family Conflict: Stacking the Odds in Favor of Children. Reno, NV. 3.0 hours. November 7, 2009.

Domestic Violence Screening & Assessment Protocols for Family Court Parenting Evaluations. Seattle University School of Law. Seattle, WA. 12.5 hours. March 4 – 5, 2010.

Dialectical Behavior Therapy (DBT) State of the Art and Science. National Education Alliance for Borderline Personality Disorder. 9<sup>th</sup> Annual National Institute of Mental Health Conference. Seattle, WA. 7.5 hours. April 2, 2011.

Clinical Considerations in Addressing Addiction in the Family. National Association of Social Workers. Claudia Black, LICSW, Ph.D. Bellevue, WA. 6.0 hours. May 20, 2011.

Learning to Listen, Listening to Learn: Improving Domestic Violence Response. 3<sup>rd</sup> Annual Domestic Violence Symposium. Seattle University School of Law. Seattle, WA. 12.75 hours. September 8 – 9, 2011.

Legal and Ethical Issues for Mental Health Professionals, Volume 2. Psychotherapy.net, self-study course. 6.0 hours. December 7, 2011.

Parenting Plans: Complex Parenting Issues. King County Bar Association CLE. Seattle, WA. 6.25 hours. May 8, 2012.

Social Work Professional Diversity and Creative Solutions for Challenging Times. NASW Washington State Chapter Annual Conference. Seattle, WA. 12.0 hours. May 18 – 19, 2012.

Relocation Disputes: Applying Research to Practice. AFCC 49<sup>th</sup> Annual Conference. Chicago, IL. 6.0 hours. June 6, 2012.

Attachment, Brain Science, and Children of Divorce: the ABCD's of Child Development for Family Law. AFCC 49<sup>th</sup> Annual Conference. Chicago, IL. 10.5 hours. June 7 – 8, 2012.

Nuts and Bolts of Parenting Coordination: Helping High Conflict Parents Resolve Disputes. Loyola University Chicago, School of Social Work. Chicago, IL. 11.5 hours. March 4-5, 2013.

Listening to Children in Divorce Processes: An Effective Semi-structured Interview Model. Joan B. Kelly, Ph.D. AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 7.5 hours. May 29 – June 1, 2013.

Developing and Drafting Clear and Effective Parenting Plans. Donald Saposnek, PhD. AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 1.5 hours. May 29 – June 1, 2013.

Sexual Abuse Allegations in Child Custody Evaluation: Is Gatekeeping a Shield or Sword? William G. Austin, Ph.D.; Milfred “Bud” Dale, Ph.D., JD., and Kathryn Kuehnle, Ph.D. AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 1.5 hours. May 29 – June 1, 2013.

Fifty Years of Cognitive Science. Nancy W. Olesen, Ph.D.; Leslie M. Drozd, Ph.D.; Michael A. Saini, Ph.D., and Hon. Marjorie Slabach (ret.). AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 1.5 hours. May 29 – June 1, 2013.

Mediating With and Without the Robe. Forrest S. Mosten, JD and Hon. R. James Williams. AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 1.5 hours. May 29 – June 1, 2013.

The Nexus Between Parent Deficiencies and Parent-Child Interactions. David Weinstock, JD, Ph.D. and John Moran, Ph.D. AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 1.5 hours. May 29 – June 1, 2013.

Dancing with Lone Wolves: Issues Facing Evaluators and Self-Represented Litigants. Jacqueline Singer, Ph.D.; Brandon R. Blevans JD, and Hon. Louise Bayles-Fightmaster. AFCC 50<sup>th</sup> Anniversary Conference. Los Angeles, CA. 1.5 hours. May 29 – June 1, 2013.

Advanced Issues in Child Custody: Evaluation, Litigation, and Settlement. AFCC-AAML Conference. Washington, DC. 15.5 hours. September 26-28, 2013.

Mediating the Litigated Case. Straus Institute for Dispute Resolution. Pepperdine University School of Law. West Los Angeles, CA. 42 hours. January 23-25 and February 6-8, 2014.

Pitfalls, Process, and Prescriptions: Advanced Strategies for Managing Parenting Coordination Cases. Robin M. Deutsch, Ph.D. AFCC in collaboration with Loyola University Chicago School of Law’s Civitas ChildLaw Center. Chicago, IL. 12 hours. March 12-13, 2014.

The Activities and Roles of Consultants: How Many is too Many? David A. Martindale, Milfred “Bud” Dale, Robert A. Simon, S. Margaret Lee, and Robin M. Deutsch. AFCC 11<sup>th</sup> Symposium on Child Custody Evaluations. San Antonio, TX. 1.5 hours. November 7, 2014.

The Forensic Substance Use Disorder Evaluation. Gregg Benson. AFCC 11<sup>th</sup> Symposium on Child Custody Evaluations. San Antonio, TX. 1.5 hours. November 7, 2014.

Beyond Diagnoses: The Meaning of Mental Problems in Custody Disputes. Mindy Mitnick, Kevin McGrath and Scott Rodman. AFCC 11<sup>th</sup> Symposium on Child Custody Evaluations. San Antonio, TX. 1.5 hours. November 7, 2014.

Allegations of Child Sexual Abuse in Custody Litigation: Memory and Behavior. Kathryn Kuehnle and Pamela Ludolph. AFCC 11<sup>th</sup> Symposium on Child Custody Evaluations. San Antonio, TX. 1.5 hours. November 7, 2014.

Ethical Controversies in Child Custody Cases: Missing the Forest for the Trees. Lyn Greenberg and Larry Fong. AFCC 11<sup>th</sup> Symposium on Child Custody Evaluations. San Antonio, TX. 1.5 hours. November 8, 2014.

Standardized Assessment of Children and Adolescents in Child Custody Evaluations. Karen K. Shelton and Sol Rappaport. AFCC 11<sup>th</sup> Symposium on Child Custody Evaluations. San Antonio, TX. 1.5 hours. November 8, 2014.

New Ways for Families: Managing High Conflict Families in Separation and Divorce. Bill Eddy, LCSW, Esq. High Conflict Institute. San Diego, CA. 12.0 hours. January 12-13, 2015.

Developing Effective Communication Skills: Testifying for Legal Decision Makers. Daniel Wolfe, J.D., Ph.D. American Academy of Forensic Psychology Continuing Education Workshops. Chicago, IL. 8 hours. April 11, 2015.

How to Analyze, Present and Challenge Forensic Reports and Testimony. David A Martindale, Timothy Tippins, and Jeffrey Wittmann. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 6.0 hours. May 27-30, 2015.

Rediscovering the Language of Youth. Julie Kenniston. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

Special Needs Children in Family Court: A Risk Assessment Model for Crafting Parenting Plans. Daniel Pickar and Robert Kaufmann. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 0.5 hours. May 27-30, 2015.

Placement Considerations for Special Needs Children. Sol Rappaport and Carlton Marcy. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

Children in the Court System: Different Doors, Different Responses, Different Outcomes. Melisa Peper Firestone, Karen Howze, Mindy Mitnick, and Ramona Gonzalez. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

Parent-Child Reunification: How The Family and Court Influence The Clinical Process. John Baker, Robert Coutu, and Edward Donnelly. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

When is Pornography a Risk in Family Assessments? Phillip Watts. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

Parenting Capacity Assessment in Autism Spectrum Disorder. Janina Szyndler. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

Clinical Reasoning, Problem Solving and Decision Making: Key Concepts. Douglas Darnall and Steve Miller. AFCC 52<sup>nd</sup> Annual Conference. New Orleans, Louisiana. 1.5 hours. May 27-30, 2015.

Psychological Testing for Legal Professionals. James R. Flens. AFCC-AAML Conference on Advanced Issues in Child Custody: Evaluation, Litigation, and Settlement. Washington, DC. 3.5 hours. October 1-3, 2015.

Shared Parenting: Legal Changes and New Research Findings. Marsha Kline Pruett and J. Herbie DiFonzo. AFCC-AAML Conference on Advanced Issues in Child Custody: Evaluation, Litigation, and Settlement. Washington, DC. 2.0 hours. October 1-3, 2015.

The De Facto Parent in the Modern Family: A Status Report. J. Herbie DiFonzo, Dennis Hottell, Martha McCarthy, Marsha Kline Pruett, and Ken Altshuler. AFCC-AAML Conference on Advanced Issues in Child Custody: Evaluation, Litigation, and Settlement. Washington, DC. 1.5 hours. October 1-3, 2015.

Alienation: Identification is Not Enough. Louise Truax and Jeffrey P. Wittmann. AFCC-AAML Conference on Advanced Issues in Child Custody: Evaluation, Litigation, and Settlement. Washington, DC. 2.0 hours. October 1-3, 2015.

Approaches to Interviews with Children. Mindy Mitnick, EdM, MA. AFCC-AAML Conference on Advanced Issues in Child Custody: Evaluation, Litigation, and Settlement. Washington, DC. 2.0 hours. October 1-3, 2015.

Current Trends in Alcohol and Drugs: Use, Abuse and Addiction. Randi Jensen, MA, LMHC, CCDC. Shoreline, WA. 6.0 hours. October 23, 2015.

New Ways for Families: Personality Disordered Parents and Alienated Children. Bill Eddy, LCSW, Esq. High Conflict Institute. San Diego, CA. 3.0 hours. January 22, 2016.

Intractable Issues in Child Custody Cases. Mindy Mitnick, EdM, MA. AFCC in collaboration with Loyola University Chicago School of Law's Civitas ChildLaw Center. Chicago, IL. 12.0 hours. March 9-10, 2016.

Ethical Theory and Ethical Practice. Delmar Stone, LMSW. NASW Continuing Education Program, Oregon Chapter and Oregon Mental Health CEU Consortium. Portland, OR. 6.0 hours. April 22, 2016.

Modern Families: New Challenges, New Solutions. AFCC 53<sup>rd</sup> Annual Conference. Seattle, WA. 11.5 hours. June 1-4, 2016.

The Science of Recovery: Introduction to Brain Development and Neuroplasticity. Thomas Durham, Ph.D. Webinar. 1.5 hours. June 22, 2016.

Contemporary Issues in Forensic Psychology. American Academy of Forensic Psychology Continuing Education Programs. San Diego, CA. September 7-11, 2016.

Child Custody Evaluations, Abuse, Alienation, and Gate Keeping: Critical Issues for Family Court Professionals. AFCC 12<sup>th</sup> Symposium. Atlanta, GA. 13.5 hours. November 3-5, 2016.

Alcohol and Other Drugs: It's a Family Affair. Steve Hanson and Hon. Peggy Fulton Hora. AFCC University of Baltimore School of Law. Baltimore, MD. December 5-6, 2016.

1                   RECEIVED  
2                   -6 JUN 2014 14 29

3                   DEPARTMENT OF  
4                   JUDICIAL ADMINISTRATION  
5                   KING COUNTY, WASHINGTON

6                     
7                   **Superior Court of Washington**  
8                   **County of King**

9                   In re:  
10                  SENNA S. DUNCAN,

Child,

11                  And

12                  2 - Name - Whistleblower Regarding H...

No. 11-3-03341-8 SEA

13                  Petitioner,  
14                  and  
15                  CHRISTINE PEDDLE-CORNISH,  
16                  Respondent.

Order Appointing Case  
Manager

This matter having come before the Court pursuant to the Parenting Plan Order signed by the  
honorable William L. Downing on October 16, 2012, and Respondent's Motion re Adequate  
Cause and to Appoint Case Manager, this court having reviewed the records herein, rules as  
follows

ORDERED,

1. APPOINTMENT OF CASE MANAGER

The Court intends that the Case Manager in this Order shall have all the rights and  
responsibilities accorded the Parenting Coordinator under Washington law. Jennifer Keilin is  
hereby appointed as Case Manager in this case, with authority as provided in this Order.

The Case Manager is appointed for a term of two (2) years and subject to (1)  
reappointment at the expiration thereof upon the Court's own motion, the request of the Case

1 Manager or motion of either party, or (2) earlier removal by Court order based upon motion  
2 showing good cause, stipulation of the parties, or (3) resignation by the Case Manager.  
3

4 IT IS FURTHER ORDERED that before either party will be allowed to file any police  
5 report or action to seek relief in Court regarding parenting time, or enforcement of the Court's  
6 various parenting orders, the parties shall first consult with the Case Manager, unless there is an  
7 emergency related to the child's health, safety and welfare. If the issue cannot be resolved with  
8 the help of the Case Manger, the part who wants to file the motion/petition shall file a separate  
9 certification that he/she has consulted with the Case Manager, the date the consultation was  
10 made, and the outcome of the consultation. Any motion/petition filed without this separate  
11 certification will be automatically denied with fees of the responding party to be paid by the  
12 party improperly seeking legal relief.  
13

14 II. CASE MANAGER AUTHORITY  
15

16 A. The Case Manager is authorized, subject to the provision of Paragraph 6 of this  
17 Order, to make recommendations regarding implementation, clarification, modification, and  
18 enforcement of any term in the permanent parenting plan, and to make recommendation on the  
19 day-to-day issues experienced by the parties in these areas. The Case Manager is not authorized,  
20 to make recommendations affecting child support, a change of custody or a substantial change in  
21 parenting time. In the event the Case Manager determines parenting or family issues or  
22 circumstances exist that are significantly detrimental to the welfare of the child and that a change  
23 in custody or a substantial change in parenting time is warranted, the Case Manager may submit  
24 the Case Manager's concerns in writing to the parties and file a report re same in King County  
25 Superior Court.  
26

1           B.     The scope of the authority of the Case Manager shall be:

2           1. to address and resolve all current and future disputes arising under the  
3 parenting plan, including but not limited to disputes over: schooling, daycare, or babysitting,  
4 medical and/or psychological care, activities of the child, discipline, daily routine, transportation  
5 and supervised transfer of the child, vacation and holiday scheduling or any other "parenting  
6 type" issues, and any issue as the Court may from time to time direct;

7           2. to determine and, as need be, to alter the terms of the present order to mutual  
8 "no contact" between the parents. The parents should have no contact with one another and all  
9 information related to Senna, his health, major decisions, scheduling, child support and more  
10 shall be posted on Our Family Wizard or some other place as directed by the Case Manager or go  
11 through the Case Manager.

12           3. to help create a common language between the parents regarding discipline,  
13 rules, diet, etc., at each house; make recommendations regarding treatment providers for parents  
14 and child when necessary, to select a new exchange supervisor if deemed necessary; and to have  
15 decision making ability for scheduling telephone calls from the nonresidential parent to Senna.

16           4. to determine and oversee the use of SKYPE or other online access to Senna  
17 including the dime, duration and context of calls, standards of proof for attempting calls and  
18 being there to receive them, altering SKYPE times if mother's employment of father's  
19 employment so requires; altering the room of room content and location in which the call(s)  
20 occurs, and to suggest call content or activities to improve the experience for Senna.

21           5. to determine and oversee the use of Our Family Wizard including, but not  
22 limited to, how each party uses it and the timeliness of their responses to the other, limits to

1 content that can be posted, whether they can alter or remove content posted by the other party  
2 and determining the access other professionals (such as the Visitation Supervisor) should have to  
3 the site.  
4

5           6. The Case Manager shall follow and monitor both parent's compliance with the  
6 Parenting Plan, mediate emails and communications between the parents by providing ongoing  
7 parent coordination.  
8

9           7. to have decision making abilities for minor deviations and/or changes to the  
10 plan or in other decisions regarding Senna and the schedule that the parents cannot make  
11 independently.  
12

13           8. to resolve/decide any issue within the scope of authority of the Case Manager  
14 by any dispute-resolution method deemed reasonable by the Case Manager or which may be  
15 agreed to by the parties.  
16

17           9. ~~to require that both parties provide proof of current, valid driver's license, proof~~  
18 ~~of insurance, JIS criminal history and driving abstracts for Arizona and Washington and to~~  
19 ~~determine how transportation shall be arranged if one party does not have a current, valid~~  
20 ~~driver's license and insurance.~~  
21

22           10. to make decisions and formulate recommendations based upon what is in the  
23 child's best interest,  
24

25           11. to interview all members of the immediate or extended family or household  
26 of both parents and the child;  
27

1           12. to interview and request the participation of any and all persons who the Case  
2 Manager deems to have relevant information including the therapists used by each party and the  
3 health care providers and daycare providers for Senna.  
4

5           13. to recommend or require that the Court order the parties and/or child to  
6 participate in ancillary services, including but not limited to: physical or psychological  
7 examinations and assessments, psychotherapy, counseling, and alcohol or drug monitoring and  
8 testing.  
9

10          14. to allocate between the parties the cost of any ancillary service not ordered at  
11 the time of the Case Manager appointment.  
12

### III. TIME SENSITIVE ISSUES, AUTHORITY AND PROCEDURE

13          The Court recognizes that occasionally circumstances and parenting issues may arise that  
14 may require immediate decision for the welfare of the child and parties on issues not addressed  
15 elsewhere in this order.  
16

17          A. When short-term, emerging, and time sensitive situation or dispute within the  
18 scope or authority of the Case Manager arises that requires an immediate decision for the welfare  
19 of the child and the parties, a Case Manager may make a binding temporary decision. This  
20 interim decision shall be made without prejudice and shall not be regarded as precedent as to  
21 any future action or procedure for any other dispute. The decision shall be filed in King County  
22 Court with a copy to the parties (or counsel, if represented) in a written report that shall  
23 document all substantive issues addressed and the basis for the decision for review and entry of  
24 any appropriate orders with the King County Court's earliest opportunity. In such an instance,  
25 and within the purview of the scope of authority of the Case Manager, the Case Manager may  
26  
27

1 communicate with the assigned judge, if any, in writing with a copy of the parents (or counsel, if  
2 represented), his recommendation to the Court, and if the court determines that interim orders  
3 may be entered sufficient to resolve the immediate dispute, and if the court makes such an  
4 interim order, the Case Manger has authority to immediately communicate the same to the  
5 parties on the Court's behalf. Thereafter, the procedures set forth in Paragraph 6(c).

7       B.     For purposes of example only, and not by limitation, such time-sensitive,  
8 emergent situations might be:

10              Temporarily changing exchange day, time or place;

11              Attendance at or participation in a special event or occasion by the  
12 child or parent;

13              Responsibility for care of a sick child or accompaniment to  
14 medical treatment;

15              A special non-recurring need of the child or parent.

16       C.     The Case Manager report shall document all substantive issues addressed and the  
17 basis for the recommendations made to the Court. The foregoing authority and procedure is  
18 implemented as an exception to the procedures set forth in Section (5) of this Order, based upon  
19 the best interests of the child covered by this Order.

20       IV.    AUTHORITY OF CASE MANAGER RE: THE CHILD

21              The Case Manger shall have the following rights, responsibilities and authority with  
22 regard to the child.

24       A.     Reasonable access to the child with reasonable notice;

1           B.     Reasonable notice of any and all judicial proceedings including requests for any  
2 examination affecting the child, and shall be provided copies of all orders and pleadings filed in  
3 this case;

4           C.     The Case Manager shall have access to:

- 5               1. all therapists of the child and parents;  
6               2. all school and medical records of the child and parents;  
7               3. any and all mental health records including but not limited to

8               psychological tests or evaluations performed on the child or the  
9 parents;

- 10              4. any and all teachers/childcare providers for the child.

11           D.     The Case Manager is authorized to interview the parties or child in any  
12 combination, whether initiated by the Case Manager or either party. If either party contacts in  
13 writing the Case Manager, the documentation or writing given to the Case Manager shall be  
14 provided to the opposing party and counsel (if any) simultaneous to providing it to the Case  
15 Manager.

16           E.     At the request of the Case Manager, each party shall execute any and all releases  
17 or consents necessary so as to authorize the Case Manager's access to the information  
18 contemplated herein above.

19           V.     CONFIDENTIALITY

20           There is no confidentiality relating to the parties' communications with/to the Case  
21 Manager or concerning the Case Manager's activities or recommendations.

22           VI.    PROCEDURE

1           The proceedings before the Case Manager shall be conducted in accordance with the  
2 following procedures:

3           A.     Either party, the Case Manager or the Court may initiate proceedings before the  
4 Case Manager. Both parties shall participate in the dispute resolution process defined by the  
5 Case Manager.

6           B.     Once proceedings are initiated under (a) above, the Case Manger shall determine,  
7 at his discretion, the sequence and frequency of meetings and who shall participate in any  
8 sessions/meetings. Notice may be made by mail to the last known address supplies to the Court  
9 or, if circumstances demand, the Case Manager may notify the parties orally and make a notation  
10 of the date and time of the notification. The Case Manager shall proceed with all reasonable  
11 diligence. If a party fails to appear at a time and place appointed, the Case Manger may proceed  
12 at that time, or at the Case Manager's discretion, continue the meeting to a future day with notice  
13 to the absent party.

14           C.     If either party fails to participate as requested by the Case Manager, then in  
15 addition to all other remedies available under law, the Case Manager may proceed and make  
16 recommendations regarding the dispute, if necessary, without the participation of such party.

17           D.     The Case Manager is not required to make a record of the proceedings, however,  
18 any party, at their option and expense and upon reasonable notice, may make a record of any  
19 information offered. The Case Manager, may, in his discretion, tape record or video record or  
20 otherwise preserve any information presented to the Case Manager.

21           E.     The Case Manger or the parties may request that the Court procure the attendance  
22 of witnesses for any proceedings conducted by the Case Manager.

1       F.     The Case Manager may request, with notice to the parties, the Court to issue  
2 subpoenas to require the appearance of any person within the jurisdiction of this Court and/or  
3 require the production of any documents within the jurisdiction of this Court or under the control  
4 of either party or their agents.  
5

6       G.     If either or both parties are represented by counsel, there shall be no ex parte  
7 communications between the Case Manager and counsel except if such communication relates  
8 solely to scheduling matter.  
9

10      H.     Additional rules applicable to the Case Manager may be ordered by the Court  
11 from time to time.  
12

13      VII. RECOMMENDATIONS RULINGS AND OBJECTIONS  
14

15      A.     Recommendations and rulings by the Case Manager must be made or confirmed  
16 in a written report to the Court and parties, which shall be submitted to the Court no later than  
17 five (5) days after an oral determination or receipt of all information necessary to make a  
18 recommendation or ruling. A copy of the report will be mailed or transmitted to the parties or  
19 their counsel on the date of submission. The report may be transmitted by fax or email to the  
20 parties at a fax number or email address provided by the parties to the Case Manager.  
21

22      B.     The Case Manager may, in his discretion, submit draft recommendations or  
23 rulings to the parties or their counsel for the purpose of receiving their suggestions. The Case  
24 Manger may, at this discretion, require the parties or their counsel to submit proposed draft  
25 recommendations or rulings to the Case Manager.  
26

1           C.     The Court, upon receipt of a report and recommendation or rulings from a Case  
2 Manager, may:

3                 1. approve the recommendation or ruling and adopt it as an interim order of the  
4 Court, subject to either party objecting or requesting a hearing within ten (10) days from the date  
5 of the report and recommendation is submitted to the Court;

6                 2. modify the recommendation or ruling and adopt the modified recommendation  
7 or ruling as an interim order of the Court, subject to either party objecting or requesting a hearing  
8 within ten (10) days from the date of the report and recommendation is submitted to the Court.

9                 3. reject the recommendation report in whole or in part and affirm the current  
10 order, subject to either party objecting or requesting a hearing within ten (10) days from the date  
11 the report and recommendation is submitted to the Court or;

12                 4. set a hearing on the assigned judicial officer's calendar.

13           D.     A party who objects shall clearly state in writing the objections to the  
14 recommendations, the basis for the objection, a proposed solution, and whether a hearing is  
15 requested. The judicial officer will set a hearing if requested. By agreement of the parties or if  
16 the Court so orders, the recommendations of the Case Manager will remain in effect during this  
17 objection period and process unless and until it is affected by a further order of the Court.

18           VIII. APPEARANCES

19           A.     The Case Manager may appear and shall be available to testify at any court  
20 hearing upon reasonable notice to the Case Manager, the Court and the opposing party regarding  
21 any issue addressed by the Case Manager.

1           B.     If transcripts, tape recordings or videotapes have been made of any portions of the  
2 Case Manager proceedings, they shall be submitted to the Court.

3           IX.    DISCLOSURES

4           The parties shall keep the Case Manager advised of their and the child's addresses,  
5 telephone numbers for home, work and school, mailing address if different than the living  
6 address, as well as any other pertinent information. This information shall be immediately  
7 communicated in writing to the Case Manager.

8           X.     IMMUNITY

9           A.     The Case Manager has immunity in accordance with Washington and Arizona  
10 law as to all acts undertaken pursuant to and consistent with the appointment order of the Court.

11           B.     Any alleged impropriety or unethical conduct by the Case Manager shall be  
12 brought to the attention of the Court in writing.

13           XI.    FEES

14           A.     *77% of the case manager's fees.*  
15           The Petitioner shall pay ~~the initial retainer fee of \$4,000.00~~ to the case manager.  
16 Once ~~the initial retainer amount has been used, then the Petitioner shall be responsible for and~~  
17 ~~pay 77% of the Case Manager's fees, and~~ The Respondent shall be responsible for and pay 23%  
18 of the Case Manager's fees, except as noted below, until further order of the Court. All fees shall  
19 be paid in advance as determined by the Case Manager. The Case Manager shall keep accurate  
20 records of services rendered and fees paid by each party.

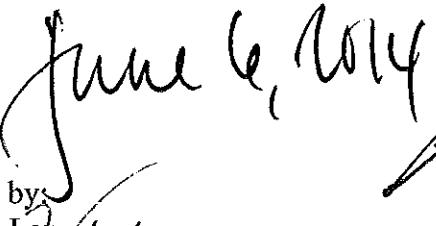
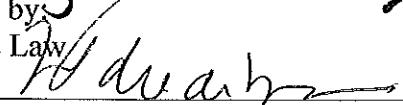
21           B.     If the Case Manager determines that one of the parties is acting in bad faith and/or  
22 not complying with the Court's orders or the decisions of the Manger, he may recommend that  
23 the party acting in bad faith pay or reimburse the other's share of his or any other professional's

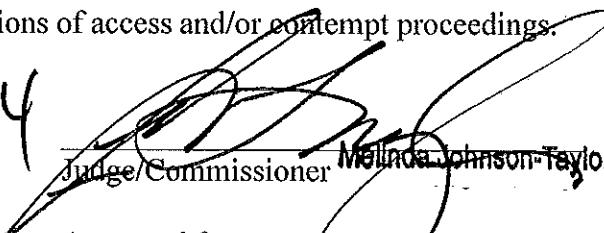
1 fees necessitated by the party acting in bad faith, as well as recommend additional sanctions  
2 (including modifications of access and/or contempt proceedings).

3 C. Should the Case Manager determine that one of the parties is using her services  
4 unnecessarily and is thereby causing greater expense for the other party as a result thereof, the  
5 Case Manager may recommend to the Court a different allocation for payment of fees.

6 D. Should the Case Manager find any party is acting in bad faith, and/or not  
7 complying with the Court's orders, the Case Manager may recommend that the party acting in  
8 bad faith pay or reimburse the other party's costs of services provided by the Case Manager  
9 necessitated by the party acting in bad faith, and the Case Manager may recommend additional  
10 sanctions, which may include modifications of access and/or contempt proceedings.

11 Dated:

12   
Presented by:  
V. Freitas Law  
waived:   
Natalie De Maar, WSBA No. 24386  
Attorney for Petitioner

13   
Judge/Commissioner Malinda Johnson-Taylor  
Approved for entry:  
Notice of presentation  
Veronica Freitas, WSBA No 19405  
Attorney for Respondent

14 Approved for entry:

15 Approved for entry:

16 Jennifer Keilin, MSW, LIC SW  
Case Manager

2 - Name - Whistleblower Regarding ...

Petitioner

21 Christine Peddle  
22 Respondent

23  
24 All parties must Immediately File With the Court and Update After any Change in the  
25 Information, the Confidential Information Form Required by RCW 26.23.050 [from Order of  
26

27 Oder Appointing Case Manager  
28 Page 12 of 13

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**Association of Family  
and Conciliation Courts**

**Guidelines for  
Parenting Coordination**

**Guidelines for  
Parenting Coordination**

**Developed by**

**The AFCC Task Force on Parenting Coordination**

**May 2005**

## **Foreword**

The *Guidelines for Parenting Coordination* ("Guidelines") are the product of the interdisciplinary AFCC Task Force on Parenting Coordination ("Task Force"). First appointed in 2001 by Denise McColley, AFCC President 2001-02, the Task Force originally discussed creating model standards of practice. At that time, however, the Task Force agreed that the role was too new for a comprehensive set of standards. The Task Force instead investigated the issues inherent in the new role and described the manner in which jurisdictions in the United States that have used parenting coordination resolved those issues. The report of the Task Force's (2001-2003) two-year study was published in April of 2003 as "Parenting Coordination: Implementation Issues."<sup>1</sup>

The Task Force was reconstituted in 2003 by Hon. George Czutrin, AFCC President 2003-04. President Czutrin charged the Task Force with developing model standards of practice for parenting coordination for North America and named two Canadian members to the twelve-member task force. The Task Force continued investigating the use of the role in the United States and in Canada and drafted *Model Standards for Parenting Coordination* after much study, discussion and review of best practices in both the United States and Canada.

AFCC posted the *Model Standards* on its website, afccnet.org, and the TaskForce members also widely distributed them for comments. The Task Force received many thoughtful and articulate comments which were carefully considered in making substantive and editorial changes based upon the feedback that was received. Even the name of this document was changed to "Guidelines for Parenting Coordination" to indicate the newness of the field of parenting coordination and the difficulty of coming to consensus in the United States and Canada on "standards" at this stage in the use of parenting coordination. The AFCC Board of Directors approved the Guidelines on May 21, 2005.

### **The members of the AFCC Task Force on Parenting Coordination (2003**

**- 2005) were:** Christine A. Coates, M.Ed., J.D., *Chairperson and Reporter*; Linda Fieldstone, M.Ed., *Secretary*; Barbara Ann Bartlett, J.D., Robin M. Deutsch, Ph.D., Billie Lee Dunford-Jackson, J.D., Philip M. Epstein, Q.C. LSM, Barbara Fidler, Ph.D., C.Psych, Acc.FM. Jonathan Gould, Ph.D., Hon. William G. Jones, Joan Kelly, Ph.D., Matthew J. Sullivan, Ph.D., Robert N. Wistner, J.D.

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<sup>1</sup> See AFCC Task Force on Parenting Coordination, *Parenting Coordination: Implementation Issues*, 41 Fam. Ct. Re. 533 (2003).

## **GUIDELINES FOR PARENTING COORDINATION**

### Overview and Definitions

Parenting coordination is a child-focused alternative dispute resolution process in which a mental health or legal professional with mediation training and experience assists high conflict parents to implement their parenting plan by facilitating the resolution of their disputes in a timely manner, educating parents about children's needs, and with prior approval of the parties and/or the court, making decisions within the scope of the court order or appointment contract.

The overall objective of parenting coordination is to assist high conflict parents to implement their parenting plan, to monitor compliance with the details of the plan, to resolve conflicts regarding their children and the parenting plan in a timely manner, and to protect and sustain safe, healthy and meaningful parent-child relationships. Parenting coordination is a quasi-legal, mental health, alternative dispute resolution (ADR) process that combines assessment, education, case management, conflict management and sometimes decision-making functions.

The Parenting Coordinator (hereinafter referred to as "PC") role is most frequently reserved for those high conflict parents who have demonstrated their longer-term inability or unwillingness to make parenting decisions on their own, to comply with parenting agreements and orders, to reduce their child-related conflicts, and to protect their children from the impact of that conflict. Because the PC makes recommendations and/or decisions for the parties and possibly reports to the court, the PC should be appointed by and be responsible to the court. This delegation of judicial authority is a serious issue and courts should only appoint qualified professionals. The power and authority inherent in the role of the PC are substantial whether stipulated by the parties or assigned by the court. Therefore, it is important that any jurisdiction implementing a parenting coordination program adopt and adhere to guidelines for PC practice and programs.

As the parenting coordination model has been implemented in various jurisdictions, there has been variation in the manner in which the PC practices, the authority of the PC, the stage of the legal process when the PC is appointed and functions, the various roles of the PC, the qualifications and training of the PC, and the best practices for the role.

The alternative dispute resolution process described above as central to the parenting coordinator's role may be inappropriate and potentially exploited by

perpetrators of domestic violence who have exhibited patterns of violence, threat, intimidation and coercive control over their co-parent. In those cases of domestic violence where one parent seeks to obtain and maintain power and control over the other, the role of the PC changes to an almost purely enforcement function. Here, the PC is likely to be dealing with a court order, the more detailed the better, rather than a mutually agreed upon parenting plan; the role is to ensure compliance with the details of the order and to test each request for variance from its terms with an eye to protecting the custodial parent's autonomy to make decisions based on the children's best interests and guarding against manipulation by the abusing parent. ADR techniques in such cases may have the effect of maintaining or increasing the imbalance of power and the victim's risk of harm. Accordingly, each jurisdiction should have in place a process to screen out and/or develop specialized PC protocols and procedures in this type of DV case. Likewise, PCs should routinely screen prospective cases for DV and decline to accept such cases if they do not have specialized expertise and procedures to effectively manage DV cases involving an imbalance of power, control and coercion.

The purpose of these *Guidelines for Parenting Coordination* ("Guidelines") is to provide:

1. detailed guidelines of practice for PCs;
2. guidelines for PCs regarding their ethical obligations and conduct;
3. qualifications for PCs, including relevant education, training and experience;
4. assistance to jurisdictions that are implementing parenting coordination programs by providing guidelines of practice that they can adopt; and
5. assistance to jurisdictions, professional organizations, educational institutions and professionals in the development and implementation of parenting coordination programs.

These *Guidelines* are aspirational in nature and offer guidance in best practices, qualifications, training and ethical obligations for PCs. Although they are not intended to create legal rules or standards of liability, they do provide very specific and detailed recommendations for training and best practices because of the expressed need for guidelines for program development and training. It is understood that each jurisdiction may vary in its practices; however, for parenting coordination to be accepted as a credible professional role, certain minimum guidelines of conduct and best practices must be articulated and followed.

The *Guidelines for Parenting Coordination* include different levels of guidance:

- Use of the term “may” in a *Guideline* is the lowest strength of guidance and indicates a practice that the PC should consider adopting, but, from which the PC can deviate in the exercise of good professional judgment.
- Most of the *Guidelines* use the term “should” which indicates that the practice described in the *Guideline* is highly desirable and should be departed from only with very strong reason.
- The rarer use of the term “shall” in a *Guideline* is a higher level of guidance to the PC, indicating that the PC should not have discretion to depart from the practice described.

### **Guideline I**

*A PC shall be qualified by education and training to undertake parenting coordination and shall continue to develop professionally in the role.*

- A. The PC shall be required to have training and experience in family mediation. The PC should become a certified/qualified mediator under the rules or laws of the jurisdiction in which he or she practices, if such certification is available.
- B. The PC shall be a licensed mental health or legal professional in an area relating to families, or a certified family mediator under the rules or laws of the jurisdiction with a master’s degree in a mental health field.
- C. The PC should have extensive practical experience in the profession with high conflict or litigating parents.
- D. The PC shall have training in the parenting coordination process, family dynamics in separation and divorce, parenting coordination techniques, domestic violence and child maltreatment, and court specific parenting coordination procedures. A model training curriculum incorporating four modules is included in these *Guidelines* as Appendix A.
- E. A PC shall acquire and maintain professional competence in the parenting coordination process. A PC shall regularly participate in educational activities promoting professional growth. It is recommended that a PC participate in peer consultation or mentoring to receive feedback and support on cases. PC orders and/or private agreements should specify that such professional consultation is permitted.

F. A PC shall decline an appointment, withdraw, or request appropriate assistance when the facts and circumstances of the case are beyond the PC's skill or expertise.

G. A jurisdiction should consider "grandfathering" existing professionals with appropriate experience.

### **Guideline II**

*A PC shall maintain impartiality in the process of parenting coordination, although a PC is not neutral regarding the outcome of particular decisions. Impartiality means freedom from favoritism or bias in word, action, or appearance, and includes a commitment to assist all parties, as opposed to any one individual.*

A. A PC shall withdraw if the PC determines he or she cannot act in an impartial or objective manner.

B. A PC shall neither give nor accept a gift, favor, loan or other item of value from any party having an interest in the parenting coordination process. During the parenting coordination process, a PC shall not solicit or otherwise attempt to procure future professional services or positions from which the PC may profit.

C. A PC shall not coerce or improperly influence any party to make a decision.

D. A PC shall not intentionally or knowingly misrepresent or omit any material fact, law, or circumstance in the parenting coordination process.

E. A PC shall not accept any engagement, provide any service or perform any act outside the role of PC that would compromise the PC's integrity or impartiality in the parenting coordination process.

### **Guideline III**

*A PC shall not serve in a matter that presents a clear conflict of interest.*

A. A conflict of interest arises when any relationship between the PC and the participants or the subject matter of the dispute compromises or appears to compromise a PC's impartiality.

B. A PC shall disclose potential conflicts of interest as soon as practical after a PC becomes aware of the interest or relationship giving rise to the potential conflict.

C. After appropriate disclosure, the PC may serve with the written agreement of all parties. However, if a conflict of interest clearly impairs a PC's impartiality, the PC shall withdraw regardless of the express agreement of the parties.

D. During the parenting coordination process, a PC shall not create a conflict of interest by providing any services to interested parties that are not directly related to the parenting coordination process.

E. A PC may make referrals to other professionals to work with the family, but shall avoid actual or apparent conflicts of interest by referrals. No commissions, rebates, or similar remuneration shall be given or received by a PC for parenting coordination or other professional referrals.

#### **Guideline IV**

*A PC shall not serve in dual sequential roles.*

A. A PC shall not serve in multiple roles in a case that create a professional conflict.

1. A child's attorney or child advocate shall not become a PC in the same case.
2. A mediator or custody evaluator shall be cautious about becoming a PC in the same case, even with the consent of the parties, because of the differences in the role and potential impact of the role change.
3. A PC shall not become a custody evaluator either during or after the term of a PC's involvement with the family.
4. A PC shall not be appointed after serving as a therapist, consultant, or coach, or serve in another mental health role to any family member.
5. A PC shall not become a therapist, consultant, or coach, or serve in any other mental health role to any family member, either during or after the term of the PC's involvement.
6. A PC shall not become one client's lawyer, either during or after the term of the PC's involvement, nor shall one client's lawyer become the PC in that client's case.

B. A PC should attempt to facilitate resolution of issues by agreement of the parties; however, the PC is not acting in a formal mediation role. An effort towards resolving an

issue (which may include therapeutic, mediation, educational, and negotiation skills) does not disqualify a PC from deciding an issue that remains unresolved after efforts of facilitation.

### **Guideline V**

*A PC shall inform the parties of the limitations on confidentiality in the parenting coordination process. Information shall not be shared outside of the parenting coordination process except for legitimate and allowed professional purposes. A PC shall maintain confidentiality regarding the sharing of information outside of the scope of the parenting coordination process, which is obtained during the parenting coordination process, except as provided by court order or by written agreement of the parties.*

A. Parenting coordination is not a confidential process, either for communications between the parties and their children and the PC, or for communications between the PC and other relevant parties to the parenting coordination process, or for communications with the court.<sup>2</sup>

B. A PC shall inform the parties of the following limitations of confidentiality:

1. The PC shall report suspected child abuse or neglect to child protective services whether or not a mandatory or voluntary reporter under state, provincial or federal law; and

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<sup>2</sup> Parenting coordination is an unusual type of intervention that does not fit within the existing framework of rules and laws dealing with the subjects of "statutory privileges," "rules of evidence," and "professional codes of ethics" related to the subject of "confidentiality" and statements made by parents or people involved in any disputed parenting case. In cases not involving a PC, the statements of parties may be protected from use as evidence in the dispute resolution process, for any of those reasons. However, the essence of the PC concept is that all such confidentiality protections need to be stripped away, so the PC is free to make quick decisions based upon all knowledge the PC has obtained from the parties and other sources. Consequently, in order for the PC to be empowered to operate freely and effectively in the role of expeditious dispute resolver, appropriate provisions need to be included in the written agreement and/or court order of appointment for the effective waiver of all privileges and rules of evidence or professional conduct regarding confidentiality which may be waived. In addition, a clear statement should be included to provide that the PC will not provide either party with legal advice or representation or psychotherapy, and the parents are advised to seek any such advice from independent providers of their own choice. The parents are entitled to a very clear and unambiguous description of the privileges and rules they are being asked to waive in order to empower the PC to perform the rather unique services contemplated in the parenting coordination process. Likewise, the PC has a significant concern with establishing a barrier from complaints of unprofessional conduct from disgruntled parents who are not happy about PC decisions.

2. The PC shall report to law enforcement or other authorities if the PC has reason to believe that any family member appears to be at serious risk to harm himself or herself, another family member or a third party.

### **Guideline VI**

*A PC shall assist the parties in reducing harmful conflict and in promoting the best interests of the children consistent with the roles and functions of a PC.*

- A. A PC serves an assessment function. The PC should review the custody evaluation, other relevant records, interim or final court orders, information from interviews with parents and children and other collateral sources, domestic violence protection orders, and any other applicable cases involving criminal assault, domestic violence or child abuse, educational records, and analyze the impasses and issues as brought forth by the parties.
- B. A PC serves an educational function. The PC should educate the parties about child development, divorce research, the impact of their behavior on the children, parenting skills, and communication and conflict resolution skills. The PC may coach the parties about these issues.
- C. A PC serves a coordination/case management function. The PC should work with the professionals and systems involved with the family (e.g. mental health, health care, social services, education, legal) as well as with extended family, stepparents, and significant others.
- D. A PC serves a conflict management function. The PC's primary role is to assist the parties to work out disagreements regarding the children to minimize conflict. The PC may utilize dispute resolution skills from principles and practices of negotiation, mediation, and arbitration. To assist the parents in reducing conflict, the PC may monitor the faxed, emailed, or written exchanges of parent communications and suggest more productive forms of communication that limit conflict between the parents. In order to protect the parties and children in domestic violence cases involving power, control and coercion, a PC should tailor the techniques used so as to avoid offering the opportunity for further coercion.
- E. A PC serves a decision-making function. When parents are not able to decide or resolve disputes on their own, the PC shall be empowered to make decisions to the extent described in the court order, or to make reports or recommendations to the

court for further consideration. PCs should communicate their decisions in a timely manner in person or by fax, e-mail or telephone. In the event decisions are provided orally, a written version shall follow in a timely manner.

F. A PC shall not offer legal advice.

### **Guideline VII**

*A PC shall serve by parent stipulation and/or formal order of the court, which shall clearly and specifically define the PC's scope of authority and responsibilities.*

- A. A court order is necessary to provide the PC authority to work with the parents outside of the adversarial process, to obtain information, and to make recommendations and decisions as specified in the order.<sup>3</sup>
- B. In addition to the court order for the PC, a written agreement between the parties and the PC may be used to detail specific issues not contained in the court order, such as fee payments, billing practices and retainers.
- C. The court order or consent order should specify a term of service for the PC, including starting and ending dates.<sup>4</sup> Parents can request that a PC continue for additional terms of service following the expiration of each term or can decline to renew the PC's services. Similarly the PC can give notice prior to the end of the term of service that the PC will not continue to serve as PC.
- D. A PC should not initiate providing services until the PC has received the fully executed and filed court order appointing the PC, or the parents, their counsel (if any) and the PC have signed a consent agreement, if any.

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<sup>3</sup> In some jurisdictions, a stipulation or consent decree is required for the appointment of a PC. A few jurisdictions allow the court to appoint the PC on its own authority. In Canada, the authority of the PC to make decisions is derived from arbitration statutes and a PC may function with the parents' consent only.

<sup>4</sup> Many experienced PC's have found a period of 18 months to 2 years to be optimal in terms of becoming familiar with the family and developing a working relationship with the parents.

## **Guideline VIII**

*A PC shall facilitate the participants' understanding of the parenting coordination process so that they can give informed consent to the process.*

- A. The position of the PC is one of considerable authority and power. It is important that parents fully understand the extent of the parental rights and power they are assigning to the PC in the form of decision-making, the limited nature of the confidentiality of the process, the professional persons with whom the PC will be authorized to consult or obtain information, and what the parents' rights are in seeking redress with the court.
- B. In the first session, a PC should carefully review the nature of the PC's role with the parents, to ensure that they understand what the parenting coordination process involves.

## **Guideline IX**

*A PC shall fully disclose and explain the basis of any fees and charges to the participants.*

- A. All charges for parenting coordination services shall be based upon the actual time expended by the PC or as directed by the local jurisdiction's parenting coordination program. All fees and costs shall be appropriately divided between the parties as directed by the court order of appointment or as agreed upon in the PC's written fee agreement with the parties with the approval of the court.<sup>5</sup>
- B. Prior to beginning the parenting coordination process, and in writing, a PC shall explain to the parties and counsel the basis of fees and costs and the method of payment and any fees associated with postponement, cancellation and/or nonappearance, as well as any other items and the parties' *pro rata* share of the fees and costs as determined by the court order or agreed to by the parties with approval of the court. In cases of domestic violence involving power, control and coercion, the PC shall hold individual sessions with the parties to convey this information.

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<sup>5</sup> Typically the fees are split equally between the parties, although if their assets and income differ substantially, fees may be apportioned accordingly. In states that have the Income Shares child support guidelines, courts sometimes apportion responsibility for PC costs in the same percentages as child support is apportioned. The court, rather than the PC, should make a determination of the appropriate ratio of payment based on the available financial data. The order may also include a provision for the parent coordinator to alter the usual ratio of payment if one parent abuses the process. In the event that a party requests judicial review of a parenting coordinator decision and does not prevail, the court may order full payment of fees by that party.

C. Activities for which a PC may charge typically include time spent interviewing parents, children and collateral sources of information; preparation of agreements; correspondence, decisions and reports; review of records and correspondence; telephone and electronic conversation; travel; court preparation; and appearances at hearings, depositions and meetings.

D. The PC should comply with any local statute, constitutional rulings, or practice rules regarding fees. A PC may request a retainer or advance deposit prior to starting a case.<sup>6</sup> The parties should be billed on a regular basis and notified when the retainer or advance deposit, if any, is to be replenished.

E. A PC shall maintain records necessary to support charges for services and expenses and should make a detailed accounting of those charges to the parties, their counsel or the court on a regular basis, if requested to do so.

### **Guideline X**

*A PC will communicate with all parties, counsel, children, and the court in a manner which preserves the integrity of the parenting coordination process and considers the safety of the parents and children. The PC will have access to persons involved with family members and to documentary information necessary to fulfill the responsibilities of the PC.*

A. Because parenting coordination is a non-adversarial process designed to reduce acrimony and settle disputes efficiently, a PC may engage in *ex parte* (individual) communications with each of the parties and/or their attorneys, if specified in writing in the order of appointment, PC agreement or stipulation. The PC may initiate or receive *ex parte* oral or written communications with the parties and their attorneys, legal representatives of the children, and other parties relevant to understanding the issues. The PC should do so in an objective, balanced manner that takes into consideration the possibility or perception of bias. The PC should communicate agreements, recommendations, or decisions to all parties and counsel at the same time.

B. If reports are written, the PC should follow the court's rules or instructions regarding whether the court should receive a copy. The PC shall not communicate *ex parte* with the judge.

C. The PC typically should have access to any persons involved with family members including, but not limited to, the custody evaluator, lawyers, school officials, and

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<sup>6</sup> In some jurisdictions, the PC also requires a refundable deposit from each party for any fees and expenses incurred but not paid prior to ending the case.

physical and mental health care providers. The PC shall have the authority to meet with the children, any stepparent or person acting in that role, or anyone else the PC determines to have a significant role in contributing to or resolving the conflict. The PC should notify any such collateral sources that information obtained from them is not confidential and that it may be used in making decisions or writing reports or recommendations to or testifying in court.

D. The PC should have access to all orders and pleadings filed in the case, as well as the custody evaluation report, school and medical records of the children, and reports of psychological testings that were generated prior to, during or after the pendency of the case. The court order should require that the parties execute releases and consents to permit access to such data and other relevant information.

E. The PC should have initial individual and/or joint interviews with the parties, and may want to interview the children if the PC has the appropriate training and skills. PCs may interview any individuals who provide services to the children as needed to assess the children's needs and wishes. The communication between the parties may be in joint face-to-face meetings, telephone conference calls, individual face-to-face or telephone meetings, e-mail, or fax. The PC should determine whether separate or joint sessions are most appropriate at any particular time. In cases of domestic violence involving power, control and coercion, the PC shall conduct interviews and sessions with the parties individually.

F. The PC shall be alert to the reasonable suspicion of any acts of domestic violence directed at the other parent, a current partner, or the children. The PC should adhere to any protection orders, and take whatever measures may be necessary to ensure the safety of the parties, their children and the PC.

G. The PC should be alert to the reasonable suspicion of any substance abuse by either parent or child, as well as any psychological or psychiatric impairment of any parent or child.

H. The PC should keep notes regarding all communications with the parties, the children and other persons with whom the PC speaks about the case.

I. A PC shall document in writing all resolutions agreed upon by the parties or determined by arbitration, noting the process by which the agreement or decision was made.

J. The PC shall maintain records in a manner that is professional, comprehensive and inclusive of information and documents that relate to the parenting coordination process and that support decisions and recommendations by the PC.

## **Guideline XI**

*A PC should attempt to facilitate agreement between the parties in a timely manner on all disputes regarding their children as they arise. When parents are unable to reach agreement, and if it has been ordered by the court, or authorized by consent, the PC shall decide the disputed issues.*

A. A PC may be granted the authority to make decisions for the parties when they cannot agree, or the PC may be allowed only to make recommendations to the parties or the court. The scope of the PC's decision-making authority may be limited in some jurisdictions by constitutional law or statute. A PC should be knowledgeable about governing law and procedure in the PC's jurisdiction regarding decision-making or arbitration by the PC.

B. A PC shall have only the authority that is delegated in the court order or the consent provided by the parties. If so written in the order or consent agreement, a PC may have authority to resolve the following type of issues:

1. Minor changes or clarification of parenting time/access schedules or conditions including vacation, holidays, and temporary variation from the existing parenting plan;
2. Transitions/exchanges of the children including date, time, place, means of transportation and transporter;
3. Health care management including medical, dental, orthodontic, and vision care;
4. Child-rearing issues;
5. Psychotherapy or other mental health care including substance abuse assessment or counseling for the children;
6. Psychological testing or other assessment of the children and parents;
7. Education or daycare including school choice, tutoring, summer school, participation in special education testing and programs or other major educational decisions;
8. Enrichment and extracurricular activities including camps and jobs;
9. Religious observances and education;

10. Children's travel and passport arrangements;
11. Clothing, equipment, and personal possessions of the children;
12. Communication between the parents about the children including telephone, fax, e-mail, notes in backpacks, etc.;
13. Communication by a parent with the children including telephone, cell phone, pager, fax, and e-mail when they are not in that parent's care;
14. Alteration of appearance of the children including haircuts, tattoos, ear and body piercing;
15. Role of and contact with significant others and extended families;
16. Substance abuse assessment or testing for either or both parents or a child, including access to results; and
17. Parenting classes for either or both parents.

C. The PC should use or gather written or verbal statements of the dispute from each party, as well as other relevant sources of information. The methodology used by the PC shall be fair to both parties, and be transparent to both the court and the parties. Each party shall be given an opportunity to be heard in the process. Notice shall be given as to what is expected from the participation of the parties and the consequences of nonparticipation. If one party refuses to cooperate after notice, then the PC may continue to resolve the dispute.<sup>7</sup>

D. The PC shall issue a written resolution of the dispute or a verbal decision in time sensitive matters to be followed by a written decision.<sup>8</sup>

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<sup>7</sup> In some jurisdictions, the PC must notify the parties of the intent to proceed to an arbitration phase if the parties do not reach agreement on their own or with the assistance of the PC.

<sup>8</sup> There is variation in the destination of the PC's recommendations and decisions. In most but not all jurisdictions in which PCs are appointed by court order, the PC is expected to send all recommendations, reports, and decisions to the court, as well as to each parent and their attorneys. Where the PC has not been appointed by the court, PCs should prepare recommendations, reports and decisions in such a manner that the court can access the information if requested. In most jurisdictions, that determination becomes an order and is considered binding. Standards for appeal and judicial review vary from jurisdiction to jurisdiction.

E. A PC shall refrain from making decisions that would change legal custody and physical custody from one parent to the other or substantially change the parenting plan. Such major decisions are more properly within the scope of judicial authority. PCs may need to make temporary changes in the parenting plan if a parent is impaired in his or her functioning and incapable of fulfilling his or her court-ordered parenting functions until further information and assessment is obtained and the court has assumed decision-making responsibility.

### **Guideline XII**

*A PC shall not engage in marketing practices that contain false or misleading information. A PC shall ensure that any advertisements regarding qualifications, services to be rendered, or the parenting coordination process are accurate and honest. A PC shall not make claims of achieving specific outcomes or promises implying favoritism for the purpose of obtaining business.*

## **APPENDIX A:**

### **RECOMMENDATIONS FOR COMPREHENSIVE TRAINING OF PARENTING COORDINATORS**

*A Parenting Coordinator ("PC") should have training in each of the following subject areas as reflected in the modules below. It is anticipated that mental health and legal professionals will have acquired some of the knowledge and experience in the competency areas listed, particularly in Section II, and in mediation training. Training programs may want to accommodate different levels of prior training and experience by offering training in these four modules and developing a process for exempting certain professionals from any of the modules where competency is established. Individual jurisdictions should set guidelines, approve trainings, and assign trainers to ensure that candidates can demonstrate minimum competencies in order to begin practice, and should require the completion of scheduled follow up trainings to achieve mastery within a reasonable amount of time. Individual jurisdictions and provinces might consider developing mentoring programs to provide consultation and support for beginning "PCs" to reinforce and develop the skills that are covered in the recommended subject areas.*

#### **Module 1: The Parenting Coordination Process**

- A. The various functions of the PC
- B. Limitations of the parenting coordination process, including the difference between parenting coordination and parent education, therapy, custody evaluation and dispute resolution processes
- C. Professional guidelines of practice for PCs
  - 1. The interplay between other professional guidelines and professional practice guidelines and local/state guidelines for court-appointed PCs
  - 2. The potential for conflict of interest of the PC and the people to whom parenting coordination services are offered
- D. Issues that are appropriate and not appropriate for parenting coordination
- E. Characteristics of individuals who are appropriate and not appropriate to participate in the parenting coordination process
  - 1. Appropriate courses of action when confronted with substance abuse during the parenting coordination process
  - 2. Screening for domestic violence and appropriate courses of action when confronted with domestic violence during the parenting coordination process

- 3. The effect of domestic violence on parents involved in the parenting coordination process
- 4. Situations in which the PC should suggest that the parties contact the supervising judicial officer, independent legal counsel, postpone or cancel the parenting coordination session, suspend the parenting coordination process, or refer the parties to other resources
- F. When to refer parties to services for child protection or elder abuse, and the issue of confidentiality as it applies to each
- G. Special needs of the *pro se* or *proper* party

## **Module 2: Family Dynamics in Separation and Divorce**

- A. Psychological Issues in Separation and Divorce and Family Dynamics
  - 1. The impact divorce has on individuals and on family dynamics and the implications for the parenting coordination process
  - 2. Useful psychological research and theories applicable to the intervention for high conflict families
  - 3. How emotions impact on divorce issues and on a party's ability to participate effectively in the parenting coordination process.
  - 4. Sources of divorce/separation impasses, including parental behaviors associated with personality disorders, and the related implications
  - 5. How to promote awareness by the parties of the interests of persons affected by actual or potential agreements, who are not represented during the parenting coordination process
    - a. The impact of grandparents, step-parents and significant others on family systems and the parenting coordination process
    - b. Situations in which participation of non-parties (e.g., grandparents, children, new spouses) may be necessary in the parenting coordination process
- B. Issues concerning the needs of children in the context of divorce
  - 1. The needs and adjustment of children and the effect of divorce on their relationships with their mother, father, step-families, siblings and others in the family relationship
  - 2. Child(ren)'s developmental stages and how they relate to divorce and parenting arrangements

3. The impact the parenting coordination process can have on the children's well-being and behavior
4. When and how to involve children in the parenting coordination process
5. Indicators of child abuse and/or neglect and the process and duty to report allegations of child abuse and/or neglect

C. Dealing with high conflict parents

1. The impact of parental conflict and appropriate parenting on children's well-being
2. The dynamics of child alignments, estrangements and alienation
3. Various parenting arrangements that consider the needs of the child(ren) and each parent's capacity to parent, including modifications for high conflict situations

D. Dealing with domestic violence issues

1. The different research-based types of domestic violence, including conflict-instigated violence, violence involving power, control, and coercion (often referred to as male battering), female violence, and separation-engendered violence
  2. The unique problems and inherent dangers presented by domestic violence of all types in terms of parental contacts, and the need for safe PC procedures and child exchanges
  3. The importance of monitoring compliance with the parenting plan and reporting to a judicial officer any infractions of the court order, including the parenting plan
  4. The psychological impact of domestic violence on child and adolescent development
- E. The different co-parenting relationships of cooperative, parallel, and conflicted parenting

### **Module 3: Parenting Coordination Techniques and Issues**

A. Structuring the parenting coordination process

1. The initial session and preparing the parties for the process
2. Scheduling the time and location, and establishing the format of each conference and focusing discussion
3. Structuring and managing the discussion, maintaining control of the sessions, and utilizing appropriate case management skills

- 4. Managing separate sessions, telephonic and e-mail communication
- 5. Maintaining appropriate records and documentation as a PC
- B. The PC's informed consent, including limits on confidentiality
- C. The PC's service contract and fee allocation
- D. The role of the parenting plan in the parenting coordination process, including how to develop, monitor and modify a parenting plan
- E. The characteristics that enhance or undermine the effectiveness of the PC including, but not limited to: demonstrating empathy, building rapport, establishing trust, setting a cooperative tone, sympathetic listening and questioning, empowering the parties, remaining non-judgmental, language use, and non-verbal communication skills
- F. Awareness of personal biases, prejudices and styles that are the product of one's background and personal experiences that may affect the parenting coordination process
- G. Socio-economic, cultural, racial, ethnic, language, age, gender, religious, sexual orientation and disability issues, which may arise and/or affect the parties' negotiation styles, ability or willingness to engage in the parenting coordination process
- H. Building on partial agreements including when and how to switch between dispute resolution processes
- I. Arbitration procedures, appropriate arbitration decisions, and writing and filing arbitration decisions/awards
- J. Appropriate techniques for handling difficult situations
- K. Appropriate boundaries of a PC
  - 1. Safety procedures for those participating in the parenting coordination process
  - 2. Office safety policies and working with clients having current restraining and protective orders
  - 3. Establishing appropriate limits for client demands
- L. When and how to use outside experts effectively
  - 1. How to assist the parties in deciding on appropriate community resources
  - 2. Developing a list of social service resources, including those for domestic violence situations
- M. The impact of high conflict client behavior on the parenting coordination process and the PC and avoiding professional burn-out
- N. Reasons for a PC to decline an appointment, withdraw or request

- appropriate assistance including, but not limited to, when the facts and circumstances of the case are beyond the PC's skill or experience
- O. The Americans with Disabilities Act (ADA) requirements and strategies for handling situations when faced with disability issues or special needs

#### **Module 4: Court Specific Parenting Coordination Procedures**

- A. The PC's responsibility to the court
- B. Knowledge of and adherence to jurisdiction-specific qualifications for a PC
- C. Mentorship and certification requirements, if applicable
- D. Local/state/province family law as it may pertain to the parenting coordination process
  - 1. The state statute and/or rule governing family parenting coordination
  - 2. The difference between neutrality and impartiality as it applies to parenting coordination and the ability to demonstrate each appropriately
  - 3. Legal concepts as they relate to the parenting coordination process including, but not limited to: geographic relocation, equitable distribution, child support, law of modification, parenting time adjustment, law of relocation, law of due process law of *ex parte* communication and law of privilege
  - 4. The statutory constraints of parenting coordination where domestic violence exists and/or protective orders are in place
- E. How and when the PC should interface with the court system
  - 1. The appointment and discharge processes of the PC
  - 2. The importance of a court designation to the parenting coordination process
  - 3. The ethical constraints on confidentiality and both in relation to the entire parenting coordination process and separate sessions within the process
- F. Forms utilized in local courts pertaining to parenting coordination and local court procedures
- G. How to work with legal, mental health and other professional disciplines, and promote cooperation among those dealing with the family H. When and how to utilize a qualified expert and/or a team approach to best serve the parties in the parenting coordination process

- H. The grievance procedure contained in the local/state rules for PCs, if any
- I. Possible ethical dilemmas that may confront a PC and how to avoid them

***Domestic Violence Training: The need for additional and/or separate training on domestic violence should continue be considered in setting up a PC training program.***

**APPENDIX B:**

**BEST JUDICIAL AND PROGRAM PRACTICES**

A parenting coordination program operates most efficiently and effectively when judges understand, support and are involved in the formation of the program. Judicial monitoring of the program, the PCs and their work is essential to protect parents, children and PCs. The process is most effective at weaning the parties from litigation when judges encourage them to rely on the PC to resolve their disagreements and discourage ongoing court proceedings. To these ends, the following best practices for the judiciary and for program development are recommended.

**1. Scope of Authority:**

In some jurisdictions, the role or scope of authority of the PC may be limited by the provisions of state constitutions, statutes, court rules or case law on public policy considerations regarding the delegation of a court's authority to protect the best interests of children in contested custody and parenting time cases. Some jurisdictions permit those disputes to be resolved in private arbitration, while other jurisdictions prohibit arbitration as against public policy (*parens patriae* doctrine). Consequently, local law should be researched carefully before a new parenting coordination program is designed.

**2. Qualifications of PCs:**

In jurisdictions establishing or revising a parenting coordination program, it is recommended that judges appoint qualified professionals to undertake this difficult work as the best means for achieving the goals of the court. Judges in each jurisdiction are encouraged to establish a means for confirming the qualifications and training of mental health and legal professionals seeking to be appointed as PCs. This information should be available for review by parents and lawyers considering a PC.

**3. Standard Order:**

It is recommended that each jurisdiction initiate an interdisciplinary effort, appointed by the judiciary, to develop and adopt a standard order describing the legal authority, duties, and responsibilities of the PC, issues to be decided, fees, grievance process, and term of service. This will minimize confusing variations in practice for professionals and parents. The order should be signed by the lawyers, parents, and a judge prior to the PC's beginning service.

#### 4. Submission and Objection to PC Recommendations and Reports to Court:

There is variation in the destination of the PC's recommendations and decisions. In most, but not all jurisdictions, where PCs are appointed by court order, the PC is expected to send all recommendations, reports, and orders of decision to the court, as well as to each parent and any attorney. Where there is no court-appointed authority, PCs should prepare recommendations, reports, and decisions in such a manner that the court can access the information if requested.

#### 5. Parent Grievances Regarding the PC and Objections to Recommendations and Decisions:

When PCs are appointed by the court or by consent agreement, it is important that the order contain clear language and procedures to handle parent grievances regarding the PC and to handle parent objections to the PC's recommendations and decisions, including wishes that the PC be removed. Some orders include language that indicates that the PC can be removed or disqualified on any of the grounds applicable to the removal of a judge, referee or arbitrator. It has been found to be helpful to articulate a series of steps for managing such grievances, which may stem from PC's acting in an unprofessional manner or may arise from anger about the PC's recommendations or decisions which were not favorable to the complaining party. These procedures have been developed to protect PCs from unfounded complaints to the professionals' licensing boards and also to provide parents with sanctioned avenues for seeking redress.

One grievance model requires that the complaining parent first set up and attend an appointment with the PC to discuss the grievance, prior to initiating any court proceedings for removal or complaining to the licensing board, in an attempt to resolve the grievance. If no resolution is reached, both parents and the PC then attend a judicially supervised settlement conference prior to any action being taken. The court reserves jurisdiction to determine if the PC's time and expenses should be reimbursed in part or totally, including any attorney's fees incurred by the PC. If either the complaining party or the PC believes that the complaint cannot be resolved, either party can file a motion to the court to terminate the PC's services. The judge is the final gatekeeper on the grievance process unless there is a PC certification body.

As an arm of the court with judicially delegated authority, PCs should be afforded quasi-judicial authority and immunity to protect them from lawsuits.

#### 6. Standard Procedures and Literature:

Parenting coordination programs may consider developing and adopting a standard parenting coordination information pamphlet that describes in clear and simple

language what the parenting coordination model is, what the objectives of the parenting coordination process are, how the PC functions, the limitations on confidentiality, and what type of decisions the PC is typically authorized to make in the event of unresolved disputes. This educational sheet can routinely be made available to parents and lawyers who are considering the appointment of a PC.

Jurisdictions should consider establishing an appointment conference with the judge soon after the decision to use a PC. At the conference which the parties, their attorneys, any children's advocates and the proposed PC must attend; the order or consent agreement is signed and distributed, the PC's role and authority are explained, fees are determined, initial appointments are scheduled, releases and contracts are signed, and responsibility for providing documents and other information is assigned, all with the goal of commencing the pc process without delay.

Each local jurisdiction should consider creating a committee to facilitate the establishment of local rules (if any), standardized procedures and orders, and needed training, and to provide PCs with peer feedback.

## **APPENDIX C:**

### **PARENTING COORDINATORS AND THE CANADIAN EXPERIENCE**

It is to be noted that the Canadian experience with respect to PCs may differ substantially from the process as utilized in the United States.

First and foremost, the Canadian constitutional framework does not permit judges to delegate to third parties any judicial or quasi-judicial functions. In essence, this means that it is not possible for a judge to order the parties to attend and work with a PC under any circumstances and, accordingly, it is also not possible for a judge to order parties to attend with a PC who has arbitral powers or any decision-making powers. That would be considered an improper delegation.

Nevertheless, there is a significant increase in the number of families that are utilizing the services of a PC in order to help them resolve parenting issues. This process in Canada is always on consent. In Canada, the parties, if desirous of using a PC, enter into a Parenting Coordinator Agreement. This Agreement usually gives the PC both mediation and decision-making powers, and the limitation of the PC's powers is set out in the Agreement. Usually this means that the PC can attempt to mediate any parenting issues that do not fundamentally change the structure of the Parenting Agreement and, failing mediation, the PC can arbitrate and, thereby, resolve the parenting dispute.

It is common for the parties to incorporate the Parenting Coordinator Agreement into a court order. This does not constitute improper delegation by a court but is a recognition that the parties are thereby agreeing to arbitrate their parenting issues and this forms a submission to arbitration under the various provincial arbitration Acts that exist in each province. That is, the courts are no longer supervising the parenting issues that are covered in the Parenting Coordinator Agreement and the parties are bound by the Parenting Coordinator Agreement to arbitrate the issues for the terms set out in the Parenting Coordinator Agreement.

In Canada, therefore, it is very common that PCs are both mediators and arbitrators in the same case. That also means that the PC, when arbitrating, may utilize information learned in the mediation process to inform the PC as to how the decision on the disputed issue will be resolved.

There are virtually no PCs in Canada that would confine their role to just arbitration, and most lawyers have found that to confine a PC's role to strictly mediation is not effective. Accordingly, a hybrid model has developed in Canada that allows the PC to both mediate and arbitrate.

## **APPENDIX D:**

### **Members of the AFCC PC Taskforce 2003-2005**

*Chairperson and reporter:* Christine A. Coates, M.Ed., J.D. is an experienced Colorado family law attorney who now emphasizes alternative dispute resolution (ADR) in domestic relations and has been an innovator in interventions for high conflict parents. She also is an adjunct professor at the University of Colorado School of Law and the author of articles on parenting coordination, high conflict families and ADR. A former president of AFCC and the chair of the first AFCC Parenting Coordination Task Force, she is the President of the Institute for Advanced Dispute Resolution and is a popular national speaker and trainer in conflict resolution, parenting coordination and family law. She co-authored *Working with High Conflict Families of Divorce* (Jason Aronson, 2001) and *Learning From Divorce* (Jossey-Bass, 2003).

*Secretary:* Linda Fieldstone, M.Ed. is supervisor of Family Court Services of the 11<sup>th</sup> Judicial Circuit of Florida, a parenting coordinator and trainer, and Certified Family Mediator, assisting the circuit in the development of its current PC program, policies and procedures. She is on the Board of Directors of AFCC, currently the President of the Florida Chapter of AFCC, and serving as Coordinator for the FLAFCPC Interest Group and FLAFCPC Taskforce. Ms. Fieldstone was appointed to the Florida Supreme Court Parenting Coordination Workgroup which has developed a PC Administrative Order/Order of Referral/Training Program which could be utilized uniformly statewide.

Barbara Ann Bartlett, J.D. has been an attorney for 20 years in Tulsa, Oklahoma and has been on the ground floor of the family law court reforms for Tulsa since they began in the early nineties. She was a co-author of the first Parenting Coordinator legislation in the nation that passed the Oklahoma legislature in 2001 and wrote the *amicus curiae* brief in support of it in the first constitutional challenge of a PC statute. She is on the Bar Register of Preeminent Lawyers.

Robin M. Deutsch, Ph.D. is a psychologist at the Massachusetts General Hospital where she is the Co-Director of the Children and the Law Program of the Law and Psychiatry Service. She is an Assistant Clinical Professor of Psychology at Harvard Medical School. Her work has focused on the application of child development research to children's adjustment to divorce, the evaluation of families involved in family change, parenting issues, and management of high conflict divorce. She is the co-author of 7 Things Your Teenager Can't Tell You (and How to Talk About Them Anyway) (Ballantine, 2005). Dr. Deutsch is a member of the Board of Directors of the AFCC and the Massachusetts chapter of AFCC (of which she is a former president). She is frequently invited to provide educational and scientific presentations to judges, lawyers, and mental health professionals

Billie Lee Dunford-Jackson, J.D. is the Co-Director of the Family Violence Department of the National Council of Juvenile and Family Court Judges. She works on law and policy issues pertaining to child custody and child protection in the context of domestic violence and provides training and technical assistance to practitioners seeking new approaches to working with families where both mothers and children are abused. She was instrumental in developing and launching the National Judicial Institute on Domestic Violence and continues to play an active role in the Department's expanding educational programs for judges and court personnel handling domestic violence caseloads. Ms. Dunford-Jackson received her Masters and Juris Doctor degrees from the University of Virginia and practiced law for sixteen years, much of her caseload devoted to representing victims of domestic violence, before joining the Department in 1997.

Philip M. Epstein, Q.C. LSM is a lawyer in Toronto, Ontario, Canada.

Barbara Fidler, Ph.D., C.Psych, Acc.FM. is a registered psychologist and accredited mediator practicing in Ontario, Canada. She has been working with high conflict and custody/access disputing families since 1982, providing various interventions including: treatment, education, assessment, mediation, parenting coordination, supervision, training and consultation. Dr. Fidler is a frequent presenter on high conflict families and related topics. Her practice includes marital/couple, individual (child, adolescent, and adult) and family therapy. In addition to maintaining an independent practice, Dr. Fidler is a member of Family Solutions, which provides a team intervention with high conflict families.

Jonathan Gould, Ph.D. is a psychologist in Charlotte, North Carolina.

Hon. William G. Jones is a retired Chief District Court Judge from Charlotte, North Carolina. He was instrumental in establishing a parenting coordination program there and in implementing other initiatives to facilitate the resolution of child custody disputes. He is also active in the National Council of Juvenile and Family Court Judges.

Joan Kelly, Ph.D. is a psychologist, researcher, and mediator, who was Director of the Northern California Mediation Center for 20 years. Her research, clinical, and teaching career of three decades has focused on child and family adjustment to divorce, custody and access issues, child development, divorce and custody mediation, and parenting coordination. She has published 75 articles and chapters in these areas of interest, and is co-author of Surviving the Breakup: How Children and Parents Cope with Divorce. Dr. Kelly has been honored for her work with many awards, including the Distinguished Mediator Award from the Academy of Family Mediators, Fellow of the American Psychological Association, and the Stanley Cohen Distinguished Research and Meyer Elkin Awards from AFCC. Joan presents seminars and keynote addresses throughout the

United States, Canada, and abroad.

Matthew J. Sullivan, Ph.D. is a clinical psychologist in private practice in Palo Alto, California, specializing in forensic child and family psychology. He has written articles, presented and done training at numerous national and international venues on topics such as high-conflict divorce, parenting coordination and child alienation. He is currently on the editorial board of the Journal of Child Custody.

Robert N. Wistner, J.D. is a Board Certified Specialist in Family Relations Law in Columbus, Ohio. After 30 years as a family law litigator, he limits his practice to non-adversarial family dispute resolution processes. In addition to service as a member on the first AFCC Task Force on Parenting Coordination, he has served as Vice-Chair of the Ohio Task Force on Family Law and Children and is currently a member of the Ohio Supreme Court Advisory Committee on Children, Families and the Courts.

**SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING**

**In re the Parenting and Support of:**

No. 11-3-03341-8 SEA

## **FINAL PARENTING PLAN**

**Petitioner,**

and

CHRISTINE E. PEDDLE CORNISH

### **Respondent.**

This parenting plan is the final parenting plan entered by the court after trial.

**It Is Ordered, Adjudged and Decreed:**

## I. General Information

This parenting plan applies to the following child:

Name \_\_\_\_\_ Age \_\_\_\_\_

Senna S. Duncan 2

1

## II. Basis for Restrictions

2

3

### 2.1 Parental Conduct (RCW 26.09.191(1), (2))

4

5

Does not apply.

6

7

### 2.2 Other Factors (RCW 26.09.191(3))

8

9

Both parents' involvement or conduct may have an adverse effect on the child's best interests because of the existence of the factors which follow:

10

11

The abusive use of conflict which creates the danger of serious damage to the child's psychological development. For details, see the Findings of Fact entered this date by the Court.

12

## III. Residential Schedule

13

14

### 3.1 Schedule for Children Under School Age

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- 16
- a) The child shall reside with the mother, except for the following days/times when the child will reside with or be with the other parent:
- 17

18

The father shall have residential time with the child every first, third and fifth weekend of each month starting Friday at around 12:00 noon or when the mother gets off work if she is working (but no later than 6:00 p.m.) until Sunday at 6:00 p.m. Except as otherwise provided in this parenting plan, the father's visitation with Senna shall take place in Arizona until Senna turns 5 years old.

19

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The parents should continue to use a professionally supervised visitation provider paid for on a pro rata basis for exchanges. The location should be at the Surprise Police Department, per the supervisor's recommendations, or another mutually agreed upon location. Although the Court finds no fault with the current exchange supervisor, a new one will be substituted in order to "start fresh" in a way that fosters trust and confidence. Ms. Sanchez will continue to serve until a substitute is named.

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22

The Case Manager (Section 3.13 below) shall make ongoing recommendations regarding the need for and identity of the exchange supervisor.

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- 2 b) If one of the parties were to relocate so that the parties live within 50 miles of  
3 each other, the residential time with the child should be divided roughly evenly  
4 prior to the child's enrollment in school. The specific schedule would need to  
be worked out in view of the circumstances of all and, ideally, this could be  
established through agreement reached at mediation.

5 **3.2 School Schedule**

6 Same as in Section 3.1 above.

7 **3.3 Schedule for Winter Vacation**

8 The child shall reside with the mother during winter vacation, except for the  
9 following days and times when the child will reside with or be with the other  
10 parent:

11 **Christmas Break Before Senna is Age 6.** Winter Vacation prior to age 6  
12 shall be defined as December 20 at 6:00 p.m. to December 30 at 6:00 p.m.  
13 and shall be exercised by the father in Arizona. The first half shall end at  
14 10:00 a.m. on December 25. The second half shall begin at 10:00 a.m. on  
15 December 25 and end December 30 at 6:00 p.m. The mother shall have the  
first half in odd years and the father shall have the second half. The mother  
shall have the second half in even years and the father shall have the first  
half.

16 **Christmas Break After Senna is Age 6.** For Christmas (winter) break,  
17 one parent shall have the child from 6:00 p.m. the day school lets out  
18 through Christmas Day at 10:00 a.m. and the other parent should have the  
child from Christmas Day at 10:00 a.m. until 6:00 p.m. the day before  
19 school begins (mother first half in odd years, father first half in even years).  
Father's visitation may be in Arizona or Washington.

20 **3.4 Schedule for Other School Breaks**

21 The child shall reside with the mother during other school breaks, except for the  
22 following days and times when the child will reside with or be with the other  
23 parent:

24 **Spring Break After Senna is Age 6.** Mother and father shall alternate  
spring vacation with the child, with mother in even years and father in odd  
years. Spring break shall begin at 6:00 p.m. the day school lets out and end

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2 at 6:00 p.m. the day before school begins. Father's visitation may be in  
3 Arizona or Washington.

4  
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6  
**Mid-Winter Break After Senna is Age 6.** Mother and father shall  
7 alternate mid-winter vacation with the child, with mother in odd years and  
8 father in even years. Spring break shall begin at 6:00 p.m. the day school  
9 lets out and end at 6:00 p.m. the day before school begins. Father's  
10 visitation may be in Arizona or Washington.

11  
12  
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14  
**3.5 Summer Schedule**

15 Upon completion of the school year, the child shall reside with the mother, except  
16 for the following days and times when the child will reside with or be with the  
17 other parent:

18  
19  
20  
**Summer Schedule Before Senna is Age 6.** Same as the schedule in  
21 Section 3.1 above. In addition, father shall have one full uninterrupted  
22 week with the child during the summer.

23  
24  
**Summer Break After Senna is Age 6.** The father shall have uninterrupted  
25 summer visitation with the child for up to one week in June and one week in  
26 July (with a few weeks in between).

27  
28  
29  
**Summer Break After Senna is Age 8.** The father shall have uninterrupted  
30 summer visitation with the child for up to ten days in June and one week in  
31 July (with a few weeks in between).

32  
33  
34  
**Summer Break After Senna is Age 10.** The father shall have five weeks  
35 of summer visitation with the child, to be divided or continuous as agreed  
36 by the parents.

37 There are no geographic restrictions as to the summer visits. Each parent shall  
38 make written proposals for their summer schedule no later than April 15 of each  
39 year. In the event of a scheduling conflict, the father's choice of dates shall have  
40 priority in odd-numbered years and the mother's choice of dates shall have priority  
41 in even-numbered years. In the event that one parent or both parents fail to select  
42 their dates by April 15, the first parent to notify the other parent of his or her  
43 choice of dates shall have priority in choice of dates.

44  
45 A week shall be defined as Monday at 6:00 p.m. to Monday at 6:00 p.m.

1

2     **3.6 Summer Vacation With Parents**

3

4         See previous section.

5

6     **3.7 Schedule for Holidays**

7

8         The father shall have the following holidays when they coincide with his weekend  
9         visitation: Martin Luther King Day, President's Day, Memorial Day and Labor  
10         Day. These holidays shall extend the father's weekend by 24 hours.

11         The following holidays shall be rotated between the parties, regardless of the  
12         schedule in Section 3.1 above: July 4 (mother even, father odd), Veteran's Day  
13         (mother odd, father even), and Thanksgiving (father even, mother odd).

14         July 4 shall begin at 10:00 a.m. and end on July 5 at 10:00 a.m. or return to  
15         school, whichever is earlier.

16         Veteran's Day shall begin at 10:00 a.m. and end at 6:00 p.m.

17         Prior to Senna commencing Kindergarten, Thanksgiving shall begin the day  
18         before Thanksgiving at 6:00 p.m. and end the day after Thanksgiving at  
19         6:00 p.m. The father shall have Senna for Thanksgiving 2012 and it shall  
20         be rotated thereafter (father even, mother odd). There shall be no third  
21         weekend visitation for Thanksgiving 2012 as the child is not ready for 5  
22         days away from the mother. The father may exercise his Thanksgiving  
23         2014 visitation and thereafter in Washington. After Senna commences  
24         Kindergarten, Thanksgiving shall begin the day before Thanksgiving at  
25         6:00 p.m. and end at 6:00 p.m. the day before school begins.

19     **3.8 Schedule for Special Occasions**

20         The mother shall have Senna for the mother's birthday and Mother's Day, and the  
21         father shall have Senna for the father's birthday and Father's Day. Senna should  
22         be with his mother on his birthday in odd years and with his father on his birthday  
23         in even years. Valentine's Day (mother odd, father even), Easter (mother odd,  
24         father even) and Halloween (mother even, father odd).

25         Special occasions shall begin at 10:00 a.m. and end at 6:00 p.m.

26     **3.9 Priorities Under the Residential Schedule**

27         Does not apply.

1

2     **3.10 Restrictions**

3

4       The concerns noted in paragraph 2.2 and explained in the Court's Findings of Fact  
5       mandate, at least for the time being, the following provisions:

- 6
- Professionally supervised exchanges.
  - A case manager to oversee parental communications and interactions.
  - Both parents to receive counseling.

7     **3.11 Transportation Arrangements**

8       Transportation costs are included in the Child Support Worksheets and/or the  
9       Order of Child Support and should not be included here. Transportation  
arrangements for the child between parents shall be as follows:

10      The parents should continue to use a professionally supervised visitation  
11       provider paid for on a pro rata basis for exchanges. The location should be  
12       at the Surprise Police Department, per the supervisor's recommendations,  
13       or another mutually agreed upon location.

14     **3.12 Designation of Custodian**

15      The child named in this parenting plan is scheduled to reside the majority of the  
16       time with the mother. This parent is designated the custodian of the child solely  
17       for purposes of all other state and federal statutes which require a designation or  
determination of custody. This designation shall not affect either parent's rights  
and responsibilities under this parenting plan.

18     **3.13 Other**

19      The parties shall participate in case management for a minimum of two years or as  
20       recommended by the case manager. The case manager should:

- 21
- Follow and monitor both parents' compliance with the parenting plan.
  - Mediate emails and communications between the parents by providing  
ongoing parent coordination. The parents should have no contact with one  
another and all information related to Senna, his health, major decisions,  
scheduling, child support and more shall all go through the case manager.
  - Help create a common language between the parents regarding discipline,  
rules, diet, etc., at each house.

- Have decision making abilities for minor deviations and/or changes to the plan or in other decisions regarding Senna and the schedule that the parents cannot make independently.
- Make recommendations regarding treatment and other services for the parents and/or child.
- Be able to communicate with each parent's treatment providers, if necessary.
- Select a new exchange supervisor within 30 days of appointment.
- Have decision making ability for scheduling telephone calls from the nonresidential parent to Senna, commencing on or after 6 months after entry of this order.

A copy of all three parenting evaluations and the Court's Findings of Fact shall be provided to the case manager. The case manager shall be in Arizona and appointed based on the recommendations of Dr. English. The costs of the case manager shall be divided on a pro rata basis.

### **3.14 Summary of RCW 26.09.430 - .480, Regarding Relocation of a Child**

This is a summary only. For the full text, please see RCW 26.09.430 through 26.09.480.

If the person with whom the child resides a majority of the time plans to move, that person shall give notice to every person entitled to court ordered time with the child.

If the move is outside the child's school district, the relocating person must give notice by personal service or by mail requiring a return receipt. This notice must be at least 60 days before the intended move. If the relocating person could not have known about the move in time to give 60 days' notice, that person must give notice within 5 days after learning of the move. The notice must contain the information required in RCW 26.09.440. See also form DRPSCU 07.0500, (Notice of Intended Relocation of A Child).

If the move is within the same school district, the relocating person must provide actual notice by any reasonable means. A person entitled to time with the child may not object to the move but may ask for modification under RCW 26.09.260.

Notice may be delayed for 21 days if the relocating person is entering a domestic violence shelter or is moving to avoid a clear, immediate and unreasonable risk to health and safety.

If information is protected under a court order or the address confidentiality program, it may be withheld from the notice.

A relocating person may ask the court to waive any notice requirements that may put the health and safety of a person or a child at risk.

Failure to give the required notice may be grounds for sanctions, including contempt.

**If no objection is filed within 30 days after service of the notice of intended relocation, the relocation will be permitted and the proposed revised residential schedule may be confirmed.**

A person entitled to time with a child under a court order can file an objection to the child's relocation whether or not he or she received proper notice.

An objection may be filed by using the mandatory pattern form WPF DRPSCU 07.0700, (Objection to Relocation/Petition for Modification of Custody Decree/Parenting Plan/Residential Schedule). The objection must be served on all persons entitled to time with the child.

The relocating person shall not move the child during the time for objection unless: (a) the delayed notice provisions apply; or (b) a court order allows the move.

If the objecting person schedules a hearing for a date within 15 days of timely service of the objection, the relocating person shall not move the child before the hearing unless there is a clear, immediate and unreasonable risk to the health or safety of a person or a child.

Neither party shall relocate the child out of Maricopa or King County without consent of the other or court approval.

#### **IV. Decision Making**

##### **4.1 Day-to-Day Decisions**

Each parent shall make decisions regarding the day-to-day care and control of the child while the child is residing with that parent. Regardless of the allocation of decision making in this parenting plan, either parent may make emergency decisions affecting the health or safety of the child.

This provision is subject to the rules and requirements of any supervised visitation counselor and/or facility where the father's visitation may occur.

#### 4.2 Major Decisions

Major decisions regarding each child shall be made as follows:

Education decisions:	Jointly, through case manager
Non-emergency health care:	Jointly, through case manager
Religious upbringing:	Jointly, through case manager

For any decision involving a cost that the mother expects the father to assist in paying, the father must consent absent court order.

#### 4.3 Restrictions in Decision Making

The parties are required to discuss any major decisions with the case manager who will seek to assist the parties in achieving agreement.

### V. Dispute Resolution

Disputes regarding the parenting plan, shall be submitted to the case manager first and the case manager shall have decision making authority for minor decisions. In the event there are larger issues or major decisions that can't be addressed through case management, the parties shall participate in arbitration prior to any further court action.

Disputes between the parties, other than child support disputes, shall be submitted to the case manager. If that does not resolve the issue then the parties will use an agreed private arbitrator or Court.

### VI. Other Provisions

There are the following other provisions:

- a. Skype/Webcam calls shall continue on a twice weekly basis until age five and not less than a weekly basis thereafter. Skype calls shall be Wednesday and Sunday evenings at 6:00 p.m. The parents should encourage Senna to participate in Skype and/or answer the phone but if he cannot or will not by choice, schedule, or other, the calling parent can leave a phone/email message

1 which should be shared as soon as possible with Senna. Screening and/or  
2 avoiding calls or blaming the other parent for not having the child available is  
3 not in the child's best interests.

- 4 b. Both parents shall complete a "Love and Logic" parenting class within six  
5 months of the entry of this order. Upon completion they shall provide a copy  
6 of their certificates to the case manager.
- 7 c. The father should continue working with Dr. Roeben for therapy and  
8 medication management. He should provide Dr. Roeben with a copy of the  
9 third parenting evaluation and the Court's Findings of Fact. He should sign a  
10 release form to allow Dr. Roeben to communicate with the case manager. Dr.  
11 Roeben's files shall not be provided to the mother in any future litigation,  
12 whether directly (e.g., via subpoena) or indirectly (e.g., via a request for  
13 records from the case manager or subsequent parenting evaluator/GAL).
- 14 d. The mother should begin weekly individual therapy with someone who has at  
15 least a master's degree in counseling, social work, or psychology, EXCEPT  
16 that she may use any therapist provided by a community clinic if necessary for  
17 financial reasons. She should provide a copy of her psychological evaluation  
18 to the provider as well as all three parenting evaluation reports and the Court's  
19 Findings of Fact. She should sign a release form to allow her therapist to  
20 communicate with the case manager as needed. The therapist's files shall not  
21 be provided to the father in any future litigation, whether directly (e.g., via  
22 subpoena) or indirectly (e.g., via a request for records from the case manager  
23 or subsequent parenting evaluator/GAL).
- 24 e. Each parent shall notify the other parent as soon as reasonably possible of any  
illness requiring medical attention, or any emergency involving the child.  
Each parent shall have access to the child and the medical staff. The parents  
will give the child all medication when and as prescribed by a doctor and  
consult independently with the doctor and case manager regarding Senna's  
diet, lactose intolerance, weight, etc.
- f. Each parent shall have equal and independent authority to confer with school,  
child care and other program personnel regarding the child's progress and each  
parent shall have full and equal access to the education and health care records  
of the child absent a court order to the contrary. Neither parent may veto the  
access requested by the other parent. Education records are limited to  
academic, attendance, and disciplinary records of public and private schools in  
all grades, Kindergarten through twelve, and any form of alternative school for  
all periods for which child support is paid or the child is dependent in fact of

1                   the parent requesting access to the records. Education records of post-  
2                   secondary educational institutions are limited to enrollment and academic  
3                   records necessary to determine, establish, or continue support.

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- g. Neither parent shall make derogatory comments about the other parent or allow anyone else to do the same in the child's presence. Neither parent shall allow or encourage the child to make derogatory comments about the other parent.
  - h. Each parent shall exert every reasonable effort to maintain free access and unhampered contact and communication between the child and the other parent, and promote the emotions of affection, love and respect between the child and the other parent. Each parent agrees to refrain from words or conduct, and further agrees to discourage other persons from uttering words or engaging in conduct, which would have a tendency to estrange the child from the other parent, to damage the opinion of the child as to the other parent, or to impair the natural development of the child's love and respect for the other parent.
  - i. Each parent shall honor the other parent's parenting style, privacy and authority. Neither parent shall interfere in the parenting style of the other nor shall either parent make plans or arrangements that would impinge upon the other parent's authority or time with the child, without the express agreement of the other parent. Each parent shall encourage the child to discuss his grievance against a parent directly with the parent in question. It is the intent of both parents to encourage a direct parent-child bond and communication.
  - j. Neither parent shall encourage the child to change his primary residence and neither parent shall advise the child of any child support or other legal matters. The parties should not exchange any documents, bills, letters or more during any child exchange. These things should be sent via mail or email and copied to the case manager.
  - k. Neither parent shall financially obligate the other parent without the other parent's consent or court order
  - l. Neither parent shall use the child, directly or indirectly, to gather information about the other parent or take verbal messages to the other parent.
  - m. Neither parent shall use or threaten to use physical or corporal punishment on the child.

- 1
- 2 n. To better serve the needs and desires of the child, changes and or deviations to  
this plan are acceptable and welcome so long as such changes are mutually  
agreed upon by both parents and the case manager.
- 3
- 4 o. The parents and case manager shall use the Our Family Wizard calendar tool to  
track the residential schedule and shall use the shared entries journal tool for  
sharing information concerning all doctor visits as well as health and wellness  
information concerning the child at residential exchanges.
- 5
- 6 p. Except for in the event of emergencies, neither parent shall initiate a report to  
police, CPS or other law enforcement regarding Senna prior to discussing it  
with the Case Manager and considering the Case Manager's input.
- 7
- 8

9

10 **VII. Order by the Court**

11

12 It is ordered, adjudged and decreed that the parenting plan set forth above is adopted and  
13 approved as an order of this court.

14

15 **WARNING:** Violation of residential provisions of this order with actual knowledge of  
16 its terms is punishable by contempt of court and may be a criminal offense under RCW  
9A.40.060(2) or 9A.40.070(2). Violation of this order may subject a violator to arrest.

17

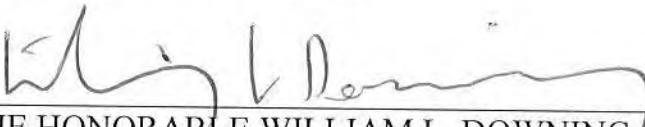
18 When mutual decision making is designated but cannot be achieved, the parties shall  
19 make a good faith effort to resolve the issue through the dispute resolution process.

20

21 If a parent fails to comply with a provision of this plan, the other parent's obligations  
22 under the plan are not affected.

23

24 DONE IN OPEN COURT this 16<sup>th</sup> day of October, 2012.

25   
26 THE HONORABLE WILLIAM L. DOWNING  
27 KING COUNTY SUPERIOR COURT JUDGE

28

29 MCKINLEY IRVIN, PLLC

30

31 JOHN W. KYDD, P.S.

32

33 David B. Starks, WSBA No. 28344  
34 Attorneys for Respondent

35

36 John W. Kydd, WSBA No. 12260  
37 Attorneys for Petitioner

38

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March 13, 2015

**No. 11-3-03341-8 SEA**

**To: Hon. William M. Downing**

**In re the Parenting and Support of:**

**SENNNA S. DUNCAN, Child;**

2 - Name - Whistleblower Regarding Health Care ...

**Petitioner,**

**and**

**CHRISTINE E. PEDDLE CORNISH**

**Respondent**

## **CASE MANAGER REPORT**

The undersigned social worker was appointed Case Manager by Commissioner Melinda Johnson-Taylor on 6/4/14.

Mr. 2 - Name - ... participated in an intake/interview on 6/26/14, but failed to bring the required retainer payment, ultimately paid on 9/4/14. Ms. Peddle paid her portion of the required retainer on 8/11/14, and participated in an intake/interview on 9/16/14.

Concerns reported by Mr. 2 - Name - ... on 6/26 included:

- A. Improper Use of Our Family Wizard by Ms. Peddle. "Abusive use of conflict against me."
- B. Low Frequency and Quality of Skype calls, to/from Senna, due to Ms. Peddle. "I have had Skype calls twice/week on average... Internet issues, games with her mother... I'm owed hundreds of sessions. When he's engaged he's great... He is asleep at 7:45 when it's time to Skype."
- C. Conflict During Past Exchanges. "Each time there is an exchange, there is a catastrophic

meltdown. They arrive late, every time, to hand him off. Their family will follow me, harass me, fire them, etc. I've never had one smooth visit or transport ever."

D. False Accusations by Ms. Peddle.

Mr. [2 - Name - W...] indicated he next planned to visit Senna around the end of July, and stated the current exchange supervisors "just fired us."

Mr. [2 - Name - ...] indicated his goal was to gain custody of Senna. He stated he completed a parenting class, and therapy with Dr. Roeben, and now has a life coach, Jeff Shushan. He listed numerous failures by Ms. Peddle, including: no therapy, not following rules, no drug tests or diluted tests, loss of custody of her daughter. He portrayed himself as beaten down by the litigation.

Further contacts with Mr. [2 - Name - ...] focused frequently on the problems related to Skype calls. "It doesn't work... I propose seeing Senna every day on Skype." Mr. [2 - Name - ...] stated Senna is often asleep, or tired and unruly at the designated time, is in different locations, or, just as often or more, the call does not occur for some reason. "We've never had a smooth Skype session since day one."

Other topics addressed included: parental alienation, Senna not enrolled in preschool, lack of visits due to financial issues and excessive notice required (21 days), false allegations, lack of transport people, continued plan to get custody, and the past.

Mr. [2 - Name - ...] acknowledged he is behind in his financial support of Senna, including child support, health insurance, and reimbursing health/other costs.

This writer finds communication with Mr. [2 - Name - ...] a challenge. Initially, Mr. [2 - Name - ...] provided significant information to this writer, relating to past allegations against Ms. Peddle. This writer's requests for updates, information or responses since September often went unheeded. Mr. [2 - Name - ...] did provide some information related to Skype sessions, in time. Over the months, Mr. [2 - Name - ...] has increased his rhetoric about Senna being abused and mistreated in Ms. Peddle's care. He denied knowledge of or participation in a recent referral to CPS against Ms. Peddle alleging physical abuse of Senna.

Concerns reported by Ms. Peddle on 9/16 included:

- A. Abduction of Senna by Mr. [2 - Name - ...], for two weeks in June 2014. "He was to have him for five days. [2 - Name...] is facing custodial interference charges."
- B. Accusations of Mistreatment of Senna by Mr. Dunan. "I get these horrific messages from [2 - Name...] accusing me of abusing Senna, lying, etc... My mom has a protection order against [2 - Name...]. He called her drunk and left horrific messages."
- C. Frequency of Skype Calls. "Four Skypes are too much. Two were hard enough."
- D. Visitation Period of 5 Nights. "It's extremely hard on Senna."

Ms. Peddle indicated her goal was to provide Senna with access to Mr. [2 - Name - ...] in a safe way. Ms. Peddle listed numerous problem behaviors by Mr. [2 - Name - ...], including: irregular visits, driving and drinking with Senna, improper use of safety restraints for Senna, past DUI and

driving on a suspended license, and three arrest warrants. She requests future visitations be supervised and occur in Arizona.

Further contacts with Ms. Peddle have focused on problems related to Skype calls. "Four times a week is not feasible... half of the time [ 2 - Name... ] doesn't show up. We are there waiting. Our lives are on hold." She also stated Mr. [ 2 - Name - ... ] "interrogates" Senna and makes inappropriate or demeaning comments directed at Ms. Peddle. She requests Skype calls take place weekly, through a supervised visitation service.

Other topics addressed included: Mr. [ 2 - Name - W... ]'s legal situation, status of driver's license, alcohol use, failure to provide financial support, false reporting to CPS, Mr. [ 2 - Name - Whist... ] accusations of abuse to Seena, and the past.

Ms. Peddle is a good communicator, in general. She is typically responsive. She continues to engage in sleuthing related to Mr. [ 2 - Name - ... ]. She provided Skype recordings to assist this writer in understanding the true nature and quality of Skype sessions. The quality of these materials varied, and was only somewhat helpful. In general, Skype sessions that occurred generally showed Mr. [ 2 - Name - ... ] engaging Senna appropriately, Senna being directed back to Skype by Ms. Peddle, and Senna's varying level of engagement in Skype. They seemed generally good. It is not clear why some Skype sessions do not occur. Sometimes both accuse the other of missing the same call, or calls dropping, etc. It remains an unfortunate, painful set up.

A review of Our Family Wizard entries by the parties reveals mixed results. Ms. Peddle appears to regularly utilize various functions of OFW, including noting bills, medical appointments, Skype sessions, and some communication with Mr. [ 2 - Name - ... ]. Sometimes her communication is "for the record", which can seem antagonistic. Mr. [ 2 - Name - ... ] does not appear to respond to Ms. Peddle's requests for payment reimbursement and has challenged the validity of requests at times, such as stating that Senna is not enrolled in preschool. When Mr. [ 2 - Name - ... ] does use OFW, he seems not to use it as a tool for communication, but almost as a megaphone to broadcast his emotions. On the whole, OFW does not seem very helpful.

At times, both parents' communication with this writer seems designed to convey a message to the other party, copied on the email. That also is not an effective communication technique.

#### DISCUSSION OF ISSUES AND RECOMMENDATIONS:

1. Skype – Skype sessions remain intensely problematic. Dr. Glassman, the prior Case Manager, recommended four Skype sessions per week due to Mr. [ 2 - Name - Whist... ] limited in-person contact. However, Skype visits are no replacement for direct contact and are not contributing to overall stability of either parent. The current frequency and nature of Skype (requiring parental supervision and help) creates a constant need for these parties (both of whom the court made abusive use of conflict findings against) to have routine contact, which keeps the drama and toxic engagement ongoing, sometimes reaching fever pitch.

Mr. [ 2 - Name - W... ] states the Skype sessions are not serving their purpose, which is to facilitate his relationship with Senna. His solution, daily Skype sessions, is not realistic.

Ms. Peddle reports the frequency of sessions is a significant burden, both to enact them, and also due to the acrimony and antagonistic communication between the parents through OFW about Skype. Ms. Peddle requested that Skype sessions be facilitated by a visitation center. She reported contacting Cherie Conte of **Child & Family Support Services**, a supervised visitation center located in Phoenix, Arizona:

“She provided me with specific information regarding the services they provide, costs, and their policies and procedures. Additional information can be found at <http://cfss.com>. Our conversation is summarized below:

- There must be a Court Order in place requiring supervised visitation (this includes Skype).
- Supervised visitation at their facility runs \$60/hour; they are willing to facilitate Skype sessions. I need to provide the laptop and Wi-Fi is available. Costs would be pro-rata per the PP and Order for Child Support.
- Skype sessions would be billed at \$30 for  $\frac{1}{2}$  hour. This would include the set-up time using my personal laptop.
- Both parties must complete and comply with their Agreement for Services. If either party violates the Agreement for Services per the conditions, services will be suspended.
- Supervised visitation and Skype sessions must have specific days and times listed in the order. For example, Skype would take place every Tuesday @ 6:45 pm Arizona time for up to 15 minutes at CFFS utilizing mothers laptop computer.
- No records will be provided to ANY party, professional etc. absent a valid subpoena in this matter.”

The benefits of a neutral provider are considerable, in this writer’s estimation: It eliminates a number of the points of contention, ensures professional assistance in ensuring the highest quality of communication between Mr. 2 - Name - W... and Senna, and allows for neutral observations of positive or negative behavior by either party. The negatives involve costs to the parties, transportation logistics, fewer opportunities for contact, and potential for abuse, such as Senna not being delivered on time or payment issues.

Ideally, Skype sessions would occur twice per week, an amount that provides substantive contact for Mr. 2 - Name - W... but also relieves Ms. Peddle of the significant weight of constant contacts. It is not clear that the parties can afford two sessions per week, and certainly transportation would be a challenge at that frequency. While two sessions per week would be preferred, the parenting plan of 10/2012 provided that Skype sessions occur twice per week until Senna was age 5, and then not less than weekly afterward (emphasis added).

Clearly, there is no perfect solution that easily balances Senna’s need for substantive contact with Mr. 2 - Name - ..., the need for reduced contact between the parties, the financial needs of both parents, and issues of availability. Again, Skype sessions are no substitute for in-person contacts.

***IT IS RECOMMENDED that Skype sessions occur once per week, through a supervised***

*visitation center. The Case Manager recommends specific language concerning the day and time of the week (Tuesday at 7 pm, for example), the length of the contact (20 minutes), and make up requirements should Ms. Peddle, or her proxy, be unavailable to bring Senna to the visitation. The visitation supervisor should be authorized to terminate any problematic contact as per the agency policies.*

*The Case Manager should have the authority to identify another supervision provider, if the agency above is not available. Supervisors will be identified using the Supervised Visitation Directory (AZ) or the Maricopa County Family Court Roster.*

*Given that it may take some days to set up the visitation provider, it is recommended that in the interim Skype contact continues to be facilitated by Ms. Peddle, but be immediately reduced to twice per week, Sunday and Wednesday, at 7:15pm. The change in time reflects both parents' observations that Senna is often tired and/or asleep by 7:45.*

*Should the visitation services not be engaged within one month, this writer will investigate the cause, and make further recommendations. A parent frustrating the process should not benefit from their actions.*

2. Visitation – Mr. [2 - Name - Whi...] in-person visitation has been very limited. His last visitation ended on June 7, 2014, and was marked by crisis, parental conflict, violation of agreements, police contacts, and courtroom drama, precipitated by Mr. [2 - Name - Whi...] failure to return Senna from visitation as arranged. Ms. Peddle had previously voiced concerns of abduction, and has since expressed a desire for supervised visitation due to his actions. Mr. [2 - Name - W...] requested one visitation since then, in January 2015, which ultimately was not authorized by this writer due to Mr. [2 - Name - Whis...] failure to provide required information.

This writer was not engaged as Case Manager during the visit in 2014 described above and has been reluctant to make recommendations in either direction. It is a concern that, in January of 2015, Mr. [2 - Name - ...] was unable to follow the current orders requiring he arrange an exchange supervisor chosen from the Supervised Visitation Directory (AZ) or the Maricopa County Family Court Roster, and provide itinerary information including places of lodging. Mr. [2 - Name - ...] does not acknowledge responsibility for the above. His willingness to follow the court orders regarding visitation parameters is a concern.

It is a further concern that there have been such protracted periods between in-person visitations with Senna and Mr. [2 - Name - ...]. Arguably, Mr. [2 - Name - ...] is not complying with the parenting plan. One wonders about the potential negative impact of an extended five-day visitation on Senna, at age 5, given the significant periods between contacts, as well as the fractured and toxic relationship between the parents that prevents constructive communication on Senna's behalf. Ultimately, the order of appointment does not grant this writer authority to make recommendations regarding a substantial change in parenting time.

***NO VISITATION CHANGES ARE RECOMMENDED given the limitations in the Case Manager's authority, although concerns are noted.***

3. Exchange supervisor – Mr. [2 - Name - ...] reported in June of 2014 that the exchange supervisors “fired us.” He asked this writer to identify a new exchange supervisor in January of 2015. As per Dr. Glassman’s recommendations of 4/19/13 incorporated by court order, ”Parents may use any other supervisor listed in the Supervised Visitation Directory (AZ) or the Maricopa County Family Court Roster. It shall remain the visiting parent’s responsibility to select the supervisor and communicate this via email to Case Manager and post to OFW.”

***IT IS RECOMMENDED that Mr. [2 - Name - Whi...] follow the court order regarding exchange supervisors.***

4. Use of Our Family Wizard – In his final report of 1/6/14, Dr. Glassman recommended the parties discontinue use of OFW, due to their level of conflict. This writer agrees that direct communication does not seem beneficial, and wonders if contact should be prohibited outside of emergency situations. Having said that, this writer does not particularly relish conveying messages between the parties, which is the alternative most available. However, this seems the best alternative.

***IT IS RECOMMENDED that the parties discontinue use of OFW, and have communication only as directed by the Case Manager.***

5. Mother’s Concerns re: Father’s Warrants/Suspended License/Financial Support Issues – Ms. Peddle has provided significant communication in recent weeks related to Mr. [2 - Name - ...]’s legal status and driver’s license. It appears she believes this bolsters her request for supervised contact. Mr. [2 - Name - ...] routinely disputes Ms. Peddle’s assertions, although he did not respond to this writer’s request for specific discussion of this issue. Frankly, this writer is unsure what to make of the information. Driving Senna without a valid license is problematic, but it is not automatically a parenting concern. The court should consider addressing whether a lack of a valid license or outstanding warrants for either parent is relevant to parenting, and whether it should impact parenting access.

Ms. Peddle has also provided significant communication in recent weeks regarding Mr. [2 - Name - Whi...] lack of financial support and his ongoing bankruptcy action, repeatedly requesting this writer intervene with Mr. [2 - Name - ...] (even as she copies him on the communication). This writer is sympathetic to Ms. Peddle’s need for child support, and Mr. [2 - Name - ...] acknowledges being in arrears. Mr. [2 - Name - ...] reports feeling harassed by Ms. Peddle’s communication with his bankruptcy attorney. Beyond recommending immediate payment of child support, including past due amounts, or recommending Ms. Peddle work with Support Enforcement, this writer is unsure what else to do.

***IT IS RECOMMENDED the court consider addressing whether a lack of a valid license or outstanding warrants for either parent is relevant to parenting and whether it should impact parenting access.***

***IT IS FURTHER RECOMMENDED Mr. [2 - Name - ...] become current on his child support obligation, and/or Ms. Peddle engage Support Enforcement services.***

6. Father's Concerns About Mother's Alienation/Abuse of Child – Dr. Glassman addressed this concern in his report of 1/6/14, stating, "Father has gone so far as to accuse mother of having abused their son. This is not true." Mr. [2 - Name - ...] continues to report problematic behavior by Ms. Peddle, and his concerns seem to escalate. Recently, Mr. [2 - Name - ...] contacted Senna's preschool, expressing concern about Senna's report that another student punched him. Mr. [2 - Name - ...] expressed some doubt as to Ms. Peddle's explanation of roughhousing with another student. Shortly after Mr. [2 - Name - W...] contacted the school, Ms. Peddle reported being contacted by Child Protective Services, regarding an allegation of physical abuse. Mr. [2 - Name - W...] denied making a report to CPS or communication with the agency.

This writer contacted Theresa Albright, Director of Phoenix Children's Academy. She reported Senna is a happy, typically developing, typically behaving child who attends their Kindergarten readiness program. She expressed having no concerns about Senna or his mother's care of him, based on her daily observations. This writer contacted Lisa Livermore, CPS investigator, but calls were not returned.

Mr. [2 - Name - Whi...] concerns seem inflated and overhyped, and were not supported by the school. It is a concern that Mr. [2 - Name - ...] may have engaged a proxy to make a report against Ms. Peddle, a past issue.

***No recommendations are made.***

7. Use Of Communication Through Case Manager – as recommended above, the parties should discontinue use of OFW and instead communicate through the Case Manager. For future reference, this mean emailing the CM any messages they want conveyed to the other party. The Case Manager has the authority to direct the parents' communications, in an effort to decrease conflict.

***IT IS RECOMMENDED that the parties discontinue use of OFW, and have communication only as directed by the Case Manager.***

8. Case Manager Fees – The advance fee deposit/retainer is depleted as of the writing of this report, and this writer requests each party provide their pro rata share of an additional retainer totaling \$2000 by 4/10/15.

***IT IS RECOMMENDED each party provide their pro rata share of an additional retainer totaling \$2000 by 4/10/15. Absent payment by the requested date, this writer is discharged as Case Manager.***

Best regards,



Jennifer Keilin, MSW, LICSW  
Court Appointed Case Manager

**No. 11-3-03341-8 SEA**

COURT ACTION:

The court

- (1) Adopts \_\_\_\_\_;
- (2) Does not adopt \_\_\_\_\_; or
- (3) Modifies \_\_\_\_\_ as follows:

The recommendations of the 3/13/15 Case Manager report as a temporary order, to become a final order if no objection is received within 10 days from the filing date of this order.

---

(Date)

---

(Judge)

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1)  
<legacycounstrain@mac.com>, angeladuncan@comcast.net <angeladuncan@comcast.net>  
**Subject:** No Subject  
**Date:** March 13, 2015 at 2:06:59 PM PDT

Jennifer,

I am from receipt of this communication revoking any and all authorization(s) I may have provided to disclose any and all HEALTH CARE INFORMATION relevant to me. I am citing RCW 5.60.060 and all applicable HIPAA protections which may cover this topic and any and all other relevant Washington State RCW and/or Constitutional and/or Common Law authority.

Just to be clear from this point forward any release of Health Care Information as defined in Washington RCW and/or HIPAA will result in swift legal response by me.

Do not speak my name, do not write my name, do not communicate any information at any person other than myself from this point forward.

Sincerely,

2 - Name - Whistleblower Regarding Health Care Provider or ...

Issaquah WA. 98027  
[www.pilotiusa.com](http://www.pilotiusa.com)  
[www.facebook.com/pilotiusa](http://www.facebook.com/pilotiusa)

1  
2  
3  
4  
5  
6  
7 **Superior Court of Washington**  
8 **County of King**

9 In re:

10 SENNA S. DUNCAN,

Child,

11 2 - Name - Whistleblower Regarding ...

12 and

Petitioner,

13 CHRISTINE E. PEDDLE-CORNISH,

Respondent.

14 No. 11-3-03341-8 SEA

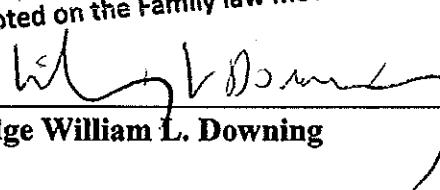
15 **Order re Case Manager's Report**  
16 **and Recommendations**

17 This Court has received (from case manager Jennifer Keilin) a written report and  
18 recommendations dated March 13, 2015. The specific recommendations made by Ms. Keilin all  
19 strike the court as being sensible and practical. No objection has been lodged. Accordingly,  
20 pursuant to section VII [C] of the Order Appointing Case Manager, the Court will hereby approve  
21 and adopt those recommendations.

22 IT IS SO ORDERED.

The Court would note that it has not retained jurisdiction over  
this matter but, treating the non-objection as agreement with  
entry of this order, it is willing to perform the ministerial act  
of signing it. Any disputes or disagreements between the parties  
will need to be properly noted on the Family law motions calendar.

23 Dated: 4/7/15

24   
Judge William L. Downing

25 Presented by:

26   
Veronica Freitas WABA No.19405  
27 Attorney for Respondent

Approved by:

28 2 - Name - Whistleblower ... Pro Se  
Petitioner

Page 1 of 1

VERONICA FREITAS  
V. FREITAS LAW, PLLC.  
210 Summit Avenue East  
Seattle, Washington 98102  
(206) 328-7362  
v@vfreitaslaw.com

**From:** Jennifer Keilin <jkeilin@comcast.net>  
**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health C...  
**Cc:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Senna Duncan  
**Date:** December 2, 2014 at 10:22:27 AM PST

Hi 2 - Name ...

I'm sorry, I was not able to respond quickly to your message.

When is our next opportunity?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

*To Ensure Client Confidentiality All Materials Sent by Messenger Must be Enclosed in an Envelope or Plain Binder Labeled Only with Recipient's Name*

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ... >  
**Date:** Monday, December 1, 2014 at 4:02 PM  
**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>  
**Subject:** Re: Senna Duncan

Hi Jennifer,  
Thank you for your quick response and concern.  
I appreciate your involvement, please let me know how to facilitate what you need.  
Face time seems like a good idea and is doable.  
Senna has a Skype session this evening at 6:45 to 7:00 pm.

My hope is you can observe a typical Skype and my concern is that won't be accomplished if Christine knows she is being observed.

Let me know how to proceed. It helps to hear from you. I can't stop worrying and it impacts my interactions that compounds my concerns and regrets. So please forgive my lack of grace at moments. I know Senna can have and deserves a better life and I can hope for that when you are in his corner.

Please coordinate with me if you could face time me at 643 pm at 206-409-7400

Regards,

2 - Name - Whistl...

Sent from Windows Mail

---

**From:** [Jennifer Keilin](#)

**Sent:** Monday, December 1, 2014 2:43 PM

**To:** 2 - Name - Whistleblower ...

**Cc:** [Jennifer Keilin](#)

Hi 2 - Name - ...

I would like to find a way to observe the Skype sessions, and I'm not sure how to do that remotely. It might depend on sharing the same technology. If you have an iPhone or iPad, maybe I could contact you via FaceTime, and then observe you Skype with Senna. Does that sound crazy?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

**From:** Jennifer Keilin <jkeilin@comcast.net>  
**To:** *2 - Name - Whistleblower Regarding Health Care Provider or Health...*, Christine Peddle <sennaduncan79@hotmail.com>  
**Cc:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** *2 - Name - ... /Peddle - OFW communication*  
**Date:** January 7, 2015 at 7:13:08 AM PST

I sent this message to each of you via OFW, and am copying it here:

Good morning,  
As of 1/7/15, communication is to change.

Please follow these rules in any communication with each other:

1. Brief (two to five lines, ideally)
2. Informative/Factual (include only the relevant information)
3. Friendly (hello and goodbye, respectful)
4. Firm (If needed, to discontinue a failing topic)

The following is to be excluded:

1. Historical statements (in the past you...)
2. Blaming statements (you always, you never...)
3. Allegations

Future emails need to read as cordial and solution oriented.

Failure to follow these guidelines will result in further limited communications.

Please confirm receipt of this message and understanding of these rules, within 48 hours.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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information in any form without first receiving specific written permission from the author of this communication.

**FILED**  
KING COUNTY, WASHINGTON

APR 19 2013

COURT CLERK  
BY DEBRA BAILEY TRAIL  
~~DEPUTY~~

**Superior Court of Washington County of King**

In re the Parenting and Support of:

SENNA SAMUEL DUNCAN,  
Child,

2 - Name - Whistleblower Regarding Healt...

Petitioner  
and

CHRISTINE PEDDLE-CORNISH,

Respondent.

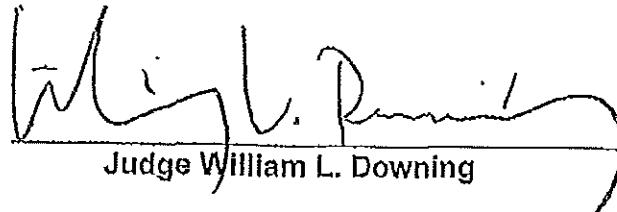
No. 11-3-03341-8 SEA

Order Re: Case Manager's  
Report & Recommendations

This Court has received from Case Manager Dr. Joel Glassman a written Report and Recommendations dated March 25, 2013. The specific recommendations made by Dr. Glassman all strike the Court as being sensible, practical, consistent with the Parenting Plan and, most likely, fully agreeable to the parties. No objection has been lodged. Accordingly, pursuant to Section VII (C) of the Order Appointing Case Manager, the Court will hereby approve and adopt those recommendations.

IT IS SO ORDERED.

Dated: April 19, 2013



Judge William L. Downing

Order Re: Case Manager's Report - 1

Hon. William L. Downing  
King County Superior Court  
516 Third Ave., C-203  
Seattle, WA 98112

**Joel B. Glassman, Ph.D., P.C.  
7520 E. Second Street  
Suite 1  
Scottsdale, Arizona 85251**

Phone: (480) 947-9591 Fax: (480) 481-0790

**SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING**

**NO. 11-3-03341-8 SEA**

**MARCH 25 2013**

**THE HONORABLE WILLIAM L. DOWNING**

In re the Parenting and Support of:

**SENNA SAMUEL DUNCAN, Child,**

**Petitioner,**

and

**CHRISTINE E. PEDDLE CORNISH, Respondent**

**CASE MANAGER REPORT**

The undersigned psychologist was appointed Case Manager by the Honorable William L. Downing, Superior Court of the State of Washington, County of King on January 11, 2013, for a term of two (2) years subject to one (1) reappointment. The Washington State Court fashioned its appointment order in a manner similar to the one used by the Superior Court of Arizona, Maricopa County for a Parenting Coordinator.

**DECLARATION:**

The Case Manager (Parenting Coordinator) has completed the educational training requirements in the areas of child abuse and domestic violence as required by ARS 25-406C.

**ISSUES:**

1. Clarifying whether a valid protective order existed.
2. Appointment of a visitation exchange supervisor(s).
3. Reformatting Father's monthly parenting time.
4. Advance notification of intent to visit.
5. Summer vacation schedule.
6. SKYPE phone calls.
7. Exchange of health care information.
8. Assessing whether parents had completed a parenting class and were involved in therapy.
9. Senna's progress with toileting training.

**PROCEDURES:**

- Documents reviewed for this report:
  - Modification of No Contact Order – February 15, 2013.
  - Order Appointing Case Manager – January 11, 2013.
  - Order re: Miscellaneous Requests – January 11, 2013.
  - Final Parenting Plan -- October 16, 2012.
  - Review of Our Family Wizard (OFW) postings.
- Individual meetings with parents, both in office and by phone when needed.
- Joint conference call with parents.

**DISCUSSION:****1. Presence/absence of a Protective Order –**

This issue had to be resolved first before the Case Manager would establish written and phone communication with parents.

At her initial meeting with the Case Manager on February 19, 2013, Mother produced a renewed protective order against Father that was issued on July 25, 2012 and was to remain in effect for one year.

During Father's initial conference call with the Case Manager on February 21, 2013, he indicated that the court had terminated this order. To verify his claim, Father submitted court documents of January 11, 2013 and February 15, 2013 that had overturned the prior protective order.

After verifying that a protective order was no longer in effect, the Case Manager opened e-mail correspondence with and between parents. In addition, a joint conference call was held with parents on March 15, 2013 to discuss the case issues listed above.

During the conference call with parents, Mother stated she was unaware that the court had rescinded the prior protective order before first meeting with the Case Manager on February 19, 2013. Father doubted this was so, but the Case Manager was unable to independently confirm when Mother knew the protective order had been lifted.

Parents completed authorization forms to permit the Case Manager to log on to their Our Family Wizard account.

2. Appointing a new visitation exchange supervisor –

Per the Final Parenting Plan, the Case Manager was to appoint a new visitation exchange supervisor.

Rather than selecting one person, the Case Manager discussed with parents the value of having multiple supervisors to insure that one was available when Father visited. For the initial visit on March 15, 2013, the Case Manager assisted parents in arranging for two new supervisors to assist with transferring Senna.

Parents have already used the Supervised Visitation Directory (Arizona) as a reference for contacting an exchange supervisor. Other supervisors are available through the Maricopa County Family Court roster. Fees for visitation exchange supervisors vary. Additional transportation charges could be incurred depending on the amount of time involved for the supervisor to travel to and from an exchange location.

The Case Manager contacted the following four individuals who confirmed their willingness to serve as a visitation exchange supervisor: Estimated fees for supervisory exchanges are included in parenthesis.

Madeline Mistral	(\$ 50/hr)
Francine Miller	(\$ 50/hr)
Meredith Porter	(\$ 50/hr)
Felice Goff	(\$ 65/hr)

Additional supervisors can be selected from the Supervised Visitation Directory or the Maricopa County Family Court roster as needed.

3. Restructuring Father's monthly parenting time –

Pursuant to the Parenting Plan, Father was awarded long distance parenting time in Phoenix on the first, third and fifth weekend of a given month, from Friday at noon through Sunday at 6:00 PM.

Father indicated it is difficult and expensive for him to make multiple trips each month to Phoenix to exercise long distance parenting time. He proposed changing this arrangement to one longer visit per month of five days. Mother was not opposed to an extended visit, but objected to the number of days Senna would be away from her.

It is noted that this past December (2012), Father did have a five day visit. Furthermore, Father does maintain SKYPE contact with Senna twice a week. Therefore, the Case Manager did not conclude that a lengthier visit once a month would be unduly hard on the child.

Parents argued over whether Father's request for a five-day visit meant four or five overnights. Father argued on behalf of five, Mother for four. Again the additional overnight stay with Father, assuming he is able to remain in Phoenix this long, was not considered to represent an undue hardship for the child.

The Case Manager believes that the relationship between Father and son would benefit from a maximum of a five-night visit once a month, provided Father has that availability. However, once implemented, this five-day visit shall replace the every other weekend parenting schedule currently outlined in the Parenting Plan.

The longer monthly visit shall not be attached onto other special occasions or holidays to extend Father's monthly parenting time. Other holiday or summer vacation visits that are longer than five days, when exercised, shall serve as Father's monthly parenting time with Senna.

4. Advance notification of monthly parenting time visits –

Parents debated whether a 30-day or 14 day advance notice of Father's intent to visit was sufficient. Father favored the shorter notification period because his work schedule could change relatively quickly and could enable him to schedule parenting time sooner than anticipated.

Given the degree of conflict noted in this case, having a set rather than flexible rule in place has the potential for minimizing debate. With that in mind, it is probably best that a compromise be adopted.

5. Summer vacation –

Presently, the Parenting Plan required parents to submit summer vacation dates by April 15<sup>th</sup>. Father has first choice in odd numbered years, Mother in even numbered year. To insure securing requested vacation dates a parent must submit his/her choice by the deadline.

Review of the Parenting Plan reveals possible confusion about this issue while Senna is still a preschooler.

On section 3.1 of the Final Parenting Plan, it states:

... "Except as otherwise provided in this parenting plan, the father's visitation with Senna shall take place in Arizona until Senna turns 5 years old."

Yet, on section 3.5 (Summer Schedule) it states:

Summer Schedule Before Senna is Age 6 – "Same as the schedule in Section 3.1 above"...., but later in the same section it states; "There are no geographic restrictions as to the summer visits"....

Father indicated that the bulk of his family lives in the Seattle area. He wants Senna to have a relationship with his family.

The Case Manager advised parents that it would be in Senna's interest to permit Father to exercise summer vacation anywhere in the United States he chooses. However, he must provide Mother with travel itineraries, places of lodging and phone numbers where Senna can be reached.

6. SKYPE calls –

The Parenting Plan included Father placing SKYPE calls to Senna twice a week. This has been the subject of problems for Father.

Father was upset upon learning that Mother had video recorded a SKYPE session. She claimed she did so because she was upset with Father muttering vulgarities when Senna would only stay on screen momentarily. From Father's perspective, not only has Mother failed to take positive steps to return Senna to the computer screen, but actually abetted him from participating in SKYPE calls by luring him away with other highly valued toys and activities.

Father indeed was frustrated when he could not get Senna's attention on the recorded SKYPE call, but based on this limited data reviewed, the Case Manager could not determine if this has been a repetitive problem. However, Father was noted to utter a few critical and somewhat vulgar statements that were picked up on the recording.

The Case Manager asked parents how long they thought a child Senna's age (3) could maintain attention and interest on a call, even one which included video. Their views differed significantly. Whereas Mother thought that a few minutes only would be reasonable, Father believed that a call could be maintained for up to 25 minutes, which he indicated he has done in the past provided that Senna was in a room with similar toys or books that Father had by which to engage his son.

Expecting a child Senna's age to maintain interest in a call for as long as Father deemed was reasonable seemed beyond the capabilities of most three year olds.

Mother asked the Parenting Coordinator if she could recommend or send to Father books and toys similar to what Senna uses in her home as a way to facilitate their SKYPE calls. This plan, if Mother follows through, would be potentially beneficial. Father would certainly have the option of using these materials or not. Yet, given the level of conflict

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noted between parents, the Case Manager is concerned that Mother's proposed actions could be interpreted by Father as an attempt to tell him what he must do on these SKYPE calls. As an alternative, Mother could list on OFW specific books and toys that Senna uses in her home for Father's consideration.

Mother offered to purchase a software program through OFW that records all SKYPE calls at her expense of \$14.95 per month. She indicated that this would be a way to independently demonstrate to Father she is attempting to assist, not hinder, these calls with Senna.

7. Exchange of health care information –

Mother acknowledged having been tardy in posting health care information concerning Senna on OFW. Father has now established direct contact with Senna's pediatrician and can receive health care records and information upon request. However, Mother must be more prompt about posting the results of health care visits on OFW.

8. Completion of parenting classes and involvement in counseling –

Pursuant to the Parenting Plan, the court ordered both parents to complete a Love & Logic parenting program and be involved in personal counseling.

Neither parent has completed a parenting class program. Only Father has been involved in counseling. Father did provide the Case Manager with a release to speak with his therapist, if so requested.

Mother claimed she had been unable to find a Love & Logic parenting program until recently. The one she did locate is offered in Mesa, which could be a one-hour drive from Mother's residence. Mother was unsure if she would have transportation to get to this program and whether she could afford its cost.

Mother claimed she did not have the funds to obtain private counseling. She said she had applied to the State of Arizona for subsidized counseling. Mother said she has been accepted into a program and was scheduled for an intake meeting at Jewish Family and Children's Services for counseling.

9. Toilet Training Progress –

Senna is in the process of toilet training. Mother claims he has almost achieved bladder and bowel control in her house. However, Father, claimed that during his January 2013 visit, Senna had not shown any progress with toilet training. Father doubted Mother's statements, although it had been two months since he had last seen Senna.

The Case Manager provided parents with tips on how to help Senna achieve toileting control when in Father's care. Father acted as if the Case Manager was patronizing him,

but was advised that the hints being offered in no way was a reflection on his ability to parent, but just a way to help him with Senna.

**RECOMMENDATIONS:**

The Case Manager requests that the court adopt and approve the following recommendations:

1. If any of the supervisors referenced in paragraph 2 in the Discussion Section are unavailable, parents may use any other person listed on the Supervised Visitation Directory (Arizona) or the Maricopa County Family Court Roster. However, it shall remain the visiting parent's responsibility to select the exchange supervisor and communicate this via e-mail to the Case Manager and post it on the OFW account.
2. Father shall have one monthly visit up to five consecutive nights. This shall replace the prior monthly parenting time on the 1<sup>st</sup>, 3<sup>rd</sup>, and 5<sup>th</sup> weekend of each month. This change shall begin May 1, 2013 although parents retain the option, if they can agree, of implementing this change in April 2013.
3. Father's extended monthly visits may be up to a maximum of five overnights, if his schedule permits. However, in making this change, Father has agreed to exercise parenting time once a month. He shall not attach his extended monthly parenting time onto other portions of the current parenting plan, e.g., holidays or a summer vacation, which would extend his parenting time beyond 7 days. Expanded parenting time shall continue being implemented as outlined in the current Parenting Plan.
4. Father shall provide Mother with a minimum of 21 days advance notice of his intent to exercise parenting time in Phoenix. This notice shall be submitted to the Case Manager and posted on OFW.
5. Father may exercise his summer vacation with Senna anywhere in the United States. However, he shall provide Mother with a travel itinerary, places of lodging and phone numbers where Senna can be reached. A summer vacation week shall not be added onto other parenting time to extend a visit beyond seven days.
6. Mother shall list on OFW books and toys that Senna regularly uses in her house that Father could purchase, if he chooses, to facilitate his SKYPE calls with Senna. Mother shall redirect Senna to the video screen during his SKYPE calls with Father when necessary. Mother shall have the option of purchasing a video recording program through OFW to document her actions with Senna to keep him engaged with Father on those calls. However, this remains her option and is not considered mandatory.
7. Mother shall post on OFW the results of all health care consultations and office visits regarding Senna within 24 hours of the visit. She is to notify the Case Manager of this posting by e-mail.

MARCH 25 2013

8. Mother shall sign a release form for the Case Manager to verify that she is attending counseling. If travel and cost for Mother to attend the Love & Logic program in Mesa is prohibitive, the Case Manager recommends that Mother contact the Parenting Skills program for a parent education class that focused on preschool age children of divorce. In addition, it is also recommended that Mother attend the high conflict parenting class offered through the Maricopa County Family Court Services. These are moderate cost programs.

9. Father is advised to purchase various aids that are marketed to help boys with toilet training and be open to implement strategies similar to those Mother has been employing in her home to help Senna gain bladder and bowel control.

**PARENTS SHALL NOT DEVIATE FROM THE TERMS OF THEIR PARENTING PLAN BEFORE REACHING AGREEMENT OR BY THE COURT ADOPTING CASE MANAGER RECOMMENDATIONS AS AN INTERIM ORDER.**

Joel B. Glassman, Ph.D.  
Case Manager (Parenting Coordinator)  
JBG/jlg  
date dictated: 03/22/13

cc: John W. Kydd, Esq. (via e-mail)  
Christine Peddle Cornish, pro se (via e-mail)  
Shaun S. Duncan (via e-mail)

**COURT ACTION:**

The court (1)\_\_\_\_\_ adopts; (2)\_\_\_\_\_ does not adopt; or (3)\_\_\_\_\_ modifies the recommendations of the March 25, 2013 Case Manager report as a temporary order, to become a final order if no objection is received within 10 days from the filing date of this order.

---

(Date)

---

(Judge)

## **Superior Court of Washington County of King**

In re the Parenting and Support of:

SENNA SAMUEL DUNCAN,  
Child,

2 - Name - Whistleblower Regarding He...

Petitioner  
and

CHRISTINE PEDDLE-CORNISH,

Respondent.

No. 11-3-03341-8 SEA

**Order Re: Case Manager's  
Report & Recommendations**

This Court has received from Case Manager Dr. Joel Glassman a written Report and Recommendations dated October 1, 2013. The specific recommendations made by Dr. Glassman all strike the Court as being sensible, practical, consistent with the Parenting Plan and should be agreeable to the parties. Any objections are overruled. Accordingly, pursuant to Section VII (C) of the Order Appointing Case Manager, the Court will hereby approve and adopt those recommendations.

**IT IS SO ORDERED.**

Dated: October 30, 2013



Judge William L. Downing

*Order Re: Case Manager's Report - 1*

Hon. William L. Downing  
King County Superior Court  
516 Third Ave., C-203  
Seattle, WA 98112

**Joel B. Glassman, Ph. D., P.C.  
7520 E. Second Street  
Suite 1  
Scottsdale, Arizona 85251**

**Phone: (480) 947-9591 Fax: (480) 481-0790**

**SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING**

**No. 11-3-03341-8 SEA**

**OCTOBER 1, 2013**

**THE HONORABLE WILLIAM L. DOWNING**

**In re the Parenting and Support of:**

**SENNAS S. DUNCAN, Child.**

2 - Name - Whistleblower Regarding Hea...

**Petitioner,**

**and**

**CHRISTINE E. PEDDLE CORNISH,**

**Respondent.**

**CASE MANAGER REPORT**

The undersigned psychologist was appointed Case Manager by the Honorable William L. Downing, Superior Court of Washington, County of King on January 11, 2013, for a term of two (2) years subject to one (1) reappointment. The Washington State Court fashioned its appointment order in a manner similar to the one used by the Superior Court of Arizona, Maricopa County for a Parenting Coordinator.

**DECLARATION:**

The Case Manager (Parenting Coordinator) has completed the educational training requirements in the areas of child abuse and domestic violence as required by ARS 25-406C.

OCTOBER 1, 2013

**ISSUES:**

1. SKYPE phone access.
2. Upcoming visits.
3. Geographical restrictions on Father's visits.

**PROCEDURES:**

- Review of parents' e-mail communications.
- Joint conference call with parents – September 27, 2013.

**DISCUSSION:**

**1. SKYPE calls –**

Father complained about ongoing problems with video calls placed to his three year old son, Senna. Currently, SKYPE access is twice a week.

Mother complained about Father not following through with SKYPE calls and failure to visit with Senna. She claimed he had not seen Senna for months, the last time being a five day summer visit in early August 2013. Father acknowledged he has been unable to visit Senna more often because of financial issues.

Father proposed scheduling SKYPE calls four days a week at 9:00 AM on Monday, Wednesday, Friday and Sunday. Mother wanted to keep Father's SKYPE access limited to two days per week, but could not guarantee that 9:00 AM would be the best time to place these calls. She also did not think that increasing phone contact between Father and Senna was in the child's best interests. The Case Manager could not disagree more.

After continued discussion with the Case Manager, parents consented to these calls being placed at 7:45 PM, which is before Senna's usual 8:30 PM bedtime. Mother felt a 15 minute call was sufficient. While Father preferred it being longer, he consented to limit his calls to a maximum of 15 minutes.

**2. Upcoming visits –**

Father indicated he intends to visit from October 30 at 6:00 PM until November 4 at 8:00 AM.

Parents agreed that in odd numbered years, Father had the second portion of the Christmas holiday. Father indicated he would exercise holiday access from December 25 at 10:00 AM until December 31 at 6:00 PM.

The Visitation Exchange Supervisor shall remain Marilyn Mistral. Should she be unavailable, Father shall select another supervisor pursuant to recommendation #1 appearing in the Case Manager's March 25, 2013 report.

OCTOBER 1, 2013

3. Geographical restrictions on Father's visits -

Mother claimed she did not recall or did not understand that this issue had been previously addressed by the Case Manager. To reiterate, Father may exercise his visits with Senna anywhere in the United States.

**RECOMMENDATIONS:**

The Case Manager requests that the court adopt and approve the following recommendations:

1. SKYPE calls to Senna shall be placed at 7:45 PM Arizona time on Monday, Wednesday, Friday and Sunday. These calls shall be no longer than 15 minutes. Mother shall insure that Senna has as much privacy as possible during those calls. Mother shall assist Senna in using the computer, if needed, and to provide Father and Senna with an audible two minute prompting prior to the conclusion of each call.
2. Father shall provide Mother and the Case Manager with Senna's travel itineraries including flight schedules and places of lodging directly through e-mail (not only on OFW).
3. All visitation exchanges shall continue being supervised with transfers occurring at the Surprise Police Department.
4. Father may exercise visits either within or outside of Arizona.
5. Parents are reminded that the primary goal of the Case Manager is to facilitate the long distance relationship between Father and Senna. The many unsettled issues and unsupported claims they inject into discussions with the Case Manager only serve to divert attention away from this purpose. Parents are directed to present those matters directly to the court if they wish to further litigate them.



Joel B. Glassman, Ph.D.  
Parenting Coordinator  
JBG/jlg  
date dictated: 10/01/13

cc: [redacted] via e-mail)  
Christine Peddle, pro se (via e-mail)  
John Kydd, Esq. (via-email)

OCTOBER 1, 2013

COURT ACTION:

The court (1)  adopts; (2)  does not adopt; or (3)  modifies the recommendations of the October 1, 2013 Parenting Coordinator report as a temporary order, to become a final order if no objection is received within 10 days from the filing date of this order. *The court has considered the parenting  
objection filed on Oct. 22, 2013.* (WJ)

Oct 30, 2013  
(Date)

WJW  
(Judge)

**From:** Jennifer Keilin <jkeilin@comcast.net>

**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health C...

**Cc:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** Senna

**Date:** January 7, 2015 at 6:48:35 AM PST

Hi 2 - Nam...,

Christine contacted me about your request for visitation on 1/19-23. In order to facilitate this, please do the following:

1. Provide me with Senna's travel itinerary for these dates, including any flight information and places of lodging, no later than this Friday.
2. Schedule supervised exchanges, to occur at the Surprise Police Station. Provide me with the specifics – dates, times, name and contact information of supervisor, no later than this Friday.

Please confirm receipt of this email promptly, and provide the information as requested by Friday.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Wednesday, January 7, 2015 at 5:06 AM

**To:** Jennifer Keilin <jkeilin@comcast.net>, 2 - Name - Whistleblower Regarding Health Care ... **Angela Duncan** <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

**Subject:** Senna

Dear Jennifer,

I am writing in regards to our conversation yesterday.

My priority right now is to be able to see my son. I realize 21 days notice is referred to in the parenting plan. There is no reason I can think of to justify denying visit time for Senna. Missing out on an opportunity for a visit that is logically difficult to coordinate and thus infrequent is simply cruel and not necessary due to the parenting plan allowing for and encouraging flexibility.

It is a bizarre way to parent....ie rare contact with my son, stressful skype sessions. I literally have no time with Senna where I am not observed. I want, and Senna deserves, a more natural interaction with his father. Shame on Christine for frustrating that for Senna. And shame on her if she denies him that while I am here.

You said you want to move forward from this point. It is insulting to disregard the negative that have brought us to this point and discouraging since you were given a special responsibility to advocate for Senna over six months ago. But I want to move forward asap and get Senna safe. He is with a narcissistic woman not able to nurture him.

For your convience, I will forward declarations included in the packet I delivered to your office.

I am hopeful to Senna and want you to know my attempts to coordinate with Christine regarding me coming to Arizona were futile as she refuses to respond.

Sent from my iPhone

<mailto:<Message-Header-D7c153b350>> Message-ID: D53484C4-10B7-49E6-410B-9491e54f7d@comcast.net References: [69984f2\_799\_4673\_8389\_486c7f781455@pluto.usa.com] In-Reply-To: [69984f2\_799\_4673\_8389\_486c7f781455@pluto.usa.com] From: mailfrom-Address-De-Preciada@ednet2 2 - Name : W/lin||| To: mailfrom-Address-De-Preciada@ednet2Cc:7c12cb374b Jennifer Keelin <jkeelin@comcast.net> Subject: Re: Senna Minns version: 1.0 boundary: "7\_2003450119\_17441397" Return-Path: jkeelin@comcast.net User-Agent: Microsoft-KeeOutlook/14.4.7.141117 Thread-Topic: Senna X-Authority-Analysis: v=2.1 cv=VetAdm;c=1;s=1 t=0 z=xmsdLSW+VWPhmboWw==;i=117 z=xmsdLSW+Y7MhPmbioWw==;r=-17 a=d;\_JH=GAAAAA:8 z=ZGcah17r\_z\_pk=10 a=fmSPWbhy0sgA10 z=pQ8r8s533YvhvA:9 a=d;\_DRC:IAA:10 d=cRkrkRW1GA:10 z=jwvWhchX50A:10 a=qj6ayJ\_AAAA:8 z=zP5WkhX8we1f;v=rndA:9 a=wNUngTcEA:10 z=eLvnY4tAAA:10 a=fOKWuAf67AA:10 a=0:jchWnWoepRd2182c:A:9 a=MWkuuVQ27f1:f:21 z=\_W\_S\_7VecoDA:10 x:CAA:59RM: 00000 Received: from resmta-sh2-07.vps.comcast.net (LHO resmta-sh2-07.vps.comcast.net) [69.252.207.71] by resmail-ch2-324.vps.comcast.net with LMTP; Wed, 7 Jan 2015 14:48:40 +0000 (UTC) Content-type: multipart/alternative; boundary="8\_3577694300\_26221555" >

Email-Archiver-Version: 364.100

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health C...

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health C...

## **Subject:** Senna

Date: January 9, 2015 at 6:52:35 AM PST

Hello Jennifer,

I am writing regarding transfer of Senna for his visit.

In the spirit of moving forward I am requesting a neutral location outside of Surprise for the pick up of Senna. There is dramatic history associated with transfers in Surprise. It would be greatly appreciated if you would designate a location and identify a supervisor as you are an unbiased party.

Please consider at least a half way point for the transfer. I can offer a local resident as a person to designate to meet Senna. Karen Warren .....If Karen is not suitable please designate someone.

Also, please clarify what documents you are waiting for from christine and the time frame you will delay to accomadate Christine

Thank you

## *me - Whistleblo...*

Sent from Windows Mail

**From:** Jennifer Keilin <jkeilin@comcast.net>  
**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health C...  
**Cc:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Senna  
**Date:** January 9, 2015 at 7:14:32 AM PST

Hi 2 - Name ...

I'm sorry, there will be no accommodations. I expect this exchange to be "by the book." The exchange supervisor needs to be a pre-approved provider. Please provide me the requested information ASAP, as requested.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Friday, January 9, 2015 at 6:52 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Subject:** Senna

Hello Jennifer,  
I am writing regarding transfer of Senna for his visit.

In the spirit of moving forward I am requesting a neutral location outside of Surprise for the pick up of Senna. There is dramatic history associated with transfers in Surprise. It

would be greatly appreciated if you would designate a location and identify a supervisor as you are an unbiased party.

Please consider at least a half way point for the transfer. I can offer a local resident as a person to designate to meet Senna. Karen Warren .....If Karen is not suitable please designate someone.

Also, please clarify what documents you are waiting for from christine and the time frame you will delay to accomadate Christine

Thank you

2 - Name ...

Sent from Windows Mail

<mailto:>:MessageHeader:0x7f83fb931810 Message-ID: D53f4858-410B-F%jkeilin@comcast.net References: [BN3PR0701MB110798B8CC986C3891505028440@BN3PR0701MB1107.namprd07.prod.outlook.com] In-Reply-To: [BN3PR0701MB110798B8CC986C3891505028440@BN3PR0701MB1107.namprd07.prod.outlook.com] From: jkeilin@comcast.net To: [mailto:>:Address:0x7f83fb931d00 2 - Name - Whist...>Cc: [mailto:>:Address:0x7f83fb9325b0 Jennifer Keilin <jkeilin@comcast.net>] Subject: Re: Senna Mime-version: 1.0 boundary="0\_3503632485\_14514445" Return-Path: jkeilin@comcast.net User-Agent: Microsoft-SMIME/14.4.7.141117 Thread-Topic: Senna X-Authority-Analysis: vr:2.1 cv:1N3oQfm9 c:1 sm:1 trn:0 a:m:5idLSW+r7WPoPmBioWw=:117 a:m:5idLSW+r7WPoPmBioWw=:117 a:C\_IrInGWAAAAA:8 a:IGcpBh7I\_oA:10 a:FmSPWBByStgA:10 a:PFo9FbRh532YmtvKA:9 a:dc\_DRCyIA:10 a:CirkrLRW1GAA:10 a:yWnXNSB8A:10 a:glEwvLA4AAA:8 a:gJhVmpX-bwIBbdU:9 a:wPNVGeIeIA:10 a:etCvnI44AA:10 a:fR0WAu47AA:10 a:XX0XnbDPeobzguAVSA:9 a:OSe-03hwvmtOb:2:21 a:UICQ7I-154:10 a:\_W\_3\_7vec0QA:10 X-CAA-SHAM: 00000 Received: from resmta-po-06v.sys.comcast.net [LHL0 resmta-po-06v.sys.comcast.net] (64.114.154.198) by resmta-po-06v.sys.comcast.net with LMTP, Fri, 9 Jan 2015 15:14:48 +0000 (UTC) Content-type: multipart/alternative; boundary="0\_3577694296\_2d45057" >

**DEPARTMENT OF HEALTH  
HEALTH SYSTEMS QUALITY ASSURANCE**

**CONFIDENTIAL INVESTIGATION REPORT  
PREPARED FOR THE  
SECRETARY, DEPARTMENT OF HEALTH**

\*\*\*\*\*

**CASE: 2016-13188LW**

**RESPONDENT: Keilen, Jennifer Lee**

\*\*\*\*\*

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**APPENDIX F - ACTIVITY REPORT**

Scott Bramhall  
Health Care Investigator 3

Scott Bramhall

APPROVED BY

AJ

DATE 7/7/17

**APPENDIX A**

**RESPONDENT INFORMATION**

**NAME:** Keilen, Jennifer Lee

**BUSINESS ADDRESS:** 1715 114th Ave SE Ste 210  
Bellevue, WA 98004-6906

**BUSINESS TELEPHONE #:** (425) 526-6556

**RESIDENCE ADDRESS:** jkeilin@comcast.net

**RESIDENCE TELEPHONE #:**

**LICENSE NUMBER:** LW.60064966

**DATE ISSUED:** 01/04/2017

**EXPIRATION DATE:** 02/06/2018

**BIRTH DATE:** 02/06/1968

**PREVIOUS COMPLAINT HISTORY:** Yes

**ATTORNEY:** Not Provided

**ATTORNEY ADDRESS:**

**ATTORNEY TELEPHONE # :**

**APPENDIX B**

**COMPLAINANT INFORMATION**

**NAME:**

**BUSINESS ADDRESS:**

2 - Name - Whistleblower Regarding Health Care Provi...

**BUSINESS TELEPHONE #:**

**RESIDENCE ADDRESS:**

**RESIDENCE TELEPHONE #:**

**ATTORNEY:** Not Provided

**ATTORNEY ADDRESS:**

**ATTORNEY TELEPHONE #:**

## APPENDIX C

### GENERAL SUMMARY

#### Allegation

The Respondent allegedly failed to properly evaluate the complainant's case and has made recommendations to the court based on her prejudice and discomfort with him. The Respondent is accused of abusive use of conflict, lying in her reporting, not following the GAL guidelines as court ordered, working outside the parameters of her job, discrimination and disregard of the parenting plan she had a duty to follow.

#### Complaint Summary:

The [redacted] - Name - Whistleblower... hereinafter "Complainant" alleges the Jennifer Keilin hereinafter "Respondent" as Case Manager failed in her duties and filed a report which did not accurately reflect the facts. *Evidence Pages 1, 2-133*

The Complainant alleges that:

- The Respondent failed in her evaluation of his complaint about the mother Christine Peddle sexually inappropriate actions during Skype. Ms. Peddle was often scantily or provocatively dressed for Skype.
- The Complainant took pictures of Ms. Peddle of in see thru, skin tight lingerie sitting with her legs spread and the Complainant's son Senna literally between her legs with his feet against her crotch.
- The pictures were provided to the Respondent.
- Ms. Peddle used the camera to scan her body so the Complainant saw Ms. Peddle's breasts and crotch.
- The lingerie was sheer white see through material.
- The child is the Respondent's son and was four and a half years old in these pictures.
- The Complainant asked the Respondent to address Ms. Peddle's exposure as he only wanted to see his son and not Ms. Peddle.
- Ms. Peddle has alleged that Complainant harassed, stalked, beat and sexually abused her and was so fearful of the Complainant that she can't function at all yet she Skype'd almost nude.
- The Respondent allegedly told the Complainant that his son looked like a toddler.
- Ms. Peddle allegedly said she had to be in the picture to get the cooperation from their son to do the visit.
- The Complainant alleges that his son can Skype without his mother.
- The Complainant alleges that he asked Ms. Peddle to put some clothes on.
- The Complainant alleges that if he were to engage in the same conduct it would not go unaddressed or rationalized.
- The Respondent failed to follow the Parenting Plan of four (4) day a week court ordered Skype visit schedule with Senna.
- The Respondent ignored the Complainant's multiple requests to enforce the court ordered Skype visits.
- The Respondent made no attempt to enforce the court ordered Skype visits.

---

2016-13188LW / KEILIN, Jennifer Lee

- The Complainant provided screen shots and print outs of non-answered Skype's that the calls were ignored.
- The Respondent scheduled twice with the Complainant and the Respondent failed to show up both times without cancelling.
- The Respondent failed to reschedule as agreed.
- The Complainant wanted the Respondent as Case Manager to witness the horrible statements his son made repeatedly about the Complainant hurting his mother, being in jail, that the Complainant was not his father and how Ms. Peddle hates the Complainant's family.
- The Complainant alleges that these horrible comments always began with Senna stating: "Mommy said."
- The Complainant was denied hundreds of visits.
- The Complainant alleges that the Respondent's failure to address these issues left Senna with unaddressed emotional and mental abuse.
- The Complainant alleges that the Respondent's failure to address these issues harmed the Complainant relationship with his son.
- The Complainant claims he suffered distress and conflict which was not managed or addressed by the Respondent.
- The Respondent never observed Ms. Peddle and her son.
- The Respondent never observed the Complainant and his son.
- It was the Respondent's duties to observe the parents with their son.
- The Respondent failed to evaluate the case and investigate concerns.
- The Respondent produced a report to the court which reflects bias against the Complainant.
- The Respondent documents an example of her bias against the Complainant in her report when she refers to him as inflaming or exaggerating a concern where Senna had an injury reported to the Arizona Child Protective Services. The Respondent's report alleges that the Complainant made the report by proxy and that the Complainant continues to deny that he made the report. The Complainant alleges that he did not make this report.
- The Respondent failed to interview all parties regarding the complaint made to the Arizona CPS. The Respondent did not discuss the incident with the Complainant.
- The Complainant states his son had a black eye, the forth one he had observed.
- The Complainant states he has observed Ms. Peddle harm Senna since Senna was very little.
- Ms. Peddle severely physically abused her daughter and lost custody of her daughter in a Washington CPS case. The Respondent failed to mention this in her report.
- Ms. Peddle was found guilty of perjury.
- Ms. Peddle was found to have self-inflicted injuries in an attempt to have the Complainant convicted of DV. The court ruled the Complainant innocent.
- The Respondent failed to note this in her report.
- Senna has said to the Complainant: She (Ms. Peddle) didn't mean to daddy.

On May 8, 2017 the Complainant was interviewed by phone. The Complainant stated that Ms. Peddle was sanctioned by the court for perjury. The Respondent was bias against him in her

Case Manager report and failed to document Ms. Peddle's untrustworthy behavior. *Evidence Pages 136-137*

On May 10, 2017 the Complainant provided a copy of the court's finding Ms. Peddle blithely ignored her oath and given knowingly false testimony. She is ordered to pay the Complainant \$9,900.00. *Evidence Page 138-140*

On June 27, 2017 the Complainant sent an email in which he indicated he was seeking legal remedy for damages the Respondent's misconduct has caused him. *Evidence Page 141*

**Collateral Investigative Activity:**

The Respondent's Case Manager's report to the court was reviewed.

On March 30, 2017 the record of the court child custody case was reviewed at the courthouse. The dispute continues over five (5) years, there are over 500 entries. Certified copies of court records relevant to the Respondent were obtained from the Clerk of the Court. *Evidence Pages 142-211*

**Respondent Summary:**

On May 10, 2017 the Respondent was sent an LOC. *Evidence Pages 213-216*

On July 3, 2017 the response to the LOC was received. The Respondent denies the allegations. *Evidence Pages 217-228*

## APPENDIX D

### EVIDENCE/EXHIBITS

<u>Page #'s</u>	<u>Description</u>
1	<b>WAC/RCW Coversheet</b>
2-133	<b>Complaint</b>
134	<b>Complainant Notification Letter</b>
135	<b>Whistleblower</b>
136-137	<b>Memo to File Complainant Interview</b>
138-140	<b>Copy of Court Record Imposing Sanction for Misconduct</b>
141	<b>Email from Complainant to Investigator</b>
142-211	<b>Court Documents</b>
212	<b>Respondent Notification Letter</b>
213-216	<b>LOC</b>
217-228	<b>Response to the LOC</b>

**APPENDIX E**

**CONTACT LIST**

**Respondent**

**Complainant**

**Scott Bramhall  
Investigator  
20425 72nd Ave South, Suite 310  
Kent, WA 98032  
(253) 395-6716**

## APPENDIX F

### ACTIVITY REPORT

12/09/2016	Atkinson, Shaun T	Investigative - Initiate Investigation	Review file. Lengthy complaint.
12/12/2016	Atkinson, Shaun T	Investigative - Case Activity	Review file. Call from Complainant, will call back, not confident to speak with him yet while trying to understand the complaint. Email to Our Family Wizard.
			Call Complainant, long discussion on procedure and understand the crux of complaint. Request release of Family Wizard records.
			Internet searches.
01/06/2017	Atkinson, Shaun T	Investigative - Case Activity	VM from Complainant. CB, LVM
03/29/2017	Bramhall, Scott J	Investigative - Initiate Investigation	Formed an investigative plan
03/30/2017	Bramhall, Scott J	Investigative - Case Activity	Respondent is not Guardian ad Litem. Travel to RJC, review 500 court entries on record. Child custody dispute. Obtained Certified Court Records Several Case Managers, many allegations between parties. 5 year dispute.
04/26/2017	Bramhall, Scott J	Investigative - Case Activity	Preparation for Complainant interview Generating LOC
05/01/2017	Bramhall, Scott J	Investigative - Case Activity	Report writing
05/01/2017	Bramhall, Scott J	Investigative - Case Activity	Report writing.
05/08/2017	Bramhall, Scott J	Investigative Letter of Cooperation	Generated LOC Interviewed Complainant
05/09/2017	Bramhall, Scott J	Investigative Report	Report and LOC writing. Communication with Complainant.
05/10/2017	Bramhall, Scott J	Investigative Letter of Cooperation	Editing the plethora of allegations into an LOC. LOC sent US Postal and email.
05/10/2017	Bramhall,	Investigative Report	Report and Memo to File writing.

2016-13188LW / KEILIN, Jennifer Lee

Scott J

05/23/2017	Bramhall, Scott J	Investigative Correspondence - General	Respondent requested and was granted a 30 day extension for the LOC to July 2
06/29/2017	Bramhall, Scott J	Investigative - Case Activity	This case was 126 days old when assigned to this Investigator. Response to LOC received via email. Response to LOC indicates that referenced exhibits are being mailed in a thumb drive. The Respondent denies the allegations.
06/29/2017	Bramhall, Scott J	Investigative Correspondence - General	Correspondence from Complainant that Respondent was dishonest, biased, and lazy. The Complainant objects to having his son go missing for a year under her role. The Complainant asserts that he has suffered damage, has hired an attorney and he will not let this matter go.
07/05/2017	Bramhall, Scott J	Investigative - Case Activity	Travel to RJC for Court Records
07/05/2017	Bramhall, Scott J	Investigative Report	Report review, editing and writing
07/05/2017	Bramhall, Scott J	Investigative Forward for Closure of Investigation	

## RESPONDENT INFORMATION

Name & Address	JENNIFER LEE KEILIN 1715 114TH AVE SE STE 210 BELLEVUE, WA 98004-6906					Case #	2016-13188LW	
						Allegation	• Pending	
						License #	SWI.LW.60064966	
						Issued	01/28/2010	
						Expires	02/06/2017	
Phone #						Status	Active in Renewal	
Legal Action	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Compliance	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Cases	Open: 1	Closed: 3

## COMPLAINANT INFORMATION

Name & Address	2 - Name - Whistleblower Regarding Health Care Provider or Healt...	
Phone #	2 - Name - Whistleblower Reg...	E-Mail

## SUMMARY OF COMPLAINT

The respondent allegedly failed to properly evaluate the complainant's case and has made recommendations to the court based on her prejudice and discomfort with him. The respondent is accused of abusive use of conflict, lying in her reporting, not following the GAL guidelines as court ordered, working outside the parameters of her job, discrimination and disregard of the parenting plan she had a duty to follow.

Investigator:

AtkinsonPriority: A B C D E Date: 12/01/16

Respondent Notification Letter  
 Complainant Notification Letter  
 Whistleblower

Assessment Worksheet

*Jennifer Keilek*  
**Respondent:** \_\_\_\_\_  
**Date:** 12/1/2016

**Case Number:** 2016-13188  
**Board/Commission/Profession:** CN **Facility Type:** \_\_\_\_\_

**Presented by:** TLK

**Staff/Panel present:**

<input checked="" type="checkbox"/> Tammy Kelley	<input checked="" type="checkbox"/> Robert Brown
<input checked="" type="checkbox"/> Lisa Hodgson	<input type="checkbox"/> Kim-Boi Shadduck
<input checked="" type="checkbox"/> Bill Kellington	<input type="checkbox"/> Debra Mendoza

**Staff present:** \_\_\_\_\_

<input checked="" type="checkbox"/> Board/Commission/CMT meeting
<input type="checkbox"/> Brad Burnham
<input type="checkbox"/> Patrick Hager
<input type="checkbox"/> Ted Dale

**A. FILE CLOSED:**

<input type="checkbox"/> BT- No Jurisdiction	<input type="checkbox"/> BT- No violation at the time the event occurred	<input type="checkbox"/> BT- Communication and personality issues	<input type="checkbox"/> BT- Risk minimal, not likely to reoccur
<input type="checkbox"/> BT- Billing and fee disputes except as designated by disciplining authority	<input type="checkbox"/> BT- Time practiced on expired credential accepted by disciplining authority	<input type="checkbox"/> BT- Incident reported by facility	<input type="checkbox"/> BT- If allegations are true, no violation of law occurred
<input type="checkbox"/> BT- Profession-specific threshold. Explain: _____  a) Violating confidentiality b) Inappropriate delegation c) Failure to supervise d) Isolated incidents e) Advertising that is a technical violation	<input type="checkbox"/> BT- Issues which have been otherwise resolved. Explain resolution: _____  (detail corrective action: practitioner is already revoked; ongoing monitoring, etc.)	<input type="checkbox"/> BT- Referral to another program or agency	<input type="checkbox"/> BT – Insufficient information

**B. A full investigation of the complaint is authorized.**

**Date investigation authorized:** \_\_\_\_\_

**Initiate investigation and obtain relevant records, including patient records.**

**Additional instructions to investigator (for example, details for a focused investigation):**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Recommended priority:**

- |                            | <u>Professions</u>         |
|----------------------------|----------------------------|
| <input type="checkbox"/> A | (risk of immediate danger) |
| <input type="checkbox"/> B | (serious risk)             |
| <input type="checkbox"/> C | (moderate risk)            |
| <input type="checkbox"/> D | (minor risk)               |
| <input type="checkbox"/> E | (technical violations)     |

- | <u>Facilities</u> |
|-------------------|
| (      # of days) |

**C. SEXUAL MISCONDUCT CASES**

**For Board and Commission cases, panel should refer sexual misconduct cases to the Secretary when the case does not involve clinical expertise or standard of care issues. (Note: any pre-investigation referral should still include a panel authorization for investigation.)**

- |                          |                                                      |
|--------------------------|------------------------------------------------------|
| <input type="checkbox"/> | Panel finds there are clinical issues, do not refer. |
| <input type="checkbox"/> | No clinical issues, refer case to Secretary          |

**COMPLAINT INTAKE  
SUMMARY WORKSHEET**

**RESPONDENT INFORMATION**

Name & Address	JENNIFER LEE KEILIN 1715 114TH AVE SE STE 210 BELLEVUE, WA 98004-6906					Case #	2016-13188LW	
						Allegation	• Pending	
						License #	SWI.LW.60064966	
						Issued	01/28/2010	
						Expires	02/06/2017	
Phone #						Status	Active in Renewal	
Legal Action	Yes	No	Compliance	Yes	No	Cases	Open:	Closed:
	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>		1	3

**COMPLAINANT INFORMATION**

Name & Address	2 - Name - Whistleblower Regarding Health Care Provider or Health C...	
Phone #	2 - Name - Whistleblower Regardin...	E-Mail

**SUMMARY OF COMPLAINT**

The respondent allegedly failed to properly evaluate the complainant's case and has made recommendations to the court based on her prejudice and discomfort with him. The respondent is accused of abusive use of conflict, lying in her reporting, not following the GAL guidelines as court ordered, working outside the parameters of her job, discrimination and disregard of the parenting plan she had a duty to follow.

**Case View Screen update**

**Case** 2016-13188  
**Status** OPENED  
**Respondent ID** 653258  
**Respondent** Jennifer Lee Keilin  
**Credential** SWI.LW.60064966  
**Address** Jennifer Lee Keilin  
 Public  Mail  

**Jennifer Lee Keilin**  
**1715 114th Ave SE Ste 210**  
**Bellevue, WA 98004-6906**

**Complainant ID** 1278582  
**Complainant** 2 - Name - Whistleblow...

**Date Created** 11/28/2016  
**Date Received** 11/22/2016  
**How Received** Mail  
**Receiving Board** SECRETARY  
**Receiving Profession** Social Worker Independent  
**Receiving Department** Clinical License  
**Received By** Case Intake  
**Alleged Issues** Kristi Cholski  
**Pending**  
**Case Nature** Pending

Audit  
 Entry Items  
 Documents  
 Notes  
 Master Cases  
 Participants  
[Add Master Case](#)  
[Timeline History](#)

**Comments:**

- Action Items
- Resolution
- Participants
- Priority History
- HIPDB Reports

**Action Items add add group**

Type	Assigned To	Activity	Track Time	Due	Effective	Completed	Order Signed	Created ▼
No action items found								

## Credential View Screen update entity tree

**Jennifer Lee Keilin**

Address:

 Public  Mail

change mail address  
 Jennifer Lee Keilin  
 1715 114th Ave SE Ste 210  
 Bellevue, WA 98004-6906

ID	653258
Warnings	CASE PENDING
SSN/FEIN	1 - DOH Licensee...
Contact Standing	Living
Contact Type	INDIVIDUAL
Birth Date	02/06/1968
Public File	YES
Mailing List	
US Citizen	
E-mail	jkeilin@comcast.net

Comments:

[Contact](#)  
[Audit](#)  
[Enforcement](#)  
[Cont. Edu](#)  
[Documents](#)  
[Owned By/](#)  
[Exams](#)  
[Experience](#)  
[Notes](#)  
[Schools](#)  
[Librarian](#)  
[Application](#)  
[Other State](#)  
[Online Inf](#)  
[Reports](#)
**Social Worker Independent Clinical License** update form letter

Credential #	SWI.LW.60064966
Application Date	11/17/2008
Effective Date	02/02/2016
Expiration Date	02/06/2017
First Issuance Date	01/28/2010
Last Date Of Contact	01/25/2010
CE Due Date	02/06/2017

Credential Status	ACTIVE IN
Status Reason	RENEWAL (11/02/2016)
Amount Due	\$0.00
Date Last Activity	11/2/2016 12:55:21 PM
Last Updated by	Stewart, Kevin
Certificate Sent Date	02/03/2016

Comments:

Background Check Processed

[Audit](#)  
[Documents](#)  
[Verification](#)  
[Workflow](#)  
[Key Mgmt](#)  
[Fees](#)  
[Notes](#)  
[Print Docs](#)  
[Comp. Aud](#)  
[Renewal](#)  
[License St](#)  
[Online Inf](#)

- Supervises
- User Defined License Data
- Workflow

DEC 02 2016

NPDB/HIPDB

Department of Health

Office of Investigation and Inspection

**Supervises** update Show All

No active Supervises Data.

**User Definable License Data**

Field	Value	update	Field	Value
			Method of Licensure	EXAMINATION
			HEAL WA Fee Not Included	No
			Cash Receipt Sequence Number	02012
			Cash Receipt Date	20091116
			Cash Receipt Batch Number	0602



## Contact View Screen update entity tree

**Jennifer Lee Keilin**Address:  Public  Mail

Jennifer Lee Keilin  
1715 114th Ave SE Ste 210  
Bellevue, WA 98004-6906

Preferred Communication Method:

ID 653258  
 Warnings CASE PENDING  
 SSN/FEIN 1 - DOH Licens...  
 Contact Standing Living  
 Contact Type INDIVIDUAL  
 Criminal History NO  
 Public File YES  
 Mailing List  
 US Citizen  
 Email: jkeilin@comcast.net

Comments:

Audit  
 Enforcement  
 Cont. Edu  
 Documents  
 Owned By/  
 Exams  
 Experience  
 Notes  
 Schools  
 Librarian  
 Application  
 Other State  
 Online Info  
 Reports

- Addresses
- Individual Information
- Credential List
- Legacy

## Contact Addresses add

## Address Information

Jennifer Lee Keilin  
1715 114th Ave SE Ste 210  
Bellevue, WA 98004-6906  
County: King  
Country: United States  
Joined on: 03/21/2014

## Contact Information

Phone (425) 526-6556  
 Fax (425) 270-1436  
 Cell  
 Email jkeilin@comcast.net

## Update Addresses

update  
 MAIN ADDRESS  
 Contact Public Address  
 Contact Mail Address  
 Form Letter  
 Public Address for:  
 - RC.RC.00021187  
 - SWI.LW.60064966  
 Mail Address for:  
 - RC.RC.00021187  
 - SWI.LW.60064966

Last updated by Marna A Keller (DOH)

## Individual Information update

Field	Value	Field	Value
Birth Place	Santa Clara CA	Gender	F
Birth Date	02/06/1968	Online User ID	KEIL653258
Drivers License State	WA		

## Credentials add

Credential	License Type	Effective Date	Expiration Date	Status	Reason
SWI.LW.60064966 Jennifer Lee Keilin 1715 114th Ave SE Ste 210 Bellevue, WA 98004-6906	Social Worker Independent Clinical License	02/02/2016	02/06/2017	ACTIVE IN RENEWAL	RENEWAL NOTICE
RC.RC.00021187 Jennifer Lee Keilin 1715 114th Ave SE Ste 210 Bellevue, WA 98004-6906	Counselor Registration	02/10/2009	02/06/2010	EXPIRED	PROFESSIONAL DISCONTINUATION

## Legacy Contact Information

## Legacy Credential History

# CASE HISTORY

**Enforcement View for Keilin, Jennifer Lee****Public Case(s)**

Case	Case Status	Credential Number	Resolution	Date Created	Date Closed
2009-137218	CLOSED	RC.RC.00021187	- Evidence does not support a violation	06/23/2009	01/25/2010
2009-137219	CLOSED	SWI.LW.60064966	- Evidence does not support a violation	06/23/2009	01/25/2010
2015-2	CLOSED	SWI.LW.60064966	- Evidence does not support a violation	01/02/2015	07/23/2015
2016-4218	Investigation	SWI.LW.60064966		04/15/2016	

**Public Master Case(s)**

No Public master case(s) associated with this contact.

**Public Examinations(s)**

No Public examinations(s) associated with this contact.

[Close](#)

**COMPLAINT INTAKE  
SUMMARY WORKSHEET**

**RESPONDENT INFORMATION**

Name & Address	JENNIFER LEE KEILIN 1715 114TH AVE SE STE 210 BELLEVUE, WA 98004-6906					Case #	2016-4218 LW	
						Allegation	• Pending	
						License #	SWI.LW.60064966	
						Issued	1/28/10	
						Expires	2/6/17	
Phone #						Status	Active	
Legal Action	Yes	No	Compliance	Yes	No	Cases	Open: 0	Closed: 3
	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>			

**COMPLAINANT INFORMATION**

Name & Address	2 - Name - Whistleblower Regarding Health Care Provider ...	
Phone #	E-Mail	2 - Name - Whistleblower Regarding Health Care...

**SUMMARY OF COMPLAINT**

Respondent is alleged to have claimed in court that they were competent to read "chemical dependency evaluations" and changed her definitions of what CDP and CCDP are qualified to do. The respondent was unable to read a drug test that was provided to her. The respondent acknowledged that she lost hundreds of pages of documents which showed how the other party in the case went about hiding drug related issues from the parenting evaluator. The respondent has demanded money directly from clients and she claims attorneys are her clients and she solicits money directly from parents participating in the evaluation. The respondent is not consistent in her evaluation procedures.

**COMPLAINT INTAKE  
SUMMARY WORKSHEET**

**RESPONDENT INFORMATION**

Name & Address	JENNIFER LEE KEILIN 1715 114TH AVE SE STE 210 BELLEVUE, WA 98004-6906					Case #	2015-2LW	
						Allegation	<ul style="list-style-type: none"> <li>• Practicing Beyond the Scope of Practice</li> <li>• Substandard or Inadequate Skill Level</li> </ul>	
						License #	SWI.LW.60064966	
						Issued	1/28/10	
						Expires	2/6/15	
Phone #						Status	Active in Renewal	
Legal Action	Yes	No	Compliance	Yes	No	Cases	Open:	Closed:
	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>		0	2

**COMPLAINANT INFORMATION**

Name & Address	2 - Name - Whistleblower Regarding Health Care Provider or Health Care F...	
Phone #		E-Mail

**SUMMARY OF COMPLAINT**

Respondent is alleged to have practiced outside her scope of practice and was out of her skill level.

The complainant went to the respondent to conduct a parenting evaluation in April 2014. The process was not begun until June 2014 and produced the report in August 2014. The complainant's daughter has a rare genetic condition and is deaf and would need a sign language interpreter when interviewed by the respondent. The respondent stated that she had never worked with a deaf child before and didn't know how to find an interpreter. The respondent didn't mention the child's health concerns or that the interview was done without appropriate interpreting services. The respondent did not interview any of the child's health care providers, only a hospital social worker who had not met the child or the complainant. The respondent also told the complainant that she would be able to review the final report before it was submitted to the court. The report contained two options for parenting but no recommendations nor description of how she came to the conclusion.

The complainant is concerned that the report may have created a unreasonable risk and harm for the child.



## CUSTOMER SERVICE COMPLAINT INTAKE SUMMARY WORKSHEET

### RESPONDENT INFORMATION

<b>NAME &amp; ADDRESS</b>	JENNIFER LEE KEILIN 216 1ST AVE S STE 333 SEATTLE, WA 98104-2534					<b>CASE #</b>	2009-137219LW	
						<b>ALLEGATION</b>	UNPROFESSIONAL CONDUCT	
						<b>LICENSE #</b>	SWILW.60064966	
						<b>ISSUED</b>		
						<b>EXPIRES</b>		
<b>PHONE #</b>						<b>STATUS</b>	PENDING	
<b>Legal Action:</b>	<b>YES</b>	<b>NO</b>	<b>Compliance</b>	<b>YES</b>	<b>NO</b>	<b>Cases</b>	<b>Open:</b>	<b>Closed:</b>
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>		<b>0</b>	<b>0</b>

### COMPLAINANT INFORMATION

<b>NAME &amp; ADDRESS</b>	2 - Name - Whistleblower Regarding Health Care P...		
<b>PHONE #</b>	2 - Name - Whistleblower Regarding...	<b>E-Mail</b>	

### SUMMARY OF COMPLAINT

Respondent was retained to do a parenting evaluation as part of a legal proceeding. Respondent is alleged of lying to both clients and interviewees, misappropriation of client money, failure execute her job fully and professional misconduct.

#### COMPANION CASE:

KEILIN, JENNIFER L: 2009-137218RC



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

August 28, 2017

Jennifer Lee Keilin  
1715 114th Ave SE Ste 210  
Bellevue, WA 98004-6906

**Subject: Case No: 2016-13188 Social Worker Independent Clinical License**

Dear Jennifer Keilin:

The department has completed our investigation of this case. We closed this case without disciplinary action because the evidence does not support a violation.

We may reconsider this decision if we receive new information or identify a pattern of similar concerns.

We have notified the person who filed the complaint of this decision. Because of state law RCW 43.70.075, we may not be able to release information about the person who filed the complaint. We cannot release details of the report via telephone or email.

You have the right to request any publicly disclosable information contained in the file. To do so, submit a written request to the Department of Health, Public Disclosure and Records Center, P.O. Box 47865, Olympia, WA 98504-7865; fax 360-586-2171; email [pdrc@doh.wa.gov](mailto:pdrc@doh.wa.gov). Please include the case number listed above.

If you have questions, please contact Kitty Slater-Einert at (360) 236-4730 or email [Kitty.Slater@doh.wa.gov](mailto:Kitty.Slater@doh.wa.gov).

Sincerely,

Health Systems Quality Assurance  
Complaint Intake Unit



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

August 28, 2017

2 - Name - Whistleblower Regarding Health Care Provid...

**Subject: Report No: 2016-13188 Social Worker Independent Clinical License**

Dear 2 - Name - Whistleblo...:

The department carefully reviewed your report about Social Worker Independent Clinical, Jennifer Keilin, in accordance with the disciplinary process under Washington's Uniform Disciplinary Act (chapter 18.130 RCW). We closed this report without an investigation or disciplinary action because the evidence does not support a violation.

The law allows you one opportunity to ask that we reconsider our decision. To do so, you must provide new information about your original report within 30 days of receiving this letter. After 30 days, we will treat any new information as a new report. Please send any new information to the Department of Health, Office of Investigation and Inspection, Case Management, P.O. Box 47874, Olympia, WA 98504-7874.

You have the right to request any publicly disclosable information contained in the file. To do so, submit a written request to the Department of Health, Public Disclosure and Records Center, P.O. Box 47865, Olympia, WA 98504-7865; fax 360-586-2171; email [pdrc@doh.wa.gov](mailto:pdrc@doh.wa.gov).

If you have questions, please contact Kitty Slater-Einert at (360) 236-4730 or email [Kitty.Slater@doh.wa.gov](mailto:Kitty.Slater@doh.wa.gov).

Sincerely,

Health Systems Quality Assurance  
Complaint Intake Unit

Department of Health staff need to:

- Place this notice in the case file.
- Keep this notice in the case file when the case is closed.

## Notice

A whistleblower is "a consumer, employee, or health care professional who reports quality of care concerns to the department of health." WAC 246-15-010(9). An individual's identity as a complainant is kept confidential except for release "to appropriate department staff or disciplining authority members, in response to a court order, or if the complaint is not made in good faith." WAC 246-15-020 and 246-15-030. However, if a whistleblower plays some other role in the complaint---as a witness for example---his or her identity may be disclosed. A notice that the complaint was made by a whistleblower will be placed and remain in the department's complaint file.

RCW 43.701.075; WAC 246-15-010; WAC 246-15-020(2); and WAC 246-15-030.

**DO NOT REMOVE FROM FILE**

**000001**

DEPARTMENT OF HEALTH  
HEALTH SYSTEMS QUALITY ASSURANCE  
OFFICE OF INVESTIGATION AND INSPECTION

RECEIVED

MEMORANDUM TO FILE

AUG 22 2017

DEPARTMENT OF HEALTH  
Office of Investigation and Inspection

Date: August 17, 2017

Case: 2016-13188LW  
Keilin, Jennifer

Reference: Standards of Care

From: Scott Bramhall, Investigator JB

On July 7, 2017 the Complainant phoned and left a message:

- He had just uncovered documented proof that while Jennifer Keilin was case manager and his son was being hid from him, his son was in a hospital having surgery.
- We have documented proof through emails that Jennifer Keilin knew of the surgery.
- Jennifer Keilin never notified the Complainant of his son's surgery.
- One of the orders of the court include the Complainant is to be notified of his son's medical matters such as surgery.

On July 10, 2017 the Complainant phoned and left a message:

- I will scan and email you documents that came out in court; there are emails from Ms. Peddle about my son to Jennifer Keilin copies to her attorney.
- It's become very evident in court of Ms. Keilin bias behavior.
- Jennifer Keilin did absolutely nothing to follow up my multiple requests and my telling Jennifer Keilin I don't know where my son is.

On July 12, 2017 documents were received from the Complainant indicating his communicating to Jennifer Keilin that he has not seen his son, he does not know where his son is, and the Complainant is concerned for his son's welfare. *Evidence Pages 228-268*

On July 25, 2017 documents were received from the Complainant indicating emails discussing a surgery that Ms. Peddle indicates did occur on the Complainant's son. *Evidence Pages 269-273*

On July 28, 2017 the Complainant phoned and left a message:

- I observed a document in court from Ms. Peddle to her attorney about my son's surgery. We know now after the fact the operation did happen and there's proof Jennifer Keilin did know about it.

Reviewed by: Yong Chin, Investigations Supervisor

Date:

8/22/17

- Jennifer Keiling never notified me of the surgery.
  - My attorney and I are looking for the document. There are 10,000 exhibits we are looking through for it.
- 

## EVIDENCE/EXHIBITS

<u>Page #'s</u>	<u>Description</u>
-----------------	--------------------

229-273	Copies of Communications and Emails
---------	-------------------------------------

---

**Jennifer Keilin, MSW, LICSW**

1715 - 114<sup>th</sup> Avenue SE Suite #210 Bellevue, WA 98004  
P/425.526.6556 F/425.270.1436 jkeilin@comcast.net

5/20/15

TO: **Christine Peddle**

2 - Name - Whistleblo...

Re: 2 - Name - &Peddle Case No. 11-3-03341-8 SEA

Dear Ms. Peddle and Mr. 2 - Name -:

On 3/13/15, this writer requested payment of an additional retainer of \$2000 by 4/10/15. I indicated that, absent payment, my services would terminate on that date.

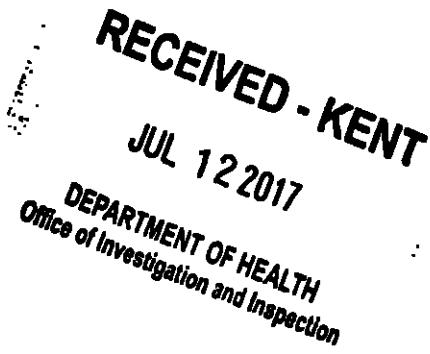
Ms. Peddle provided payment of \$460.00 as of 4/8/15. No payment was received from Mr. 2 - Name -. Consequently, this writer's services terminated on 4/10/15 due to lack of payment from Mr. 2 - Name -.

Best regards,

*Jenn + Keilin*

Jennifer Keilin, MSW, LICSW

Cc: Veronica Freitas



000229

2 - Name - Whistleblower Re...

**From:** 2 - Name - Whistleblower ...  
**Sent:** Wednesday, July 2, 2014 9:57 PM  
**To:** Jennifer Keilin  
**Subject:** Re: 2 - Na... follow up

**My check was sent last week??**

**Is this being postponed due to Peddie payment? I am confused as this had been set.**

**Thank you**

**Sent from my iPad**

**On Jul 2, 2014, at 9:34 PM, "Jennifer Keilin" <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:**

Hi 2 - Nam...

**I need to hold off on any more meetings until the retainer is paid.**

**I will touch base with Christine about this and keep you updated.**

**Best regards,**

**Jennifer Keilin, MSW, LICSW**

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436**

**Confidentiality notice: This communication and the information contained within, along with any items attached as an enclosure, may contain information that is privileged and confidential. If you are not one of the intended addressees or you believe you may have received this communication in error, please reply to the sender indicating that fact and delete this message from your system immediately. In addition, you shall not print, copy, retransmit, disseminate, or otherwise use this information in any form without first receiving specific written permission from the author of this communication.**

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RC...

**Date: Tuesday, July 1, 2014 at 8:49 AM**

**To: Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>**

**Cc: 2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RC...**

**Subject: RE 2 - Na... follow up**

**Good morning Jennifer,**

I have to say my first initially meeting with you was very uplifting as I feel I was finally able to tell the entire truth about this plight of our lives.

I wanted to just follow up on a couple details before this weekend as I have a major move in my company. I will continue to always tell the truth and forge ahead as I promised. As you know you read that Ms. Peddle owes me a large sum from the perjury and the lap top theft. Ms. Peddle is owed nothing from me and if she is indicating child support this would be our first start to the victim role and lies she will start with you. Child support is to be for Senna and the way he is dressed and delivered to me it is clearly not spent on him.

This pattern has been with every case manager, professional and now no pay to the transporters. Previous case manager Joel Glassman was left with final invoices owed. Ms. Peddle has been able to hire Veronica Freitas and file more motions filled with lies and cruelty, the retainer was over \$15k, as you know this is the attorney in the Sky Mettawalla case. Ms. Peddle has attorneys filing frivolous lawsuits all over this state, Ms. Peddle is all over social media with new clothes, eye lashes, hair extensions and most recently travel to Tulsa Oklahoma to illegally meet with a college professor begging for a letter of reference for a job in a family law firm, this has never happened and the professor documented the class as incomplete. Ms. Peddle was in Seattle for a week just last week to illegally see her daughter graduate while leaving Senna behind.. I apologize if this appears harsh or strong in any way, I promised myself to stand strong and always for the safety and wellbeing of Senna as a very concerned father.

In closing much testimony for taking Senna out of the state was employment, school and family, none have been accomplished. We were not able to document employment for 20 years. Ms. Peddles ongoing victim role and finances have nothing to do with you, me or this new direction working with you.

Yes it is over complicated. I hope we can keep our meeting.

Regards,

2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - ...

---

**From:** Jennifer Keillin [mailto:[jkeillin@comcast.net](mailto:jkeillin@comcast.net)]

**Sent:** Monday, June 30, 2014 8:59 PM

**To:** 2 - Name - Whistlebl...

**Cc:** Jennifer Keillin

**Subject: Re:** 2 - Na... follow up

Hi 2 - Nam...

I'm hesitant to proceed with another meeting right now, as Christine indicated she cannot pay her retainer until after 7/6 (related to a payment she expects from you, she said). Anyway, it's important to keep my initial contacts balanced.

Can you let me know if she is expecting a payment from you, or if that is more complicated than she indicated?

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RC...

**Date:** Monday, June 30, 2014 at 11:43 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

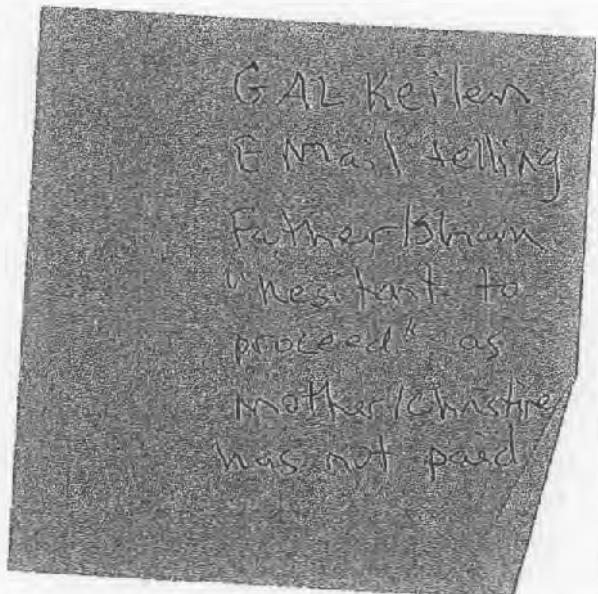
**Subject: RE:** 2 - Nam... follow up

Jennifer,

Yes 11:30 will work this Thursday.

Thank you

2 - Name - Whistleblower Regarding Health Care Provider or Health ...



**From:** Jennifer Keilin [<mailto:jkeilin@comcast.net>]

**Sent:** Friday, June 27, 2014 3:04 PM

**To:** 2 - Name - Whistlebl...

**Cc:** Jennifer Keilin

**Subject: Re:** 2 - Na... follow up

Hi 2 - Nam...

**The best I have right now is Thursday, at 11:30.**

**Will that work?**

**Best regards,**

*Jennifer Keilin, MSW, LCSW*

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004**

**P        425-526-6556  
F        425-270-1436**

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RC...

**Date:** Friday, June 27, 2014 at 7:30 AM

**To:** Jennifer Keilin <[kellin@comcast.net](mailto:kellin@comcast.net)>

**Subject:** 2 - Na... follow up

**Good morning Jennifer,**

**After thinking long about our meeting, I would like to request just a 1 hour follow up if I may. Let me know if today works or possibly Monday.**

**I sent you more information this morning, please let me know if there is anything else you would require.**

**Regards,**

2 - Name - Whistleblower Regarding Health Care Provider or Health Care Faci...

**000233**

**From:** 2 - Name - Whistleblowe...  
**Sent:** Thursday, July 3, 2014 10:16 AM  
**To:** 'Jennifer Keilin'  
**Subject:** Emailing: jennifer OFW  
**Attachments:** jennifer OFW.pdf

Jennifer,

Please see what I found online to be filled out and sent in.

Regards

2 - Name - ...

Your message is ready to be sent with the following file or link attachments:

jennifer OFW

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

000234

**From:** 2 - Name - Whistleblower ...  
**Sent:** Thursday, July 3, 2014 10:16 AM  
**To:** 'Jennifer Keilin'  
**Subject:** Emailing:jennifer OFW  
**Attachments:** jennifer OFW.pdf

Jennifer,

Please see what I found online to be filled out and sent in.

Regards

2 - Name - W...

Your message is ready to be sent with the following file or link attachments:

jennifer OFW

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

**From:** 2 - Name - Whistleblo...  
**Sent:** Thursday, July 3, 2014 10:22 AM  
**To:** 'Jennifer Keilin'  
**Subject:** Emailing: jennifer OFW July 2014  
**Attachments:** jennifer OFW July 2014.pdf

Your message is ready to be sent with the following file or link attachments:

jennifer OFW July 2014

**Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.**

000236

**From:** 2 - Name - Whistleblower Regarding Health Car...  
**Subject:** 2 - Na... email  
**Date:** September 8, 2014 at 3:04 PM  
**To:** Jennifer Keilin jkeilin@comcast.net



Jennifer,

You should have a check at your office from Angela Duncan, my step mother, we have had an issue with the Speedware email.

Please see email from one of our divisions..

2 - Name - Whistleblower Regarding Health Care Provider or H...

000237

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - N... and senna follow up  
**Date:** September 10, 2014 at 3:09 PM  
**To:** 2 - Name - Whistleblower Regarding Health Ca...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name...

Sorry, I'm slow. I did receive – thank you very much.

I received payment and am currently scheduling a meeting with Christine. She and I have not had any contact yet, like the meeting you and I had.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health...  
**Date:** Wednesday, September 10, 2014 at 2:40 PM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** 2 - Name... and senna follow up

Jennifer,

I replied to you on Monday from your voice mail. Have you received the check?

2 - Name - Whistleblower Regarding Health Care Provider or ...

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** RE: Professional/Third Party Access To OFW  
**Date:** September 16, 2014 at 6:25 AM  
**To:** Jennifer Keilin jkeilin@comcast.net



Jennifer I fill out all the documentation and it was emailed to you, you were to have signed and finished it then forward to the members of OFW..

2 - Name - Whistleblower Regarding Health Care Provider or ...

**From:** Jennifer Keilin [mailto:[jkeilin@comcast.net](mailto:jkeilin@comcast.net)]  
**Sent:** Tuesday, September 16, 2014 5:34 AM  
**To:** 2 - Name - Whistleblo...  
**Cc:** Jennifer Keilin  
**Subject:** Re: Professional/Third Party Access To OFW

Hi 2 - Nam.,

Does that mean you submitted it to OFW already?

Best regards,

*Jennifer Keilin, MSW, LICSW*

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Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Date:** Monday, September 15, 2014 at 10:25 PM  
**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

000239

**Subject: Re: Professional/Third Party Access To OFW**

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Name - Whistl...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <[jkellin@comcast.net](mailto:jkellin@comcast.net)> wrote:

Hi 2 - Nam...

Will you complete the referenced form and submit to OFW?

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>

**Date:** Sunday, September 14, 2014 at 1:58 PM

**To:** Jennifer Keilin <[jkellin@comcast.net](mailto:jkellin@comcast.net)>

**Subject:** Professional/Third Party Access To OFW

Hi Jennifer,

I emailed the completed access form to 2 - Name - ... on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

000240

Thank you,

Christine

<09.07.14 OFW Msg To 2 - Name - ... Sign Release Add Keilin Form Print+Messages.pdf>

000241

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Care  
**Subject:** RE: Professional/Third Party Access To OFW  
**Date:** September 18, 2014 at 8:25 AM  
**To:** Jennifer Keillin jkeillin@comcast.net



Jennifer I fill out all the documentation and it was emailed to you, you were to have signed and finished it then forward to the members of OFW..

2 - Name - Whistleblower Regarding Health Care Provider or Health ...

**From:** Jennifer Keillin [mailto:[jkeillin@comcast.net](mailto:jkeillin@comcast.net)]  
**Sent:** Tuesday, September 16, 2014 5:34 AM  
**To:** 2 - Name - Whistleblowe...  
**Cc:** Jennifer Kellin  
**Subject:** Re: Professional/Third Party Access To OFW

Hi 2 - Name...

Does that mean you submitted it to OFW already?

Best regards,

*Jennifer Keillin, MSW, LICSW*

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Date:** Monday, September 15, 2014 at 10:25 PM  
**To:** Jennifer Keillin <[jkeillin@comcast.net](mailto:jkeillin@comcast.net)>, Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

000242

**Subject: Re: Professional/Third Party Access To OFW**

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Nam...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Nam...,

Will you complete the referenced form and submit to OFW?

Best regards,

*Jennifer Keilin, MSW, LICSW*

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Bellevue, WA 98004  
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---

**From:** Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>  
**Date:** Sunday, September 14, 2014 at 1:58 PM  
**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>  
**Subject:** Professional/Third Party Access To OFW

Hi Jennifer,

I emailed the completed access form to 2 - Name ... on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

**000243**

**Thank you,**

**Christine**

**<09.07.14 OFW Msg To [2 - Name ... Sign Release Add Keilin Form Print+Messages.pdf>**

**000244**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Emailing: jennifer OFW docs  
**Date:** September 18, 2014 at 4:00 PM  
**To:** 2 - Name - Whistleblower Regarding Health Ca...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

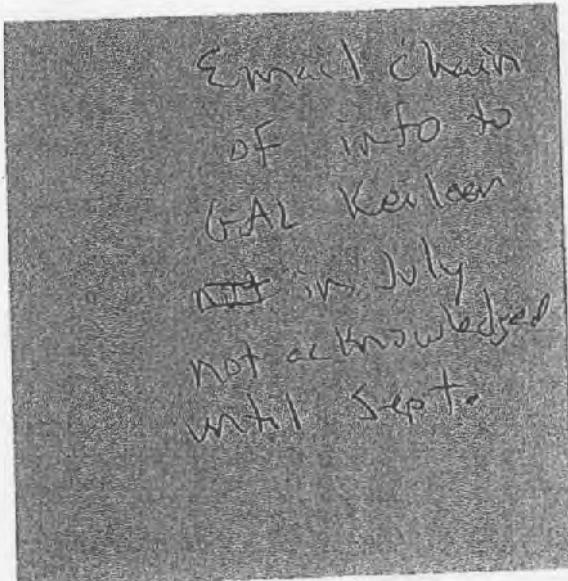
Hi 2 - Nam...

Great – thanks.

Best regards,

Jennifer Keilin, MSW, LICSW

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Bellevue, WA 98004  
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F 425-270-1436



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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health...  
**Date:** Wednesday, September 17, 2014 at 8:55 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Emailing: Jennifer OFW docs

Jennifer,

Please see emails and dates when I sent the OFW documents to you July 3 2014.

Thank you

2 - Name - Whistleblower Regarding He...

000245

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...

**Date:** Monday, December 1, 2014 at 1:33 PM

**To:** Jennifer Kellin <jkeilin@comcast.net>

**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health...>

**Subject:** Senna Duncan

Dear Jennifer,

I am writing to you about Senna Duncan regarding my intensifying concerns for his welfare. It's been my understanding throughout the court process that a GAL'S role is to look out for the kids and advise the court

with the understanding the recommendations to keep Senna safe and bonded with family. Senna's childhood is not being spent in the environment he is most likely to thrive in or even be safe in.

I am now writing you in desperation because Senna is having a home life that can only result in his being parentified , estranged from his grandparents and father, and develop a style of interacting in the world that is dysfunctional and opportunistic as that is what is role modeled in his Arizona home by his mother and grandparents.

I have learned what parentified means from trying to understand Senna's behavior during Skype, and to understand what happened to Senna's sister, Morgan. I see the fear in Senna's face during Skype sessions and visits with him. He is more concerened with his mothers emotional state than any element in his life. He is taking care of himself and his mother in an attempt to manage his environment. At the age of 5 he already doesn't rely on the adult taking care of him, his mother. I now know this is classic parentification common in dysfunctional and abusive homes. Worse, I also know the psychological and emotional suffering that creates this phenomena for a child. I can't bear to keep watching Senna in this miserable home life, please help Senna. His bond and sense of family with me and his grandparents gets weaker and weaker as time goes by. I am so fearful that he has no emotional anchor because no one is in a position to be this for him.

His mother does not give him the gifts we have sent or have him acknowledge sentiments forwarded to him so he will know he is cared for. His Skype sessions end abruptly at 7 pm. A timer sounds and the screen goes black. Last night was Senna's fifth birthday. For the second time in more months than I can count Senna was engaged in the session. He couldn't tell me if he had any presents from me or family (we all sent him birthday packages and it has been her routine to withhold or deny receipt) but I was able to tell him happy birthday, that he is a great boy and loved. He was playful and laughing when the timer sounded and there was blackness. Please imagine a door slamming shut separating you from a loved one without any regard to the emotions or content for that moment, not allowing a good bye and not knowing when you will see that person again. That is Senna's world and the cruel way he is forced to connect with his father. Christine has the power to make Senna's contact positive but she doesn't make choices that help Senna. Christine has done nothing to change or improve her parenting since she raised Morgan so its very likely she is parenting the same way abusive way with Senna. I know it speaks

000246

volumes as to her narcissism that she cannot be flexible with the Skype and help Senna have the most his family has to offer in his life. Senna will still say his mother hates Senna's grandparents and that he doesn't have a dad. Please think what this means for a young child. How will he thrive, how will he ever sort out that he is loved and does have a daddy and contrast that with the altered reality she creates, how will ever grapple with the fact that his sister was neglected, beaten and taken away by CPS but he was left to grow up with this same mother and no one helped him. The visit supervisor admitted to letting Senna go with his mother after she arrived to pick him up obviously intoxicated, more than an hour late, wearing only a bikini. This is Christine's normal way of operating, not isolated incidents in Senna's childhood.

I am pleading with you, Jennifer, to please help Senna. He is not in a good home and it doesn't need to be that way for him. He does have alternates that are kind and nurturing but he is being deprived of this by his mother. Don't let Senna's life be like this, please look at the history, the current failure of the parenting plan and please do not let Senna keep suffering in this controlling masquerade his mother perpetuates. I will always live with the guilt that I played a role creating this dysfunctional family that Senna has to navigate. All I can do for him now is be there always and help him cope with what this will mean for him at every pivotal moment of his life. Please tell me how to help him and I am begging you to help him too.

Christine is what I call amped up now as she knows I am advocating strongly for Senna and it's the holidays. This means an increased chaotic, confusing, and increasingly risky environment for Senna.

Sincerely,  
Urgently,  
Desperately,  
On behalf of Senna.

Sent from Windows Mail

000247

**From:** 2 - Name - Whistleblower Regarding Health Care...  
**Subject:** email In family wizard  
**Date:** December 25, 2014 at 3:28 PM  
**To:** Jennifer Keilin jkeilin@comcast.net

Jennifer,

Merry Xmas,

FYI I have not seen my son for weeks now, I looked to you for help as a court ordered support system for what is best for our son.

The abusive use of conflict and abuse to our son is at an all time high. You will see a new message in Family Wizard for you.

Please respond as I will no longer allow this to go on and let Senna live this tormented life.

I will await to hear from you.

Can you imagine another holiday alone and have no idea where my son is, 3 years in a row.

2 - Name - Whi...

Sent from Windows Mail

000248

**From:** 2 - Name - Whistleblower Regarding Health Care...  
**Subject: Re: Senna Duncan**  
**Date:** December 18, 2014 at 10:35 AM  
**To:** Jennifer Kellin jkeilin@comcast.net

Jennifer,

Thank you for taking time for Senna.

Regards,

2 - Name - Whistl...

Sent from Windows Mail

**From:** Jennifer Keilin  
**Sent:** Wednesday, December 17, 2014 10:14 AM  
**To:** 2 - Name - Whistleblower ...  
**Cc:** Jennifer Keilin

Great – I'll have 30 minutes available at that time.

Best regards,

*Jennifer Kellin, MSW, LICSW*

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Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Date:** Wednesday, December 17, 2014 at 9:26 AM  
**To:** Jennifer Kellin <jkeilin@comcast.net>  
**Subject:** Re: Senna Duncan

000249

Jennifer,

I will call you at 10 am on Thursday Morning.

Thank you

2 - Name ...

Sent from Windows Mail

**From:** Jennifer Keilin

**Sent:** Tuesday, December 16, 2014 7:02 PM

**To:** 2 - Name - Whistleblower ...

**Cc:** Jennifer Keilin

Hi 2 - Name - ...

I want to problem solve around this Skype issue.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...

**Date:** Tuesday, December 16, 2014 at 8:11 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

**Subject:** Re: Senna Duncan

000250

Good morning Jennifer,

Please fill me in on what you plan to discuss. I can be available Thursday but would prefer Wednesday.

Please confirm.

Regards,

2 - Name - Whistleblower Regarding Health Care...

Sent from Windows Mail

**From:** Jennifer Keilin

**Sent:** Tuesday, December 16, 2014 7:17 AM

**To:** 2 - Name - Whistleblower ...

**Cc:** Jennifer Keilin

Hi 2 - Name - ... I would like to schedule a call with you for Thursday morning, at 10. Please advise.

Best regards,

*Jennifer Keilin, MSW, LICSW*

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Bellevue, WA 98004  
P 425-526-6556  
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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health...

**Date:** Tuesday, December 2, 2014 at 10:26 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health ...

**Subject:** Re: Senna Duncan

000251

Hello Jennifer,

Just checking in. Skype for Senna was brief, about 3 minutes last night.

I am not sure how to include you as an observer. You asked if face time sounded crazy. I have not used it but people like it. I trust your professionalism to use any technology ethically. If there are any grey areas I want to act on the side of caution and not increase drama around Senna.

Trying to parent via Skype is impossible and having a bond with Senna via Skype very challenging.

Please let me know your thoughts moving forward.

2 - Name...

Sent from Windows Mail

**From:** Jennifer Keilin

**Sent:** Monday, December 1, 2014 2:43 PM

**To:**  2 - Name - Whistleblower ...

**Cc:** Jennifer Keilin

Hi  2 - Name ...,

I would like to find a way to observe the Skype sessions, and I'm not sure how to do that remotely. It might depend on sharing the same technology: If you have an iPhone or iPad, maybe I could contact you via FaceTime, and then observe you Skype with Senna. Does that sound crazy?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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000252

I called the school and introduced myself and was immediately told the school was aware of who I am and would not be interacting with me and that they had court docs prohibiting me from seeing Senna. The tone used to address me is of scorn and distrust. I am emotionally wore out from being treated like scum and reviled by those associated with Senna.

I provided documents for your review at your office. I have appreciated your reaching out to me and only have repetitive concerns to report. Sennas mother is consistent in her dysfunction and presentation as the victim while she victimizes her own son, just as she did to her daughter and the previous men in her life.

I will make every effort to see Senna while I am here. His nana and papa have not seen him but once in 2014, Senna will be subjected to the drama that goes along with all of our contact; police, dirty looks from those who believe her and Senna anxiously trying to appease her.

You have asked me what to do....Senna needs the parenting plan amended and to be placed with me. I deserve and he needs the peace I can provide for his childhood.

Regarding health insurance, I will never fail to provide for Senna, even if that is direct payment to providers. Neither will I continue to be the victim of non compliance with a court ordered parenting plan. I will follow the plan and dont want to be harrassed when I am in compliance.

I assume you saw my previous email. Please confirm this as I have not received acknowledgement of this communication.

Sent from my iPhone

On Jan 5, 2015, at 2:10 PM, Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Name...

Let's schedule a call. Are you available tomorrow afternoon, at 2 pm?

We will continue to discuss the Skype issues and Senna's health insurance coverage.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000253

**From:** Jennifer Keillin jkeillin@comcast.net  
**Subject:** Re: Senna  
**Date:** January 7, 2015 at 7:12 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care...  
**Cc:** Jennifer Keillin jkeillin@comcast.net

Yes, this email is in reply.

Best regards,

*Jennifer Keillin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Heal... >  
**Date:** Wednesday, January 7, 2015 at 6:50 AM  
**To:** Jennifer Keillin <jkeillin@comcast.net>  
**Subject:** Re: Senna

Did you receive my email this morning?

Sent from my iPhone

On Jan 7, 2015, at 7:48 AM, Jennifer Keillin <jkeillin@comcast.net> wrote:

Hi 2 - Nam...

Christine contacted me about your request for visitation on 1/19-13. In order to facilitate this, please do the following:

1. Provide me with Senna's travel itinerary for these dates, including any flight information and places of lodging, no later than this Friday.
2. Schedule supervised exchanges, to occur at the Surprise Police Station. Provide me with the specifics – dates, times, name and contact information of supervisor, no later than this Friday.

Please confirm receipt of this email promptly, and provide the information as requested by Friday.

Best regards,

000254

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...

**Date:** Wednesday, January 7, 2015 at 5:06 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health ... **Angela Duncan** <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

**Subject:** Senna

Dear Jennifer,

I am writing in regards to our conversation yesterday.

My priority right now is to be able to see my son. I realize 21 days notice is referred to in the parenting plan. There is no reason I can think of to justify denying visit time for Senna. Missing out on an opportunity for a visit that is logistically difficult to coordinate and thus infrequent is simply cruel and not necessary due to the parenting plan allowing for and encouraging flexibility.

It is a bizarre way to parent....ie rare contact with my son, stressful skype sessions. I literally have no time with Senna where I am not observed. I want, and Senna deserves, a more natural interaction with his father. Shame on Christine for frustrating that for Senna. And shame on her if she denies him that while I am here.

You said you want to move forward from this point. It is insulting to disregard the negative that have brought us to this point and discouraging since you were given a special responsibility to advocate for Senna over six months ago. But I want to move forward asap and get Senna safe. He is with a narcissistic woman not able to nurture him.

For your convenience, I will forward declarations included in the packet I delivered to your office.

I am hopeful to Senna and want you to know my attempts to coordinate with Christine regarding me coming to Arizona were futile as she refuses to respond.

Sent from my iPhone

**000255**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** 2 - Nam... Peddle - OFW communication  
**Date:** January 7, 2015 at 7:13 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care..., Christine Peddle sennaduncan79@hotmail.com  
**Cc:** Jennifer Keilin jkeilin@comcast.net



I sent this message to each of you via OFW, and am copying it here:

**Good morning,**  
As of 1/7/15, communication is to change.

**Please follow these rules in any communication with each other:**

1. Brief (two to five lines, ideally)
2. Informative/Factual (include only the relevant information)
3. Friendly (hello and goodbye, respectful)
4. Firm (If needed, to discontinue a failing topic)

**The following is to be excluded:**

1. Historical statements (in the past you...)
2. Blaming statements (you always, you never...)
3. Allegations

**Future emails need to read as cordial and solution oriented.**

**Failure to follow these guidelines will result in further limited communications.**

**Please confirm receipt of this message and understanding of these rules, within 48 hours.**

**Best regards,**

**Jennifer Keilin, MSW, LICSW**

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436**

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**000256**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna  
**Date:** January 7, 2015 at 7:12 AM  
**To:** 2 - Name - Whistleblower Regarding Health Car...  
**Cc:** Jennifer Keilin jkeilin@comcast.net



Yes, this email is in reply.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Date:** Wednesday, January 7, 2015 at 6:50 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Re: Senna

Did you receive my email this morning?

Sent from my iPhone

On Jan 7, 2015, at 7:48 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Nam...

Christine contacted me about your request for visitation on 1/19-23. In order to facilitate this, please do the following:

1. Provide me with Senna's travel itinerary for these dates, including any flight information and places of lodging, no later than this Friday. 1/19/15
2. Schedule supervised exchanges, to occur at the Surprise Police Station. Provide me with the specifics – dates, times, name and contact information of supervisor, no later than this Friday.

Please confirm receipt of this email promptly, and provide the information as requested by Friday.

Best regards,

000257

**Jennifer Kellin, MSW, LCSW**

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436**

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health...

**Date:** Wednesday, January 7, 2015 at 5:06 AM

**To:** Jennifer Kellin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health..., Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

**Subject:** Senna

Dear Jennifer,

I am writing in regards to our conversation yesterday.

My priority right now is to be able to see my son. I realize 21 days notice is referred to in the parenting plan. There is no reason I can think of to justify denying visit time for Senna. Missing out on an opportunity for a visit that is logically difficult to coordinate and thus infrequent is simply cruel and not necessary due to the parenting plan allowing for and encouraging flexibility.

It is a bizarre way to parent....ie rare contact with my son, stressful skype sessions. I literally have no time with Senna where I am not observed. I want, and Senna deserves, a more natural interaction with his father. Shame on Christine for frustrating that for Senna. And shame on her if she denies him that while I am here.

You said you want to move forward from this point. It is insulting to disregard the negative that have brought us to this point and discouraging since you were given a special responsibility to advocate for Senna over six months ago. But I want to move forward asap and get Senna safe. He is with a narcissistic woman not able to nurture him.

For your convience, I will forward declarations included in the packet I delivered to your office.

I am hopeful to Senna and want you to know my attempts to coordinate with Christine regarding me coming to Arizona were futile as she refuses to respond.

Sent from my iPhone

**000258**

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Subject:** Re: Senna  
**Date:** January 9, 2015 at 7:23 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>



Please call my cell phone 206-409-7400 I just left you a voicemail!

Sent from my iPhone

On Jan 9, 2015, at 8:14 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi Shaun,

I'm sorry, there will be no accommodations. I expect this exchange to be "by the book." The exchange supervisor needs to be a pre-approved provider. Please provide me the requested information ASAP, as requested.

Best regards,

Jennifer Keilin, MSW, LCSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Date:** Friday, January 9, 2015 at 6:52 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...  
**Subject:** Senna

Hello Jennifer,  
I am writing regarding transfer of Senna for his visit.

In the spirit of moving forward I am requesting a neutral location outside of Surprise for the pick up of Senna. There is dramatic history associated with transfers in Surprise. It would be greatly appreciated if you would designate a location and identify a supervisor as you are an unbiased party.

Please consider at least a half way point for the transfer. I can offer a local resident as a person to designate to meet Senna. Karen Warren .....If Karen is not suitable please designate someone.

Also, please clarify what documents you are waiting for from Christine and the time frame you will delay to accomodate Christine

Thank you

2 - Name...

000259

**From:** Liz Jeppesen [trent.jep@gmail.com](mailto:trent.jep@gmail.com)  
**Subject:** Fwd: 2 - Nam... Peddie - 2 - Na... requested visit 1/19-23  
**Date:** January 14, 2015 at 3:39 PM  
**To:** 2 - Name - Whistleblower Regarding Health Ca...



Hello Jennifer,  
I just received your email denying Senna a visit with his father.

I felt I did let you know my itinerary for time with Senna by leaving you voice mail and email stating the following.  
The plan was to have Senna stay with me in AZ at my family home as has been the routine when I have visitation in AZ.  
I gave the dates to you and put the dates on family wizard.  
There is no plan for my time with Senna other than that. No flights, excursions or trips...just family time. So no other info to provide to you.  
I asked for help or alternatives to doing a transport for the visit as NONE of the requests or contacts I made for a professional transporter responded. I have been told this is due to Christine's harassing type of complaints of everyone used in the past.

Possibly Christine would have better luck securing a transporter and of course I will cover the costs. I asked you to be open to an appropriate adult to transport given the difficulty hiring a professional.

I am devastated that an opportunity for Senna to be with his family is going to be missed over these communication gaps.

I am attaching the parenting plan currently in effect with the hope that this can be resolved and Senna sees his father and family. I have not seen where an itinerary was required for visitation. I did provide it to you as I said...the plan is simply to be together in AZ.

Please tell me how to resolve this. I am concerned that my expression of frustration regarding your services and the stress and compliances I meet to just try and see my son may have swayed you to not be flexible which only hurts Senna. Christine was allowed to leave WA State because she told the court she would be open and flexible with visitation. If this were true she would help, not hinder, visitation. Remember Senna is repeatedly asking me if and why I hurt his mother. He needs to see me and have his own frame of reference.

Please don't make Senna the loser here because his parents and the system are failing to do what's right.

----- Forwarded message -----

**From:** 2 - Name - Whistleblower Regarding Health Care P...  
**Date:** Jan 14, 2015 2:46 PM  
**Subject:** Fwd: 2 - Nam... Peddie - 2 - Nam... requested visit 1/19-23  
**To:** "Liz Jeppeson" <[trent.jep@gmail.com](mailto:trent.jep@gmail.com)>  
**Cc:**

Liz I did respond and I told her I was in Arizona not lying and I told her that I could not find a transport person and ask for help please advise me

Sent from my iPhone

Begin forwarded message:

**From:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>  
**Date:** January 14, 2015 at 3:40:55 PM MST  
**To:** 2 - Name - Whistleblower Regarding Health Care Provider or H... Peddie <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>  
**Cc:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>  
**Subject:** 2 - Nam... /Peddie - 2 - Nam... requested visit 1/19-23

Good afternoon,

2 - Na... requested a visit with Senna for the above dates. As per the parenting plan, I requested Shaun provide me with his itinerary, to include any flights for Senna and places of lodging during that period, by Friday, 1/9/14. I also requested Shaun schedule the supervised visitation exchange at the Surprise Police Station, and provide me the details (times, supervisor, and supervisor contact info) by Friday, 1/9/14.

2 - Na... has not provided any of the requested information as of today. Consequently, the visit will not occur.

Best regards,

Jennifer Keilin, MSW, LCSW

1715 114th Ave, SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

*info  
not as  
to itinerary*

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000260

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** Senna sz  
**Date:** January 14, 2015 at 4:44 PM  
**To:** Jennifer Kellin jkellin@comcast.net



Hello Jennifer,  
I just received your email denying Senna a visit with his father.

I felt I did let you know my itinerary for time with Senna by leaving you voice mail and email stating the following.  
The plan was to have Senna stay with me in AZ at my family home as has been the routine when I have visitation in AZ.  
I gave the dates to you and put the dates on family wizard.  
There is no plan for my time with Senna other than that. No flights, excursions or trips...just family time. So no other info to provide to you.  
I asked for help or alternatives to doing a transport for the visit as NONE of the requests or contacts I made for a professional transporter responded. I have been told this is due to Christine's harrassing type of complaints of everyone used in the past.

Possibly Christine would have better luck securing a transporter and of course I will cover the costs. I asked you to be open to an appropriate adult to transport given the difficulty hiring a professional.

I am devastated that an opportunity for Senna to be with his family is going to be missed over these communication gaps.

I am attaching the parenting plan currently in effect with the hope that this can be resolved and Senna sees his father and family. I have not seen where an itinerary was required for visitation. I did provide it to you as I said...the plan is simply to be together in AZ.

Please tell me how to resolve this. I am concerned that my expression of frustration regarding your services and the stress and compliances I meet to just try and see my son may have swayed you to not be flexible which only hurts Senna. Christine was allowed to leave WA State because she told the court she would be open and flexible with visitation. If this were true she would help, not hinder, visitation. Remember Senna is repeatedly asking me if and why I hurt his mother. He needs to see me and have his own frame of reference.

Please don't make Senna the loser here because his parents and the system are failing to do what's right.

----- Forwarded message -----

**From:** 2 - Name - Whistleblower Regarding Health Care P...  
**Date:** Jan 14, 2015 2:46 PM  
**Subject:** Fwd: 2 - Nam... Peddie - 2 - Na... requested Visit 1/19-23  
**To:** "Liz Jeppeson" <lrent.jep@gmail.com>  
**Cc:**

Liz I did respond and I told her I was in Arizona not flying and I told her that I could not find a transport person and ask for help please advise me

000261

*Show to Jennifer  
and to [redacted]  
T/Keilin 3/3/15*

From: Jennifer Keilin jkeilin@comcast.net  
Subject: 2 - Name...Peddle - OFW  
Date: February 12, 2015 at 10:19 AM  
To: 2 - Name - Whistleblower Regarding Health Care ...  
Cc: Jennifer Keilin jkeilin@comcast.net

Hi 2 - Nam...,

I hope you are well. I would like the opportunity to talk with you about the things that need to happen for an in-person visit with Senna. Let's schedule a call for 2/23, 1 pm?

Also, do you find that OFW is very helpful? I know Christine provides some relevant information, such as updates on Senna, bills, etc. She also sometimes writes things "for the record." It seems that you also use it primarily "for the record." Is that accurate or do you see it differently?

I am wondering if the benefits of OFW outweigh the negatives.

I would like to hear your thoughts.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210

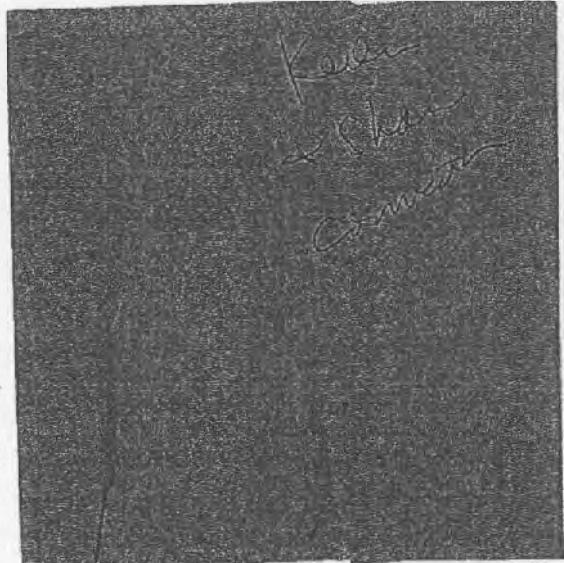
Bellevue, WA 98004

P 425-526-6556

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000262

KEILIN, JENNIFER 2016-13188LW PAGE 172

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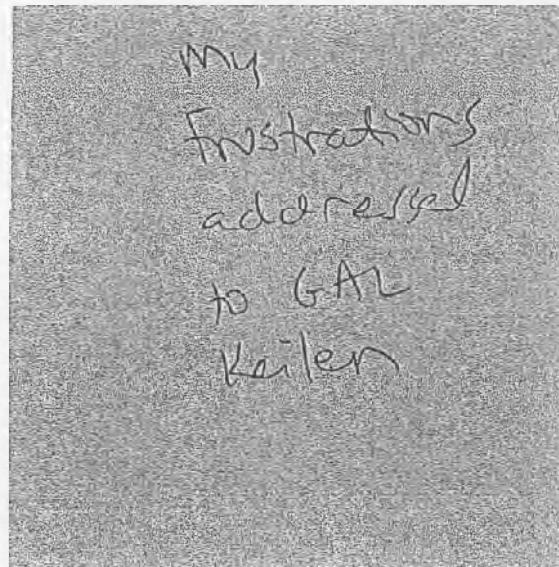
**000263**

have received this communication in error, please immediately notify me by reply email, delete the communication and destroy all copies.

---

**From:**  2 - Name - Whistleblower Regarding H...  
**To:** [amakirkland@hotmail.com](mailto:amakirkland@hotmail.com)  
**Subject:** Fw: Senna  
**Date:** Fri, 13 Mar 2015 20:43:35 +0000

2 - Name - Whistleblower Regarding Health Care Provider or H...



---

**From:**  2 - Name - Whistleblowe...  
**Sent:** Friday, March 13, 2015 12:49 PM  
**To:** [Jennifer Keilin](mailto:jenniferkeilin@gmail.com)  
**Cc:**  2 - Name - Whistleblower..., [legacycounstrain@mac.com](mailto:legacycounstrain@mac.com), [angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)

I appreciate your including me on the email chain with Christine and her lawyers.

Your services started June of 2014 and today I have a greater concern than ever before. I barely see my son, have not seen him in person since June 2014, and never interact with him free of interrupting comments. My son never sees his paternal relatives and literally has ended his toddler years, and is about to launch into his elementary years, without a father parenting and interacting with him.

I have not once received any accommodation or been given the hope of one, or help by any party being flexible in facilitating a relationship between me and Senna. I believe a reasonable accommodation or being flexible would be letting a Skype go 1 minute long so Senna can complete counting to one hundred or telling his dad what color his pjs are so we aren't hung up on mid sentence. I also think a reasonable request for flexibility would allow Senna to see his father and grandparents with 19 days notice when 21 days was not manageable despite good faith efforts. Especially when that missed opportunity for a visit meant no visit for 10 months.

000264

Having a gal and this parenting plan is completely failing Senna. I will not agree to continue to retain a gal and will be seeking other interventions to be able to be an effective and participating father for Senna.

Your retainer is nearly exhausted and during 10 months you haven't addressed the failure of the parenting plan. You have not followed up on your own scheduled and canceled telephonic meetings, your own recommendation that Senna see a child psychologist, nor my request that therapy for Senna include parenting evals for both of his parents. With only hours left on your retainer you continue to cancel meetings you schedule, take weeks if you return calls at all, and state you don't have time to make collateral contacts. The report you just entered is misleading and you have not addressed the very proof I showed you on ignored calls and or lude visions of Ms. Peddle in inappropriate attire. Further more it was all clearly documented in family wizard that Senna was ill on our Seattle visit, and that we had a back to back visit planned for months, there are NO pending charges. Jennifer I cant believe how you have singled me out, why is it you failed to write about the restraining order I had against her father chasing me on a motorcycle, with proof of photos not hearsay? yet single me out? This is what I expected with the system in place in Washington State.

I asked previously for you to resign your position if you couldn't address the needs of this case. 10 months later the retainer I paid has not resulted in one issue being clearly identified or remedied. You state you are still seeking info. What is happening is Senna's childhood is moving forever forward without his father. There is no reason to deny our father son relationship and the loss of a father is immeasurable. I will legally continue to advocate for my son.

2 - Name - Whistleblower Regarding Health Care Provider or Health ...

000265

## Amy Pasco

---

**From:** Jennifer Keilin <jkeilin@comcast.net>  
**Sent:** Wednesday, January 14, 2015 3:17 PM  
**To:** Amy Pasco; Veronica Freitas  
**Cc:** Christine and Senna; Jennifer Keilin  
**Subject:** Re: 2 - Name - Whistlebl... JIS REPORTS DUI WARRANT

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Amy,

Visit is canceled due to failure to comply with parenting plan requirements.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** Amy Pasco <amy@vfreitaslaw.com>  
**Date:** Wednesday, January 14, 2015 at 1:48 PM  
**To:** Jennifer Keilin <jkeilin@comcast.net>, Veronica Freitas <veronica@vfreitaslaw.com>  
**Cc:** Christine Peddle <sennaduncan79@hotmail.com>  
**Subject:** RE: 2 - Name - Whistlebl... JIS REPORTS DUI WARRANT

Hello Jennifer,

I believe that you requested that 2 - Nam... provide you with his travel itinerary etc. by last Friday. Neither Christine or our office have received any information regarding his plans or itinerary. He has not logged in to Our Family Wizard since January 1<sup>st</sup>. Christine has not received any additional communication regarding his proposed visit days. Veronica, Christine and I have all forwarded information that verifies he has multiple warrants out and that he has no driver's license or insurance. You have requested that he provide you with his travel itinerary if he plans to take Senna out of Arizona or where they will be staying etc. if they remain in Arizona. Apparently Shaun has a bankruptcy hearing in Seattle on January 21<sup>st</sup>. Christine has not received any communication from anyone regarding the scheduling of a professional supervised exchange person. I believe that he proposed that his visit begin on Monday the 19<sup>th</sup>. That is only five days away. We are asking that you now deny his visit due to his lack of compliance, his history of non compliance, him having no driver's license or insurance and no ability to drive during his time with the child and his multiple arrest warrants. We will be filing a Petition to Modify the Parenting Plan shortly.

Thank you,  
Amy Pasco  
Paralegal  
V. Freitas Law, PLLC  
210 Summit Ave. E.  
Seattle, WA 98102  
Phone: (206)328-7362  
Fax: (206)323-0404  
<mailto:amv@vfreitaslaw.com>  
[www.vfreitaslaw.com](http://www.vfreitaslaw.com)

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**From:** Jennifer Keilin [<mailto:jkeilin@comcast.net>]  
**Sent:** Saturday, January 10, 2015 3:37 PM  
**To:** Veronica Freitas  
**Cc:** Amy Pasco; Christine and Senna; Jennifer Keilin  
**Subject:** Re: 2 - Name - Whistlebl... JIS REPORTS DUI WARRANT

Veronica,

Received, thank you.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

To Ensure Client Confidentiality All Materials Sent by Messenger Must be Enclosed in an Envelope or Plain  
Binder Labeled Only with Recipient's Name

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**From:** Veronica Freitas <[veronica@vfreitaslaw.com](mailto:veronica@vfreitaslaw.com)>  
**Date:** Saturday, January 10, 2015 at 1:44 PM  
**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>  
**Cc:** Amy Pasco <[amv@vfreitaslaw.com](mailto:amv@vfreitaslaw.com)>; Christine Peddle <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>  
**Subject:** Fwd: 2 - Name - Whistlebl... JIS REPORTS DUI WARRANT

Jennifer,  
Please review the attached docket from Kirkland Municipal court. 2 - Nam... has a no bail warrant for failure to comply with the conditions of his sentencing on his DUI reduced to Reckless Driving.

- It does not appear that Mr. [2 - Name ...] is stable. He is not complying with court orders in this case, the DUI case and others. I request that you require his contact with Senna to be limited to supervised visits until he has resolved the outstanding warrants and he can prove he has a valid license and insurance.

I note that Mr. [2 - Name ...] repeatedly denied having been charged with DUI to the prior case manager.

Also, Mr. [2 - Name ...] took the child to undisclosed locations in violation of the parenting plan and kept the child for several days beyond the agreed return date despite telling his own attorney he would return the child on time, then the next day, etc. during his previous visit with the child. This is further evidence of his instability.

The child's safety is potentially at risk given the circumstances. Thank you for your consideration of this request.

Sent from my iPhone

Begin forwarded message:

**From:** "Christine and Senna" <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>  
**To:** "Amy Pasco" <[amy@vfreitaslaw.com](mailto:amy@vfreitaslaw.com)>  
**Cc:** "Veronica Freitas" <[veronica@vfreitaslaw.com](mailto:veronica@vfreitaslaw.com)>  
**Subject:** RE: [2 - Name - Whistlebl... JIS REPORTS DUI WARRANT

Attached please find the JIS Reports for [2 - Name ...] current warrant in the DUI matter. I will send the other info soon.

Thank you,

Christine

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**From:** Amy Pasco [<mailto:amy@vfreitaslaw.com>]  
**Sent:** Friday, January 9, 2015 4:45 PM  
**To:** [jkeilin@comcast.net](mailto:jkeilin@comcast.net)  
**Cc:** Veronica Freitas; Beth Humphrey; Hye; Kelli Gomez; Christine and Senna  
**Subject:** [2 - Name - Whistlebl...]

Hi Jennifer,

Veronica looked up [2 - Name ...] driver's license information on the DOL website.

[2 - Name ...] does not have a driver's license. Of course this means that he also does not have insurance.

I have attached the printouts to this email.

Thank you,

Amy Pasco  
Paralegal  
V. Freitas Law, PLLC  
210 Summit Ave. E.  
Seattle, WA 98102  
Phone: (206)328-7362  
Fax: (206)323-0404  
<mailto:amy@vfreitaslaw.com>  
[www.vfreitaslaw.com](http://www.vfreitaslaw.com)

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**Veronica Freitas**

**From:** Christine and Senna <SennaDuncan79@hotmail.com>  
**Sent:** Thursday, May 18, 2017 6:19 AM  
**To:** Veronica Freitas; Veronica Freitas  
**Subject:** Notified Keilin before surgery Fw: Senna surgery

RECEIVED - KENT  
JUL 25 2017  
DEPARTMENT OF HEALTH  
Office of Investigation and Inspection

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**From:** Christine and Senna <SennaDuncan79@hotmail.com>  
**Sent:** Friday, October 21, 2016 9:43 AM  
**To:** wendy hutchinscook  
**Cc:** Amy Pasco  
**Subject:** Re: Senna surgery

Also, I informed Jennifer Keilin before she withdrew of Senna's conditions, Dr. appts etc.

Christine

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**From:** Christine and Senna <SennaDuncan79@hotmail.com>  
**Sent:** Friday, October 21, 2016 9:35 AM  
**To:** wendy hutchinscook  
**Cc:** Amy Pasco  
**Subject:** Re: Senna surgery

Wendy,

Attached please find a print out from the OFW "Information" section where I uploaded information regarding Senna's surgery. They are available for both parents to view. I've highlighted the items for you to look at.

Second, I've included 2 - Name - ... complete log-in history. He's had plenty of access to view the information entered.

Christine

---

**From:** wendy hutchinscook <hutchinscook@yahoo.com>  
**Sent:** Friday, October 21, 2016 8:08 AM  
**To:** Christine and Senna  
**Cc:** Amy Pasco  
**Subject:** Re: Senna surgery

Thanks Christine.

What financials were provided to the Court for what hearing date(s)? If those financial materials were provided within your documents that were provided to me, just direct me to them in the materials or resend, whichever is easiest.

Was I provided copies of OFW entries? Again direct me where in materials or resend. This one, in particular would be good to look at.

Wendy

On Oct 21, 2016, at 7:54 AM, Christine and Senna wrote:

I know about his credit card statements thru financials he provided to the court.

I was referring to the fact [2 - Name...] had not asked to see Senna in almost two years. That's a long time without seeing Senna. I had hoped by extending an olive branch he might visit Senna.

All medical decisions were to go thru our case manager Jennifer Keilin. Jennifer Keilin withdrew from the case because [2 - Name ...] would not pay her. It was ordered that [2 - Nam...] and I have no communication and discontinue communication with each other in Our Family Wizard. However, I did scan the surgery information into Our Family Wizard. [2 - Name -... had access to the information since 5/2015.

[2 - Nam...] has historically been non-responsive to decision making such as doctors, schools, daycare, dentists etc even when we had Jennifer Keilin on board.

On Oct 21, 2016, at 7:12 AM, "wendy hutchinscook" <[hutchinscook@yahoo.com](mailto:hutchinscook@yahoo.com)> wrote:

Christine,

I am asking [2 - Nam...] about these events of the past few emails....he doesn't know how you know of his credit card charges of that time period of the Desert valley office visit by him in March, 2016.

Also, when you say you wanted [2 - Nam...] to have another opportunity to connect with Senna, in the phone calls in October 2015 , what were you referring to?

[2 - Name ...] says he knew nothing of the surgery referral, plan or surgery until after the fact. It sounds like this is not a decision the two of you made, is that correct?

Thanks,  
Wendy

On Oct 20, 2016, at 3:00 PM, Christine and Senna wrote:

2 - Name - ... credit card statement showed a charge to Desert ValleyPediatrics and the online patient portal showed an office visit during the time 2 - Nam... was visiting in March.

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**From:** wendy hutchinscook <[hutchinscook@yahoo.com](mailto:hutchinscook@yahoo.com)>  
**Sent:** Thursday, October 20, 2016 2:57 PM  
**To:** Christine and Senna  
**Subject:** Re: Senna surgery

My question was given my email information, how you came to the conclusion that 2 - Nam... took Senna to the dr.?

I appreciate the records request.

If the time you called 2 - Nam... and talked to him on the phone was around this fall time, it makes sense you talked about Halloween. Did you? But I see the referral for the ENT surgery was in April/May, so how was it you were talking about the surgery in Oct/Nov? I have a chronologically arranged brain so I appreciate your information.

Wendy

On Oct 20, 2016, at 2:46 PM, Christine and Senna wrote:

2 - Nam... has a history of taking Senna in for unnecessary reasons. Mostly he complains Senna is not being cared for or abuse allegations.

I completed a records request to Dr. Keizers office today.

C

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**From:** wendy hutchinscook  
<[hutchinscook@yahoo.com](mailto:hutchinscook@yahoo.com)>  
**Sent:** Thursday, October 20, 2016 2:44 PM  
**To:** Christine and Senna  
**Cc:** Amy Pasco; Veronica Freitas; Christopher Tapuro  
**Subject:** Re: Senna surgery

Thanks Christine. I'll check for the surgery records in the next day or two.

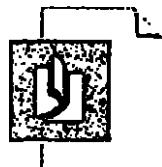
Wendy

P.S. Not sure why you think 2 - Nam... took Senna to the doctor in Surprise in March, 2016

On Oct 20, 2016, at 2:06 PM, Christine and Senna wrote:

Christine and Senna has shared a OneDrive file with you. To view it, click the link below.

 [Emails with Sennas Doctors Office Re surgery.pdf](#)



Emails with Sennas Doctors C  
surgery.pdf

1drv.ms

PDF File

Wendy,

Attached please communications between Desert Valley Pediatrics and me regarding the referral to Dr. Keizer, appointments with Keizer and scheduled surgery date.

Christine

---

**From:** wendy hutchinscook  
<hutchinscook@yahoo.com>  
**Sent:** Thursday, October 20, 2016 10:43 AM  
**To:** Christine and Senna  
**Subject:** Senna surgery

Hi Christine,

A question has come up for me. 2 - Name... report is that this same time last year (October/November, 2015) you telephoned 2 - Na... and the two of you talked.

My information is that you told 2 - Na... not to be worried but Senna had had minor surgery and that Senna is okay. Then the conversation moved on, you were tearful and mentioned your need for money, you mentioned that 2 - Na... could come to Arizona and trick or treat with Senna and you offered for Senna and 2 - Na... to talk right then. Senna could be heard in the background expressing excitement about the trick or treating with his dad.

When 2 - Na... went to the pediatrician's office at the time of the March 2016 visit, the pediatrician's office looked up the records and said no they did not have record of any surgery. My question(finally) what surgery, where, what date and if you would get the records of the surgery for me that would settle my question.

Thanks,

Wendy



Health Professions Quality Assurance  
P.O. Box 47865  
Olympia WA 98504-7865

## Health Systems Quality Assurance Complaint Form

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NOV 29 2016

Today's Date: 10-05-2016

OFFICE OF LEGAL SERVICES  
COMPLAINT INTAKE

### 1. Your Information

Name: 2 - Name - Whistleblower Re...

Address: 2 - Name - Whistleblower Regarding Heal...

City: 2 - Name - Whistleblo... State: 2 - Nam... Zip: 2 - Nam...

Phone: Work (2 - Name - Whistleblower Regarding Health ...) - Home (same ) - .....

### 2. Information about the Facility or Health Care Professional

Type of facility or profession: MSW, LICSW

Name of facility or professional: Jennifer Keilin

Address: 1715 114TH Ave SE Suite 210

City: Bellevue State:WA Zip: 98004

### 3. Resident/Guest/Patient Information

Full Name (if different than above) \_\_\_\_\_

Date of Birth (of patient, if complaint involves a patient) 2 - Name - Whistleblower Regar... 11-30-2009 son S

Date of incident: August 2014-March 2015

### 4. Please describe your complaint in the space below. Include the name, title and phone number of other patients, witnesses or staff members involved in the incident. Email completed form to the Customer Service Center at HPQA.CSC@doh.wa.gov, or fax to 360.236.4818, or mail to:

Washington State Department of Health  
P.O. Box 47865  
Olympia WA 98504-7865.

Please attach any supporting documentation and additional sheets if necessary.

Please see attached letter and documents.

000002

HSQA  
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11-5-2016

Complaint Document GAL/ Case manager Jennifer Keilin.

This is attached to DSHS state complaint form.

This letter and statements of fact is no particular order.

RECEIVED NOV 23 2016

NOV 23 2016 COUNTER

OFFICE OF LEGAL SERVICES  
COMPLAINT INTAKE

This Case manager failed to follow the GAL/ case manager Washington State guidelines as outlined below:

1. Ms. Keilin failed in her evaluation of my complaint about the sexually inappropriate aspect of the mother's actions during Skype. The mother was often scantily or provocatively dressed for Skype. I took pictures of the mother in see thru, skin tight lingerie sitting with her legs spread and my son literally between her legs with his feet against her crotch and provided this to Ms. Keilen. During this Skype the mother used the camera to scan her body so what I saw was her breasts and crotch. The mother's lingerie is a sheer white see through material. Senna is four and a half years old in these pictures. I asked Ms. Keilin to please address this as I just want to see my son not the mother. The mother repeatedly claims to be harassed, stalked, beaten and sexually abused by me and so fearful of me she can't function at all yet she Skype's almost nude. Ms. Keilen respond to me that he looked like a toddler??? He was 4 1/2 years in the picture as if this would make it ok for me to have to contend with her conduct, and the mother said she had to be in the picture to get cooperation from my son to do the visit. As I said Senna was four and a half years old and if the mother needs to be in the shot (which Senna can Skype without her) can she put on some clothes was my request. This is a clear example of Ms. Keilin's prejudice of a sexist nature favoring the mother as I am certain if I wore see thru underwear with a child touching my genitals for a visit with the mother it would not go unaddressed or rationalized with such a ridiculous explanation.

2. This Case manager failed to follow the Parenting plan for Senna Duncan ordered by Judge Downing when she ignored my multiple requests and made no attempt to enforce the 4 day a week court ordered Skype visit schedule. Ms. Keilin was made aware through email, phone calls, and provided very clear documentation (screen shots and printouts of non answered Skype's) that the Skype calls were being ignored. Ms. Keilen scheduled twice with me to observe a Skype visit and Ms. Keilen failed to show up both times without canceling, and failed to reschedule as agreed. It was important for Ms. Keilen to observe Skype in order to see the interaction between myself, Senna and his mother. I repeatedly asked Ms. Keilen to observe Skype due to my concern about the horrible statements my son repeatedly made about me hurting his mother, being in jail, that I wasn't his father, how his mom hates my family, were comments made routinely and all attributed to his mother as he always started with.... "Mommy said." Ms. Keilen's failure to address the non compliance with Skype allowed the mother to deny me hundreds of visits with my son and worse left the emotional and mental abuse of my son unaddressed. This harmed Senna and my relationship with him. This was unbearably distressing for me and the conflict created went unmanaged and unaddressed by Ms. Keilen. In short Ms. Kielen never met or observed my son or the mother in this case as is required as her duty as a GAL. Ms. Keilen did meet me but never observed me with my son. Without performing this part of her duty Ms. Keilen didn't have the knowledge, experience or information to form sound evaluations or assessments of the parties involved as she failed to fully evaluate the case. Ms. Keilen's failure to investigate the concerns and failure to perform the basic duty of her position led to harmful and unwarranted recommendations influenced by her bias against me.

Ms. Keilin's bias against me is most evident when she refers to me as inflaming or exaggerating a concern where Senna had a injury reported to AZ child protective services, and that I clearly made this report by proxy. I was never contacted by anyone including Ms. Keilen regarding the AZ investigation by child protective services and I did not make the report. Ms. Keilen didn't even discuss this incident with me at all but states she has no doubt as to my reaction and concern in negative dismissive terms. This is a clear failure to interview all parties and shows her bias as she speculates about my reaction rather than contact me. My son had a black eye, the forth one I have observed. I am concerned as I have witnessed the mother physically harm Senna since he was very little. I have stated these facts as I think they are relevant and hope that someone is checking on Senna. Again Ms. Keilen failed to interview all parties to make a professional evaluation and then writes about me in the negative on her biased presumption of how I would react if she bothered to contact me.

000003

The mother severely physically abused her daughter and lost custody of her daughter. Washington CPS was involved with the mother's daughter. This was before I met the mother so I cannot be accused of influencing the loss of her daughter. The GAL guide book says past behavior will be considered when evaluating family dynamics. Ms. Keilen fails to mention any history impacting this case including that the Mother has never fully cooperated with court orders, was found guilty of perjury so is a known and proven liar, the mother was found to have self inflicted her injuries in an attempt to have me convicted of DV and I was found innocent. This is significant information never used in Ms. Keillin's clinical evaluation of this case and thus horrifically failed Senna as he continued to be withheld from his father and subject to her mental, emotional, and I believe, physical abuse given the number of injuries I observed and Senna's report that his mother hits him, swats him and has hurt him, saying "she didn't mean to daddy." I don't know the outcome of the AZ child services investigation and wonder if Ms. Keillin knows either.

3. This Case manager failed to follow Parenting plan guidelines to follow up with Ms Peddle for her court ordered counseling with a PhD provider. My multiple emails and calls regarding my concern that the mom was not engaged in needed and ordered therapy got no response.

5. Ms. Keillin continues in her report to quote from the mother, Christine Peddle that I called drunk and left horrific messages, this is another lie written and not verified by Ms. Keillin.

6. Ms. Keillin goes on to write I have irregular visits, and that I was drinking and driving with my son, this is another lie written by Ms. Keillin and not verified. Ms. Keilen recounted many lies perpetuated by the mother without verifying or following up with me. Lies that influenced her recommendations against me.

7. Ms. Keillin writes that the 15 minutes, 4 times a week of Skype, which are court ordered, are not feasible. Again, Skype she never observed. This was my only contact with my son. This gave the mother an excuse to not follow the court order and basically excused her from the 100's of Skype's she had failed to do.

8. Ms Keillin writes that it is not clear why Skype does not occur, she was given clear proof and documentation on multiple occasions that the mother simply doesn't answer the phone or provide Senna with a device so he can Skype with his father. Ms. Keilen doesn't even mention her efforts to assess the issue because she failed to assess the issue. The mother has a consistent pattern of interfering with visits, using her proxies to harass me during visits, so it is not only Skype that was chronically interfered with by the mother. I obtained no contact orders against her father for this harassment, the mother's other proxies were fired and reprimanded at their employment because they used their positions to intimidate me at the mother's urging. This is documented and not mentioned by Ms. Keilen, but the mother's lies are relied in Ms.Keillin's evaluation as she finds the mother credible.

9. Ms Keillin writes again with no research, as promised to me via email and phone she would look into Skype, she would be part of the calls and for several months would email she really wants to understand what is going on, none of this was followed up by her, she failed at this in every way, and then lied in her findings. With that she concludes I am now to pay for supervised Skype to see my son when the court ordered was never followed by Ms. Peddle or investigated by Ms. Keillin. So now I have even less time with my son and more layers of professionals involved with a mother who repeatedly doesn't cooperate. The mother said skyping was unbearable. So with both parents complaining and having concerns about Skype Ms. Keilen still didn't observe even one.

10. This Case manager failed to follow Parenting plan guidelines and incorrectly writes that June 2014, scheduled visit had violation agreements, this is a lie and again Ms Keillin failed to do her research. The mother keeps asserting these lies and I repeatedly demonstrate that she is lying but the damage of insinuating I am not trust worthy and pose a risk to Senna is done when Ms. Keilen includes it in her report without the context and history of that allegation.

11. This Case manager failed to follow Parenting plan guidelines, when I attempted to have a visit in January 2015 she ignored many phone calls, as she admitted to me and I was very clear with her (see emails), I was unable to secure a transport person for the simple task of walking Senna to me from his mother. I asked for flexibility as the parenting plan states there should be flexibility as the father has to travel to see his son. The parenting plan states the Case Manger is to find a transport person since the mother had terminated all

000004

previous transporters accusing them of drinking, flirting with me, ect. Ms Keilin had more than the 21 days notice requesting a visit, the parenting plan doesn't say I have to have every logistic detail worked out only that the visit be requested. At nineteen days before the visit I was asking for help or an alternative to a paid transport person such as pick up at school or use a police officer for the pickup and was told to stop trying as I was now past the 21 days to be ready for the visit and Ms. Keilen was therefore denying my visit. I have to travel to AZ to see Senna so it is a hardship and an infrequent opportunity yet I was in AZ unable to see my son. This was an unwarranted denial and again hurt mine and Senna's relationship by lost opportunities to bond and parent that he and I can never recover. Ms. Keilen repeatedly asked me for an itinerary for this visit as well and no matter how I answered her stating that I was staying in AZ with no travel plans for me and Senna she was not satisfied and said I failed to provide an itinerary.

12. Ms Keilin lies repeatedly in this report but nothing more glaring is that Ms. Keilin writes that there is a negative impact on my son for a 5 day visit in June. All the drama related to this visit was created by the mother and stems from the mother falsely reporting abduction of Senna. This is an unsupported stretch to make such an assessment of a child she has never observed with either of his parents. The drama around the 5 day visit was not unique, there is not one visit that the mother doesn't create chaos and make false allegations either about me or the transport person, not even one. Ms Keilin never met my son nor Ms. Peddle yet writes about what? Ms. Keilen regurgitates the mother's lies and doesn't present the information available to her that counters and disproves the mother's lies. Ms. Kielen is so hampered by her bias against me she cannot assess the information provided to her fairly and didn't use an analytical or professional approach to this case.

13. Ms. Keilin failed to do any investigation as to the use of Family Wizard, hospital visits, doctor's information, the information that is to be used for the child. These violations occurred for years by the mother as the mother doesn't upload medical info but self reports and the mother is a known liar having faked her own cancer, claimed she took Senna to his infant checkups when she had not, and failed to share medications the mother said Senna needed telling me to take him to a doctor and get prescriptions myself. Again, Ms. Keilin failing to follow the scope of her role and making biased recommendations and observations.

14. Ms. Keilin comments on child support, My personal bankruptcy, and bankruptcy attorneys, yet fails to ever mention the money owed to me per court order by the mother for stealing and destroying my property and the perjury findings by Judge Downing against the mother, yet writes negative, judgmental comments about my financial challenges (I have gone broke paying the many professionals always associated with this case and many attorneys I have hired to fight the mother's lies). Judging me for having financial difficulties is not under the scope of her job and if she is going to use it as part of her assessment she should investigate the financial issues associated with the whole case. The mother was allowed to move to AZ to pursue a career but almost five years later the mother still fails to have the means to support herself or Senna yet this was the basis to be separated from his father and for me to assume the very substantial financial burden this created in order to visit Senna.

Ms. Keilen fails to address that the mother repeatedly states she fled WA to get away from my abuse; she was allowed to leave WA after telling the court she had a promising career in AZ and would be very flexible in facilitating a relationship for Senna with his grandparents and father. In fact she has not even once allowed Senna to see his grandparents and tells Senna he has been attacked by his grandparents dogs, almost drowned in their pool and they are horrible people, all false and creating anxiety and fear for Senna. This is the abuse of Senna Ms. Keilin would have witnessed had she observed any Skype. Even though this is false and I have already stated I was found innocent and the mother was found to have staged and faked her injuries to support her allegations. That Ms. Keilin fails to address both sides of the financial issue and to recognize that financial gain for the mother was the basis for the mother's relocation to AZ again demonstrates her prejudice against the father in this case.

This Case manager failed to address lack of compliance of the Parenting plan guidelines that all school records and medical records be listed in the Family Wizard program. Ms. Keilin failed to enforce or investigate this non compliance with the court order despite my stating my concern for Senna and my wanting to know from providers, not from the mother, how Senna was progressing. The mother enrolled in an address protection plan using many false documents to justify the need for being in the program which completely blocked me from

00005

knowing where my son gets services and attends school. This happened while Ms. Keilin was assigned to the case and yet she writes nothing about it. Ms. Keilin likely knew nothing about it as she based her reporting on the mother's lies and failed to verify information provided to her. This demonstrates how Ms. Keilin misplaced her trust and reliance on the mother.

17. This Case manager failed to follow Parenting plan guidelines, during her reporting, or lack thereof, Ms. Peddle had entered her and my son into an address protection program, I have multiple emails to Ms. Keilin telling her I do not know where my son is, and these emails went ignored.

18. This Case manager failed to follow Parenting plan guidelines as Ms. Keilin did not meet Ms. Peddle or my son and again the parenting plan was violated as they had moved and did not alert the courts. Another failure due to the lack of investigation and reporting done by Ms. Keilin.

19. Ms Keilin lied in her report about a late payment by me. She was paid on time by me and was paid over two months late by the mother. Ms. Keilin's failure to accurately report payment is likely due to her bias skewing her perceptions and recollections. She also writes that I was a challenge to work with. You will see in chronological order the late start and slow attitude Ms. Keilin had from the time she was assigned the case. I corrected her misperceptions and asked about her failures to return calls and her failure to keep appointments with me. Urging Ms. Keilen to do her job that she had accepted payment for is when Ms. Keilin refers to as me being difficult. I started the Family Wizard program on July 3<sup>rd</sup>, 2014, Ms Keilin did not engage until September 17, 2014, and only then in response to a negative email from Ms. Peddle inaccurately stating I had not engaged in the process. Ms. Keilen never adjusts her report to reflect corrections to her misstated assumptions. Ms Keilin would go 2-3 weeks at a time before returning emails and or phone calls to me but was very responsive to the mother again showing her bias against the father. Ms.Keilin's lack of timeliness is another violation of the Washington State standards for a GAL as the GAL guidelines state you will respond in a timely manner, this was never done by Ms. Keilin, and see attached emails. She didn't even have the courtesy to cancel appointments she wasn't able to keep.

Had Ms. Keilen done her job she would have observed the mother, myself and the child at least in a skype session.

Had Ms. Keilen contacted the child's school, daycare, and doctors she would have found out that the mother was in an address protection program which she is using to hide Senna from me, and that the mother was providing false documents about the father as a perpetrator of violence and was not allowed to see his son per the false documents the mother provided.

Had Ms. Keilen contacted the daycare she would have found out that the mother had blocked all contact between me and providers that the mother provided the daycare a false parenting plan supposedly granted in an AZ court making the mother the sole parent.

Had Ms. Keilen used the investigative tools available to her she would have found the mother in violation of the parenting plan, as she moved, and held a job without reporting to the court. Facts not reported to the court or to the GAL as court ordered in the parenting plan.

Had Ms. Keilen observed a Skype she almost certainly would have observed Senna say the horrible things about me that I have reported as Senna makes these statements nearly every single contact I have with him.

Had Ms. Keilen enforced and addressed all aspects of the parenting plan Ms. Peddle would pay her court ordered portion of travel costs for visitation. Ms. Peddle would provide academic and medical information about Senna, self reporting is not acceptable due to Ms. Peddle's long pattern of lying about this issue for herself and for Senna. Most importantly visitation would have been flexible so that I could have time with Senna in AZ. My most recent visit went forward with law enforcement doing the exchange. There is no reason that this arrangement could not have been used for the denied visit in Jan. 2015. I was in AZ for almost a month and never got to see Senna. The 21 day requirement for a visit could have been met by simply delaying my visit the first 3 days. Ms. Keilen simply said no and quote "to stop trying" when I asked for a visit and help in coordinating the transfer. To deny Senna seeing his father, particularly when it is such a hardship to make all

the arrangements to see him, was so cruel, unnecessary and arbitrary. For those several weeks I was about an hour drive from my son and told I could not see him. I am still hurt by the loss and lack of compassion in this decision.

In closing, there are many documents and emails enclosed that show Ms. Keilin's failure to evaluate the case she was assigned to and show she made recommendations to the court based on her prejudice and discomfort in working with me and not on any facts or clinical assessment. We will be taking legal action against Ms. Keilin for her abusive use of conflict, lying in her reporting, not following the GAL guidelines as court ordered, working outside the parameters of her job, discrimination against me, and disregard for the parenting plan she had a duty to follow. Never meeting or evaluating my son or Ms. Peddle and ignoring multiple requests about my son's welfare, our missed Skypes and false reporting against me. When confronted with this Ms Keilin definitely took an aggressive and dishonest approach towards my case and me. She filed a modification to the parenting plan without even calling or emailing me to discuss it reducing my contact with my son by half and ordering me to pay up to \$150 per 20 minutes to see my son. I literally have no contact with my son that doesn't have a price tag. I will look forward to the State doing their due diligence to address this incompetence and prejudice during my year with Ms. Keilin. My son has suffered a great deal of stress from his mother Ms. Peddle. My son and I share a very strong bond and the separation perpetuated by the mother and Ms. Keilin from my son is incredibly painful to both of us. The stress, both emotional and financial, has been unbearable and Ms. Keilin created and exacerbated the conflict in this case by her failures.

Ms. Keilin's report as a GAL carries weight and has power with the court as it presumed she is being thorough and diligent in gathering information from all sources to base her recommendations. When Ms. Keilen failed to do a professional, clinical, timely, analysis of this case she caused me irreparable harm and influenced the court and other professionals to act in ways that have damaged my role as a parent, my relationship with my son and caused other professionals to follow her negative lead towards me. Her failure has also caused me significant financial losses.

Ms. Keilin is prejudice against fathers in favor of mothers and/or is so incompetent or lazy that she was readily manipulated by the mother and worse than failed to do her job, did her job in a manner that has permanently harmed me and my family. I hope that Ms. Keilin is not allowed to continue to harm other families with her prejudices and incompetence.

I will look forward to your prompt reply.

2 - Name - Whistleblower Regarding Health Care Provi...

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RECEIVED

To: DSHS 11-17-2016

NOV 22 2016

Addition information to Jennifer Keilin complaint.

OFFICE OF LEGAL SERVICES  
COMPLAINT INTAKE

Please see addition to my complained filed on MSW Jennifer Keilin. These are the photos I discussed in my complaint. My son was 4 ½ years old at the time. I shared this with Ms. Keilin in person and provided these pictures. Her response was simply, he looks like a toddler?

This is another clear violation of the case manager not investigating, further more Ms. Keilin never mentioned in any of her reporting. I will ask a very simple question to the state. If this was a man with a 4 ½ year old girl photo'd like this can you imagine the implications?

Thank you

2 - Name - Whistleblower Regard...

2 - Name - Whistleblower Regarding Health

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600009

2 - Name - Whistleblower ...



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000011



Verizon

7:56 PM

70%



000013



# Jennifer Keilin, MSW, LICSW

1715 - 114<sup>th</sup> Avenue SE, Suite 210 Bellevue, WA 98004  
P/425.526.6556 F/425.270.1436 [jkeilin@comcast.net](mailto:jkeilin@comcast.net)

March 13, 2015

**No. 11-3-03341-8 SEA**

**To: Hon. William M. Downing**

**In re the Parenting and Support of:**

**SENNAS DUNCAN, Child;**

2 - Name - Whistleblower Regarding He...

**Petitioner,**

**and**

**CHRISTINE E. PEDDLE CORNISH**

**Respondent**

## **CASE MANAGER REPORT**

The undersigned social worker was appointed Case Manager by Commissioner Melinda Johnson-Taylor on 6/4/14.

Mr. 2 - Name - W... participated in an intake/interview on 6/26/14, but failed to bring the required retainer payment, ultimately paid on 9/4/14. Ms. Peddle paid her portion of the required retainer on 8/11/14, and participated in an intake/interview on 9/16/14.

Concerns reported by Mr. 2 - Name - W... on 6/26 included:

- A. Improper Use of Our Family Wizard by Ms. Peddle. "Abusive use of conflict against me."
- B. Low Frequency and Quality of Skype calls, to/from Senna, due to Ms. Peddle. "I have had Skype calls twice/week on average... Internet issues, games with her mother... I'm owed hundreds of sessions. When he's engaged he's great... He is asleep at 7:45 when it's time to Skype."
- C. Conflict During Past Exchanges. "Each time there is an exchange, there is a catastrophic

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meltdown. They arrive late, every time, to hand him off. Their family will follow me, harass me, fire them, etc. I've never had one smooth visit or transport ever."

D. False Accusations by Ms. Peddle.

Mr. [2 - Name - ...] indicated he next planned to visit Senna around the end of July, and stated the current exchange supervisors "just fired us."

Mr. [2 - Name - ...] indicated his goal was to gain custody of Senna. He stated he completed a parenting class, and therapy with Dr. Roeben, and now has a life coach, Jeff Shushan. He listed numerous failures by Ms. Peddle, including: no therapy, not following rules, no drug tests or diluted tests, loss of custody of her daughter. He portrayed himself as beaten down by the litigation.

Further contacts with Mr. [2 - Name - ...] focused frequently on the problems related to Skype calls. "It doesn't work... I propose seeing Senna every day on Skype." Mr. [2 - Name - ...] stated Senna is often asleep, or tired and unruly at the designated time, is in different locations, or, just as often or more, the call does not occur for some reason. "We've never had a smooth Skype session since day one."

Other topics addressed included: parental alienation, Senna not enrolled in preschool, lack of visits due to financial issues and excessive notice required (21 days), false allegations, lack of transport people, continued plan to get custody, and the past.

Mr. [2 - Name - ...] acknowledged he is behind in his financial support of Senna, including child support, health insurance, and reimbursing health/other costs.

This writer finds communication with Mr. [2 - Name - ...] a challenge. Initially, Mr. [2 - Name - ...] provided significant information to this writer, relating to past allegations against Ms. Peddle. This writer's requests for updates, information or responses since September often went unheeded. Mr. [2 - Name - ...] did provide some information related to Skype sessions, in time. Over the months, Mr. [2 - Name - ...] has increased his rhetoric about Senna being abused and mistreated in Ms. Peddle's care. He denied knowledge of or participation in a recent referral to CPS against Ms. Peddle alleging physical abuse of Senna.

Concerns reported by Ms. Peddle on 9/16 included:

- A. Abduction of Senna by Mr. [2 - Name - ...], for two weeks in June 2014. "He was to have him for five days. [2 - Name - ...] is facing custodial interference charges."
- B. Accusations of Mistreatment of Senna by Mr. [2 - Name - ...]. "I get these horrific messages from [2 - Name - ...] accusing me of abusing Senna, lying, etc... My mom has a protection order against [2 - Name - ...]. He called her drunk and left horrific messages."
- C. Frequency of Skype Calls. "Four Skypes are too much. Two were hard enough."
- D. Visitation Period of 5 Nights. "It's extremely hard on Senna."

Ms. Peddle indicated her goal was to provide Senna with access to Mr. [2 - Name - ...] in a safe way. Ms. Peddle listed numerous problem behaviors by Mr. [2 - Name - ...], including: irregular visits, driving and drinking with Senna, improper use of safety restraints for Senna, past DUI and

driving on a suspended license, and three arrest warrants. She requests future visitations be supervised and occur in Arizona.

Further contacts with Ms. Peddle have focused on problems related to Skype calls. "Four times a week is not feasible... half of the time [2 - Name ...] doesn't show up. We are there waiting. Our lives are on hold." She also stated Mr. [2 - Name - ...] "interrogates" Senna and makes inappropriate or demeaning comments directed at Ms. Peddle. She requests Skype calls take place weekly, through a supervised visitation service.

Other topics addressed included: Mr. [2 - Name - Whist...] legal situation, status of driver's license, alcohol use, failure to provide financial support, false reporting to CPS, Mr. [2 - Name - W...] accusations of abuse to Senna, and the past.

Ms. Peddle is a good communicator, in general. She is typically responsive. She continues to engage in sleuthing related to Mr. [2 - Name - ...]. She provided Skype recordings to assist this writer in understanding the true nature and quality of Skype sessions. The quality of these materials varied, and was only somewhat helpful. In general, Skype sessions that occurred generally showed Mr. [2 - Name - ...] engaging Senna appropriately, Senna being directed back to Skype by Ms. Peddle, and Senna's varying level of engagement in Skype. They seemed generally good. It is not clear why some Skype sessions do not occur. Sometimes both accuse the other of missing the same call, or calls dropping, etc. It remains an unfortunate, painful set up.

A review of Our Family Wizard entries by the parties reveals mixed results. Ms. Peddle appears to regularly utilize various functions of OFW, including noting bills, medical appointments, Skype sessions, and some communication with Mr. [2 - Name - ...]. Sometimes her communication is "for the record", which can seem antagonistic. Mr. [2 - Name - ...] does not appear to respond to Ms. Peddle's requests for payment reimbursement and has challenged the validity of requests at times, such as stating that Senna is not enrolled in preschool. When Mr. [2 - Name - ...] does use OFW, he seems not to use it as a tool for communication, but almost as a megaphone to broadcast his emotions. On the whole, OFW does not seem very helpful.

At times, both parents' communication with this writer seems designed to convey a message to the other party, copied on the email. That also is not an effective communication technique.

#### DISCUSSION OF ISSUES AND RECOMMENDATIONS:

1. Skype – Skype sessions remain intensely problematic. Dr. Glassman, the prior Case Manager, recommended four Skype sessions per week due to Mr. [2 - Name - W...] limited in-person contact. However, Skype visits are no replacement for direct contact and are not contributing to overall stability of either parent. The current frequency and nature of Skype (requiring parental supervision and help) creates a constant need for these parties (both of whom the court made abusive use of conflict findings against) to have routine contact, which keeps the drama and toxic engagement ongoing, sometimes reaching fever pitch.

Mr. [2 - Name - W...] states the Skype sessions are not serving their purpose, which is to facilitate his relationship with Senna. His solution, daily Skype sessions, is not realistic.

Ms. Peddle reports the frequency of sessions is a significant burden, both to enact them, and also due to the acrimony and antagonistic communication between the parents through OFW about Skype. Ms. Peddle requested that Skype sessions be facilitated by a visitation center. She reported contacting Cherie Conte of **Child & Family Support Services**, a supervised visitation center located in Phoenix, Arizona:

“She provided me with specific information regarding the services they provide, costs, and their policies and procedures. Additional information can be found at <http://cfss.com>. Our conversation is summarized below:

- There must be a Court Order in place requiring supervised visitation (this includes Skype).
- Supervised visitation at their facility runs \$60/hour; they are willing to facilitate Skype sessions. I need to provide the laptop and Wi-Fi is available. Costs would be pro-rata per the PP and Order for Child Support.
- Skype sessions would be billed at \$30 for ½ hour. This would include the set-up time using my personal laptop.
- Both parties must complete and comply with their Agreement for Services. If either party violates the Agreement for Services per the conditions, services will be suspended.
- Supervised visitation and Skype sessions must have specific days and times listed in the order. For example, Skype would take place every Tuesday @ 6:45 pm Arizona time for up to 15 minutes at CFFS utilizing mothers laptop computer.
- No records will be provided to ANY party, professional etc. absent a valid subpoena in this matter.”

The benefits of a neutral provider are considerable, in this writer's estimation: It eliminates a number of the points of contention, ensures professional assistance in ensuring the highest quality of communication between Mr. [2 - Name - ...] and Senna, and allows for neutral observations of positive or negative behavior by either party. The negatives involve costs to the parties, transportation logistics, fewer opportunities for contact, and potential for abuse, such as Senna not being delivered on time or payment issues.

Ideally, Skype sessions would occur twice per week, an amount that provides substantive contact for Mr. [2 - Name - ...] but also relieves Ms. Peddle of the significant weight of constant contacts. It is not clear that the parties can afford two sessions per week, and certainly transportation would be a challenge at that frequency. While two sessions per week would be preferred, the parenting plan of 10/2012 provided that Skype sessions occur twice per week until Senna was age 5, and then not less than weekly afterward (emphasis added).

Clearly, there is no perfect solution that easily balances Senna's need for substantive contact with Mr. [2 - Name - ...], the need for reduced contact between the parties, the financial needs of both parents, and issues of availability. Again, Skype sessions are no substitute for in-person contacts.

***IT IS RECOMMENDED that Skype sessions occur once per week, through a supervised***

*visitation center. The Case Manager recommends specific language concerning the day and time of the week (Tuesday at 7 pm, for example), the length of the contact (20 minutes), and make up requirements should Ms. Peddle, or her proxy, be unavailable to bring Senna to the visitation. The visitation supervisor should be authorized to terminate any problematic contact as per the agency policies.*

*The Case Manager should have the authority to identify another supervision provider, if the agency above is not available. Supervisors will be identified using the Supervised Visitation Directory (AZ) or the Maricopa County Family Court Roster.*

*Given that it may take some days to set up the visitation provider, it is recommended that in the interim Skype contact continues to be facilitated by Ms. Peddle, but be immediately reduced to twice per week, Sunday and Wednesday, at 7:15pm. The change in time reflects both parents' observations that Senna is often tired and/or asleep by 7:45.*

*Should the visitation services not be engaged within one month, this writer will investigate the cause, and make further recommendations. A parent frustrating the process should not benefit from their actions.*

2. Visitation – Mr. [2 - Name - Whi...] in-person visitation has been very limited. His last visitation ended on June 7, 2014, and was marked by crisis, parental conflict, violation of agreements, police contacts, and courtroom drama, precipitated by Mr. [2 - Name - Whi...] failure to return Senna from visitation as arranged. Ms. Peddle had previously voiced concerns of abduction, and has since expressed a desire for supervised visitation due to his actions. Mr. [2 - Name - W...] requested one visitation since then, in January 2015, which ultimately was not authorized by this writer due to Mr. [2 - Name - Whi...] failure to provide required information.

This writer was not engaged as Case Manager during the visit in 2014 described above and has been reluctant to make recommendations in either direction. It is a concern that, in January of 2015, Mr. [2 - Name - W...] was unable to follow the current orders requiring he arrange an exchange supervisor chosen from the Supervised Visitation Directory (AZ) or the Maricopa County Family Court Roster, and provide itinerary information including places of lodging. Mr. [2 - Name - ...] does not acknowledge responsibility for the above. His willingness to follow the court orders regarding visitation parameters is a concern.

It is a further concern that there have been such protracted periods between in-person visitations with Senna and Mr. [2 - Name - W...]. Arguably, Mr. [2 - Name - ...] is not complying with the parenting plan. One wonders about the potential negative impact of an extended five-day visitation on Senna, at age 5, given the significant periods between contacts, as well as the fractured and toxic relationship between the parents that prevents constructive communication on Senna's behalf. Ultimately, the order of appointment does not grant this writer authority to make recommendations regarding a substantial change in parenting time.

***NO VISITATION CHANGES ARE RECOMMENDED given the limitations in the Case Manager's authority, although concerns are noted.***

3. Exchange supervisor – Mr. [2 - Name - ...] reported in June of 2014 that the exchange supervisors “fired us.” He asked this writer to identify a new exchange supervisor in January of 2015. As per Dr. Glassman’s recommendations of 4/19/13 incorporated by court order, “Parents may use any other supervisor listed in the Supervised Visitation Directory (AZ) or the Maricopa County Family Court Roster. It shall remain the visiting parent’s responsibility to select the supervisor and communicate this via email to Case Manager and post to OFW.”

***IT IS RECOMMENDED that Mr. [2 - Name - ...] follow the court order regarding exchange supervisors.***

4. Use of Our Family Wizard – In his final report of 1/6/14, Dr. Glassman recommended the parties discontinue use of OFW, due to their level of conflict. This writer agrees that direct communication does not seem beneficial, and wonders if contact should be prohibited outside of emergency situations. Having said that, this writer does not particularly relish conveying messages between the parties, which is the alternative most available. However, this seems the best alternative.

***IT IS RECOMMENDED that the parties discontinue use of OFW, and have communication only as directed by the Case Manager.***

5. Mother’s Concerns re: Father’s Warrants/Suspended License/Financial Support Issues – Ms. Peddle has provided significant communication in recent weeks related to Mr. [2 - Name - W...] legal status and driver’s license. It appears she believes this bolsters her request for supervised contact. Mr. [2 - Name - W...] routinely disputes Ms. Peddle’s assertions, although he did not respond to this writer’s request for specific discussion of this issue. Frankly, this writer is unsure what to make of the information. Driving Senna without a valid license is problematic, but it is not automatically a parenting concern. The court should consider addressing whether a lack of a valid license or outstanding warrants for either parent is relevant to parenting, and whether it should impact parenting access.

Ms. Peddle has also provided significant communication in recent weeks regarding Mr. [2 - Name - Whi...] lack of financial support and his ongoing bankruptcy action, repeatedly requesting this writer intervene with Mr. [2 - Name - ...] (even as she copies him on the communication). This writer is sympathetic to Ms. Peddle’s need for child support, and Mr. [2 - Name - ...] acknowledges being in arrears. Mr. [2 - Name - ...] reports feeling harassed by Ms. Peddle’s communication with his bankruptcy attorney. Beyond recommending immediate payment of child support, including past due amounts, or recommending Ms. Peddle work with Support Enforcement, this writer is unsure what else to do.

***IT IS RECOMMENDED the court consider addressing whether a lack of a valid license or outstanding warrants for either parent is relevant to parenting and whether it should impact parenting access.***

***IT IS FURTHER RECOMMENDED Mr. [2 - Name - ...] become current on his child support obligation, and/or Ms. Peddle engage Support Enforcement services.***

6. Father's Concerns About Mother's Alienation/Abuse of Child – Dr. Glassman addressed this concern in his report of 1/6/14, stating, "Father has gone so far as to accuse mother of having abused their son. This is not true." Mr. [2 - Name - ...] continues to report problematic behavior by Ms. Peddle, and his concerns seem to escalate. Recently, Mr. [2 - Name - ...] contacted Senna's preschool, expressing concern about Senna's report that another student punched him. Mr. [2 - Name - ...] expressed some doubt as to Ms. Peddle's explanation of roughhousing with another student. Shortly after Mr. [2 - Name - W...] contacted the school, Ms. Peddle reported being contacted by Child Protective Services, regarding an allegation of physical abuse. Mr. [2 - Name - W...] denied making a report to CPS or communication with the agency.

This writer contacted Theresa Albright, Director of Phoenix Children's Academy. She reported Senna is a happy, typically developing, typically behaving child who attends their Kindergarten readiness program. She expressed having no concerns about Senna or his mother's care of him, based on her daily observations. This writer contacted Lisa Livermore, CPS investigator, but calls were not returned.

Mr. [2 - Name - Whi...] concerns seem inflated and overhyped, and were not supported by the school. It is a concern that Mr. [2 - Name - ...] may have engaged a proxy to make a report against Ms. Peddle, a past issue.

***No recommendations are made.***

7. Use Of Communication Through Case Manager – as recommended above, the parties should discontinue use of OFW and instead communicate through the Case Manager. For future reference, this mean emailing the CM any messages they want conveyed to the other party. The Case Manager has the authority to direct the parents' communications, in an effort to decrease conflict.

***IT IS RECOMMENDED that the parties discontinue use of OFW, and have communication only as directed by the Case Manager.***

8. Case Manager Fees – The advance fee deposit/retainer is depleted as of the writing of this report, and this writer requests each party provide their pro rata share of an additional retainer totaling \$2000 by 4/10/15.

***IT IS RECOMMENDED each party provide their pro rata share of an additional retainer totaling \$2000 by 4/10/15. Absent payment by the requested date, this writer is discharged as Case Manager.***

Best regards,



Jennifer Keilin, MSW, LICSW  
Court Appointed Case Manager

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**No. 11-3-03341-8 SEA**

**COURT ACTION:**

The court

- (1) Adopts \_\_\_\_\_;
- (2) Does not adopt \_\_\_\_\_; or
- (3) Modifies \_\_\_\_\_ as follows:

The recommendations of the 3/13/15 Case Manager report as a temporary order, to become a final order if no objection is received within 10 days from the filing date of this order.

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(Date)

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(Judge)

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**8**

Senna/Jennifer Outline March 2015/ Liz

1. Skype and issues related to contact and visitation have been ongoing for 3 years.
  - a. 7:45 is too late for Senna, asked for 2 years for adjusted time, no response from professionals and documentation has been made available and is available in familywizard for independent verification of how skype fails to maintain a relationship or bond for senna and myself. I had hoped for scheduling changes to skype but have come to realize the timing is not the issue. The barrier to senna having a relationship with me is christine.
  - b. Christine swore in court she would never keep senna from his nanna and poppa, that she would be flexible in coparenting and my visitation. Senna has not seen any family member even once. Senna would need reassurance about his mother feelings to do so since he often states how christine hates them. I have never had any visitation with senna that wasn't plagued with harrassment and drama leading up to and post a visit. Drama being frequent police calls to harrass me while senna and i are together, false statements about my activities, and christine rehashing her proven lies about herself and me. Actually this is my experience just trying to see senna, and the stress and anxiety become unbearable when i do see senna. christines attacks intensify, and it is an assault on my character, my relationships, my emotional well being, and my livelihood, because all these areas of my life are diminished and continue to suffer from a accumulative effect i no longer feel i can recover from. Christine is relentless to this end. look at her email and ofw activity, sending and writing literally all night.
  - c. there Inappropriate shots of christine taken during skype with Senna in her crotch, wearing lingerie and scanning herself nearly nude during my time with senna. No woman would be expected to have to inde a near nude man in her visitation. christine illegally records all skype visits and doesnt consider how her actions effect or can potentially effect senna. senna was 4 in these lude shots that could be easily avoided regardless of his age by simply wearing something. To me this is christine using skype to try and taunt me and a reflection of her sick mind. She was furious i didnt want to marry her and misrepresented herself as my wife for years. Like many of her false assertions people take this as fact to this day. Another lie that lives on that i repeatedly face
- a. Skype has been used for threats and abusive use of conflict as any time i attempt to arrange visitation or seek educational or medical info about senna skype sessions then dont happen and ofw and email are inundated around the clock bringing her fabricated, old and new, lies and excuses to life.
- b. I am behind well over 300 skypes lost and ignored. Closing in on 300 missed skypes. This is christines way to currently punish me when i want contact and info on my son. If you look in ofw the pattern is clear i am punished this way leading up to and post visitation. NEVER has there been an attempt at make up or an effort to help Senna see his father. Excuses: Her weekends off, Vacation, Senna sick, Senna sleeping, Senna diarrhea, Her travel for legal issues, and most recently needing to make up lost time at work due to two full days with cps

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investigator. Christine will say differently but she has no intention to facilitate a relationship between senna and his paternal family. She has stated and i believe coached Sennato say he does not want to see his father or family. This is evident in sennas repeated statements that christine hates his grand parents, that his mommy told him i am not his daddy, asking me why i hurt mommy, and that he is sad that he has no family.

- c. when negative comments are made to me during skype sessions christine and her mother literally laugh.
- d. I have witnessed blackeyes, cuts to his cheeks and lumps on his head several times on skype, Many calls are ignored and now I wonder why ie to wait for injuries to heal and get senna to give a plausible explanation for his injuries.
- a. Christine makes financial threats, and demeans me with false statements in several media venues. I am prepared to address all false statements and have done so over and over costing me exorbitant amounts of money to do so. Christine does this to deflect attention when a concern is raised about her behaviors and chronic inability to facilitate a conflict free connection for me and senna
- a. Over the last 3 years my math has now brought this case to over \$550k with my travel, professionals, insurance, child support, and legal issues. Christine promised to destroy me on every level when i had no interest in marriage and still refused to marry her when she got pregnant. Remember she told me she could not get pregnant due to her cancer. Then was found by the court to never have had cancer and to have had 16 abortions.
- b. I have over paid by my share of insurance by about \$250.00 monthly for 3 years. I am not complaining about Senna, it is how I am threatened through the schools/ Jennifer/ courts As if i am failing to provide for senna without acknowledgement of what i do provide under constant duress. there is a tremendous expense and scheduling juggle involved to have a face to face visit with senna that is not recognized. Remember all my attempts and contact generate a storm of activity from christine that is so hurtful that it becomes difficult to sleep and function and adds up my fees to professionals as this can only be addressed indirectly.
- c. i Have spent \$150k to fight my false DV charge in Kirkland alone with now over 40 false police reports, all of which I had to combat with attorneys or the city. I prevailed with a court finding of innocent on dv and christine was convicted of perjury twice. Because the presentation as a dv victim has been so effective in keeping the focus off of christine and senna she continues to call herself this, i was found innocent and i am innocent. After twenty years of telling people she had cancer and was discovered in this lie she now uses another false but effective farce to manipulate people. Her true character was revealed in kirkland and that is the real reason she went to az.
- a. October 6 2012 Judge Downing found that christine Peddle had lied and perjured herself multiple times to multiple judges and commissioners which resulted in a Judgment against her was for \$9900.00. To date nothing has been collected on this judgement which was to

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be paid to me. I was found to be the victim.

- b. Christine Peddle is copying Monica Freitas in all correspondence to Jennifer Keilen now. So it appears she has an attorney on retainer. Yet she is not paying her obligations. The courts general practice is to not allow further litigation when the petitioner owes outstanding fees. Yet christine continues to state she is unpaid when she owes me thousands for her judgement, not paying her share of child costs, and costs associated with repeatedly trying to address her contempt of court by not complying with the parenting plan
- c. Deflection, Peddle has had DSHS call Piloti, my place of business, she is always stalking and harassing me to sabotage my life as she threatened and promised, and to keep the light off of her.
- d. Senna visit in June, Senna stayed late at my home he was ill, I entered this in OFW, next thing I have police at my door all night and her friends driving by then entering 2 false declarations about me.
- e. There has never been one visit without conflict, we have gone through 7 transport people from Kirkland to AZ. I have had Senna withheld from arranged visits. I have had Al Peddle chase me on a Motorcycle, I have had Peddle and her father circle the police station in their vehicle. I have had Peddle and her mother drive within 5 feet of me at 30 MPH when leaving the surprise Pd. Not only do they stalk me and engage others in stalking me their actions have put me and senna in harms way. I barely avoided a collision with grdpap peddle when he broke traffic rules and rode next to my car.

## 2. Senna and safety

- a. This will be the 4-6 incident this year where Senna has discussed a black eye or I have seen, cuts, lumps and black eyes on his face.
- b. This is the 2<sup>nd</sup> call to CPS, the first call was the start of my case and Greg Roeben 30 year counselor Who called based on medical facts about Senna, and it was dismissed much like this situation. Greg Roeben said given christines history of faking serious illness and reporting false illnesses both for herself and senna christine presented as having munchhausen by proxy and he was very concerned for senna.
- c. Entries in OFW for years have been lies regarding Senna's health and wellbeing. He was never diagnosed Lactose intolerant as she tells everyone, and yet she continued to feed him various dairy products. Christine also passes herself off as a graduate of law school and obtained false documents to support her charade. It takes diligence to verify christines numerous false claims regarding her achievements, health, and victimization. And all who realize her lies or challenge her assertions become targets for her campaigns to demonize

and destroy.

- d. Senna at times has been horribly skinny, when addressed there was retaliation towards me. I am always concerned because she under fed, starved, and beat her daughter until she was age 12 and finally removed from christines care by cps
- e. False Declarations were written that i drove senna without a proper car seat senns is driven by christine in a two seater, sitting in the front seat with an airbag. If there were a collision this would be fatal.
  - a. Lost daughter King County filed as will full abandonment. Did nothing she testified to in court she would handle the issues related to her parentinf deficits immediately, was to undergo rehab, Hair follicle samples and UA tests were to occur, this never happened.
  - b. During our court case Peddle was ordered to UA, this order was not complied with. Christine provided 3 uas that came back as diluted which is a common trick addicts use to avoid a dirty ua and diluted uas are tallied as dirty. I watched christine drink during her pregnancy and friends shared with me observations of her comments, aand a ctions out of concern for the pregnancy. Christine has been observed twice drunk with senna. Once by a professional transport driver when christine arrived an hour late to pick up senna in a bikini and stumbling. The driver has always regretted not with holding senna that day. The other time christine went to her daughters school drunk with senna. You can imagine the distress caused to her daughter and christine has a no contact order with morgan. Morgan has also shared her fears about her mother and senna. Just as with morgan no sensible measures are taken to give senna a safe, nurturing childhood. Just repeated accommodations for christines unresolvable issues.
  - c. Christine disrupted my UA tests to the point in my reports the provider testified christine lied to them to attempt to influencinfluence my results. I was clean and compliant with court orders 100% of the time
  - d. Peddle aligns herself with people she can manipulate to do her dirty work, Manley Surprise PD reprimanded, People lie and write declarations she orchestrated, then if you cross her in any way the wrath will come.
  - e. She is threatening Jennifer through emails demanding issues to be resolved per her advice and what she perceives to be reality.
  - f. Facebook postings
  - g. Jennifer...wh a t i want you to know is Senna needs a nurturing safe home he can develop in, wher. He is safe and nurtured. Senna doesnt have that which is clear by his statements that i am not his daddy, he can name all the people his mother hates,(my friends and family) which is also his so he is developing self hate and insecurities, he says his daddy hurt his mommy, ect. This is repetitive info but ple a se remember this rerepetition is in our exchanges. Senna is sad, confused, and fed this hurt by christine. I am 1600 miles away and helpless to give him comfort or help him sort outvthe inappropriate and adult info his mother exposes . Him to intentionally.

000025

- h. I have struggled emotionally with my fears for his development and safety, the seeming relentless assassination of me as a person with the result of denying senna a father and his entire paternal family. i have cracked under this strain and completely lost it at the second thanksgiving visitation was withheld. My verbal melt down at that time is me at my worst, there is nothing else i have to acknowledge or regret because of the impact on senna. I know i am human. I am not a dv perpetrator...ever..christine hit me repeatedly with objects when she was jealous i talked innocently with women, accused me of affairs while she was soliciting my friends by bad mouthing me and offering herself to them. Christine cut up all my clothes, poured glue all over my shoes and carpet, damaged my condo in creative, horrific ways, intentionally destroyed my vehicles by driving them into bridges and closing the garage door on them...or she was drunk, or vindictive or both, stole my dead fathers wedding ring, cut my valuable art in half and placed it back in their casings, bragged to me how she had done this things to others. I am sharing this not to destroy her but to show you why i am in constant fear for senna. Senna was born two years to the day that cps removed morgan from christine. This means immediately upon morgan getting safe christine was working her cancer scam to cover her drug use and dupe me into taking care of her. Christine has not done therapy, parenting or rehab to help her get better or act differently. there has been nothing done to mitigate the risk she poses to anyone dependent on her. her behaviors show she is mentally very ill and untreated. I have done everything court ordered, warrented or not, for sennas sake.
- i. When senna has been with me he has been given an ipad so he can skype and call his mother whenever he wanted. I know he needs that to feel secure. Not once did she accept his calls or call him!!! This was heart breaking to see him reach out and be ignored.

Senna will be well parented and cared for with me. I will always seek professional help to so i give him informed parenting. I will always help him have a bond and know of his maternal family by skype, visits, posting on media for him to share with his relatives. I stated senna will know what christine has done one day meaning he will know i never hurt anyone, least of all anyone he cares about, i never abandoned him as she tries to tell him i am not his daddy, and he is lied to by the people she tells him she hates. With me he will not be sad he doesn't have a family like often says lately. After tonights skype i am worried christine has taken away senna's main source of comfort, his baby. Senna was worried he can't find his baby and she told him not to worry. Senna expresses himself via his baby so i wasn't surprised that it has gone missing. She is sick enough to do that especially when senna has used his baby as a way to state his fears and reality. This would be threatening to christine's house of cards.

I hope the changes made in the future put senna in the safety of my care as this gives him the brightest chance at a good future and despite christine's sickness, a positive bond maybe managed.

000026

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## Jennifer Keilin

### Licensed Clinical Social Worker

Bellevue, Washington | Mental Health Care

Current Jennifer Keilin, MSW, LICSW

Previous Stuart Greenberg, Ph.D., DSHS/DCFS

Education University of Washington

[Connect](#)[Send Jennifer InMail](#)

2nd

143 connections

<https://www.linkedin.com/in/jennifer-keilin-95018187>

Business Name	<input type="text"/>
Business Phone	<input type="text"/>
Business Address	<input type="text"/>
Zip Code	<input type="text"/>
<a href="#">Check Now</a>	

#### Background

#### People Also Viewed



##### Elizabeth Selleck

Owner, Elizabeth K Selleck, Attorney



##### Kathleen Kennelly M.S.W.

Social Worker & Court-Appointed  
Guardian ad Litem

##### Dr. Gary Wieder

Clinical and Forensic Psychologist



##### David Hodges

Co-Owner at Family Evaluation, GAL  
& Mediation

##### Jane Hulsey

Customer Service Manager at Blue  
Cross Blue Shield of Alabama

##### Genia Graves

President at Graves Labrador  
Retrievers

##### Наталья Воробьева

Специалист - Гостиничное дело



##### Susan MacPherson

French teacher at Grand Island School  
District

##### Joanna Chan

--



##### Boutique Hotel Riviera

Бутик-отель "Ривьера"

#### How You're Connected

#### Skills

7 Family Law



2 Child Custody...

000027



Jennifer Keilin

## Education

### University of Washington

Master of Arts (MA), Social Work  
1996 – 1998



### Pacific Lutheran University

Bachelor of Arts (BA), Social Work  
1989 – 1991

## Additional Info

### Advice for Contacting Jennifer

1715 114th Ave SE, Suite 210, Bellevue, WA 98004  
P/425-526-6556 F/425-270-1436  
Email: [Jkeilin@Comcast.net](mailto:Jkeilin@Comcast.net)

## Connections

Shared (1)



Terry Zundel 1<sup>st</sup>  
owner at Zundel Law Offices, PLLC

## People Similar to Jennifer



Eve Cribbs, LCSW 3<sup>rd</sup>  
Psychotherapist at Healing Your Relationship ...  
Connect

## Following



### Pacific Lutheran Uni...

Higher Education  
Follow

### University of Washin...

Higher Education  
Following

## Schools



University of Washin...  
Greater Seattle Area  
Following



Pacific Lutheran Uni...  
Greater Seattle Area  
Follow

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna updates  
**Date:** October 21, 2014 at 1:49 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care Pro...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Nam...,

Thanks. Any updates?

Best regards,

Jennifer Keilin, MSW, LICSW

Skype Project.

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

To Ensure Client Confidentiality All Materials Sent by Messenger Must be Enclosed in an Envelope or Plain Binder Labeled Only with Recipient's Name

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Thursday, October 9, 2014 at 9:20 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Subject:** Senna updates

Jennifer,

I have been challenged with a new email format and systems with Windows 8 and it has been very challenging. I have done as asked and updated live time on my skype, they are printed and copies to be delivered to your office. The situation as warned has become worse and to the point we are almost completely disconnected.

7:45 pm does not work and it has not worked for close to 3 years.

9-10-2014

Senna not online for call they answer at 7:47 call ends at 8:00 PM. Time loss 2 Minutes

9-12-2014

I called for the entire time and no answer. Skype did not occur. Time loss 15 minutes

000029

**9-14-2014**

messages were sent via IM on Skype not Christines fault that Senna fell asleep. I called the entire session no answer. Time loss 15 minutes.

**9-15-2014**

call started at 7:45 ended 7:55 Delores Peddle was present and Senna's comments and behavior were very poor. He stated he hated his Nana and Papa, this is my Family and that his mother cant stand them. Delores said nothing call was cut short. Time loss 5 minutes

**9-17-2014**

Call did not take place I was in a no reception area. Time loss 15 minutes.

**9-19-2014**

call started 7:45 pm ended 7:55 PM time loss 5 minutes.

**9-21-2014**

call did not happen no reception area time loss 15 minutes.

**9-22-2014**

called at 7:45 Senna in a strange bed he was asleep time loss 15 minutes

**9-24-2014**

call did not happen in a no reception area time loss was 15 minutes.

**9-26-2014**

call started at 7:45 pm call ended at 7:57 pm I was asking Senna for a kiss and the call was cut off time loss 3 minutes.

**9-28-2014**

Call started at 7:45 pm Senna was sick and fell asleep at 7:48 pm. Time loss was 12 minutes.

**9-29-2014**

call started at 7:45 pm and ended 7:57 PM Senna again saying horrible things about my family. time loss 3 Minutes.

**10-1-2014**

no call no reception area time loss 15 minutes.

**10-3-2014**

no call no reception area time loss 15 minutes.

**10-5-2014**

call started at 7:45 pm no answer on their end loss 15 minutes.

**10-6-2014**

**000030**

**call started at 7:45 Senna sleeping call ended 7:46 pm time loss 14 minutes.**

**10-8-2014**

**call started at 7:45 pm Senna asleep call ended at 7:46 PM time loss 14 minutes.**

**Total time loss 193 minutes in this very short time.**

**Jennifer it is known fact Senna does not even have a bedroom and many of these calls he is sleeping in her parents bed. There has never in the history had 1 make up call attempted or granted. Senna is slipping away and when I first met you stated very clearly the situation is worse now than ever before with the attempted alienation of the Father.**

**I look forward to your very prompt solutions.**

2 - Name ...

**Sent from Windows Mail**

**000031**

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9                   **SUPERIOR COURT OF WASHINGTON**  
10                   **COUNTY OF KING**

11                   **In re the Parenting and Support of:**

12                   **SENNA S. DUNCAN, Child.**

13                   **No. 11-3-03341-8 SEA**

14                   **FINAL PARENTING PLAN**

15                   2 - Name - Whistleblower Regarding Health Ca...

16                   **Petitioner,**

17                   **and**

18                   **CHRISTINE E. PEDDLE CORNISH,**

19                   **Respondent.**

20                   

---

**This parenting plan is the final parenting plan entered by the court after trial.**

21                   **It Is Ordered, Adjudged and Decreed:**

22                   **I. General Information**

23                   **This parenting plan applies to the following child:**

24                   **Name**                   **Age**

                      Senna S. Duncan    2

1

**II. Basis for Restrictions**

2

3

**2.1 Parental Conduct (RCW 26.09.191(1), (2))**

4

Does not apply.

5

**2.2 Other Factors (RCW 26.09.191(3))**

6

Both parents' involvement or conduct may have an adverse effect on the child's best interests because of the existence of the factors which follow:

The abusive use of conflict which creates the danger of serious damage to the child's psychological development. For details, see the Findings of Fact entered this date by the Court.

10

**III. Residential Schedule**

11

12

**3.1 Schedule for Children Under School Age**

13

a) The child shall reside with the mother, except for the following days/times when the child will reside with or be with the other parent:

The father shall have residential time with the child every first, third and fifth weekend of each month starting Friday at around 12:00 noon or when the mother gets off work if she is working (but no later than 6:00 p.m.) until Sunday at 6:00 p.m. Except as otherwise provided in this parenting plan, the father's visitation with Senna shall take place in Arizona until Senna turns 5 years old.

The parents should continue to use a professionally supervised visitation provider paid for on a pro rata basis for exchanges. The location should be at the Surprise Police Department, per the supervisor's recommendations, or another mutually agreed upon location. Although the Court finds no fault with the current exchange supervisor, a new one will be substituted in order to "start fresh" in a way that fosters trust and confidence. Ms. Sanchez will continue to serve until a substitute is named.

The Case Manager (Section 3.13 below) shall make ongoing recommendations regarding the need for and identity of the exchange supervisor.

- 1
- 2
- 3
- 4
- b) If one of the parties were to relocate so that the parties live within 50 miles of each other, the residential time with the child should be divided roughly evenly prior to the child's enrollment in school. The specific schedule would need to be worked out in view of the circumstances of all and, ideally, this could be established through agreement reached at mediation.

5      **3.2 School Schedule**

6      Same as in Section 3.1 above.

7      **3.3 Schedule for Winter Vacation**

8      The child shall reside with the mother during winter vacation, except for the  
9      following days and times when the child will reside with or be with the other  
10     parent:

11     **Christmas Break Before Senna is Age 6.** Winter Vacation prior to age 6  
12     shall be defined as December 20 at 6:00 p.m. to December 30 at 6:00 p.m.  
13     and shall be exercised by the father in Arizona. The first half shall end at  
14     10:00 a.m. on December 25. The second half shall begin at 10:00 a.m. on  
15     December 25 and end December 30 at 6:00 p.m. The mother shall have the  
first half in odd years and the father shall have the second half. The mother  
shall have the second half in even years and the father shall have the first  
half.

16     **Christmas Break After Senna is Age 6.** For Christmas (winter) break,  
17     one parent shall have the child from 6:00 p.m. the day school lets out  
18     through Christmas Day at 10:00 a.m. and the other parent should have the  
child from Christmas Day at 10:00 a.m. until 6:00 p.m. the day before  
19     school begins (mother first half in odd years, father first half in even years).  
Father's visitation may be in Arizona or Washington.

20     **3.4 Schedule for Other School Breaks**

21     The child shall reside with the mother during other school breaks, except for the  
22     following days and times when the child will reside with or be with the other  
23     parent:

24     **Spring Break After Senna is Age 6.** Mother and father shall alternate  
spring vacation with the child, with mother in even years and father in odd  
years. Spring break shall begin at 6:00 p.m. the day school lets out and end

1  
2 at 6:00 p.m. the day before school begins. Father's visitation may be in  
3 Arizona or Washington.

4  
5  
6 **Mid-Winter Break After Senna is Age 6.** Mother and father shall  
7 alternate mid-winter vacation with the child, with mother in odd years and  
8 father in even years. Spring break shall begin at 6:00 p.m. the day school  
9 lets out and end at 6:00 p.m. the day before school begins. Father's  
10 visitation may be in Arizona or Washington.

11 **3.5 Summer Schedule**

12 Upon completion of the school year, the child shall reside with the mother, except  
13 for the following days and times when the child will reside with or be with the  
14 other parent:

15 **Summer Schedule Before Senna is Age 6.** Same as the schedule in  
16 Section 3.1 above. In addition, father shall have one full uninterrupted  
17 week with the child during the summer.

18 **Summer Break After Senna is Age 6.** The father shall have uninterrupted  
19 summer visitation with the child for up to one week in June and one week  
20 in July (with a few weeks in between).

21 **Summer Break After Senna is Age 8.** The father shall have uninterrupted  
22 summer visitation with the child for up to ten days in June and one week in  
23 July (with a few weeks in between).

24 **Summer Break After Senna is Age 10.** The father shall have five weeks  
of summer visitation with the child, to be divided or continuous as agreed  
by the parents.

There are no geographic restrictions as to the summer visits. Each parent shall  
make written proposals for their summer schedule no later than April 15 of each  
year. In the event of a scheduling conflict, the father's choice of dates shall have  
priority in odd-numbered years and the mother's choice of dates shall have priority  
in even-numbered years. In the event that one parent or both parents fail to select  
their dates by April 15, the first parent to notify the other parent of his or her  
choice of dates shall have priority in choice of dates.

A week shall be defined as Monday at 6:00 p.m. to Monday at 6:00 p.m.

1

2     **3.6 Summer Vacation With Parents**

3

4         See previous section.

5

6     **3.7 Schedule for Holidays**

7

8         The father shall have the following holidays when they coincide with his weekend  
9         visitation: Martin Luther King Day, President's Day, Memorial Day and Labor  
10         Day. These holidays shall extend the father's weekend by 24 hours.

11         The following holidays shall be rotated between the parties, regardless of the  
12         schedule in Section 3.1 above: July 4 (mother even, father odd), Veteran's Day  
13         (mother odd, father even), and Thanksgiving (father even, mother odd).

14         July 4 shall begin at 10:00 a.m. and end on July 5 at 10:00 a.m. or return to  
15         school, whichever is earlier.

16         Veteran's Day shall begin at 10:00 a.m. and end at 6:00 p.m.

17         Prior to Senna commencing Kindergarten, Thanksgiving shall begin the day  
18         before Thanksgiving at 6:00 p.m. and end the day after Thanksgiving at  
19         6:00 p.m. The father shall have Senna for Thanksgiving 2012 and it shall  
20         be rotated thereafter (father even, mother odd). There shall be no third  
21         weekend visitation for Thanksgiving 2012 as the child is not ready for 5  
22         days away from the mother. The father may exercise his Thanksgiving  
23         2014 visitation and thereafter in Washington. After Senna commences  
24         Kindergarten, Thanksgiving shall begin the day before Thanksgiving at  
25         6:00 p.m. and end at 6:00 p.m. the day before school begins.

26

27     **3.8 Schedule for Special Occasions**

28

29         The mother shall have Senna for the mother's birthday and Mother's Day, and the  
30         father shall have Senna for the father's birthday and Father's Day. Senna should  
31         be with his mother on his birthday in odd years and with his father on his birthday  
32         in even years. Valentine's Day (mother odd, father even), Easter (mother odd,  
33         father even) and Halloween (mother even, father odd).

34         Special occasions shall begin at 10:00 a.m. and end at 6:00 p.m.

35

36     **3.9 Priorities Under the Residential Schedule**

37         Does not apply.

38         Final Parenting Plan - Page 5 of 12

39         **Hon. William L. Downing**  
40             King County Superior Court  
41             516 Third Avenue  
42             Seattle, WA 98104

43         **000036**

1

2 **3.10 Restrictions**

3

4 The concerns noted in paragraph 2.2 and explained in the Court's Findings of Fact  
5 mandate, at least for the time being, the following provisions:

- 6
- 7 • Professionally supervised exchanges.
  - 8 • A case manager to oversee parental communications and interactions.
  - 9 • Both parents to receive counseling.

10

11 **3.11 Transportation Arrangements**

12

13 Transportation costs are included in the Child Support Worksheets and/or the Order of Child Support and should not be included here. Transportation arrangements for the child between parents shall be as follows:

14 The parents should continue to use a professionally supervised visitation provider paid for on a pro rata basis for exchanges. The location should be at the Surprise Police Department, per the supervisor's recommendations, or another mutually agreed upon location.

15

16 **3.12 Designation of Custodian**

17

18 The child named in this parenting plan is scheduled to reside the majority of the time with the mother. This parent is designated the custodian of the child solely for purposes of all other state and federal statutes which require a designation or determination of custody. This designation shall not affect either parent's rights and responsibilities under this parenting plan.

19

20 **3.13 Other**

21 The parties shall participate in case management for a minimum of two years or as recommended by the case manager. The case manager should:

- 22
- 23 • Follow and monitor both parents' compliance with the parenting plan.
  - 24 • Mediate emails and communications between the parents by providing ongoing parent coordination. The parents should have no contact with one another and all information related to Senna, his health, major decisions, scheduling, child support and more shall all go through the case manager.
  - Help create a common language between the parents regarding discipline, rules, dict, etc., at each house.

- Have decision making abilities for minor deviations and/or changes to the plan or in other decisions regarding Senna and the schedule that the parents cannot make independently.
- Make recommendations regarding treatment and other services for the parents and/or child.
- Be able to communicate with each parent's treatment providers, if necessary.
- Select a new exchange supervisor within 30 days of appointment.
- Have decision making ability for scheduling telephone calls from the nonresidential parent to Senna, commencing on or after 6 months after entry of this order.

A copy of all three parenting evaluations and the Court's Findings of Fact shall be provided to the case manager. The case manager shall be in Arizona and appointed based on the recommendations of Dr. English. The costs of the case manager shall be divided on a pro rata basis.

### 3.14 Summary of RCW 26.09.430 - .480, Regarding Relocation of a Child

This is a summary only. For the full text, please see RCW 26.09.430 through 26.09.480.

If the person with whom the child resides a majority of the time plans to move, that person shall give notice to every person entitled to court ordered time with the child.

If the move is outside the child's school district, the relocating person must give notice by personal service or by mail requiring a return receipt. This notice must be at least 60 days before the intended move. If the relocating person could not have known about the move in time to give 60 days' notice, that person must give notice within 5 days after learning of the move. The notice must contain the information required in RCW 26.09.440. See also form DRPSCU 07.0500, (Notice of Intended Relocation of A Child).

If the move is within the same school district, the relocating person must provide actual notice by any reasonable means. A person entitled to time with the child may not object to the move but may ask for modification under RCW 26.09.260.

Notice may be delayed for 21 days if the relocating person is entering a domestic violence shelter or is moving to avoid a clear, immediate and unreasonable risk to health and safety.

If information is protected under a court order or the address confidentiality program, it may be withheld from the notice.

A relocating person may ask the court to waive any notice requirements that may put the health and safety of a person or a child at risk.

Failure to give the required notice may be grounds for sanctions, including contempt.

If no objection is filed within 30 days after service of the notice of intended relocation, the relocation will be permitted and the proposed revised residential schedule may be confirmed.

A person entitled to time with a child under a court order can file an objection to the child's relocation whether or not he or she received proper notice.

An objection may be filed by using the mandatory pattern form WPF DRPSCU 07.0700, (Objection to Relocation/Petition for Modification of Custody Decree/Parenting Plan/Residential Schedule). The objection must be served on all persons entitled to time with the child.

The relocating person shall not move the child during the time for objection unless: (a) the delayed notice provisions apply; or (b) a court order allows the move.

If the objecting person schedules a hearing for a date within 15 days of timely service of the objection, the relocating person shall not move the child before the hearing unless there is a clear, immediate and unreasonable risk to the health or safety of a person or a child.

Neither party shall relocate the child out of Maricopa or King County without consent of the other or court approval.

#### IV. Decision Making

##### 4.1 Day-to-Day Decisions

Each parent shall make decisions regarding the day-to-day care and control of the child while the child is residing with that parent. Regardless of the allocation of decision making in this parenting plan, either parent may make emergency decisions affecting the health or safety of the child.

This provision is subject to the rules and requirements of any supervised visitation counselor and/or facility where the father's visitation may occur.

#### 4.2 Major Decisions

Major decisions regarding each child shall be made as follows:

Education decisions:	Jointly, through case manager
Non-emergency health care:	Jointly, through case manager
Religious upbringing:	Jointly, through case manager

For any decision involving a cost that the mother expects the father to assist in paying, the father must consent absent court order.

#### 4.3 Restrictions in Decision Making

The parties are required to discuss any major decisions with the case manager who will seek to assist the parties in achieving agreement.

### V. Dispute Resolution

Disputes regarding the parenting plan, shall be submitted to the case manager first and the case manager shall have decision making authority for minor decisions. In the event there are larger issues or major decisions that can't be addressed through case management, the parties shall participate in arbitration prior to any further court action.

Disputes between the parties, other than child support disputes, shall be submitted to the case manager. If that does not resolve the issue then the parties will use an agreed private arbitrator or Court.

### VI. Other Provisions

There are the following other provisions:

- a. Skype/Webcam calls shall continue on a twice weekly basis until age five and not less than a weekly basis thereafter. Skype calls shall be Wednesday and Sunday evenings at 6:00 p.m. The parents should encourage Senna to participate in Skype and/or answer the phone but if he cannot or will not by choice, schedule, or other, the calling parent can leave a phone/email message

which should be shared as soon as possible with Senna. Screening and/or avoiding calls or blaming the other parent for not having the child available is not in the child's best interests.

- b. Both parents shall complete a "Love and Logic" parenting class within six months of the entry of this order. Upon completion they shall provide a copy of their certificates to the case manager.
  - c. The father should continue working with Dr. Roeben for therapy and medication management. He should provide Dr. Roeben with a copy of the third parenting evaluation and the Court's Findings of Fact. He should sign a release form to allow Dr. Roeben to communicate with the case manager. Dr. Roeben's files shall not be provided to the mother in any future litigation, whether directly (e.g., via subpoena) or indirectly (e.g., via a request for records from the case manager or subsequent parenting evaluator/GAL).
  - d. The mother should begin weekly individual therapy with someone who has at least a master's degree in counseling, social work, or psychology. EXCEPT that she may use any therapist provided by a community clinic if necessary for financial reasons. She should provide a copy of her psychological evaluation to the provider as well as all three parenting evaluation reports and the Court's Findings of Fact. She should sign a release form to allow her therapist to communicate with the case manager as needed. The therapist's files shall not be provided to the father in any future litigation, whether directly (e.g., via subpoena) or indirectly (e.g., via a request for records from the case manager or subsequent parenting evaluator/GAL).
  - e. Each parent shall notify the other parent as soon as reasonably possible of any illness requiring medical attention, or any emergency involving the child. Each parent shall have access to the child and the medical staff. The parents will give the child all medication when and as prescribed by a doctor and consult independently with the doctor and case manager regarding Senna's diet, lactose intolerance, weight, etc.
  - f. Each parent shall have equal and independent authority to confer with school, child care and other program personnel regarding the child's progress and each parent shall have full and equal access to the education and health care records of the child absent a court order to the contrary. Neither parent may veto the access requested by the other parent. Education records are limited to academic, attendance, and disciplinary records of public and private schools in all grades, Kindergarten through twelve, and any form of alternative school for all periods for which child support is paid or the child is dependent in fact of

1  
2       the parent requesting access to the records. Education records of post-  
3       secondary educational institutions are limited to enrollment and academic  
4       records necessary to determine, establish, or continue support.

- 5
- 6       g. Neither parent shall make derogatory comments about the other parent or allow  
7       anyone else to do the same in the child's presence. Neither parent shall allow  
8       or encourage the child to make derogatory comments about the other parent.
- 9
- 10      h. Each parent shall exert every reasonable effort to maintain free access and  
11       unhampered contact and communication between the child and the other  
12       parent, and promote the emotions of affection, love and respect between the  
13       child and the other parent. Each parent agrees to refrain from words or  
14       conduct, and further agrees to discourage other persons from uttering words or  
15       engaging in conduct, which would have a tendency to estrange the child from  
16       the other parent, to damage the opinion of the child as to the other parent, or to  
17       impair the natural development of the child's love and respect for the other  
18       parent.
- 19
- 20      i. Each parent shall honor the other parent's parenting style, privacy and  
21       authority. Neither parent shall interfere in the parenting style of the other nor  
22       shall either parent make plans or arrangements that would impinge upon the  
23       other parent's authority or time with the child, without the express agreement  
24       of the other parent. Each parent shall encourage the child to discuss his  
      grievance against a parent directly with the parent in question. It is the intent  
      of both parents to encourage a direct parent-child bond and communication.
- 25
- 26      j. Neither parent shall encourage the child to change his primary residence and  
27       neither parent shall advise the child of any child support or other legal matters.  
28       The parties should not exchange any documents, bills, letters or more during  
29       any child exchange. These things should be sent via mail or email and copied  
30       to the case manager.
- 31
- 32      k. Neither parent shall financially obligate the other parent without the other  
33       parent's consent or court order
- 34
- 35      l. Neither parent shall use the child, directly or indirectly, to gather information  
36       about the other parent or take verbal messages to the other parent.
- 37
- 38      m. Neither parent shall use or threaten to use physical or corporal punishment on  
39       the child.

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- n. To better serve the needs and desires of the child, changes and or deviations to this plan are acceptable and welcome so long as such changes are mutually agreed upon by both parents and the case manager.
  - o. The parents and case manager shall use the Our Family Wizard calendar tool to track the residential schedule and shall use the shared entries journal tool for sharing information concerning all doctor visits as well as health and wellness information concerning the child at residential exchanges.
  - p. Except for in the event of emergencies, neither parent shall initiate a report to police, CPS or other law enforcement regarding Senna prior to discussing it with the Case Manager and considering the Case Manager's input.

## VII. Order by the Court

It is ordered, adjudged and decreed that the parenting plan set forth above is adopted and approved as an order of this court.

**WARNING:** Violation of residential provisions of this order with actual knowledge of its terms is punishable by contempt of court and may be a criminal offense under RCW 9A.40.060(2) or 9A.40.070(2). Violation of this order may subject a violator to arrest.

When mutual decision making is designated but cannot be achieved, the parties shall make a good faith effort to resolve the issue through the dispute resolution process.

If a parent fails to comply with a provision of this plan, the other parent's obligations under the plan are not affected.

DONE IN OPEN COURT this 16<sup>th</sup> day of October, 2012.

  
THE HONORABLE WILLIAM L. DOWNING  
KING COUNTY SUPERIOR COURT JUDGE

MCKINLEY IRVIN, PLLC

JOHN W. KYDD, P.S.

---

David B. Starks, WSBA No. 28344  
Attorneys for Respondent

---

John W. Kydd, WSBA No. 12260  
Attorneys for Petitioner

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** 2 - Name... /Peddle - reschedule call  
**Date:** January 8, 2015 at 8:54 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name - ...

I have not received the materials I need yet, so I need to reschedule our call. I hope to get back to you tomorrow with a new date/time.

Best regards,

MATERIALS NOT READ.

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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000044

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** Re: 2 - Nam... /Peddle - reschedule call  
**Date:** January 8, 2015 at 9:04 AM  
**To:** Jennifer Keilin jkeilin@comcast.net

Jennifer I'm confused what materials are you referring to?

Sent from my iPhone

On Jan 8, 2015, at 9:54 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Na...

I have not received the materials I need yet, so I need to reschedule our call. I hope to get back to you tomorrow with a new date/time.

Best regards,

*Jennifer Keilin, MSW, LCSW*

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

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000045

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna  
**Date:** January 7, 2015 at 7:12 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Yes, this email is in reply.

Best regards,

*Jennifer Keilin, MSW, LICSW*

**1715 114th Ave. SE Suite 210**  
**Bellevue, WA 98004**  
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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Wednesday, January 7, 2015 at 6:50 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Re: Senna

Did you receive my email this morning?

Sent from my iPhone

On Jan 7, 2015, at 7:48 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Nam...

Christine contacted me about your request for visitation on 1/19-23. In order to facilitate this, please do the following:

1. Provide me with Senna's travel itinerary for these dates, including any flight information and places of lodging, no later than this Friday.
2. Schedule supervised exchanges, to occur at the Surprise Police Station. Provide me with the specifics – dates, times, name and contact information of supervisor, no later than this Friday.

Please confirm receipt of this email promptly, and provide the information as requested by Friday.

Best regards,

**000046**

**Jennifer Keilin, MSW, LICSW**

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date: Wednesday, January 7, 2015 at 5:06 AM**

**To: Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health C... >, Angela Duncan <[angela.duncan@comcast.net](mailto:angela.duncan@comcast.net)>**

**Subject: Senna**

Dear Jennifer,

I am writing in regards to our conversation yesterday.

My priority right now is to be able to see my son. I realize 21 days notice is referred to in the parenting plan. There is no reason I can think of to justify denying visit time for Senna. Missing out on an opportunity for a visit that is logically difficult to coordinate and thus infrequent is simply cruel and not necessary due to the parenting plan allowing for and encouraging flexibility.

It is a bizarre way to parent....ie rare contact with my son, stressful skype sessions. I literally have no time with Senna where I am not observed. I want, and Senna deserves, a more natural interaction with his father. Shame on Christine for frustrating that for Senna. And shame on her if she denies him that while I am here.

You said you want to move forward from this point. It is insulting to disregard the negative that have brought us to this point and discouraging since you were given a special responsibility to advocate for Senna over six months ago. But I want to move forward asap and get Senna safe. He is with a narcissistic woman not able to nurture him.

For your convience, I will forward declarations included in the packet I delivered to your office.

I am hopeful to Senna and want you to know my attempts to coordinate with Christine regarding me coming to Arizona were futile as she refuses to respond.

Sent from my iPhone

**000047**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna  
**Date:** January 7, 2015 at 6:48 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name ...

Christine contacted me about your request for visitation on 1/19-23. In order to facilitate this, please do the following:

1. Provide me with Senna's travel itinerary for these dates, including any flight information and places of lodging, no later than this Friday.
2. Schedule supervised exchanges, to occur at the Surprise Police Station. Provide me with the specifics – dates, times, name and contact information of supervisor, no later than this Friday.

Please confirm receipt of this email promptly, and provide the information as requested by Friday.

Best regards,

*Jennifer Keilin, MSW, LICSW*

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Wednesday, January 7, 2015 at 5:06 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health ... >, Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

**Subject:** Senna

Dear Jennifer,

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000048

**parenting plan allowing for and encouraging flexibility.**

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**Sent from my iPhone**

**000049**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna  
**Date:** January 7, 2015 at 6:48 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi [REDACTED],

Christine contacted me about your request for visitation on 1/19-23. In order to facilitate this, please do the following:

1. Provide me with Senna's travel itinerary for these dates, including any flight information and places of lodging, no later than this Friday.
2. Schedule supervised exchanges, to occur at the Surprise Police Station. Provide me with the specifics – dates, times, name and contact information of supervisor, no later than this Friday.

Please confirm receipt of this email promptly, and provide the information as requested by Friday.

Best regards,

*Jennifer Keilin, MSW, LICSW*

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---

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**Date:** Wednesday, January 7, 2015 at 5:06 AM

**To:** Jennifer Keilin <jkeilin@comcast.net>, 2 - Name - Whistleblower Regarding Health Care Provider or Health ... >, Angela Duncan <angeladuncan@comcast.net>

**Subject:** Senna

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000050

**parenting plan allowing for and encouraging flexibility.**

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**For your convience, I will forward declarations included in the packet I delivered to your office.**

**I am hopeful to Senna and want you to know my attempts to coordinate with Christine regarding me coming to Arizona were futile as she refuses to respond.**

**Sent from my iPhone**

**000051**

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** Senna  
**Date:** January 7, 2015 at 5:06 AM  
**To:** Jennifer Keilin jkeilin@comcast.net, 2 - Name - Whistleblower Regarding Health Care ..., Angela Duncan angeladuncan@comcast.net

Dear Jennifer,

I am writing in regards to our conversation yesterday.

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You said you want to move forward from this point. It is insulting to disregard the negative that have brought us to this point and discouraging since you were given a special responsibility to advocate for Senna over six months ago. But I want to move forward asap and get Senna safe. He is with a narcissistic woman not able to nurture him.

For your convience, I will forward declarations included in the packet I delivered to your office.

I am hopeful to Senna and want you to know my attempts to coordinate with Christine regarding me coming to Arizona were futile as she refuses to respond.

Sent from my iPhone

000052

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - Name... /Peddle - health insurance verification  
**Date:** January 6, 2015 at 6:18 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name ...

I did receive your previous email, thank you. I will call you at 2 pm.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Monday, January 5, 2015 at 7:00 PM

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** Re: 2 - Name - ... /Peddle - health insurance verification

Dear Jennifer,

Thank you for your email. I can be available for a call at two.

Senna continues to be subjected to hurtful actions from his mother. The previous two skypes are common examples. The first skype Senna was with his grandmother who repeatedly told him he had attended school that day. Senna insisted he had not and was corrected to say he had. I could see the confusion and fear on his face. I contacted the school and it was closed on the day he was coerced to say he went.

The most recent skype Senna asked me if it was true I hurt and was mean to his mother. I assured him this was not true and that he was ok. Sennas mother said sternly...senna you know I dont talk to your dad and ended the session about 8 minutes early. This makes me fear what is being said to senna.

I never harmed his mother and never would. She stole sentimental and very valuable items from, in fact she wiped my home clean and what she couldnt take cut up and destroyed. The damage to my home is still evident after repairs. I will never tell this to senna in his childhood and maybe never.

I am now in AZ, extremely tired and showing signs of exhaustion and struggling to not be short in my tone.

000053

I called the school and introduced myself and was immediately told the school was aware of who I am and would not be interacting with me and that they had court docs prohibiting me from seeing Senna. The tone used to address me is of scorn and distrust. I am emotionally wore out from being treated like scum and reviled by those associated with Senna.

I provided documents for your review at your office. I have appreciated your reaching out to me and only have repetitive concerns to report. Sennas mother is consistent in her dysfunction and presentation as the victim while she victimizes her own son, just as she did to her daughter and the previous men in her life.

I will make every effort to see Senna while I am here. His nana and papa have not seen him but once in 2014, Senna will be subjected to the drama that goes along with all of our contact; police, dirty looks from those who believe her and Senna anxiously trying to appease her.

You have asked me what to do....Senna needs the parenting plan amended and to be placed with me. I deserve and he needs the peace i can provide for his childhood.

Regarding health insurance, i will never fail to provide for Senna, even if that is direct payment to providers. Neither will i continue to be the victim of non compliance with a court ordered parenting plan. I will follow the plan and dont want to be harrassed when i am in compliance.

I assume you saw my previous email. Please confirm this as i have not received acknowledgement of this communication.

Sent from my iPhone

On Jan 5, 2015, at 2:10 PM, Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Nam...,

Let's schedule a call. Are you available tomorrow afternoon, at 2 pm?

We will continue to discuss the Skype issues and Senna's health insurance coverage.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**000054**

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Monday, January 5, 2015 at 9:55 AM

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Subject: Re:** 2 - Name - ... /Peddle - health insurance verification

Please also consider the \$10,000 judgment I have against Christine when she perjured herself to judge downing for the stolen laptop plus interest for three years at this stage of the game Jennifer I'm flat out broke this is what this system has done to me and to Senna so I'm not sure you want to go with this line of questioning when I provide you documentation since July

Sent from my iPhone

On Jan 5, 2015, at 10:22 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Nam...,

Please repond ASAP re: Senna's health insurance.

Best regards,

*Jennifer Keilin, MSW, LICSW*

**1715 114th Ave. SE Suite 210**

**Bellevue, WA 98004**

**P 425-526-6556**

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**From:** Jennifer Keilin <jkeilin@comcast.net>

**Date:** Thursday, December 18, 2014 at 4:58 PM

**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Cc:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** 2 - Name - ... /Peddle - health insurance verification

2 - Nam...,

**Will you verify Senna's health insurance status?**

Best regards,

*Jennifer Keilin, MSW, LICSW*

**000055**

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
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000056

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** Re: 2 - Nam... /Peddle - health insurance verification  
**Date:** January 5, 2015 at 7:00 PM  
**To:** Jennifer Keilin jkeilin@comcast.net

Dear Jennifer,  
Thank you for your email. I can be available for a call at two.

Senna continues to be subjected to hurtful actions from his mother. The previous two skypes are common examples. The first skype Senna was with his grandmother who repeatedly told him he had attended school that day. Senna insisted he had not and was corrected to say he had. I could see the confusion and fear on his face. I contacted the school and it was closed on the day he was coerced to say he went.

The most recent skype Senna asked me if it was true I hurt and was mean to his mother. I assured him this was not true and that he was ok. Sennas mother said sternly...senna you know I dont talk to your dad and ended the session about 8 minutes early. This makes me fear what is being said to senna.

I never harmed his mother and never would. She stole sentimental and very valuable items from, in fact she wiped my home clean and what she couldnt take cut up and destroyed. The damage to my home is still evident after repairs. I will never tell this to senna in his childhood and maybe never.

I am now in AZ, extremely tired and showing signs of exhaustion and struggling to not be short in my tone.

I called the school and introduced myself and was immediately told the school was aware of who I am and would not be interacting with me and that they had court docs prohibiting me from seeing Senna. The tone used to address me is of scorn and distrust. I am emotionally worn out from being treated like scum and reviled by those associated with Senna.

I provided documents for your review at your office. I have appreciated your reaching out to me and only have repetitive concerns to report. Sennas mother is consistent in her dysfunction and presentation as the victim while she victimizes her own son, just as she did to her daughter and the previous men in her life.

I will make every effort to see Senna while I am here. His nana and papa have not seen him but once in 2014, Senna will be subjected to the drama that goes along with all of our contact; police, dirty looks from those who believe her and Senna anxiously trying to appease her.

You have asked me what to do...Senna needs the parenting plan amended and to be placed with me. I deserve and he needs the peace I can provide for his childhood.

Regarding health insurance, I will never fail to provide for Senna, even if that is direct payment to providers. Neither will I continue to be the victim of non compliance with a court ordered parenting plan. I will follow the plan and dont want to be harrassed when I am in compliance.

I assume you saw my previous email. Please confirm this as I have not received acknowledgement of this communication.

NW REPT  
NO

Sent from my iPhone

On Jan 5, 2015, at 2:10 PM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Na...

Let's schedule a call. Are you available tomorrow afternoon, at 2 pm?

We will continue to discuss the Skype issues and Senna's health insurance coverage.

Best regards,

Jennifer Keilin, MSW, LCSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1438

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...

**Date:** Monday, January 5, 2015 at 9:55 AM

000057

**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject: Re:** 2 - Name - ... /Peddle - health insurance verification

Please also consider the \$10,000 judgment I have against Christine when she perjured herself to judge downing for the stolen laptop plus interest for three years at this stage of the game Jennifer I'm flat out broke this is what this system has done to me and to Senna so I'm not sure you want to go with this line of questioning when I provide you documentation since July

Sent from my iPhone

On Jan 5, 2015, at 10:22 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Na...

Please repond ASAP re: Senna's health insurance.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** Jennifer Keilin <jkeilin@comcast.net>

**Date:** Thursday, December 18, 2014 at 4:58 PM

**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Cc:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** 2 - Name - ... /Peddle - health insurance verification

2 - Nam...

Will you verify Senna's health insurance status?

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000058

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** Dear Jennifer,  
**Date:** January 1, 2015 at 2:26 PM  
**To:** Jennifer Keilin jkeilin@comcast.net

I am writing to you because my concerns for Senna's emotional and mental health have not diminished. Last night's Skype session 12/31/2014, presented another reminder for me that precious time is being lost while Senna is experiencing a caretaking pattern that is very likely causing long term damage to his future because the parenting he is experiencing is damaging and altering his childhood development.

During Skype on 12/31/2014, Senna repeatedly said he didn't want to talk to his father. When I attempted to trouble shoot Senna's statement to salvage his time with his father and understand his mental state Senna said he was afraid of his father. Senna also denied repeatedly that he had attended school on that same day, 12/31/2014, and was repeatedly told by his maternal grandmother that yes he did attend school. No attempt is made to help Senna sort out his thoughts and emotions so that he can have relief from his confusion and fears. Senna has no unsupervised time with his father as the Skype is monitored by maternal relatives all with a history of being openly hostile to me and thus there is not opportunity for time between Senna and his father to occur that isn't stressed and distressing.

Senna is in need of co-parenting and unfortunately he is placed in primary custody of the parent who is not able to co-parent or parent.

I have had this concern regarding isolation of Senna and alienation from his father and paternal family for several years and presented this to you in July, 2014. I have appreciated your attention to this case but the time involved has not resulted in action so no relief has been pursued regarding the concerns while Senna's childhood moves forward in this harmful environment. I want to emphasize that his childhood cannot be recaptured. The harmful results of the dysfunctional environment cannot be undone.

I am desperate for my son to be ok and I realize all to painfully that his suffering is difficult to document due to the psychological nature of the damage. However, it is possible. I have confidence that a skilled clinician can document the concerns and show the court that the parenting plan has to be changed for Senna's sake. No ethical professional would fail to provide this information to the court asap as the damage to Senna's psyche is pervasive and most damaging when occurring in these formative years.

For this reason I am asking that if you are unable to take immediate action on Senna's behalf that you provide your resignation along with returned retainer funds.

Thank you,

2 - Name ...

Sent from Windows Mail

000059

**From:** 2 - Name - Whistleblower Regarding Health Care P...  
**Subject:** email in family wizard  
**Date:** December 25, 2014 at 3:28 PM  
**To:** Jennifer Keilin jkeilin@comcast.net

Jennifer,

Merry Xmas,

**FYI I have noit seen my son for weeks now, I looked to you for help as a court ordered support system for what is best for our son.**

**The abusive use of conflict and abuse to our son is at an all time high. You will see a new message in Family Wizard for you.**

**Please respond as I will no longer allow this to go on and let Senna live this tormented life.**

**I will await to hear from you.**

**Can you imagine another holiday alone and have no idea where my son is, 3 years in a row.**

2 - Name ...

Sent from Windows Mail

**000060**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Email in family wizard  
**Date:** December 25, 2014 at 3:30 PM  
**To:** 2 - Name - Whistleblower ...

Hi, I am out of the office until 1/5/15. I will respond to your message as soon as I return.

000061

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Jennifer Keilin Out of Office 4/6-10  
**Date:** April 1, 2015 at 11:54 PM  
**To:** Jennifer Keilin jkeilin@comcast.net  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi,

I will be out of the office all of next week and will not be checking email or phone messages.

Please contact me at your earliest opportunity if you have a pressing matter.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**000062**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Senna Duncan CPS Investigation  
**Date:** March 5, 2015 at 9:31 AM  
**To:** llivermore@azdes.gov  
**Cc:** Jennifer Keilin jkeilin@comcast.net, Christine Peddle sennaduncan79@hotmail.com, Veronica Freitas v@vfreitaslaw.com, Amy Pasco amy@vfreitaslaw.com, 2 - Name - Whistleblower Regarding Health Care ...

Good morning Lisa

I left a second voicemail this morning and am also reaching out by email. I am a Case Manager appointed in Washington State to assist Senna's parents in operationalizing their Parenting Plan (court order attached). I would like to learn about the CPS allegation and status of the investigation, and provide you any information that is helpful to you. Ms. Peddle is the residential parent and has provided her consent for our contact (see attached). If you also require Mr. 2 - Name - W... consent I am confident he will provide it immediately, as requested.

I look forward to speaking with you at your soonest opportunity.

Best regards,

Jennifer Keilin, MSW, LICSW

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Bellevue, WA 98004

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**Jennifer Keilin, MSW, LICSW**

1715 114<sup>th</sup> Ave. St. Suite 210 Bellevue, WA 98004  
P 425-526-6556 F 425-270-1436 jkeilin@comcast.net

**AUTHORIZATION FOR THE MUTUAL RELEASE AND EXCHANGE  
OF CONFIDENTIAL AND PRIVILEGED INFORMATION**

I hereby authorize the mutual written and verbal exchange of any confidential or privileged information between Jennifer Keilin, MSW, LICSW, and LISA LLIVERMORE, regarding CHRISTINE E PROOLE & SAWNA S.  
(person/entity receiving release) (client name) Dr. J.K.  
AZ DES At 2/12/15 Contra Costa.

Any exceptions to this exchange of confidential or privileged information are identified below.

To the person or entity receiving a copy of this agreement, I request that you exchange and release any and all of my information and/or records and history as requested to Ms. Keilin and that you do so without restriction or qualification, specifically including but not limited to: personal knowledge, intake summaries, treatment plans, progress notes, psychological and developmental history, physical examinations, psychiatric and psychological diagnostic evaluations and therapy, consultation reports, psychological test results, answer sheets, raw data, physician's orders, pharmacy records, diagnoses, psychiatric, psychological, educational, social, vocational, educational and financial plans, medical records, financial records, and other related documents.

000063

occupational and physical therapy records, legal records, financial records, juvenile records, academic, disciplinary, and counseling records, Child Protective Services and Department of Health records, and records of drug and alcohol assessment and treatment specifically including those that would otherwise be protected by Federal and State Confidentiality Regulations. This release also includes all similar records as stated above as related to any minor child(ren) for whom I am legal guardian.

I understand that Ms. Keilin consults with other professionals as a part of normal practice and mutual professional feedback and supervision, that she may engage in research and provide continuing professional education to other professionals in which anonymous evaluation material may be utilized, and that she may use professional copying services and that documents from my file may be made available to such services.

I understand that without this release my records are otherwise protected under the Federal and State Confidentiality Regulations and cannot be disclosed except in accordance with those regulations. I retain the right to limit, withdraw, or revoke this release at any time. I understand that this release expires 180 days from the date of the signature below, except for the purposes of this forensic examination, i.e., providing evidence or testimony, and providing continuing education and research. I understand that, even if I revoke this release or if this release expires, the laws of the State of Washington may still require disclosure of otherwise privileged information in situations of suspected child or elder abuse, of suspected potential harm to oneself or to another, in instances where the court shall order the disclosure of otherwise privileged information, or in response to a subpoena for these records.

Unless noted otherwise below, a photocopy of this form and my signature is as valid as the original.

In consideration of Ms. Keilin's agreement to perform this service, I release Ms. Keilin and each person and each entity from any liability that might directly or indirectly result from the exchange of any information described in this agreement.

Any exceptions not included in the release \_\_\_\_\_

Signed: Christine E. Liddle Printed: Christine E. Liddle

Dated: 2/25/15



\_1 2014.06.06 Order  
Appointing ...anager.pdf

000064

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - Name... /Peddle - phone call  
**Date:** February 25, 2015 at 6:14 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi [REDACTED],

I can speak with you today, at 1:30. Should I call you at the number below?

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** [REDACTED] 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...  
**Date:** Tuesday, February 24, 2015 at 11:19 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Re: [REDACTED] 2 - Name - ... /Peddle - phone call

Jennifer,

Yes thank you I would like the opportunity to speak with you. I am available this evening or tomorrow afternoon.

I would prefer this evening.

Thank you,

---

[REDACTED]  
2 - Name - Whistleblower Regarding Health Care Provider or...

000065

Suite C  
Issaquah WA. 98027  
[www.pilotiusa.com](http://www.pilotiusa.com)  
[www.facebook.com/pilotiusa](http://www.facebook.com/pilotiusa)

**From:** Jennifer Keilin  
**Sent:** Tuesday, February 24, 2015 9:55 AM

**To:** 2 - Name - Whistleblower Re...

**Cc:** Jennifer Keilin

Hi 2 - Name - ...

Christine requested a phone call with me to discuss CPS's recent contact with her, and your contact with the school.

I wonder if you would also like to speak with me?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000066

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** 2 - Na... /Peddle - release of information  
**Date:** February 23, 2015 at 2:51 PM  
**To:** Christine Peddle sennaduncan79@hotmail.com, 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi,

**Please sign and immediately return this form authorizing my contact with Lisa Livermore of Arizona Child Protective Services.**

**Best regards,**

*Jennifer Keilin, MSW, LICSW*

**1715 114th Ave. SE Suite 210**

**Bellevue, WA 98004**

**P 425-526-6556**

**F 425-270-1436**

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**ROI.Authorization to  
Release Inf...ssional.doc**

**000067**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Duncan/Pedde - OFW  
**Date:** February 12, 2015 at 10:19 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Nam...

I hope you are well. I would like the opportunity to talk with you about the things that need to happen for an in-person visit with Senna. Let's schedule a call for 2/23, 1 pm?

Also, do you find that OFW is very helpful? I know Christine provides some relevant information, such as updates on Senna, bills, etc. She also sometimes writes things "for the record." It seems that you also use it primarily "for the record." Is that accurate or do you see it differently?

I am wondering if the benefits of OFW outweigh the negatives.

I would like to hear your thoughts.

Best regards,

*Jennifer Keilin, MSW, LICSW*

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Bellevue, WA 98004  
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000068

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - Name... Peddle - 2 - Name... requested visit 1/19-23  
**Date:** January 14, 2015 at 3:02 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name...,

I'm sorry, you did not provide me the itinerary information required by the parenting plan and you do not have an authorized exchange supervisor. I am not authorized to act outside of the parenting plan.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...  
**Date:** Wednesday, January 14, 2015 at 2:46 PM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Cc:** Christine Peddle <sennaduncan79@hotmail.com>  
**Subject:** Re: 2 - Name - /Peddle - 2 - Name - ... requested visit 1/19-23

Jennifer I did respond asking for help because I have been unable to locate a transport person. I am not flying I am staying in Arizona I would respectfully request that the visit move forward as again I asked for help and I've not been able to find a transport person please advise

Sent from my iPhone

On Jan 14, 2015, at 3:41 PM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Good afternoon,

2 - Name... requested a visit with Senna for the above dates. As per the parenting plan, I requested 2 - Name... provide me with his itinerary, to include any flights for Senna and places of lodging during that period, by Friday, 1/9/14. I also requested 2 - Name... schedule the supervised visitation exchange at the Surprise Police Station, and provide me the details (times, supervisor, and supervisor contact info) by Friday, 1/9/14.

2 - Name... has not provided any of the requested information as of today. Consequently, the visit will not occur.

000069

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
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000070

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna  
**Date:** January 9, 2015 at 7:14 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care P...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Nam...,

I'm sorry, there will be no accommodations. I expect this exchange to be "by the book." The exchange supervisor needs to be a pre-approved provider. Please provide me the requested information ASAP, as requested.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Friday, January 9, 2015 at 6:52 AM

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Subject:** Senna

Hello Jennifer,

I am writing regarding transfer of Senna for his visit.

In the spirit of moving forward I am requesting a neutral location outside of Surprise for the pick up of Senna. There is dramatic history associated with transfers in Surprise. It would be greatly appreciated if you would designate a location and identify a supervisor as you are an unbiased party.

Please consider at least a half way point for the transfer. I can offer a local resident as a person to designate to meet Senna. Karen Warren .....If Karen is not suitable please designate someone.

Also, please clarify what documents you are waiting for from Christine and the time frame you will delay to accomodate Christine

000071

Thank you

2 - Name - Whistle...

Sent from Windows Mail

000072

From: Jennifer Keilin jkeilin@comcast.net  
Subject: Re: | 2 - Name... Peddle - reschedule call  
Date: January 8, 2015 at 9:55 AM  
To: 2 - Name - Whistleblower Regarding Health Care...  
Cc: Jennifer Keilin jkeilin@comcast.net

Hi | 2 - Name...,

I'm referring to some materials from Christine.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** | 2 - Name - Whistleblower Regarding Health Care F...

**Date:** Thursday, January 8, 2015 at 9:04 AM

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** Re: | 2 - Name - .../Peddle - reschedule call

Jennifer I'm confused what materials are you referring to?

Sent from my iPhone

On Jan 8, 2015, at 9:54 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi | 2 - Name...,

I have not received the materials I need yet, so I need to reschedule our call. I hope to get back to you tomorrow with a new date/time.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556

000073

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000074

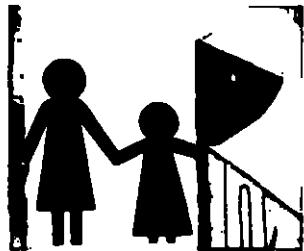


## Family Court: Dad Initially Labeled Abuser Wins Appeals Case on Custody

By Nina Shapiro Thu., Feb 23 2012 at 12:00AM

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Scott Bakal

In last month's cover story on perceived male bias in family court, *Seattle Weekly* told the case of "Richard," a dad who faced protection orders and domestic violence treatment classes in the course of his custody battle. Eventually, he won that battle, but his ex-wife appealed. Now, the appeals ruling is in.

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Like the trial court, the appeals court makes short shrift of a putative domestic violence finding against Richard by an "expert" risk assessor named Doug Bartholomew. The evidence to support an abuse finding "is not substantial," the appeals judges say. Indeed, even Bartholomew himself now seems to agree, telling *SW* during an interview for the cover story that his seemingly damning conclusions did not add up to domestic violence.

The appeals court also rejects another key part of the appeal filed by Richard's wife: the "irregular" behavior of her attorney at trial. Jan Dyer was so "sarcastic," according to the trial judge, that he took the rare step of admonishing her on the record. And then things got really crazy. The appeals court ruling relates:

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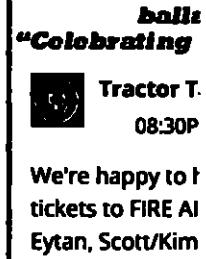
Dyer was 'sobbing' in the courtroom and, apparently, made such noise by slamming furniture that the court reporter noted 'loud crash' on three occasions. Also during [parent evaluator Jennifer] Keilin's direct examination, Dyer's cell phone rang, causing the court reporter to note a 'barking cellphone interruption.'

As one might guess from her cellphone ring tone, Dyer is known for her aggressiveness, particularly when it comes to domestic violence cases.

And so, the appeals ruling goes on to observe: "Dyer's antics stopped when she began her cross-examination of Keilin." Indeed, the court says that, in general, Dyer "thoroughly examined" the witnesses and "provided competent representation."

Keilin had submitted an extensive report recommending that Richard be the primary parent, based on what she judged was his stronger relationship with his son. Unlike with Bartholomew's report, the trial and appeals court judges gave her findings great weight.

So, in the end, the system worked for Richard. But it had him pegged as an abuser for more than a year-and-a-half, giving him an uphill battle to fight. A successful engineer, he had the money to keep going. Many men, lawyers say, can't do the same.



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Ivanka Trump's Life Changing Decision Leaves Friends and Family in Awe

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000078

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** 2 - Name... /Peddle - OFW communication  
**Date:** January 7, 2015 at 7:13 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care..., Christine Peddle sennaduncan79@hotmail.com  
**Cc:** Jennifer Keilin jkeilin@comcast.net

I sent this message to each of you via OFW, and am copying it here:

Good morning,  
As of 1/7/15, communication is to change.

Please follow these rules in any communication with each other:

1. Brief (two to five lines, ideally)
2. Informative/Factual (include only the relevant information)
3. Friendly (hello and goodbye, respectful)
4. Firm (If needed, to discontinue a failing topic)

The following is to be excluded:

1. Historical statements (in the past you...)
2. Blaming statements (you always, you never...)
3. Allegations

Future emails need to read as cordial and solution oriented.

Failure to follow these guidelines will result in further limited communications.

Please confirm receipt of this message and understanding of these rules, within 48 hours.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000079

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - Name... Peddle - health insurance verification  
**Date:** January 6, 2015 at 6:18 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name ...

I did receive your previous email, thank you. I will call you at 2 pm.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Monday, January 5, 2015 at 7:00 PM

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** Re: 2 - Name - ... /Peddle - health insurance verification

Dear Jennifer,

Thank you for your email. I can be available for a call at two.

Senna continues to be subjected to hurtful actions from his mother. The previous two skypes are common examples. The first skype Senna was with his grandmother who repeatedly told him he had attended school that day. Senna insisted he had not and was corrected to say he had. I could see the confusion and fear on his face. I contacted the school and it was closed on the day he was coerced to say he went.

The most recent skype Senna asked me if it was true I hurt and was mean to his mother. I assured him this was not true and that he was ok. Sennas mother said sternly...senna you know I dont talk to your dad and ended the session about 8 minutes early. This makes me fear what is being said to senna.

I never harmed his mother and never would. She stole sentimental and very valuable items from, in fact she wiped my home clean and what she couldnt take cut up and destroyed. The damage to my home is still evident after repairs. I will never tell this to senna in his childhood and maybe never.

I am now in AZ, extremely tired and showing signs of exhaustion and struggling to not be short in my tone.

000080

KEILIN, JENNIFER 2016-13188LW PAGE 262

I called the school and introduced myself and was immediately told the school was aware of who I am and would not be interacting with me and that they had court docs prohibiting me from seeing Senna. The tone used to address me is of scorn and distrust. I am emotionally wore out from being treated like scum and reviled by those associated with Senna.

I provided documents for your review at your office. I have appreciated your reaching out to me and only have repetitive concerns to report. Sennas mother is consistent in her dysfunction and presentation as the victim while she victimizes her own son, just as she did to her daughter and the previous men in her life.

I will make every effort to see Senna while I am here. His nana and papa have not seen him but once in 2014, Senna will be subjected to the drama that goes along with all of our contact; police, dirty looks from those who believe her and Senna anxiously trying to appease her.

You have asked me what to do....Senna needs the parenting plan amended and to be placed with me. I deserve and he needs the peace i can provide for his childhood.

Regarding health insurance, i will never fail to provide for Senna, even if that is direct payment to providers. Neither will i continue to be the victim of non compliance with a court ordered parenting plan. I will follow the plan and dont want to be harrassed when i am in compliance.

I assume you saw my previous email. Please confirm this as i have not received acknowledgement of this communication.

Sent from my iPhone

On Jan 5, 2015, at 2:10 PM, Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Nam...,

Let's schedule a call. Are you available tomorrow afternoon, at 2 pm?

We will continue to discuss the Skype issues and Senna's health insurance coverage.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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000081

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ... >

**Date:** Monday, January 5, 2015 at 9:55 AM

**To:** Jennifer Keilin <jkeilin@comcast.net>

**Subject: Re:** 2 - Name - ... /Peddle - health insurance verification

Please also consider the \$10,000 judgment I have against Christine when she perjured herself to judge downing for the stolen laptop plus interest for three years at this stage of the game Jennifer I'm flat out broke this is what this system has done to me and to Senna so I'm not sure you want to go with this line of questioning when I provide you documentation since July

Sent from my iPhone

On Jan 5, 2015, at 10:22 AM, Jennifer Keilin <jkeilin@comcast.net> wrote:

Hi 2 - Nam...,

Please repond ASAP re: Senna's health insurance.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210

Bellevue, WA 98004

P 425-526-6556

F 425-270-1436

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**From:** Jennifer Keilin <jkeilin@comcast.net>

**Date:** Thursday, December 18, 2014 at 4:58 PM

**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Cc:** Jennifer Keilin <jkeilin@comcast.net>

**Subject:** 2 - Name - ... /Peddle - health insurance verification

2 - Name ...

**Will you verify Senna's health insurance status?**

Best regards,

Jennifer Keilin, MSW, LICSW

000082

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
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**000083**

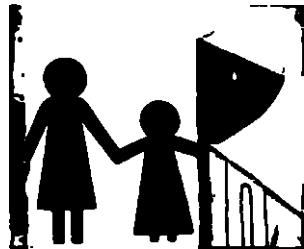


## Family Court: Dad Initially Labeled Abuser Wins Appeals Case on Custody

By Nina Shapiro Thu., Feb 23 2012 at 12:00AM

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Scott Bakal

In last month's cover story on perceived male bias in family court, *Seattle Weekly* told the case of "Richard," a dad who faced protection orders and domestic violence treatment classes in the course of his custody battle. Eventually, he won that battle, but his ex-wife appealed. Now, the appeals ruling is in.

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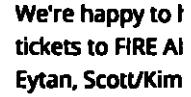
Dyer was 'sobbing' in the courtroom and, apparently, made such noise by slamming furniture that the court reporter noted 'loud crash' on three occasions. Also during [parent evaluator Jennifer] Keilin's direct examination, Dyer's cell phone rang, causing the court reporter to note a 'barking cellphone interruption.'

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And so, the appeals ruling goes on to observe: "Dyer's antics stopped when she began her cross-examination of Keilin." Indeed, the court says that, in general, Dyer "thoroughly examined" the witnesses and "provided competent representation."

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000087

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Professional/Third Party Access To OFW  
**Date:** September 16, 2014 at 5:34 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name ...

Does that mean you submitted it to OFW already?

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Monday, September 15, 2014 at 10:25 PM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

**Subject:** Re: Professional/Third Party Access To OFW

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Nam...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Name...

Will you complete the referenced form and submit to OFW?

Best regards,

000088

**Jennifer Keilin, MSW, LICSW**

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436**

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---

**From: Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>**

**Date: Sunday, September 14, 2014 at 1:58 PM**

**To: Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>**

**Subject: Professional/Third Party Access To OFW**

Hi Jennifer,

I emailed the completed access form to 2 - Name - ... on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

Thank you,

Christine

<09.07.14 OFW Msg To 2 - Name - ... Sign Release Add Keilin Form Print+Messages.pdf>

**000089**

**From:** 2 - Name - Whistleblower Regarding Health Care ...  
**Subject:** Dear Jennifer,  
**Date:** January 1, 2015 at 2:26 PM  
**To:** Jennifer Keilin jkeilin@comcast.net

I am writing to you because my concerns for Senna's emotional and mental health have not diminished. Last night's Skype session 12/31/2014, presented another reminder for me that precious time is being lost while Senna is experiencing a caretaking pattern that is very likely causing long term damage to his future because the parenting he is experiencing is damaging and altering his childhood development.

During Skype on 12/31/2014, Senna repeatedly said he didn't want to talk to his father. When I attempted to trouble shoot Senna's statement to salvage his time with his father and understand his mental state Senna said he was afraid of his father. Senna also denied repeatedly that he had attended school on that same day, 12/31/2014, and was repeatedly told by his maternal grandmother that yes he did attend school. No attempt is made to help Senna sort out his thoughts and emotions so that he can have relief from his confusion and fears. Senna has no unsupervised time with his father as the Skype is monitored by maternal relatives all with a history of being openly hostile to me and thus there is not opportunity for time between Senna and his father to occur that isn't stressed and distressing.

Senna is in need of co-parenting and unfortunately he is placed in primary custody of the parent who is not able to co-parent or parent.

I have had this concern regarding isolation of Senna and alienation from his father and paternal family for several years and presented this to you in July, 2014. I have appreciated your attention to this case but the time involved has not resulted in action so no relief has been pursued regarding the concerns while Senna's childhood moves forward in this harmful environment. I want to emphasize that his childhood cannot be recaptured. The harmful results of the dysfunctional environment cannot be undone.

I am desperate for my son to be ok and I realize all to painfully that his suffering is difficult to document due to the psychological nature of the damage. However, it is possible. I have confidence that a skilled clinician can document the concerns and show the court that the parenting plan has to be changed for Senna's sake. No ethical professional would fail to provide this information to the court asap as the damage to Senna's psyche is pervasive and most damaging when occurring in these formative years.

For this reason I am asking that if you are unable to take immediate action on Senna's behalf that you provide your resignation along with returned retainer funds.

Thank you,

2 - Name - ...

Sent from Windows Mail

000090

**From:** Jennifer Keillin jkeillin@comcast.net  
**Subject:** Re: email in family wizard  
**Date:** December 25, 2014 at 3:30 PM  
**To:** 2 - Name - Whistleblower ...

Hi, I am out of the office until 1/5/15. I will respond to your message as soon as I return.

000091

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Senna Duncan  
**Date:** December 17, 2014 at 10:14 AM  
**To:** Shaun Duncan shaun@pilotusa.com  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Great – I'll have 30 minutes available at that time.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Wednesday, December 17, 2014 at 9:26 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Re: Senna Duncan

Jennifer,

I will call you at 10 am on Thursday Morning.

Thank you

2 - Name ...

Sent from Windows Mail

**From:** Jennifer Keilin  
**Sent:** Tuesday, December 16, 2014 7:02 PM  
**To:** 2 - Name - Whistleblower R...  
**Cc:** Jennifer Keilin

Hi 2 - Name ...,

00092

I want to problem solve around this Skype issue.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Care ...

**Date:** Tuesday, December 16, 2014 at 8:11 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

**Subject:** Re: Senna Duncan

Good morning Jennifer,

Please fill me in on what you plan to discuss. I can be available Thursday but would prefer Wednesday.

Please confirm.

Regards,

2 - Name - Whistleblower Regarding Health Care Provider or He...

Sent from Windows Mail

**From:** Jennifer Keilin

**Sent:** Tuesday, December 16, 2014 7:17 AM

**To:** 2 - Name - Whistleblower ...

**Cc:** Jennifer Keilin

000093

Hi 2 - Name ..., I would like to schedule a call with you for Thursday morning, at 10. Please advise.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Date:** Tuesday, December 2, 2014 at 10:26 AM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Subject:** Re: Senna Duncan

---

Hello Jennifer,

Just checking in. Skype for Senna was brief, about 3 minutes last night.

I am not sure how to include you as an observer. You asked if face time sounded crazy. I have not used it but people like it. I trust your professionalism to use any technology ethically. If there are any grey areas I want to act on the side of caution and not increase drama around Senna.

Trying to parent via Skype is impossible and having a bond with Senna via Skype very challenging.

Please let me know your thoughts moving forward.

2 - Name - Whistl...

Sent from Windows Mail

**From:** Jennifer Keilin

**Sent:** Monday, December 1, 2014 2:43 PM

**To:** 2 - Name - Whistleblower Rega...

**Cc:** Jennifer Keilin

000094

Hi 2 - Name ...,

I would like to find a way to observe the Skype sessions, and I'm not sure how to do that remotely. It might depend on sharing the same technology. If you have an iPhone or iPad, maybe I could contact you via FaceTime, and then observe you Skype with Senna. Does that sound crazy?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

**To Ensure Client Confidentiality All Materials Sent by Messenger Must be Enclosed in an Envelope or Plain Binder Labeled Only with Recipient's Name**

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...

**Date:** Monday, December 1, 2014 at 1:33 PM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

**Cc:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**Subject:** Senna Duncan

Dear Jennifer,

I am writing to you about Senna Duncan regarding my intensifying concerns for his welfare. It's been my understanding throughout the court process that a GAL'S role is to look out for the kids and advise the court with the understanding the recommendations to keep Senna safe and bonded with family. Senna's childhood is not being spent in the environment he is most likely to thrive in or even be safe in.

I am now writing you in desperation because Senna is having a home life that can only result in his being parentified , estranged from his grandparents and father, and develop a style of interacting in the world that is dysfunctional and opportunistic as that is what is role modeled in

**000095**

his Arizona home by his mother and grandparents.

I have learned what parentified means from trying to understand Senna's behavior during Skype, and to understand what happened to Senna's sister, Morgan. I see the fear in Senna's face during Skype sessions and visits with him. He is more concerned with his mother's emotional state than any element in his life. He is taking care of himself and his mother in an attempt to manage his environment. At the age of 5 he already doesn't rely on the adult taking care of him, his mother. I now know this is classic parentification common in dysfunctional and abusive homes. Worse, I also know the psychological and emotional suffering that creates this phenomena for a child. I can't bear to keep watching Senna in this miserable home life, please help Senna. His bond and sense of family with me and his grandparents gets weaker and weaker as time goes by. I am so fearful that he has no emotional anchor because no one is in a position to be this for him.

His mother does not give him the gifts we have sent or have him acknowledge sentiments forwarded to him so he will know he is cared for. His Skype sessions end abruptly at 7 pm. A timer sounds and the screen goes black. Last night was Senna's fifth birthday. For the second time in more months than I can count Senna was engaged in the session. He couldn't tell me if he had any presents from me or family (we all sent him birthday packages and it has been her routine to withhold or deny receipt) but I was able to tell him happy birthday, that he is a great boy and loved. He was playful and laughing when the timer sounded and there was blackness. Please imagine a door slamming shut separating you from a loved one without any regard to the emotions or content for that moment, not allowing a good bye and not knowing when you will see that person again. That is Senna's world and the cruel way he is forced to connect with his father. Christine has the power to make Senna's contact positive but she doesn't make choices that help Senna. Christine has done nothing to change or improve her parenting since she raised Morgan so it's very likely she is parenting the same way abusive way with Senna. I know it speaks volumes as to her narcissism that she cannot be flexible with the Skype and help Senna have the most his family has to offer in his life. Senna will still say his mother hates Senna's grandparents and that he doesn't have a dad. Please think what this means for a young child. How will he thrive, how will he ever sort out that he is loved and does have a daddy and contrast that with the altered reality she creates, how will ever grapple with the fact that his sister was neglected, beaten and taken away by CPS but he was left to grow up with this same mother and no one helped him. The visit supervisor admitted to letting Senna go with his mother after she arrived to pick him up obviously intoxicated, more than an hour late, wearing only a bikini. This is Christine's normal way of operating, not isolated incidents in Senna's childhood.

I am pleading with you, Jennifer, to please help Senna. He is not in a good home and it doesn't need to be that way for him. He does have alternates that are kind and nurturing but he is being deprived of this by his mother. Don't let Senna's life be like this, please look at the history, the current failure of the parenting plan and please do not let Senna keep suffering in this controlling masquerade his mother perpetuates. I will always live with the guilt that I played a role creating this dysfunctional family that Senna has to navigate. All I can do for him now is be there always and help him cope with what this will mean for him at every pivotal moment of his life. Please tell me how to help him and I am begging you to help him too.

000096

**Christine is what I call amped up now as she knows I am advocating strongly for Senna and it's the holidays. This means an increased chaotic, confusing, and increasingly risky environment for Senna.**

**Sincerely,  
Urgently,  
Desperately,  
On behalf of Senna.**

**Sent from Windows Mail**

**000097**

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>

**Date:** Sunday, September 14, 2014 at 1:58 PM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

**Subject:** Professional/Third Party Access To OFW

Hi Jennifer,

I emailed the completed access form to 2 - Name - ... on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

Thank you,

Christine

*CONFFLICT -*

<09.07.14 OFW Msg To 2 - Name - ... Sign Release Add Keilin Form Print+Messages.pdf>

*I HANDLED ON  
JULY 3<sup>RD</sup> KEILIN  
DRAFT TO  
SEPT 14-2014  
FAILURES.*

000098

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Jennifer Keilin Out of Office 12/22-1/2  
**Date:** December 17, 2014 at 6:37 AM  
**To:** Jennifer Keilin jkeilin@comcast.net  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Be advised I will be out of the office on these dates and will not be checking email or voicemail.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000099

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Jennifer Keilin Out of Office 11/26-30, and 12/3-7  
**Date:** November 25, 2014 at 9:18 AM  
**To:** Jennifer Keilin jkeilin@comcast.net  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Please be advised I will be out of the office on the above dates and will not be checking email or voicemail.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000100

**From:** 2 - Name - Whistleblower Rega...  
**Sent:** Thursday, July 3, 2014 10:22 AM  
**To:** 'Jennifer Keilin'  
**Subject:** Emailing: jennifer OFW july 2014  
**Attachments:** jennifer OFW july 2014.pdf

Your message is ready to be sent with the following file or link attachments:

jennifer OFW july 2014

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

DELAYS FROM  
KEILIN.  
SEE DATES / TIMES

000101

KEILIN, JENNIFER 2016-13188LW PAGE 283

Once completed, send by fax or mail to:



The OurFamilyWizard® website  
Attn: Professional Services  
1302 2<sup>nd</sup> Street NE, Suite 200  
Minneapolis, MN 55413  
Fax (952) 548-8159

**Permission for Professional Access**

Professional		OFW Office Use Only:
First Name:	Last Name:	U-ID:
Username:		Notes:
Phone No.	Fax No.	
Email:		ABN? Y/N By:

First Parent Account		OFW Office Use Only:
Fir	2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility...	U-ID:
Us	2 - Name - Whistleblower Regarding Health Care Provider...	Notes:
	Fax No. <i>425-869-1801</i>	
Email:	2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1)	ABN? Y/N By:
I,	the above named professional permission to access my OurFamilyWizard Parent Account using an OurFamilyWizard® Professional Account.	
Signature:	2 - Name - Whistleblower Regarding Health Ca...	Date: <i>7/3/2014</i>

Second Parent Account		OFW Office Use Only:
First Name:	Last Name:	U-ID:
Username:		Notes:
Phone No.	Fax No.	
Email:		ABN? Y/N By:
I,	grant the above named professional permission to access my OurFamilyWizard Parent Account using an OurFamilyWizard® Professional Account	
Signature:	Date:	

000102

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Emailing: jennifer OFW docs  
**Date:** September 18, 2014 at 4:00 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name...,

Great – thanks.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Wednesday, September 17, 2014 at 8:55 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Emailing: jennifer OFW docs

Jennifer,

Please see emails and dates when I sent the OFW documents to you July 3 2014.

Thank you

2 - Name - Whistleblower Regarding He...

July 3 -  
Sept 17  
still not  
signed  
000103

**Your message is ready to be sent with the following file or link attachments:**

**jennifer OFW docs**

**Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.**

**000104**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Professional/Third Party Access To OFW  
**Date:** September 16, 2014 at 5:34 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care Provide...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Nam...,

**Does that mean you submitted it to OFW already?**

**Best regards,**

*Jennifer Keilin, MSW, LICSW*

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Monday, September 15, 2014 at 10:25 PM  
**To:** Jennifer Keilin <jkeilin@comcast.net>, Angela Duncan <angeladuncan@comcast.net>  
**Subject:** Re: Professional/Third Party Access To OFW

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Name - ...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <jkeilin@comcast.net> wrote:

Hi 2 - Nam...

Will you complete the referenced form and submit to OFW?

Best regards,

**000105**

*Jennifer Keilin, MSW, LICSW*

**1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
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---

**From: Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>**

**Date: Sunday, September 14, 2014 at 1:58 PM**

**To: Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>**

**Subject: Professional/Third Party Access To OFW**

Hi Jennifer,

I emailed the completed access form to | 2 - Name - ... | on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

Thank you,

Christine

<09.07.14 OFW Msg To | 2 - Name - ... | Sign Release Add Keilin Form Print+Messages.pdf>

**000106**

## **Stuart Brown project for GAL**

**Emails starting with Jennifer Keilin.**

**Emails from July 2014- Sept 2014.**

**Note:**

- 1. June 26 2014 [2 - Name - Whi...]** Meets in person 3 hours Keilin.
- 2. July 3 2014 I sent email with docs to Keilin to enter OFW system and review history.**
- 3. Sept 10 email received money and see emails on project given to me on skype documentation.**
- 4. Sept 14 email from Peddle blaming me on OFW docs not done when they had been done for 2 plus months.**
- 5. See Sept 16, 17, 18 emails to Keilin she is still looking into this OFW issue.**
- 6. See first invoice from Keilin, dates and delays listed June 2014- November 2014 execution level in 5 months. Materials were hand delivered day one to Keilin by me.**

**c00107**

**From:** Lindsay McClelland [kellinadmin@comcast.net](mailto:kellinadmin@comcast.net)  
**Subject:** 2 - Name ... Peddie Nov. billing statement  
**Date:** December 12, 2014 at 3:14 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care ... , Christine Peddie Sennaduncal97@gmail.com  
**Cc:** Jennifer Keilin [jkeilin@comcast.net](mailto:jkeilin@comcast.net)



Hello,

Attached is the November billing statement regarding this matter.

Thank you,

**Lindsay McClelland**  
**Administrative Assistant**

Jennifer Keilin, MSW, LICSW  
1715 – 114th Avenue SE, Suite 210  
Bellevue, WA 98004  
ph: 425-526-6556  
fax: 425-270-1436

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**Jennifer Keilin, MSW, LICSW**

1715 – 114th Avenue SE, Suite 210 Bellevue, WA 98004

Phone (425) 526-6556 Fax (425) 270-1436

12/10/14

**Shaun Peddie**

**Christine Peddie**

**Case:**  & Peddie Case Manager

Account Activity Through Nov. 2014

Date	Description	Qty	Amount	Payment	Balance
6/26/14	Interview: Shaun Duncan				0.00
8/11/14	Retainer: Christine Peade	1.5	300.00	700.00	400.00

000108

9/4/14	Retainer: Shaun Duncan		2,700.00	3,100.00
9/16/14	Interview: Christine Peedle (phone)	1.0	200.00	2,900.00
9/22/14	Review Materials provided by 2 - Name - ...	1.0	200.00	2,700.00
9/23/14	Christine Peedle (phone)	0.5	100.00	2,600.00
9/25/14	Shaun Duncan (phone)	0.5	100.00	2,500.00
11/14/14	Emails to/from parties	0.1	20.00	2,480.00

Credit Balance:

2,480.00

000109

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Emailing: jennifer OFW docs  
**Date:** September 18, 2014 at 4:00 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net



Hi [2 - Nam...],

Great – thanks.

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** [2 - Name - Whistleblower Regarding Health Care Provider or Health ... >  
**Date:** Wednesday, September 17, 2014 at 8:55 AM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** Emailing: jennifer OFW docs

Jennifer,

Please see emails and dates when I sent the OFW documents to you July 3 2014.

Thank you

2 - Name - Whistleblower Regarding Health...

000110

**Your message is ready to be sent with the following file or link attachments:**

**jennifer OFW docs**

**Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.**

**000111**

**From:** 2 - Name - Whistleblower Regarding Health Care Pro...   
**Subject:** RE: Professional/Third Party Access To OFW  
**Date:** September 16, 2014 at 8:25 AM  
**To:** Jennifer Keilin jkeilin@comcast.net



Jennifer I fill out all the documentation and it was emailed to you, you were to have signed and finished it then forward to the members of OFW..

2 - Name - Whistleblower Regarding Health Care Provider or Health Car...

**From:** Jennifer Keilin [mailto:[jkeilin@comcast.net](mailto:jkeilin@comcast.net)]  
**Sent:** Tuesday, September 16, 2014 5:34 AM  
**To:** 2 - Name - Whistleblowe...  
**Cc:** Jennifer Keilin  
**Subject:** Re: Professional/Third Party Access To OFW

Hi 2 - Name...

Does that mean you submitted it to OFW already?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P        425-526-6556  
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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ... >  
**Date:** Monday, September 15, 2014 at 10:25 PM  
**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

000112

**Subject: Re: Professional/Third Party Access To OFW**

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Name - Wh...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Nam...,

Will you complete the referenced form and submit to OFW?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
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---

**From:** Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>

**Date:** Sunday, September 14, 2014 at 1:58 PM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

**Subject:** Professional/Third Party Access To OFW

Hi Jennifer,

I emailed the completed access form to 2 - Name - ... on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

000113

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...

**Date:** Monday, September 15, 2014 at 10:25 PM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, Angela Duncan <[angeladuncan@comcast.net](mailto:angeladuncan@comcast.net)>

**Subject:** Re: Professional/Third Party Access To OFW

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Name - ...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)> wrote:

Hi 2 - Nam... ,

Will you complete the referenced form and submit to OFW?

Best regards,

Jennifer Keilin, MSW, LICSW

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Bellevue, WA 98004  
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000114

confidential. If you are not one of the intended addressees or you believe you may have received this communication in error, please reply to the sender indicating that fact and delete this message from your system immediately. In addition, you shall not print, copy, retransmit, disseminate, or otherwise use this information in any form without first receiving specific written permission from the author of this communication.

**From:** Christine and Senna - Display <[sennaduncan79@hotmail.com](mailto:sennaduncan79@hotmail.com)>

**Date:** Sunday, September 14, 2014 at 1:58 PM

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>

**Subject:** Professional/Third Party Access To OFW

Hi Jennifer,

I emailed the completed access form to 2 - Name - ... on the 7th, but he has not logged into OFW since Sept 2. It can only be processed once he signs and returns the form to myself or OFW. Please advise how to proceed.

Thank you,

Christine

<09.07.14 OFW Msg To 2 - Name - ... Sign Release Add Keilin Form Print+Messages.pdf>

000115

Thank you,

Christine

<09.07.14 OFW Msg To 2 - Name -... Sign Release Add Keilin Form Print+Messages.pdf>

**000116**

**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>, 2 - Name - Whistleblower Regarding Health Care Provider or Health Ca...  
**Subject:** Senna updates

Jennifer,

I have been challenged with a new email format and systems with Windows 8 and it has been very challenging. I have done as asked and updated live time on my skypes, they are printed and copies to be delivered to your office. The situation as warned has become worse and to the point we are almost completely disconnected.

7:45 pm does not work and it has not worked for close to 3 years.

9-10-2014

Senna not online for call they answer at 7:47 call ends at 8:00 PM. Time loss 2 Minutes

9-12-2014

I called for the entire time and no answer. Skype did not occur. Time loss 15 minutes

9-14-2014

messages were sent via IM on Skype not Christines fault that Senna fell asleep. I called the entire session no answer. Time loss 15 minutes.

9-15-2014

call started at 7:45 ended 7:55 Delores Peddle was present and Senna's comments and behavior were very poor. He stated he hated his Nana and Papa, this is my Family and that his mother cant stand them. Delores said nothing call was cut short. Time loss 5 minutes

9-17-2014

Call did not take place I was in a no reception area. Time loss 15 minutes.

9-19-2014

call started 7:45 pm ended 7:55 PM time loss 5 minutes.

9-21-2014

call did not happen no reception area time loss 15 minutes.

9-22-2014

called at 7:45 Senna in a strange bed he was asleep time loss 15 minutes

9-24-2014

call did not happen in a no reception area time loss was 15 minutes.

9-26-2014

call started at 7:45 pm call ended at 7:57 pm I was asking Senna for a kiss and the call was cut off time loss 3 minutes.

000117

9-28-2014

Call started at 7:45 pm Senna was sick and fell asleep at 7:48 pm. Time loss was 12 minutes.

9-29-2014

call started at 7:45 pm and ended 7:57 PM Senna again saying horrible things about my family. time loss 3 Minutes.

10-1-2014

no call no reception area time loss 15 minutes.

10-3-2014

no call no reception area time loss 15 minutes.

10-5-2014

call started at 7:45 pm no answer on their end loss 15 minutes.

10-6-2014

call started at 7:45 Senna sleeping call ended 7:46 pm time loss 14 minutes.

10-8-2014

call started at 7:45 pm Senna asleep call ended at 7:46 PM time loss 14 minutes.

Total time loss 193 minutes in this very short time.

Jennifer it is known fact Senna does not even have a bedroom and many of these calls he is sleeping in her parents bed. There has never in the history had 1 make up call attempted or granted. Senna is slipping away and when I first met you stated very clearly the situation is worse now than ever before with the attempted alienation of the Father.

I look forward to your very prompt solutions.

2 - Name - Whistle...

Sent from Windows Mail

000118

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - Name - and senna follow up  
**Date:** September 10, 2014 at 3:09 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care P...  
**Cc:** Jennifer Keilin jkeilin@comcast.net



Hi 2 - Name - ...

**Sorry, I'm slow. I did receive – thank you very much.**

I received payment and am currently scheduling a meeting with Christine. She and I have not had any contact yet, like the meeting you and I had.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Wednesday, September 10, 2014 at 2:40 PM  
**To:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** 2 - Name - and senna follow up

Jennifer,

I replied to you on Monday from your voice mail. Have you received the check?

2 - Name - Whistleblower Regarding Health Care Provider or Health...

**000119**

**From:** 2 - Name - Whistleblower ...  
**Sent:** Thursday, July 3, 2014 10:16 AM  
**To:** 'Jennifer Keilin'  
**Subject:** Emailing: jennifer OFW  
**Attachments:** jennifer OFW.pdf

Jennifer,

Please see what I found online to be filled out and sent in.

Regards

2 - Name - Whist...

Your message is ready to be sent with the following file or link attachments:

jennifer OFW

**Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.**

000120

**From:** 2 - Name - Whistleblower Reg...  
**Sent:** Thursday, July 3, 2014 10:22 AM  
**To:** 'Jennifer Keilin'  
**Subject:** Emailing: jennifer OFW july 2014  
**Attachments:** jennifer OFW july 2014.pdf

**Your message is ready to be sent with the following file or link attachments:**

**jennifer OFW july 2014**

**Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.**

**000121**

Once completed, send by fax or mail to:



The OurFamilyWizard® website  
Attn: Professional Services  
1302 2<sup>nd</sup> Street NE, Suite 200  
Minneapolis, MN 55413  
Fax (952) 548-8159

**Permission for Professional Access**

<b>Professional</b>	<b>OFW Office Use Only:</b>
First Name: _____	Last Name: _____
Username: _____	U-ID: _____
Phone No. _____	Fax No. _____
Email: _____	Notes: _____
	ABN? Y/N _____ By: _____

<b>First Parent Account</b>		<b>OFW Office Use Only:</b>
First Name: _____	2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility... _____	U-ID: _____
Username: _____	2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility... _____	Notes: _____
Phone No. _____	Fax No. <u>425-869-1801</u>	ABN? Y/N _____
Email: _____	2 - Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1) _____	By: _____
I, _____ OurFamily _____	the above named professional permission to access my an OurFamilyWizard® Professional Account.	
Signature: _____	Date: <u>7/3/2014</u>	

<b>Second Parent Account</b>	<b>OFW Office Use Only:</b>
First Name: _____	Last Name: _____
Username: _____	U-ID: _____
Phone No. _____	Fax No. _____
Email: _____	Notes: _____
ABN? Y/N _____ By: _____	
I, _____, grant the above named professional permission to access my OurFamilyWizard Parent Account using an OurFamilyWizard® Professional Account.	
Signature: _____	Date: _____

**000122**

**From:** 2 - Name - Whistleblower Regarding Health Care Pro...  
**Subject:** Fwd: 2 - Na... email  
**Date:** April 6, 2015 at 10:06 AM  
**To:** Liz Jeppesen trent.jep@gmail.com



Please see date this was sent and the follow up emails and responses per Jennifer. emails to follow.

2 - Name - Whistleblower Regarding Health Care Provider or Health Care Fac...

Begin forwarded message:

**From:** 2 - Name - Whistleblower Regarding Health Care Provid...  
**To:** Jennifer Keilin <[jkeilin@comcast.net](mailto:jkeilin@comcast.net)>  
**Subject:** 2 - Na... email  
**Date:** September 8, 2014 at 3:04:51 PM PDT

Jennifer,

You should have a check at your office from Angela Duncan, my step mother, we have had an issue with the Speedware email.

Please see email from one of our divisions..

2 - Name - Whistleblower Regarding Health Care Provider or Health ...

000123

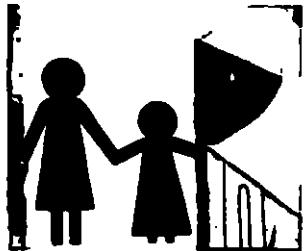


# Family Court: Dad Initially Labeled Abuser Wins Appeals Case on Custody

By Nina Shapiro Thu., Feb 23 2012 at 12:00AM

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Scott Bakal

In last month's cover story on perceived male bias in family court, *Seattle Weekly* told the case of "Richard," a dad who faced protection orders and domestic violence treatment classes in the course of his custody battle. Eventually, he won that battle, but his ex-wife appealed. Now, the appeals ruling is in.

"The overwhelming amount of the evidence the trial court heard and read supports the court's decision to make [Richard] the primary residential parent," the state Court of Appeals opines.

Like the trial court, the appeals court makes short shrift of a putative domestic violence finding against Richard by an "expert" risk assessor named Doug Bartholomew. The evidence to support an abuse finding "is not substantial," the appeals judges say. Indeed, even Bartholomew himself now seems to agree, telling *SW* during an interview for the cover story that his seemingly damning conclusions did not add up to domestic violence.

The appeals court also rejects another key part of the appeal filed by Richard's wife: the "irregular" behavior of her attorney at trial. Jan Dyer was so "sarcastic," according to the trial judge, that he took the rare step of admonishing her on the record. And then things got really crazy. The appeals court ruling relates:

**DO YOU KN  
IMPACTED**

The MS Comm  
learn more &  
treatme

Octo

1

or C

2006  
2007  
2008  
2009  
2010  
2011



Friends to

000124

**000125**

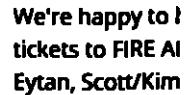
Dyer was 'sobbing' in the courtroom and, apparently, made such noise by slaming furniture that the court reporter noted 'loud crash' on three occasions. Also during [parent evaluator Jennifer] Keilin's direct examination, Dyer's cell phone rang, causing the court reporter to note a 'barking cellphone interruption.'

As one might guess from her cellphone ring tone, Dyer is known for her aggressiveness, particularly when it comes to domestic violence cases.

And so, the appeals ruling goes on to observe: "Dyer's antics stopped when she began her cross-examination of Keilin." Indeed, the court says that, in general, Dyer "thoroughly examined" the witnesses and "provided competent representation."

Keilin had submitted an extensive report recommending that Richard be the primary parent, based on what she judged was his stronger relationship with his son. Unlike with Bartholomew's report, the trial and appeals court judges gave her findings great weight.

So, in the end, the system worked for Richard. But it had him pegged as an abuser for more than a year-and-a-half, giving him an uphill battle to fight. A successful engineer, he had the money to keep going. Many men, lawyers say, can't do the same.



000126

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**000127**

## Can Ivanka Trump Hide from the Rumors Any Longer?

Ivanka Trump's Life Changing Decision Leaves Friends and Family in Awe

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000128

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: 2 - Name... Peddle - update  
**Date:** November 21, 2014 at 4:59 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Name ...

I haven't heard from you, following my message below.

Please respond?

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** Jennifer Keilin <jkeilin@comcast.net>  
**Date:** Friday, November 14, 2014 at 2:47 PM  
**To:** 2 - Name - Whistleblower Regarding Health Care Provider or Health ...>  
**Cc:** Jennifer Keilin <jkeilin@comcast.net>  
**Subject:** 2 - Name - ... /Peddle - update

Hi 2 - Name ...

We have not had contact in a little while and I wanted to touch base. I'm glad to see you are back on OFW.

I'm trying to figure a way to get more insight into the Skype contacts.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

000129

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**000130**

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Jennifer Keilin Out of Office 11/6 and 11/7  
**Date:** November 4, 2014 at 9:26 AM  
**To:** Jennifer Keilin jkeilin@comcast.net  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Good morning,

Please be advised I will be out of the office this Thursday and Friday and will not be available by email. Any issues that need to be addressed this week should be brought to my attention immediately. Any issues that come up after noon on Wednesday will be addressed upon my return to the office on Monday, 11/10.

Best regards,

*Jennifer Keilin, MSW, LICSW*

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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000131

**From:** Jennifer Keilin jkeilin@comcast.net  
**Subject:** Re: Professional/Third Party Access To OFW  
**Date:** September 16, 2014 at 5:34 AM  
**To:** 2 - Name - Whistleblower Regarding Health Care ...  
**Cc:** Jennifer Keilin jkeilin@comcast.net

Hi 2 - Nam...,

Does that mean you submitted it to OFW already?

Best regards,

Jennifer Keilin, MSW, LICSW

1715 114th Ave. SE Suite 210  
Bellevue, WA 98004  
P 425-526-6556  
F 425-270-1436

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---

**From:** 2 - Name - Whistleblower Regarding Health Care Provider or Health Car...  
**Date:** Monday, September 15, 2014 at 10:25 PM  
**To:** Jennifer Keilin <jkeilin@comcast.net>, Angela Duncan <angeladuncan@comcast.net>  
**Subject:** Re: Professional/Third Party Access To OFW

I sent this previously to you Jennifer, I will pull for you my documentation and resend, this was during failure to engage with you from opposing party. These are my clear concerns on wasted funds which I will document along the way. This is a peddle money issue I will not pay for any longer.

Thank you

2 - Name - Wh...

Sent from my iPad

On Sep 15, 2014, at 5:27 PM, "Jennifer Keilin" <jkeilin@comcast.net> wrote:

Hi 2 - Name - W...

Will you complete the referenced form and submit to OFW?

Best regards,

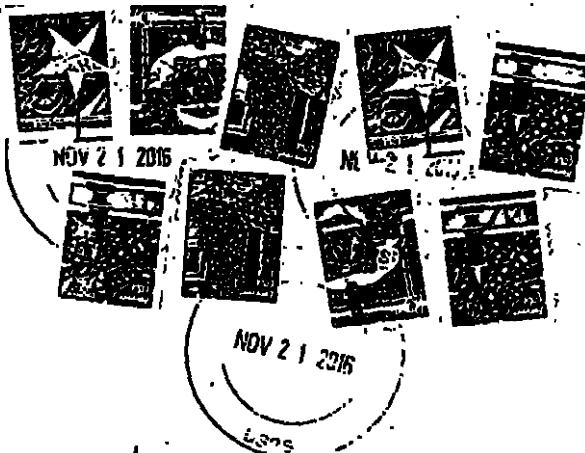
000132

Duncan  
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~~OAK HARBOR~~ WA.  
98277



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98504

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000133

(Complaint Form)



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

December 6, 2016

2 - Name - Whistleblower Regarding Health Care Provider or H...

RE: **Jennifer Lee Kellin**  
Case No: 2016-13188LW

Dear 2 - Name - Whistleblower ...:

Your complaint about **Jennifer Lee Kellin**, has been referred to our Investigation and Inspection Office for investigation. We have assigned your complaint to:

**Shaun Atkinson, Health Care Investigator**  
**Investigation & Inspection Office**  
**20425 72nd Avenue South, Suite 310**  
**Kent, WA 98032**  
**Phone: (253) 395-6788 FAX: (253) 395-6365**  
**Email: [Shaun.Atkinson@doh.wa.gov](mailto:Shaun.Atkinson@doh.wa.gov)**

In order to effectively proceed with your complaint, we ask that you sign and return the enclosed "Whistleblower Form" within 14 days. I have enclosed a self-addressed envelope for your convenience.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Tina Crawford".  
Tina Crawford  
Health Services Consultant

Enc: Whistleblower Form  
SASE

•••••

0001343

RECEIVED

State of Washington  
Department of Health

DEC 13 2016

DEPARTMENT OF HEALTH  
Office of Investigation

**WHISTLEBLOWER FORM**

A whistleblower is "a consumer, employee, or health care professional who reports quality of care concerns to the department of health." RCW 43.70.075(1); WAC 246-15-010(9). An individual's identity as the complainant is kept confidential except for release "to appropriate department staff or disciplining authority members, in response to a court order, or if the complaint is not made in good faith." WAC 246-15-020, and 246-15-030. However, if a whistleblower plays some other role in the complaint---as a witness for example---his or her identity as to that role may be disclosed.

**WAIVER OF WHISTLEBLOWER CONFIDENTIALITY**

By signing below, I waive my right to confidentiality as a complainant, and authorize the Department of Health to release my identity as the person who made this complaint to the Respondent and for use in any resulting administrative hearing regarding my complaint.

Signature: X \_\_\_\_\_

2 - Name - Whistleblower Regarding Health Care Provider or ...

Date: \_\_\_\_\_

12/10/2016

Name (printed): \_\_\_\_\_

2 - Name - Whistleblower Regarding Health Care Provider or Health ...

Phone: \_\_\_\_\_

2 - Name - Whistleblower Regarding Health Care Provider or H...

**DENIAL OF WAIVER OF WHISTLEBLOWER CONFIDENTIALITY**

By signing below, I decline to waive my confidentiality as the whistleblower. I understand that this decision may impair the department's ability to pursue my complaint, and/or take adverse action against the Respondent(s). I also understand that if I played some other role in the complaint, my identity as to that role may be disclosed.

Signature: X \_\_\_\_\_ Date: \_\_\_\_\_

Name (printed): \_\_\_\_\_ Phone: \_\_\_\_\_

**RESPONDENT: Jennifer Lee Keilin  
CASE #: 2016-13188LW**

**000135**

**DEPARTMENT OF HEALTH  
HEALTH SYSTEMS QUALITY ASSURANCE  
OFFICE OF INVESTIGATION AND INSPECTION**

**MEMORANDUM TO FILE**

**Date:** May 8, 2017

**Case:** 2016-13188LW  
Jennifer Keilin

**Reference:** Standards of Care, Practice Beyond the Scope, Incompetence

**From:** Scott Bramhall, Investigator

On May 8, 2017 the Complainant 2 - Name - Whistleblower... was interviewed by phone. The Mr. 2 - Name - ... said:

- Jennifer Keilin's report as Case Manager was bias against him in spite of ample examples of Ms. Peddle's deliberate dishonesty before the court.
- Jennifer Keilin failed to document in her Case Manager's report to the court Ms. Peddle's untrustworthy behavior which he specifically brought to Jennifer Keilin's attention.
- Jennifer Keilin did not follow the court parenting plan for Skype visits.
- The Ms. Peddle hid the child from the court.
- The Ms. Peddle lied to the court about his work laptop.
- The Ms. Peddle stole Mr. 2 - Name - Wh... work laptop and told the court she didn't know where it was at.
- The judge demanded Ms. Peddle provide the whereabouts of the laptop and Ms. Piddle said she had it.
- Ms. Peddle lied to the court by saying she did not access the laptop while it was in her possession.
- Forensics determined that laptop was accessed while Ms. Peddle had it.
- The data in the laptop was corrupted while Ms. Peddle had the laptop.
- The loss of intellectual property harmed Mr. 2 - Name - Whi... livelihood significantly.
- The court sanctioned Ms. Piddle over \$5,000.00 for her false testimony.
- Ms. Peddle hid their child in the witness protection program which she entered under false pretenses.
- Ms. Piddle created injuries through self-infliction and filed a false report with law enforcement that Mr. 2 - Name - ... had criminally assaulted her.

---

Reviewed by: Yong Chin, Investigations Supervisor

Date:

**000136**

- Ms. Peddle had a daughter which she lost custody of prior to the birth of the child with Mr. [2 - Name - ...].
- Ms. Peddle lied to Mr. [2 - Name - ...] about having been diagnosed with ovarian cancer which created a sense of urgency to have this child with Mr. [2 - Name - ...].
- Ms. Peddle turned the camera toward her crotch while she was in her underwear during a Skype session.
- If he as a male conducted himself in like manner Jennifer Keilin would report it.
- Jennifer Keilin did not enter in her report to the court Ms. Peddle's turning the camera toward her crotch while she was in her underwear.
- Jennifer Keilin recommended to the court that Skype sessions be supervised by a facility that would cost \$150.00 per session.
- Jennifer Keilin never observed Mr. [2 - Name - ...] with his child.
- Jennifer Keilin told Mr. [2 - Name - ...] she never observed Ms. Peddle with the child.
- Jennifer Keilin failed keep appointments for Skype sessions and failed to cancel.
- Jennifer Keilin promised to reschedule Skype sessions and failed to.
- After the allegation of sexually inappropriate behavior on Ms. Piddle's part were brought to the attention of Jennifer Keilin as a Case Manager for a case in Washington, the Skype sessions were coordinated through an out of State facility which prohibited releasing copies of Skype sessions without a subpoena.
- Jennifer Keilin reports of Mr. [2 - Name - Whi...] finances are outside her scope and erroneous. Mr. [2 - Name - ...] told Jennifer Keilin he wasn't going to pay her because in the year she oversaw the case as Case Manger he did not see his child and did not know where his child was at.

000137

**RECEIVED - KENT**

**MAY 10 2017**

**DEPARTMENT OF HEALTH  
Office of Investigation and Inspection**

**Superior Court of Washington County of King**

In re the Parenting and Support of:

**SENNYA SAMUEL DUNCAN,**  
Child,

2 - Name - Whistleblower Regard...

and **Petitioner**

**CHRISTINE PEDDLE-CORNISH,**

**Respondent.**

**No. 11-3-03341-8 SEA**

**Order Imposing Sanctions  
On Respondent for  
Misconduct with Laptop**

In the Court's October 6, 2012 Findings and Conclusions, it set the stage for resolution of an issue that could not be resolved at that time. In June of 2011, Ms. Peddle-Cornish had been ordered to return to Mr. 2 - Name - ... his laptop computer if she had possession of it. She denied having it. At trial, she stated that she had discovered in early 2012 that she did inadvertently have it in her possession in Arizona but she maintained that she had not accessed the information on the computer. Nor did she return it upon her purported "discovery". At trial, the Court ordered that it be returned at once and forensically examined; if her story was borne out, there would be no sanction but if it was not, there would be. The laptop has now been returned (in an obviously

*Order Imposing Sanctions - 1*

*Hon. William L. Downing  
King County Superior Court  
516 Third Ave., C-203  
Seattle, WA 98112*

**000138**

deliberately damaged state) and examined by an independent forensic examiner. The Court would incorporate the unrefuted December 6, 2012 report of Alison Goodman as the Court's findings in this regard. Contrary to her sworn statements, Ms. Peddle-Cornish did access Mr. [2 - Name - Whi...] private information on his laptop computer between May of 2011 and February 2012 and did access Mr. [2 - Name - Whi...] private information on his laptop computer between February 2012 and the fall 2012 trial.

The Court concludes that Christine Peddle-Cornish (a) gave false testimony to Commissioner Jeske in June of 2011 when she denied being in knowing possession of Mr. [2 - Name - Whi...] computer; (b) invaded the privacy of Mr. [2 - Name - ...] by illegally accessing his information while his computer was in her possession; (c) committed misconduct by withholding and damaging Mr. [2 - Name - Whi...] computer; and (d) gave false testimony to this Court at trial when she denied accessing the information stored on the computer while it was illegally in her possession.

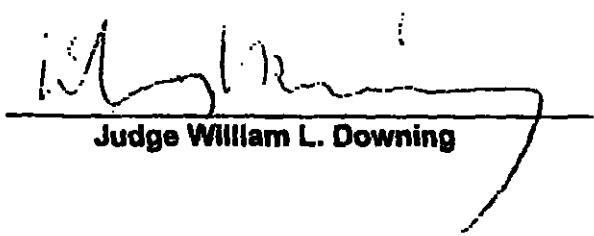
As sanctions, the Court directs the following:

1. In any future proceedings in which matters of credibility are involved, the judicial officer may be informed (without over-emphasis) of the findings made herein. While it doesn't mean she can never be believed, there is no way of getting around the conclusion that, on the noted occasions at least, Ms. Peddle-Cornish has blithely ignored her oath and given knowingly false testimony. That she may have benefitted from this is particularly painful to the court.
2. As indicated it would do in its previous order, the Court would now order that Ms. Peddle-Cornish pay Mr. [2 - Name - ...] a monetary sanction in the

amount of \$5000. In addition, she shall reimburse him the sum of \$3000 as legal fees related to this post-trial proceeding and \$1900 for the cost of the forensic examination that revealed her duplicity.

3. The parties are certainly free to agree on alternative conditions that might be fulfilled in lieu of the monetary sanction (perhaps along the lines suggested in Mr. [redacted] proposed order) but the Court has no intention of overseeing such a process.
4. If no contrary agreement is reached within 30 days, the monetary portion of this sanction may be reduced to judgment without further motion.

Dated: January 29, 2013



Judge William L. Downing

**Bramhall, Scott J (DOH)**

---

**From:** senna ducati <sennaducati79@gmail.com>  
**Sent:** Tuesday, June 27, 2017 2:12 PM  
**To:** Bramhall, Scott J (DOH); Shaun Senna  
**Subject:** Jennifer Keilin state complaint

Dear Scott,

Thank you for the phone call return yesterday 6-26-2017. I want you to know that I am here for the duration and that I want to inform you of the following.

- 1, In Trial Ms. Keilin testified that I did not follow up with her on the skype calls and or the screen shots I showed you with my son at 4.5 years old between my ex's legs inappropriately. This was a lie, Ms. Keilin was given on 2 occasions plus dozens of emails provided to you that court ordered Skype calls were being ignored and inappropriate behavior was taking place. She was give two, 3 plus inch stacks of screen shots and a detail of all calls being ignored.
2. Ms. Keilin was also dishonest as to me paying her late to start as to cover up her her delayed entry into family wizard at the time I had to push her to get started and she responded to me that she was just slow. She stated she was not starting due to late payment, this is a lie and no such document or statement exists to this. Ms Keilin had met me did an intake and then I waited close to 3 months for her to get going.
3. Ms Keilin was clearly biased in her testimony missing dozens of concerns I had in the whereabouts to my son. In trial we uncovered he was moved against a court order and was hidden from me for over a year. You are in possession of dozens of emails where I am begging for help and do not know where my son is. Ms Keilin ignored these concerns.
4. Ms Keilin testified I was not a good communicator yet ignored the fact I emailed, called on many occasions and would go 2-3 weeks without responding to me.

I have now hired legal counsel to seek damages to her behaviors and look forward to your responses and where this goes. I believe Ms. Keilin has many complaints as to her lack of follow through and lazy attitude. A year went by with my son missing under her role. She did not follow one rule under the role as GAL or parent coordinator as to the WA State manual. The damage to me and my son are immeasurable.

Thank you

2 - Name - Whistl...

**000141**

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KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 11-3-03341-8 SEA

# CERTIFIED COPY

SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING

In Re the Parenting and Support of:

SENNAS S. DUNCAN,

NO. 11-3-03341-8 SEA

Child,

DECLARATION OF 2 - Name - Whistleblower Regarding ...  
IN RESPONSE TO MOTION TO  
APPOINT JENNIFER KEILIN AS  
CASE MANAGER

Petitioner.

and

CHRISTINE E. PEDDLE CORNISH,

Respondent.

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

- 1) I have read the pleadings of Christine Peddle-Cornish and her Motion to Appoint Jennifer Keilin as the Case Manager and respond as follows.
- 2) First and foremost, I am completely in favor of appointing Jennifer Keilin as

DECLARATION OF 2 - Name - Whistleblowe... - I

Law & Mediation Services  
of  
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9 Lake Bellevue Drive  
Suite 103  
Bellevue, WA 98005  
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Fax (425) 462-6401

000142

KEILIN, JENNIFER 2016-13188LW PAGE 324

1 our case manager. Ms. Peddle-Cornish and I have had a very tumultuous history  
2 culminating in a trial before Judge William Downey in October, 2012. Ms. Peddle-  
3 Cornish and I have a wonderful son, Senna, age 4. Unfortunately, Ms. Peddle-Cornish  
4 decided to take our son with her and return to her family in Arizona. This was very  
5 difficult for me and has remained the case. Much to my dismay, Judge Downey decided  
6 that relocation should be granted. He entered a Parenting Plan attached at Exhibit 1.

7  
8 3) Although I had hoped otherwise, the conflict between us has continued. Joel  
9 Glassman was appointed as the original Case Manager. The conflict was so high that  
10 although Mr. Glassman stated he quit because he retired, I believe he actually quit  
11 because he could no longer endure the constant pressure caused by Ms. Peddle-Cornish's  
12 behavior. This ranged from attacking the exchange supervisor, calling the Arizona police  
13 repeatedly on me, withholding Senna or playing constant games with time I had with  
14 Senna, changing exchange sites, causing public scenes, having her father stalk and harass  
15 me, denying me Skype and telephone access, using our Family Wizard as an harassment  
16 tool rather than a communication tool and the list goes on and on. I truly believe Mr.  
17 Glassman felt he could no longer handle Ms. Peddle-Cornish and her relentless campaign  
18 to keep me from our son and decided retirement was more appropriate.  
19  
20

21 4) That is why I believe Jennifer Keilin would in fact be a more suitable case  
22 manager in this matter than any other candidate, and I look forward to her coming on  
23 board in this case.

24 5) That being said, the salient issue before this Court is what should be the  
25

DECLARATION OF 2 - Name - Whistleblower... - 2

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000143

1       duties of Ms. Keilin as outlined in her appointment order.

2       6) Ms. Peddle-Cornish has provided the court with an appointment order which  
3 largely places Ms. Keilin in some sort of evaluator role, especially as to me, rather than as  
4 a case manager. Fortunately, the issue of what the specific duties of the case manager are  
5 and must be has already been fully adjudicated and decided by our trial judge, Judge  
6 Downey at pages 6 & 7, section 3.13 of our parenting plan. I attach those excerpted  
7 pages for the Court's case as Exhibit 2. As the Court can see, Judge Downey stated with  
8 just cause the role the case manager was to play. Ms. Peddle-Cornish's proposed  
9 appointment order is not a reflection of the Judge's specific delineated duties. Therefore,  
10 at Exhibit 3 is my proposed Order of Appointment which I ask this Court to adopt in lieu  
11 of Ms. Peddle-Cornish's proposed order.  
12  
13

14       7) I do believe that I need to address however the accusations launched at me  
15 (again) by Ms. Peddle-Cornish as reflected in her motion. I note first for the record that  
16 Ms. Peddle-Cornish's assault on me continues to prove her ongoing desire to engage in  
17 abusive use of conflict, especially through litigation. As noted above, since Ms. Peddle-  
18 Cornish has been allowed to go to Arizona with our son, she has attacked the exchange  
19 supervisors and involved the police in our disputes at every turn possible. She has taken  
20 this abusive use of conflict to a higher level here, because even on a simple motion to  
21 appoint a case manager we have repeatedly told her was acceptable, Ms. Peddle-Cornish  
22 has taken the opportunity to personally attack me and make allegations against me.  
23  
24

25       8) Although I believe her allegations against me are irrelevant to the sole issue

DECLARATION OF 2 - Name - Whistleblowe... • 3

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000144

1 of the appointment of Ms. Keilin as the case manager, I believe it is important for the  
2 record for me to address Ms. Peddle-Cornish's allegations.

3       9) Although I was arrested by Kirkland and charged with DUI, Hit and Run and  
4 driving on a suspended license, the story ends there. The hit and run and driving on a  
5 suspended license has been dropped completely and the DUI has been reduced to a  
6 reckless driving. I did actually hit a car on my cul-de-sac. I have a very large vehicle and  
7 did not see that I hit a parked car as I pulled out of my driveway. No one was in the  
8 vehicle and no one was hurt. I denied I had hit anyone or fled the scene because I did not  
9 know I had done so. That is why the charges were dropped. I did go out with friends and  
10 I did have a drink while I was out. I was not intoxicated. I had a full evaluation for  
11 alcohol abuse and dependency by a state certified treatment evaluator, Steve Uhrich. His  
12 Declaration is attached at Exhibit 4. This is not the first time Ms. Peddle-Cornish has  
13 accused me of being an alcoholic. A prior evaluation was conducted during the course of  
14 the litigation with her and that evaluation is attached at Exhibit 5 As the Court can see, I  
15 am an occasional social drinker. I was not drinking and driving while intoxicated and I  
16 would never do so with Senna.  
17  
18

19       10) As to the issue of driving while on a suspended license. This was an  
20 administrative error and that charge has been dropped. I am in full compliance with my  
21 license.  
22

23       11) While all of this is irrelevant to the appointment of Ms. Keilin, I thought it  
24 important to address these allegations by Ms. Peddle-Cornish. I am not perfect, but I am  
25

DECLARATION OF 2 - Name - Whistleblower... 4

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000145

1 not the monster Ms. Peddle-Cornish tries to make me out to be at every turn. While I  
2 understand this is an attempt by her to deflect attention from her and her behavior, it is  
3 very troubling that she continues to attack me at every turn. I hope Ms. Keilin can help  
4 Ms. Peddle-Cornish better understand that I am Senna's father and that we need to work  
5 more cooperatively together for his best interest. I look forward to Ms. Keilin coming on  
6 board to that end.  
7

8 12) Therefore, I ask this court to adopt my Order in this case.

9 DATED this \_\_ day of April, 2014.

10 See Attached

11 2 - Name - Whistleblower ...

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DECLARATION OF 2 - Name - Whistleblowe... - 5

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of  
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000146

1 not the monster Ms. Peddle-Cornish tries to make me out to be at every turn. While I  
2 understand this is an attempt by her to deflect attention from her and her behavior, it is  
3 very troubling that she continues to attack me at every turn. I hope Ms. Keilin can help  
4 Ms. Peddle-Cornish better understand that I am Seanna's father and that we need to work  
5 more cooperatively together for his best interest. I look forward to Ms. Keilin coming on  
6 board to that end.

7

8 12) Therefore, I ask this court to adopt my Order in this case.

9 DATED this 17 day of April, 2014.

10 2 - Name - Whistleblower Regarding Health Care Provider or Health Care Faci...

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DECLARATION OF 2 - Name - Whistleblow... - S.

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000147

KEILIN, JENNIFER 2016-13188LW PAGE 329

# **EXHIBIT 1**

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**000148**

KEILIN, JENNIFER 2016-13188LW PAGE 330

**SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING**

**In re the Parenting and Support of:**

**SENNA S. DUNCAN, C.R.D.**

No. 11-3-03341-8 SEA.

## **FINAL PARENTING PLAN**

#### **Reunions**

**CHRISTINE E. PEDDLE-CORNISH,**

**Respondent:**

This parenting plan is the final parenting plan entered by the court after trial.

**It Is Ordered, Adjudged and Decreed:**

## **L General Information**

**This parenting plan applies to the following child:**

Name \_\_\_\_\_ -Age \_\_\_\_\_

Senna S. Duncan 2

Final Parenting Plan - Page 1 of 12

Hon. William L. Downing  
King County Sheriff's Court  
5187 1/2 Avenue  
Seattle, Washington.

000149

1  
2                   **II. Basis for Restrictions**

3           **2.1 Parental Conduct (RCW 26.09.191(1), (2))**

4                 Does not apply.

5           **2.2 Other Factors (RCW 26.09.191(3))**

6                 Both parents' involvement or conduct may have an adverse effect on the child's  
7                 best interests because of the existence of the factors which follow:

8                 The abusive use of conflict which creates the danger of serious damage to  
9                 the child's psychological development. For details, see the Findings of  
Fact entered this date by the Court:

10                   **III. Residential Schedule**

11           **3.1 Schedule for Children Under School Age**

- 12           a) The child shall reside with the mother, except for the following days/times  
when the child will reside with or be with the other parent:

13                 The father shall have residential time with the child every first, third and  
14                 fifth weekend of each month starting Friday at around 12:00 noon or when  
15                 the mother gets off work if she is working (but no later than 6:00 p.m.) until  
16                 Sunday at 6:00 p.m. Except as otherwise provided in this parenting plan,  
17                 the father's visitation with Senna shall take place in Arizona until Senna  
18                 turns 5 years old.

19                 The parents should continue to use a professionally supervised visitation  
provider paid for on a pro rata basis for exchanges. The location should be  
20                 at the Surprise Police Department per the supervisor's recommendations,  
or another mutually agreed upon location. Although the Court finds no  
21                 fault with the current exchange supervisor, a new one will be substituted in  
order to "start fresh" in a way that fosters trust and confidence. Ms.  
22                 Sanchez will continue to serve until a substitute is named.

23                 The Case Manager (Section 3.13 below) shall make ongoing  
recommendations regarding the need for and identity of the exchange  
supervisor.

- 1  
2 b) If one of the parties were to relocate so that the parties live within 50 miles of  
3 each other, the residential time with the child should be divided roughly evenly  
4 prior to the child's enrollment in school. The specific schedule would need to  
be worked out in view of the circumstances of all and, ideally, this could be  
established through agreement reached at mediation.

5     3.2 School Schedule

6         Same as in Section 3.1 above.

7     3.3 Schedule for Winter Vacation

8         The child shall reside with the mother during winter vacation, except for the  
9         following days and times when the child will reside with or be with the other  
10       parent:

11             Christmas Break Before Senna is Age 6. Winter Vacation prior to age 6  
12       shall be defined as December 20 at 6:00 p.m. to December 30 at 6:00 p.m.,  
13       and shall be exercised by the father in Arizona. The first half shall end at  
14       10:00 a.m. on December 25. The second half shall begin at 10:00 a.m. on  
15       December 25 and end December 30 at 6:00 p.m. The mother shall have the  
16       first half in odd years and the father shall have the second half. The mother  
17       shall have the second half in even years and the father shall have the first  
18       half.

19             Christmas Break After Senna is Age 6. For Christmas (winter) break,  
20       one parent shall have the child from 6:00 p.m. the day school lets out  
21       through Christmas Day at 10:00 a.m. and the other parent should have the  
22       child from Christmas Day at 10:00 a.m. until 6:00 p.m. the day before  
23       school begins (mother first half in odd years, father first half in even years).  
24       Father's visitation may be in Arizona or Washington.

25     3.4 Schedule for Other School Breaks

26         The child shall reside with the mother during other school breaks, except for the  
27         following days and times when the child will reside with or be with the other  
28       parent:

29             Spring Break After Senna is Age 6. Mother and father shall alternate  
30       spring vacation with the child, with mother in even years and father in odd  
31       years. Spring break shall begin at 6:00 p.m. the day school lets out and end

1 at 6:00 p.m. the day before school begins. Father's visitation may be in  
2 Arizona or Washington.

3 Mid-Winter Break After Senna is Age 6. Mother and father shall  
4 alternate mid-winter vacation with the child, with mother in odd years and  
5 father in even years. Spring break shall begin at 6:00 p.m. the day school  
6 lets out and end at 6:00 p.m. the day before school begins. Father's  
visitation may be in Arizona or Washington.

7 **3.5 Summer Schedule.**

8 Upon completion of the school year, the child shall reside with the mother, except  
9 for the following days and times when the child will reside with or be with the  
other parent:

10 Summer Schedule Before Senna is Age 6. Same as the schedule in  
11 Section 3.1 above. In addition, father shall have one full uninterrupted  
12 week with the child during the summer.

13 Summer Break After Senna is Age 6. The father shall have uninterrupted  
14 summer visitation with the child for up to one week in June and one week  
in July (with a few weeks in between).

15 Summer Break After Senna is Age 8. The father shall have uninterrupted  
16 summer visitation with the child for up to ten days in June and one week in  
July (with a few weeks in between).

17 Summer Break After Senna is Age 10. The father shall have five weeks  
18 of summer visitation with the child, to be divided or continuous as agreed  
by the parents.

19 There are no geographic restrictions as to the summer visits. Each parent shall  
make written proposals for their summer schedule no later than April 15 of each  
20 year. In the event of a scheduling conflict, the father's choice of dates shall have  
21 priority in odd-numbered years and the mother's choice of dates shall have priority  
22 in even-numbered years. In the event that one parent or both parents fail to select  
23 their dates by April 15, the first parent to notify the other parent of his or her  
choice of dates shall have priority in choice of dates.

24 A week shall be defined as Monday at 6:00 p.m. to Monday at 6:00 p.m.

1

2     **3.6 Summer Vacation With Parents**

3

4         See previous section.

5

6     **3.7 Schedule for Holidays**

7

8         The father shall have the following holidays when they coincide with his weekend  
9         visitation: Martin Luther King Day, President's Day, Memorial Day and Labor  
10         Day. These holidays shall extend the father's weekend by 24 hours.

11

12         The following holidays shall be rotated between the parties, regardless of the  
13         schedule in Section 3.1 above: July 4 (mother even, father odd), Veteran's Day  
14         (mother odd, father even), and Thanksgiving (father even, mother odd).

15

16         July 4 shall begin at 10:00 a.m. and end on July 5 at 10:00 a.m. or return to  
17         school, whichever is earlier.

18

19         Veteran's Day shall begin at 10:00 a.m. and end at 6:00 p.m.

20

21         Prior to Senna commencing Kindergarten, Thanksgiving shall begin the day  
22         before Thanksgiving at 6:00 p.m. and end the day after Thanksgiving at  
23         6:00 p.m. The father shall have Senna for Thanksgiving 2012 and it shall  
24         be rotated thereafter (father even, mother odd). There shall be no third  
       weekend visitation for Thanksgiving 2012 as the child is not ready for 5  
       days away from the mother. The father may exercise his Thanksgiving  
       2014 visitation and thereafter in Washington. After Senna commences  
       Kindergarten, Thanksgiving shall begin the day before Thanksgiving at  
       6:00 p.m. and end at 6:00 p.m. the day before school begins.

25     **3.8 Schedule for Special Occasions**

26

27         The mother shall have Senna for the mother's birthday and Mother's Day, and the  
28         father shall have Senna for the father's birthday and Father's Day. Senna should  
29         be with his mother on his birthday in odd years and with his father on his birthday  
30         in even years. Valentine's Day (mother odd, father even), Easter (mother odd,  
31         father even) and Halloween (mother even, father odd).

32

33         Special occasions shall begin at 10:00 a.m. and end at 6:00 p.m.

34

35     **3.9 Priorities Under the Residential Schedule**

36

37         Does not apply.

38         Final Parenting Plan - Page 5 of 12

39         Hon. William L. Downing  
40         King County Superior Court  
41         510 Third Avenue  
42         Seattle, WA 98104

43         000153

1

2     **3.10 Restrictions**

3

4     The concerns noted in paragraph 2.2 and explained in the Court's Findings of Fact  
5     mandate, at least for the time being, the following provisions:

- 6
  - Professionally supervised exchanges.
  - A case manager to oversee parental communications and interactions.
  - Both parents to receive counseling.

7     **3.11 Transportation Arrangements**

8     Transportation costs are included in the Child Support Worksheets and/or the  
9     Order of Child Support and should not be included here. Transportation  
arrangements for the child between parents shall be as follows:

10     The parents should continue to use a professionally supervised visitation  
11     provider paid for on a pro rata basis for exchanges. The location should be  
12     at the Surprise Police Department, per the supervisor's recommendations,  
or another mutually agreed upon location.

13     **3.12 Designation of Custodian**

14     The child named in this parenting plan is scheduled to reside the majority of the  
15     time with the mother. This parent is designated the custodian of the child solely  
16     for purposes of all other state and federal statutes which require a designation or  
determination of custody. This designation shall not affect either parent's rights  
and responsibilities under this parenting plan.

17     **3.13 Other**

18     The parties shall participate in case management for a minimum of two years or as  
19     recommended by the case manager. The case manager should:

- 20
  - Follow and monitor both parents' compliance with the parenting plan.
  - Mediate emails and communications between the parents by providing  
ongoing parent coordination. The parents should have no contact with one  
another and all information related to Serina, his health, major decisions,  
scheduling, child support and more shall all go through the case manager.
  - Help create a common language between the parents regarding discipline,  
rules, dict, etc., at each house.

- Have decision making abilities for minor deviations and/or changes to the plan or in other decisions regarding Senna and the schedule that the parents cannot make independently.
- Make recommendations regarding treatment and other services for the parents and/or child.
- Be able to communicate with each parent's treatment providers, if necessary.
- Select a new exchange supervisor within 30 days of appointment.
- Have decision making ability for scheduling telephone calls from the nonresidential parent to Senna, commencing on or after 6 months after entry of this order.

A copy of all three parenting evaluations and the Court's Findings of Fact shall be provided to the case manager. The case manager shall be in Arizona and appointed based on the recommendations of Dr. English. The costs of the case manager shall be divided on a pro rata basis.

### 3.14 Summary of RCW 26.09.430 - .480; Regarding Relocation of a Child

This is a summary only. For the full text, please see RCW 26.09.430 through 26.09.480.

If the person with whom the child resides a majority of the time plans to move, that person shall give notice to every person entitled to court ordered time with the child.

If the move is outside the child's school district, the relocating person must give notice by personal service or by mail requiring a return receipt. This notice must be at least 60 days before the intended move. If the relocating person could not have known about the move in time to give 60 days' notice, that person must give notice within 5 days after learning of the move. The notice must contain the information required in RCW 26.09.440. See also form DRPSCU 07.0500, (Notice of Intended Relocation of A Child).

If the move is within the same school district, the relocating person must provide actual notice by any reasonable means. A person entitled to time with the child may not object to the move, but may ask for modification under RCW 26.09.260.

Notice may be delayed for 21 days if the relocating person is entering a domestic violence shelter or is moving to avoid a clear, immediate and unreasonable risk to health and safety.

If information is protected under a court order or the address confidentiality program, it may be withheld from the notice.

A relocating person may ask the court to waive any notice requirements that may put the health and safety of a person or a child at risk.

Failure to give the required notice may be grounds for sanctions, including contempt.

If no objection is filed within 30 days after service of the notice of intended relocation, the relocation will be permitted and the proposed revised residential schedule may be confirmed.

A person entitled to time with a child under a court order can file an objection to the child's relocation whether or not he or she received proper notice.

An objection may be filed by using the mandatory pattern form WPF DRPSCU 07.0700, (Objection to Relocation/Petition for Modification of Custody Decree/Parenting Plan/Residential Schedule). The objection must be served on all persons entitled to time with the child.

The relocating person shall not move the child during the time for objection unless: (a) the delayed notice provisions apply; or (b) a court order allows the move.

If the objecting person schedules a hearing for a date within 15 days of timely service of the objection, the relocating person shall not move the child before the hearing unless there is a clear, immediate and unreasonable risk to the health or safety of a person or a child.

Neither party shall relocate the child out of Maricopa or King County without consent of the other or court approval.

#### IV. Decision Making

##### 4.1 Day-to-Day Decisions

Each parent shall make decisions regarding the day-to-day care and control of the child while the child is residing with that parent. Regardless of the allocation of decision making in this parenting plan, either parent may make emergency decisions affecting the health or safety of the child.

This provision is subject to the rules and requirements of any supervised visitation counselor and/or facility where the father's visitation may occur.

#### 4.2 Major Decisions

Major decisions regarding each child shall be made as follows:

Education decisions:	Jointly, through case manager
Non-emergency health care:	Jointly, through case manager
Religious upbringing:	Jointly, through case manager

For any decision involving a cost that the mother expects the father to assist in paying, the father must consent absent court order.

#### 4.3 Restrictions in Decision Making

The parties are required to discuss any major decisions with the case manager who will seek to assist the parties in achieving agreement.

### V. Dispute Resolution

Disputes regarding the parenting plan, shall be submitted to the case manager first and the case manager shall have decision making authority for minor decisions. In the event there are larger issues or major decisions that can't be addressed through case management, the parties shall participate in arbitration prior to any further court action.

Disputes between the parties, other than child support disputes, shall be submitted to the case manager. If that does not resolve the issue then the parties will use an agreed private arbitrator or Court.

### VI. Other Provisions

There are the following other provisions:

- a. Skype/Webcam calls shall continue on a twice weekly basis until age five and not less than a weekly basis thereafter. Skype calls shall be Wednesday and Sunday evenings at 6:00 p.m. The parents should encourage Senna to participate in Skype and/or answer the phone but if he cannot or will not by choice, schedule, or other, the calling parent can leave a phone/email message

- 1                   h. To better serve the needs and desires of the child, changes and/or deviations to  
2                   this plan are acceptable and welcome so long as such changes are mutually  
3                   agreed upon by both parents and the case manager.
- 4                   o. The parents and case manager shall use the Our Family Wizard calendar tool to  
5                   track the residential schedule and shall use the shared entries journal tool for  
6                   sharing information concerning all doctor visits as well as health and wellness  
7                   information concerning the child at residential exchanges.
- 8                   p. Except for in the event of emergencies, neither parent shall initiate a report to  
9                   police, CPS or other law enforcement regarding Senna prior to discussing it  
10                  with the Case Manager and considering the Case Manager's input.

#### VII. Order by the Court

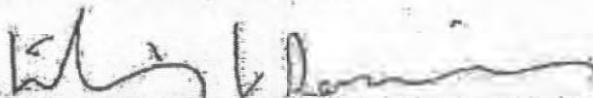
11 It is ordered, adjudged and decreed that the parenting plan set forth above is adopted and  
12 approved as an order of this court.

13 **WARNING:** Violation of residential provisions of this order with actual knowledge of  
14 its terms is punishable by contempt of court and may be a criminal offense under RCW  
15 9A.40.060(2) or 9A.40.070(2). Violation of this order may subject a violator to arrest.

16 When mutual decision making is designated but cannot be achieved, the parties shall  
17 make a good faith effort to resolve the issue through the dispute resolution process.

18 If a parent fails to comply with a provision of this plan, the other parent's obligations  
19 under the plan are not affected.

20                  DONE IN OPEN COURT this 16<sup>th</sup> day of October, 2012.

21                    
22                  THE HONORABLE WILLIAM L. DOWNING  
23                  KING COUNTY SUPERIOR COURT JUDGE

24                  McKINLEY IRVIN, PLLC

JOHN W. KYDD, P.S.

David B. Starks, WSBA No. 28344  
Atorneys for Respondent

John W. Kydd, WSBA No. 12260  
Atorneys for Petitioner

# **EXHIBIT 2**

**000159**

1

2 3.10 Restrictions

3

4 The concerns noted in paragraph 2.2 and explained in the Court's Findings of Fact  
5 mandate, at least, for the time being, the following provisions:

- 6
- 7 • Professionally supervised exchanges.
  - 8 • A case manager to oversee parental communications and interactions.
  - 9 • Both parents to receive counseling.

10

11 3.11 Transportation Arrangements

12

13 Transportation costs are included in the Child Support Worksheets and/or the  
14 Order of Child Support and should not be included here. Transportation  
15 arrangements for the child between parents shall be as follows:

16 The parents should continue to use a professionally supervised visitation  
17 provider paid for on a pro rata basis for exchanges. The location should be  
18 at the Surprise Police Department, per the supervisor's recommendations,  
19 or another mutually agreed upon location.

20

21 3.12 Designation of Custodian

22

23 The child named in this parenting plan is scheduled to reside the majority of the  
24 time with the mother. This parent is designated the custodian of the child solely  
25 for purposes of all other state and federal statutes which require a designation or  
26 determination of custody. This designation shall not affect either parent's rights  
27 and responsibilities under this parenting plan.

28

29 3.13 Other

30

31 The parties shall participate in case management for a minimum of two years or as  
32 recommended by the case manager. The case manager should:

- 33
- 34 • Follow and monitor both parents' compliance with the parenting plan.
  - 35 • Mediate emails and communications between the parents by providing  
36 ongoing parent coordination. The parents should have no contact with one  
37 another and all information related to Senna, her health, major decisions,  
38 scheduling, child support and more shall all go through the case manager.
  - 39 • Help create a common language between the parents regarding discipline,  
40 rules, nick etc., at each house.

- Have decision making abilities for minor deviations and/or changes to the plan or in other decisions regarding Senna and the schedule that the parents cannot make independently.
- Make recommendations regarding treatment and other services for the parents and/or child.
- Be able to communicate with each parent's treatment providers, if necessary.
- Select a new exchange supervisor within 30 days of appointment.
- Have decision making ability for scheduling telephone calls from the nonresidential parent to Senna, commencing on or after 6 months after entry of this order.

A copy of all three parenting evaluations and the Court's Findings of Fact shall be provided to the case manager. The case manager shall be in Arizona and appointed based on the recommendations of DE English. The costs of the case manager shall be divided on a pro rata basis.

### 3.14 Summary of RCW 26.09.430-.480; Regarding Relocation of a Child

This is a summary only. For the full text, please see RCW 26.09.430 through 26.09.480.

If the person with whom the child resides a majority of the time plans to move, that person shall give notice to every person entitled to court ordered time with the child.

If the move is outside the child's school district, the relocating person must give notice by personal service or by mail requiring a return receipt. This notice must be at least 60 days before the intended move. If the relocating person could not have known about the move in time to give 60 days' notice, that person must give notice within 5 days after learning of the move. The notice must contain the information required in RCW 26.09.470. See also form DCPSCU 07-0500 (Notice of Intended Relocation of A Child).

If the move is within the same school district, the relocating person must provide actual notice by any reasonable means. A person entitled to time with the child may not object to the move but may ask for modification under RCW 26.09.260.

Notice may be delayed for 21 days if the relocating person is entering a domestic violence shelter or is moving to avoid a clear, immediate and unreasonable risk to health and safety.

# **EXHIBIT 3**

**000162**

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7 **SUPERIOR COURT OF WASHINGTON  
COUNTY OF KING**

8  
9 **In Re the Parenting and Support of:**

10 **SENNA S. DUNCAN,**

11 **NO. 11-3-03341-8 SEA**

12 **Child,**

13 **2 - Name - Whistleblower Regarding Heal...  
ORDER ON APPOINTMENT OF  
JENNIFER KEILIN AS CASE  
MANAGER**

14 **Petitioner.**

15 **and**

16 **CHRISTINE E. PEDDLE CORNISH,**

17 **Respondent.**

18  
19 **THIS COURT having reviewed a Motion to Appoint Jenifer Keilin as the Case  
20 Manager in this case and having reviewed all pleadings and heard oral argument in this  
21 matter, this Court hereby appoints Ms. Keilin to perform the following duties as outlined  
22 in the parties Parenting Plan dated October 16, 2012 as follows:**

23  
24  
25 **ORDER ON APPOINTMENT OF CASE MANAGER - I**

*Law & Mediation Services  
of  
Natalie De Maar  
9 Lake Bellevue Drive  
Suite 103  
Bellevue, WA 98005  
(425) 462-6580  
Fax (425) 462-6401*

**000163**

1 Follow and monitor both parents' compliance with the parenting plan.

2 Mediate emails and communications between the parents by providing  
3 ongoing parent coordination. The parents should have no contact with one  
4 another and all information related to Senna, his health, major decisions,  
scheduling, child support and more shall all go through the case manager.

5 Help create a common language between the parents regarding the  
6 discipline, rules, diet, etc., at each house.

7 Have decision making abilities for minor deviations and/or changes to the  
8 plan or in other decisions regarding Senna and the schedule that the  
parents cannot make independently.

9 Make recommendations regarding treatment and other services for the  
10 parents and/or child.

11 Be able to communicate with each parent's treatment providers, if  
12 necessary.

13 Select a new exchange supervisor within 30 days of appointment.

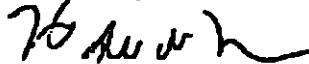
14 Have decision making ability for scheduling telephone calls from the  
15 nonresidential parent to Senna, commencing on or after 6 months after  
entry of this order.

16 It is so ORDERED.

17 DATED this \_\_\_\_ day of April, 2014.  
18

19 \_\_\_\_\_  
Commissioner

20 Presented by:

21   
\_\_\_\_\_  
Natalie de Maar

22 WSBA #24386

23 Attorney for 2 - Name - Whistleblow...

Approved as to Form:

\_\_\_\_\_  
Veronica Freitas  
WSBA #19405  
Attorney for Christine Peddle-  
Comish

25 ORDER ON APPOINTMENT OF CASE MANAGER - 2

Law & Mediation Services  
of

Natalie De Maar  
9 Lake Bellevue Drive  
Suite 103  
Bellevue, WA 98005  
(425) 462-6580  
Fax (425) 462-6401

000164

# **EXHIBIT 4**

**000165**

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8     **SUPERIOR COURT OF WASHINGTON**  
9     **COUNTY OF KING**

10     **In Re the Parenting and Support of:**

11     **SENNAS S. DUNCAN,**

12                 **Child,**

13                 2 - Name - Whistleblower Regarding...

14                 **Petitioner,**

15                 **and**

16     **CHRISTINE E. PEDDLE-CORNISH,**

17                 **Respondent.**

18     **NO. 11-3-03341-S SEA**

19     **DECLARATION OF**

20     **(DCLR)**

21     This declaration is made by:

22     Name: Steve Uhrich

23     Age: 47

24     Relationship to the parties in this action: Alcohol / Drug Evaluator

25     I DECLARE that:

DECLARATION (DCLR)- 1.  
WPF DR 09.0100 (9/2001)

Law & Mediation Services  
of  
*Natalia De Maar*  
9 Lake Bellonus Drive  
Seattle 98103  
Bellevue, WA 98005  
(425) 462-0360  
Fax (425) 462-6401

(4)

000166

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7  
8 **SUPERIOR COURT OF WASHINGTON**  
9 **COUNTY OF KING**

10 **In Re the Parenting and Support of:**

11 **SENNAS S. DUNCAN,**

12 **Child,**

13 **NO. 11-3-03341-8 SEA**

14 2 - Name - Whistleblower Regarding Health Care ...  
15 **Petitioner,**  
16 **and**  
17 **CHRISTINE E. PEDDLE-CORNISH,**

18 **Respondent.**

19

20 

---

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

23 I saw Mr. 2 - Name - Whistleblow... for an alcohol/drug evaluation on July 8, 2013 pursuant to  
24 an allegation that Mr. 2 - Name - ... was driving under the influence. I understand that this charge  
25 has been reduced to reckless driving. It is my professional opinion that Mr. 2 - Name - ... does not

DECLARATION OF STEVE UHRICH - 1

*Law & Mediation Services*

*of*

*Natalie De Maar*

*9 Lake Bellevue Drive*

*Suite 103*

*Bellevue, WA 98005*

*(425) 462-6580*

*Fax (425) 462-6401*

**000167**

1 display a maladaptive pattern of use that would indicate a diagnosis of abuse or dependency.  
2 It is my understanding that he had a prior evaluation based on allegations from his former  
3 partner, which all showed Mr. [2 - Name - ...] had no problems with alcohol. I am a chemical  
4 dependency professional, certified by the State of Washington Department of Health, and  
5 have conducted over 6,000 evaluations. I am trained in the technique of motivational  
6 interviewing and assessing the current state of the patient. We use ASAM and DSM IV  
7 criteria to determine the diagnosis and subsequent recommendations if they are needed.  
8

9 DATED this 16 day of April, 2014.

10 See Attached

11 Steve Uhrich  
12 Alcohol/Drug Evaluator  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

DECLARATION OF STEVE UHRICH - 2

Law & Mediation Services  
of  
Natalie De Maar  
9 Lake Bellevue Drive  
Suite 103  
Bellevue, WA 98005  
(425) 462-6580  
Fax (425) 462-6401

000168



Steve Urinch

Print or Type Name

DO NOT ATTACH FINANCIAL RECORDS TO THIS DECLARATION.  
FINANCIAL RECORDS SHOULD BE SERVED ON THE OTHER PARTY AND  
FILED WITH THE COURT SEPARATELY USING THE SEALED FINANCIAL  
SOURCE DOCUMENTS COVER SHEET (WPF DRFSCU 09.0220). IF FILED  
SEPARATELY USING THE COVER SHEET, THE RECORDS WILL BE SEALED  
TO PROTECT YOUR PRIVACY (ALTHOUGH THEY WILL BE AVAILABLE TO  
THE OTHER PARTIES IN THE CASE, THEIR ATTORNEYS, AND CERTAIN  
OTHER INTERESTED PERSONS. SEE GR 12(C)(2)).

DECLARATION (DCLR)-3  
WPF DR 09.0100 (9/2001)

Law & Mediation Services  
of  
Natalie De Moor  
9 Lake Bellavus Drive  
Suite 03  
Bellview, WA 98005  
(425) 462-6380  
Fax (425) 462-6401

# **EXHIBIT 5**

**000170**

Quantah Assessment & Counseling, PLLC  
10564 Fifth Avenue Northeast, Suite 406 - Seattle, Washington 98125  
Telephone: 206.957.0721 - Facsimile: 206.957.0723

---

Chemical Dependency Assessment Summary

Date: 06.01.2011

Name: \_\_\_\_\_  
Address: 2 - Name - Whistleblower Regarding Health Care Provider or Healt...  
DOB: \_\_\_\_\_  
Court: Kirkland Municipal Court  
Case #: 2011-00019293

---

Current Charge: Domestic Violence in the Fourth Degree, Obstruction

Date of Offense: 04.30.2010

---

History of chemical dependency related arrests or reduced charges: None reported

With a review of: driving abstract (ADR) and/or criminal history (DCH, JIS, WSP)

---

Prior CD assessment Date: None reported

Prior ADIS Date: None reported

Prior Deferred Prosecution Date: None reported

---

Diagnostic assessment: Insufficient evidence of an abuse or dependence problem

---

Treatment recommendation - ASAM level & estimated duration: no treatment recommended at this time

---

Diagnostic consideration in recommendation: DSM IV, ASAM placement criteria

---

This assessment may include collateral information from: attorney - Judicial Information System Link - court - law enforcement - treatment agency

---

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A general incident release of information is not sufficient for disclosure of the contents of this document.

(5)  
000171

**Quantah Assessment & Counseling, PLLC**  
10564 Fifth Avenue Northeast, Suite 405 - Seattle, Washington 98125  
Telephone: 206.957.0721 - Facsimile: 206.957.0723

August 15, 2011

Terry A. Zundel  
Attorney at Law  
Zundel Law Offices, PLLC  
1000 Second Avenue, Suite 1420  
Seattle, Washington 98104

**RE:**                   **Chemical Dependency Assessment**

**Client:**              2 - Name - Whistleblower Re...  
                            Date of Birth: 2 - Name - Whistle...  
                            Case #: 2011-00018293

**Assessor:**            Timothy J. McCauley, CDP  
                          Quantah Assessment & Counseling, PLLC  
                          Washington State Department of Social and Health Services  
                          Division of Behavioral Health and Recovery  
                          License: 17 1138 00

This letter is to document that on July 5, 2011, 2 - Name - Whistle... was assessed to determine the extent of his involvement with alcohol and/or other drugs and the possible need for treatment. Mr. 2 - Nam... was assessed as a result of a custody proceeding.

**Bio -** Mr. 2 - Nam... is a forty-eight year old single male, currently residing at 2042 Willows Road Northeast in Redmond, Washington. He is originally from Oregon, and has resided in Washington for the past thirty years describing his social network as family and friends. Mr. 2 - Nam... is a self-employed business owner of Speedware, which is a motorsports company.

**Health -** Mr. 2 - Nam... describes his current physical health as "good". Mr. 2 - Na... reports being diagnosed with anxiety and depression for which he takes; clonazepam .5 mg, alprazolam .5 mg, bupropion and zolpidem tartrate as prescribed by his primary care provider. Mr. 2 - Na... did prove a printout of his medications from Evergreen Pharmacy for May, June and July of 2011. Mr. 2 - Nam... reports with no other major acute or chronic medical conditions.

**Legal -** Mr. 2 - Nam... reports no other legal issues involving alcohol or other drugs. This information was provided by Mr. 2 - Name... and verified by a ten-year Washington State driving abstract (ADR) and/or a review of his criminal history (DCH, JIS, WSP). A complete police report of the arrest incident was provided to this agency for review.

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**000172**

**Alcohol and Other Drug History -** Mr. [2 - Nam...] describes his current pattern of use of alcohol as "social", with the frequency of his alcohol consumption averaging one to two times a week and states his average consumption per occasion is one to two drinks. Mr. [2 - Nam...] does not believe he has a problem with alcohol and does not consider it a significant part of his lifestyle. This agency did review Mr. [2 - Name ...] prescription print out from Evergreen Pharmacy.

Mr. [2 - Nam...] also states he does not use illegal drugs.

Mr [2 - Name ...] presented as being forthright in his description of his alcohol and other drug use, with no evidence of avoiding questions or minimizing his use.

- Michigan Alcohol Screening Test results: 2
- Drug Assessment Screening Test results: 2
- Urinalysis: 07.05.11 - positive ETG/mg creatinine 7401.7 ng/mL, 07.14.11 - negative, 07.19.11 - positive ETG/mg creatinine 843.8 ng/mL, 07.21.11 - negative, 07.26.11 - 08.05.11 - positive for benzodiazepine, correlating with his prescribed medications

**Collateral Contacts** were obtained as follows:

Ms. Christina Pediia-Cornish describes her relationship with Mr. [2 - Nam...] as having known each other for the past twelve years as friends before living together for the recent past three years and they share as son. Ms. Cornish reports having been in many social settings with Mr. [2 - Nam...] where alcohol has been served. Ms. Cornish states that Mr. [2 - Nam...] would consume alcohol in excess amounts at many occasions averaging five to six drinks of hard alcohol.

Ms. Cornish states she has witnessed Mr. [2 - Nam...] undergo significant behavioral changes after alcohol consumption presenting as hostility, aggressiveness, argumentative, irrational and problem blaming. Ms. Cornish recalls many occasions where Mr. [2 - Nam...] behavior after alcohol consumption resulted in safety risks for their son presenting as driving with him in a vehicle while under the influence of alcohol.

Ms. Cornish did relate a specific incident occurring on January 18, 2011 in Whidbey Island where Mr. Duncan left the residence without her, taking only their son home while he was heavily intoxicated.

Ms. Cornish also reports having spent time in Mr. [2 - Nam...] office where she has witnessed staff meetings that included alcohol consumption by Mr. [2 - Nam...] and his employees as well as witnessing many large empty and full bottles of alcohol in Mr. [2 - Nam...] office. Ms. Cornish also reports that many customers and vendors give Mr. [2 - Nam...] gifts in the form of alcohol as she herself did quite a while ago, having been a customer.

Ms. Cornish has spoken with friends and neighbors including Brenda Aston, who are concerned with Mr. [2 - Name ...] relationship with alcohol.

Ms. Cornish reports Mr. [2 - Nam...] holding many prescriptions for anxiety and depression such as: Xanax, Clonazepam, Valium, Trazadone, anti-depressants and anti-hallucinogens. Mr. Cornish states these prescription medications are provided to Mr. [2 - Nam...] by their neighbor who is also his pharmacist. Ms. Cornish further states that these medications are at times delivered to their house, occasionally being left on their kitchen counter.

This agency did speak with Ms. Kathy Devine with Evergreen Pharmacy. Ms. Devine Confirmed that she has filled Mr. [2 - Name - ...] prescriptions and has hand delivered them as well as leaving them in Mr. [2 - Name - ...] residence, while she further added that she has only left prescriptions while Mr. [2 - Nam...] is the only residence at that address and has not done so after Ms. Cornish had moved into the residence.

Ms. Cornish reports Mr. [2 - Nam...] consuming 30 to 60 pills of Xanax per month in addition to other prescribed medications for depression and anxiety. Mr. Cornish states that Mr. [2 - Nam...] would most often consume hard alcohol after taking his prescribed medications and at times would request herself to prepare for him a drink with 2 pills of Xanax to be ready for him upon his arrival home from work, bring them to his work, leave them on the front porch for him to pick up, or pack them in his overnight bags when he would travel.

Ms. Cornish states that Mr. [2 - Name...] would suffer severe panic if he ever traveled away without his medications and at times would obtain medications from various friends if he consumed all of his own. Ms. Cornish also states that Mr. [2 - Name...] would carry his medications on his person and take multiple doses if he was feeling stressed.

It is this agency's opinion that some of Mr. Cornish's statements and recalls have been exaggerated or mis-reported to support a specific outcome for this evaluation's final results.

Ms. Brenda Aston describes her relationship with Mr. [2 - Nam...] as close family friends, having known him for the past ten years or more.

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Ms. Aston reports having been in social settings where alcohol was served and has witnessed Mr. [2 - Nam...] consume alcohol. Ms. Aston states that Mr. [2 - Na...] does not consume alcohol at every social occasion and when he does consume, his amount per occasion is moderate. Ms. Aston reports not having witnessed Mr. [2 - Nam...] undergo any significant behavioral changes after having consumed alcohol.

Ms. Aston reports never having witnessed Mr. [2 - Nam...] use any illegal drugs

Ms. Aston reports knowing of no friends or family members that are concerned for Mr. [2 - Name - ...] relationship with alcohol or drug use.

Ms. Aston reports not knowing of Mr. [2 - Na...] suffering any negative consequences related to alcohol or drug use.

---

Ms. Hoxit describes her relationship with Mr. [2 - Nam...] as close family friends, having known him for the past thirty years. She states she communicates with him daily as he has been living in her residence due to his relationship issues and his inability to return to his home.

Ms. Hoxit reports having been in social settings with Mr. [2 - Nam...] where alcohol has been present and she rates his drinking as minimal. She also states he does not consume alcohol at every social setting and has not witnessed Mr. [2 - Name ...] undergo any significant behavioral changes after alcohol consumption. Ms. Hoxit also states she has not witnessed nor does she know of Mr. [2 - Nam...] suffering any negative consequences related to alcohol consumption.

Ms. Hoxit states that Mr. [2 - Nam...] has not consumed alcohol in her presence for the past month and a half.

Ms. Hoxit has never witnessed Mr. [2 - Nam...] use any illegal drugs and states she has witnessed him use a sleeping aid that he leaves near the sink. Ms. Hoxit also reports that she has not witnessed Mr. [2 - Nam...] consume alcohol after taking his sleeping aid.

Ms. Hoxit reports not knowing of any family members or friends who are concerned for Mr. [2 - Name - ...] relationship with alcohol and/or drugs. Ms. Hoxit further states that she would not believe any such allegations of Mr. [2 - Nam...] having an abusive relationship with alcohol and/or drugs and feels strongly that if she believed that he did, she would confront him on this issue.

This agency also spoke with Kathy Devine with Evergreen Pharmacy, reviewed the King County Superior Court order for a chemical dependency assessment, a police report for a domestic violence incident on April 30, 2011 and a police report for the January 16, 2011 incident.

---

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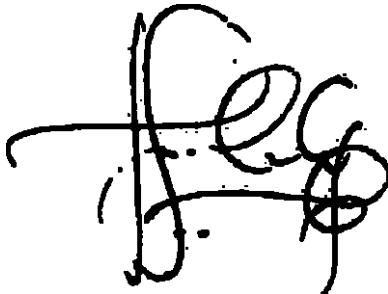
**Assessment Recommendations:**

Based on the information provided, using the diagnostic criteria of DSM IV, The American Society of Addiction Medicine (ASAM) and with recommendations from the Washington State Division of Alcohol and Substance Abuse, it is determined there is insufficient evidence of an alcohol/substance problem. Mr. [2 - Nam...] did not present with the necessary signs and symptoms for an abuse or dependence diagnosis.

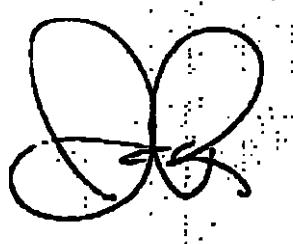
- No treatment recommended at this time
- 

Mr. [2 - Nam...] was informed of the results of this assessment. Please call with any questions.

Sincerely,



Timothy J. McCauley, CDP



Jessica C. Rhodes, CDPT

cc: 2 - Name - Whistleblo...  
cc: File

"VIT ALARM b vnu...  
11/12/2014  
11/12/2014  
11/12/2014  
11/12/2014

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I BARBARA MINER Clerk of the Superior Court of the State of Washington  
for King County do hereby certify that this copy is a true and perfect transcript  
of said original as it appears on file and of record in my office and of the whole  
thereof IN TESTIMONY WHEREOF I have affixed this seal of said Superior  
Court at my office at Seattle on this date \_\_\_\_\_

JUL 05 2017

BARBARA MINER Superior Court Clerk

By \_\_\_\_\_  
Deputy Clerk



V. CHOUNRAMANY

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000176  
KEILIN, JENNIFER 2016-13188LW PAGE 358

**FILED**

14 JUN -6 PM 2:36

KING COUNTY  
SUPERIOR COURT CLERK,  
SEATTLE, WA

**CERTIFIED  
COPY**

**Superior Court of Washington  
County of King**

In re:  
**SENNA S. DUNCAN,**

Child,

And

2 - Name - Whistleblower Regard...

Petitioner,

and

**CHRISTINE PEDDLE-CORNISH,**

Respondent.

**No. 11-3-03341-8 SEA**

**Order Appointing Case  
Manager**

This matter having come before the Court pursuant to the Parenting Plan Order signed by the honorable William L. Downing on October 16, 2012, and Respondent's Motion re Adequate Cause and to Appoint Case Manager, this court having reviewed the records herein, rules as follows

**ORDERED,**

**1. APPOINTMENT OF CASE MANAGER**

The Court intends that the Case Manager in this Order shall have all the rights and responsibilities accorded the Parenting Coordinator under Washington law. Jennifer Keilin is hereby appointed as Case Manager in this case, with authority as provided in this Order.

The Case Manager is appointed for a term of two (2) years and subject to (1) reappointment at the expiration thereof upon the Court's own motion, the request of the Case

Oder Appointing Case Manager  
Page 1 of 13

VERONICA FREITAS  
V. FREITAS LAW, PLLC.  
210 Summit Avenue East  
Seattle, Washington 98102  
(206) 328-7362  
v@vfreitaslaw.com

000177

1 Manager or motion of either party, or (2) earlier removal by Court order based upon motion  
2 showing good cause, stipulation of the parties, or (3) resignation by the Case Manager.

3 IT IS FURTHER ORDERED that before either party will be allowed to file any police  
4 report or action to seek relief in Court regarding parenting time, or enforcement of the Court's  
5 various parenting orders, the parties shall first consult with the Case Manager, unless there is an  
6 emergency related to the child's health, safety and welfare. If the issue cannot be resolved with  
7 the help of the Case Manager, the part who wants to file the motion/petition shall file a separate  
8 certification that he/she has consulted with the Case Manager, the date the consultation was  
9 made, and the outcome of the consultation. Any motion/petition filed without this separate  
10 certification will be automatically denied with fees of the responding party to be paid by the  
11 party improperly seeking legal relief.

12 **II. CASE MANAGER AUTHORITY**

13 A. The Case Manager is authorized, subject to the provision of Paragraph 6 of this  
14 Order, to make recommendations regarding implementation, clarification, modification, and  
15 enforcement of any term in the permanent parenting plan, and to make recommendation on the  
16 day-to-day issues experienced by the parties in these areas. The Case Manager is not authorized,  
17 to make recommendations affecting child support, a change of custody or a substantial change in  
18 parenting time. In the event the Case Manager determines parenting or family issues or  
19 circumstances exist that are significantly detrimental to the welfare of the child and that a change  
20 in custody or a substantial change in parenting time is warranted, the Case Manager may submit  
21 the Case Manager's concerns in writing to the parties and file a report re same in King County  
22 Superior Court.

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26  
27  
28 Oder Appointing Case Manager  
Page 2 of 13

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1           B.     The scope of the authority of the Case Manager shall be:

2           1. to address and resolve all current and future disputes arising under the  
3 parenting plan, including but not limited to disputes over: schooling, daycare, or babysitting,  
4 medical and/or psychological care, activities of the child, discipline, daily routine, transportation  
5 and supervised transfer of the child, vacation and holiday scheduling or any other "parenting  
6 type" issues, and any issue as the Court may from time to time direct;

7           2. to determine and, as need be, to alter the terms of the present order to mutual  
8 "no contact" between the parents. The parents should have no contact with one another and all  
9 information related to Senna, his health, major decisions, scheduling, child support and more  
10 shall be posted on Our Family Wizard or some other place as directed by the Case Manager or go  
11 through the Case Manager.

12           3. to help create a common language between the parents regarding discipline,  
13 rules, diet, etc., at each house; make recommendations regarding treatment providers for parents  
14 and child when necessary; to select a new exchange supervisor if deemed necessary; and to have  
15 decision making ability for scheduling telephone calls from the nonresidential parent to Senna.

16           4. to determine and oversee the use of SKYPE or other online access to Senna  
17 including the dime, duration and context of calls, standards of proof for attempting calls and  
18 being there to receive them, altering SKYPE times if mother's employment or father's  
19 employment so requires; altering the room of room content and location in which the call(s)  
20 occurs, and to suggest call content or activities to improve the experience for Senna.

21           5. to determine and oversee the use of Our Family Wizard including, but not  
22 limited to, how each party uses it and the timeliness of their responses to the other, limits to

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Order Appointing Case Manager  
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1 content that can be posted, whether they can alter or remove content posted by the other party  
2 and determining the access other professionals (such as the Visitation Supervisor) should have to  
3 the site.

4           6. The Case Manager shall follow and monitor both parent's compliance with the  
5 Parenting Plan, mediate emails and communications between the parents by providing ongoing  
6 parent coordination.

7           7. to have decision making abilities for minor deviations and/or changes to the  
8 plan or in other decisions regarding Senna and the schedule that the parents cannot make  
9 independently.

10          8. to resolve/decide any issue within the scope of authority of the Case Manager  
11 by any dispute-resolution method deemed reasonable by the Case Manager or which may be  
12 agreed to by the parties.

13          9. ~~to require that both parties provide proof of current, valid driver's license, proof~~  
14 ~~of insurance, US criminal history and driving abstracts for Arizona and Washington and to~~  
15 ~~determine how transportation shall be arranged if one party does not have a current, valid~~  
16 ~~driver's license and insurance.~~

17          10. to make decisions and formulate recommendations based upon what is in the  
18 child's best interest,

19          11. to interview all members of the immediate or extended family or household  
20 of both parents and the child;

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Oder Appointing Case Manager  
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1           12. to interview and request the participation of any and all persons who the Case  
2 Manager deems to have relevant information including the therapists used by each party and the  
3 health care providers and daycare providers for Senna.

4           13. to recommend or require that the Court order the parties and/or child to  
5 participate in ancillary services, including but not limited to: physical or psychological  
6 examinations and assessments, psychotherapy, counseling, and alcohol or drug monitoring and  
7 testing.

8           14. to allocate between the parties the cost of any ancillary service not ordered at  
9 the time of the Case Manager appointment.

10          III. TIME SENSITIVE ISSUES, AUTHORITY AND PROCEDURE

11          The Court recognizes that occasionally circumstances and parenting issues may arise that  
12 may require immediate decision for the welfare of the child and parties on issues not addressed  
13 elsewhere in this order.

14          A. When short-term, emerging, and time sensitive situation or dispute within the  
15 scope or authority of the Case Manager arises that requires an immediate decision for the welfare  
16 of the child and the parties, a Case Manager may make a binding temporary decision. This  
17 interim decision shall be made without prejudice and shall not be regarded as precedent as to  
18 any future action or procedure for any other dispute. The decision shall be filed in King County  
19 Court with a copy to the parties (or counsel, if represented) in a written report that shall  
20 document all substantive issues addressed and the basis for the decision for review and entry of  
21 any appropriate orders with the King County Court's earliest opportunity. In such an instance,  
22 and within the purview of the scope of authority of the Case Manager, the Case Manager may  
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Oder Appointing Case Manager  
Page 5 of 13

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1 communicate with the assigned judge, if any, in writing with a copy of the parents (or counsel, if  
2 represented), his recommendation to the Court, and if the court determines that interim orders  
3 may be entered sufficient to resolve the immediate dispute, and if the court makes such an  
4 interim order, the Case Manager has authority to immediately communicate the same to the  
5 parties on the Court's behalf. Thereafter, the procedures set forth in Paragraph 6(c).  
6

7       B. For purposes of example only, and not by limitation, such time-sensitive,  
8 emergent situations might be:

9              Temporarily changing exchange day, time or place;

10             Attendance at or participation in a special event or occasion by the  
11 child or parent;

12             Responsibility for care of a sick child or accompaniment to  
13 medical treatment;

14             A special non-recurring need of the child or parent.

15       C. The Case Manager report shall document all substantive issues addressed and the  
16 basis for the recommendations made to the Court. The foregoing authority and procedure is  
17 implemented as an exception to the procedures set forth in Section (5) of this Order, based upon  
18 the best interests of the child covered by this Order.  
19

20       IV. AUTHORITY OF CASE MANAGER RE: THE CHILD  
21

22       The Case Manager shall have the following rights, responsibilities and authority with  
23 regard to the child.

24       A. Reasonable access to the child with reasonable notice;

1       B. Reasonable notice of any and all judicial proceedings including requests for any  
2 examination affecting the child, and shall be provided copies of all orders and pleadings filed in  
3 this case;

4       C. The Case Manager shall have access to:

- 5           1. all therapists of the child and parents;  
6           2. all school and medical records of the child and parents;  
7           3. any and all mental health records including but not limited to

8           psychological tests or evaluations performed on the child or the  
9 parents;

- 10           4. any and all teachers/childcare providers for the child.

11       D. The Case Manager is authorized to interview the parties or child in any  
12 combination, whether initiated by the Case Manager or either party. If either party contacts in  
13 writing the Case Manager, the documentation or writing given to the Case Manager shall be  
14 provided to the opposing party and counsel (if any) simultaneous to providing it to the Case  
15 Manager.

16       E. At the request of the Case Manager, each party shall execute any and all releases  
17 or consents necessary so as to authorize the Case Manager's access to the information  
18 contemplated herein above.

19       V. CONFIDENTIALITY

20       There is no confidentiality relating to the parties' communications with/to the Case  
21 Manager or concerning the Case Manager's activities or recommendations.

22       VI. PROCEDURE

23       Order Appointing Case Manager  
24       Page 7 of 13

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1       The proceedings before the Case Manager shall be conducted in accordance with the  
2 following procedures:

3       A.     Either party, the Case Manager or the Court may initiate proceedings before the  
4 Case Manager. Both parties shall participate in the dispute resolution process defined by the  
5 Case Manager.

6       B.     Once proceedings are initiated under (a) above, the Case Manger shall determine,  
7 at his discretion, the sequence and frequency of meetings and who shall participate in any  
8 sessions/meetings. Notice may be made by mail to the last known address supplies to the Court  
9 or, if circumstances demand, the Case Manager may notify the parties orally and make a notation  
10 of the date and time of the notification. The Case Manager shall proceed with all reasonable  
11 diligence. If a party fails to appear at a time and place appointed, the Case Manger may proceed  
12 at that time, or at the Case Manager's discretion, continue the meeting to a future day with notice  
13 to the absent party.

14      C.     If either party fails to participate as requested by the Case Manager, then in  
15 addition to all other remedies available under law, the Case Manager may proceed and make  
16 recommendations regarding the dispute, if necessary, without the participation of such party.

17      D.     The Case Manager is not required to make a record of the proceedings, however,  
18 any party, at their option and expense and upon reasonable notice, may make a record of any  
19 information offered. The Case Manager, may, in his discretion, tape record or video record or  
20 otherwise preserve any information presented to the Case Manager.

21      E.     The Case Manger or the parties may request that the Court procure the attendance  
22 of witnesses for any proceedings conducted by the Case Manager.

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Order Appointing Case Manager  
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1       F.     The Case Manager may request, with notice to the parties, the Court to issue  
2 subpoenas to require the appearance of any person within the jurisdiction of this Court and/or  
3 require the production of any documents within the jurisdiction of this Court or under the control  
4 of either party or their agents.  
5

6       G.     If either or both parties are represented by counsel, there shall be no ex parte  
7 communications between the Case Manager and counsel except if such communication relates  
8 solely to scheduling matter.

9       H.     Additional rules applicable to the Case Manager may be ordered by the Court  
10 from time to time.  
11

12

## 13 VII RECOMMENDATIONS RULINGS AND OBJECTIONS

14       A.     Recommendations and rulings by the Case Manager must be made or confirmed  
15 in a written report to the Court and parties, which shall be submitted to the Court no later than  
16 five (5) days after an oral determination or receipt of all information necessary to make a  
17 recommendation or ruling. A copy of the report will be mailed or transmitted to the parties or  
18 their counsel on the date of submission. The report may be transmitted by fax or email to the  
19 parties at a fax number or email address provided by the parties to the Case Manager.  
20

21       B.     The Case Manager may, in his discretion, submit draft recommendations or  
22 rulings to the parties or their counsel for the purpose of receiving their suggestions. The Case  
23 Manager may, at this discretion, require the parties or their counsel to submit proposed draft  
24 recommendations or rulings to the Case Manager.  
25

1           C. The Court, upon receipt of a report and recommendation or rulings from a Case  
2 Manager, may:

- 3                 1. approve the recommendation or ruling and adopt it as an interim order of the  
4 Court, subject to either party objecting or requesting a hearing within ten (10) days from the date  
5 of the report and recommendation is submitted to the Court;  
6  
7                 2. modify the recommendation or ruling and adopt the modified recommendation  
8 or ruling as an interim order of the Court, subject to either party objecting or requesting a hearing  
9 within ten (10) days from the date of the report and recommendation is submitted to the Court.  
10  
11                 3. reject the recommendation report in whole or in part and affirm the current  
12 order, subject to either party objecting or requesting a hearing within ten (10) days from the date  
13 the report and recommendation is submitted to the Court or;  
14  
15                 4. set a hearing on the assigned judicial officer's calendar.

16           D. A party who objects shall clearly state in writing the objections to the  
17 recommendations, the basis for the objection, a proposed solution, and whether a hearing is  
18 requested. The judicial officer will set a hearing if requested. By agreement of the parties or if  
19 the Court so orders, the recommendations of the Case Manager will remain in effect during this  
20 objection period and process unless and until it is affected by a further order of the Court.  
21

22           VIII. APPEARANCES

23           A. The Case Manager may appear and shall be available to testify at any court  
24 hearing upon reasonable notice to the Case Manager, the Court and the opposing party regarding  
25 any issue addressed by the Case Manager.  
26  
27

1           B. If transcripts, tape recordings or videotapes have been made of any portions of the  
2 Case Manager proceedings, they shall be submitted to the Court.

3           IX. DISCLOSURES

4           The parties shall keep the Case Manager advised of their and the child's addresses,  
5 telephone numbers for home, work and school, mailing address if different than the living  
6 address, as well as any other pertinent information. This information shall be immediately  
7 communicated in writing to the Case Manager.

8           X. IMMUNITY

9           A. The Case Manager has immunity in accordance with Washington and Arizona  
10 law as to all acts undertaken pursuant to and consistent with the appointment order of the Court.

11           B. Any alleged impropriety or unethical conduct by the Case Manager shall be  
12 brought to the attention of the Court in writing.

13           XI. FEES

14           A. The Petitioner shall pay the ~~initial retainer fee of \$4,000.00~~ *77% of the case manager's fees.*  
15 Once the ~~initial retainer amount has been used, then the Petitioner shall be responsible for and~~  
16 ~~pay 77% of the Case Manager's fees, and~~ the Respondent shall be responsible for and pay 23%  
17 of the Case Manager's fees, except as noted below, until further order of the Court. All fees shall  
18 be paid in advance as determined by the Case Manager. The Case Manager shall keep accurate  
19 records of services rendered and fees paid by each party.

20           B. If the Case Manager determines that one of the parties is acting in bad faith and/or  
21 not complying with the Court's orders or the decisions of the Manger, he may recommend that  
22 the party acting in bad faith pay or reimburse the other's share of his or any other professional's  
23

1 fees necessitated by the party acting in bad faith, as well as recommend additional sanctions  
 2 (including modifications of access and/or contempt proceedings).

3       C. Should the Case Manager determine that one of the parties is using her services  
 4 unnecessarily and is thereby causing greater expense for the other party as a result thereof, the  
 5 Case Manager may recommend to the Court a different allocation for payment of fees.

6       D. Should the Case Manager find any party is acting in bad faith, and/or not  
 7 complying with the Court's orders, the Case Manager may recommend that the party acting in  
 8 bad faith pay or reimburse the other party's costs of services provided by the Case Manager  
 9 necessitated by the party acting in bad faith, and the Case Manager may recommend additional  
 10 sanctions, which may include modifications of access and/or contempt proceedings.

11 Dated:

*June 6, 2014*

Judge/Commissioner *Melinda Johnson-Taylor*

12 Presented by:

V. Freitas Law

13 waived: *No defense*

Natalie De Maar, WSBA No. 24386

14 Attorney for Petitioner

Approved for entry:

Notice

of presentation

Veronica Freitas, WSBA No 19405

15 Attorney for Respondent

16 Approved for entry:

Approved for entry:

17 Jennifer Keilin, MSW, LIC SW

18 Case Manager

2 - Name - Whistleblower Regard... *17.06.14*

Petitioner *Subscribed and sworn to this day,*

24 Christine Peddle

25 Respondent

26 All parties must Immediately File With the Court and Update After any Change in the  
 27 Information, the Confidential Information Form Required by RCW 26.23.050 [from Order of

28 Order Appointing Case Manager

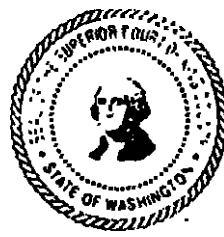
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 v@vfreitashlaw.com

CC: [redacted]

000188

I BARBARA MINER Clerk of the Superior Court of the State of Washington  
for King County do hereby certify that this copy is a true and perfect transcript  
of said original as it appears on file and of record in my office and of the whole  
thereof IN TESTIMONY WHEREOF I have affixed this seal of the Superior  
Court at my office at Seattle on this date MAR 30 2017



BARBARA MINER Superior Court Clerk

By  
Deputy Clerk

V. CHOUNRAMANY

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# CERTIFIED COPY

## FAMILY LAW CLERK'S MINUTES

**SCOMIS CODE: MTHRG..**

**Commissioner:** Melinda Johnson Taylor... ....  
**Coordinator:** Mary Bromberger... ....  
**Court Clerk:** Sarah Hudson  
**Digital Record:** W.278... ....  
**Start:** 1:41:27.....  
**Stop:** 1:58:50

**Dept.. FAM 01**  
**Date: 6/6/2014**

---

**KING COUNTY CAUSE NO.: 11-3-03341-8 SEA**

2 - Name - Whistleblower Regar... **v. Christine Peddle Cornish**

---

**Appearances:**

Petitioner appearing by counsel, **Natalie De Maar**  
 Respondent is present by telephone with counsel, **Veronica Freitas**

...

### MINUTE ENTRY

Respondent's Motion for Adequate Cause and Motion to Appoint Case Manager are heard:

Respondent's Motion for Adequate Cause and Motion to Appoint Case Manager are granted.

Temporary Orders are entered as follows:

- Mutual Restraining Orders
- Parenting Plan is ordered:
  - Holidays                    Vacations    Transportation/Exchange
  - Professional Supervised Visitation: father
  - Temporary Order of Child Support
  - Transfer payment of \$.. per month commencing .. to be paid by Respondent
  - Temporary Spousal Maintenance to Petitioner of \$.. commencing ..

2 - Name - Whistleblower Re... **v. Christine Peddle Cornish**  
**King County Cause No. 11-3-03341-8**

- Transferred to Family Court Services for Domestic Violence Report
- CPS Status Report to be provided to the court.
- GAL is appointed.
- Request for attorney's fees for the Respondent is granted. \$1,500

Other:

- Jennifer Keilan is appointed as Case Manager
- 
- 
- 

- Hearing is continued to . . .
  - Confirmation waived.

- Orders are signed.

11-3-03341-8  
CORNISH, CHRISTINE  
PENN, JENNIFER  
13188LW  
KEILIN, JENNIFER

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Page 2 of 2

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for King County do hereby certify that this copy is a true and perfect transcript  
of said original as it appears on file and of record in my office and of the whole  
thereof IN TESTIMONY WHEREOF I have affixed this seal of said Superior  
Court at my office at Seattle on this date MAR 30 2011



BARBARA MINER Superior Court Clerk

By  
Deputy Clerk

V. CHOUNRAMANY

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KING COUNTY, WASHINGTON

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APR 17 2015

SUPERIOR COURT CLERK  
BY DEBRA BAILEY TRAIL  
- DEPUTY

## Superior Court of Washington County of King

In re:

SENNIA S. DUNCAN,

Child,

2 - Name - Whistleblower Regarding Healt...

Petitioner,

and

CHRISTINE E. PEDDLE-CORNISH,

Respondent.

No. 11-3-03341-8 SEA

Order re Case Manager's Report  
and Recommendations

This Court has received (from case manager Jennifer Keilin) a written report and recommendations dated March 13, 2015. The specific recommendations made by Ms. Keilin all strike the court as being sensible and practical. No objection has been lodged. Accordingly, pursuant to section VII [C] of the Order Appointing Case Manager, the Court will hereby approve and adopt those recommendations.

IT IS SO ORDERED.

The Court would note that it has not retained jurisdiction over this matter but, treating the non-objection as agreement with entry of this order, it is willing to perform the ministerial act of signing it. Any disputes or disagreements between the parties will need to be properly noted on the Family law motions calendar.

Dated: 4/17/15

Judge William L. Downing

Presented by:



Veronica Freitas WSBA No.19405  
Attorney for Respondent

Approved by:

2 - Name - Whistleblower... Pro Se  
Petitioner

Page 1 of 1

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I BARBARA MINER Clerk of the Superior Court of the State of Washington  
for King County do hereby certify that this copy is a true and perfect transcript  
of said original as it appears on file and of record in my office and of the whole  
thereof IN TESTIMONY WHEREOF I have affixed this seal of said Superior  
Court at my office at Seattle on this date MAR 30 2017



BARBARA MINER Superior Court Clerk  
By \_\_\_\_\_  
Deputy Clerk

V. CHOUNRAMANY

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15 SEP 22 PM 3:20

KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 11-3-03341-8 SEA

# CERTIFIED COPY

## Superior Court of Washington County of King

In re:

Senna Duncan,

Child,

2 - Name - Whistleblower Regard...

Petitioner,

and

CHRISTINE PEDDLE,

Respondent.

No. 11-3-03341-8 SEA

Petition for Modification/ Adjustment  
of Custody Decree/ Parenting  
Plan/Residential Schedule  
(PTMD)

Para. 2.14: check box if petition is attached  
for:

- Order for protection DV (PTORPRT)  
 Order for protection UH (PTORAH)

### 1.1 Identification of Requesting Party/Parties

Name: Christine Peddle-Cornish. Birth date: May 24, 1973.

Last known residence: Maricopa County, AZ.

### 1.2 Identification of Other Party/Parties

Name: [REDACTED] Birth date: [REDACTED]

Last known residence: King County, WA.

### 1.3 Dependent Child

Name: Senna Duncan

Age 5

1  
2           **II. Basis**

3           **2.1 Petition for an Order Modifying Custody Decree/Parenting Plan/Residential Schedule**

4           This is a petition for an order modifying the prior custody decree/parenting plan/residential  
5           schedule/judgment establishing parentage and approving my proposed parenting plan/residential  
6           schedule, which is filed with this petition.

7           **2.2 Adequate Cause**

8           There is adequate cause for hearing the petition for modification.

9           **2.3 Child Support**

10          Child support should be modified or established if the court grants the petition to modify the  
11          parenting plan or residential schedule. A child support worksheet and financial declaration must be  
12          filed with this action. RCW 26.09.170.

13          **2.4 Jurisdiction and Venue**

14          The court has proper jurisdiction and venue.

15          The requesting party resides in Maricopa County, AZ.

16          The child resides in Maricopa County, AZ.

17          The other party resides in King County, WA.

18          **2.5 Jurisdiction Over Proceeding**

19          This court has jurisdiction over this proceeding for the reasons below:

20          This court has exclusive continuing jurisdiction. The court has previously made a child custody,  
21          parenting plan, residential schedule or visitation determination in this matter and retains jurisdiction  
22          under RCW 26.27.211.

23          **2.6 Uniform Child Custody Jurisdiction and Enforcement Act Information**

24           Name of Child  
25           Senna Duncan

26           Parent's Name  
27           Christine Peddle

28           Parent's Name

29           2 - Name - Whistleblo...

30          During the last five years, the child have lived in no place other than the state of Washington and  
31          Arizona, where the custodial parent resides, and with no person other than the requesting party or  
32          the other party.

33          Claims to custody or visitation:

34          The requesting party does not know of any person other than the other party who has physical  
35          custody of, or claims to have custody or visitation rights to, the child.

Involvement in any other proceeding concerning the child:

The requesting party has not been involved in any other proceeding regarding the child.  
Other legal proceedings concerning the child:

The requesting party does not know of, any other legal proceedings concerning the child.

## 2.7 Custody Decree or Parenting Plan/Residential Schedule

The Custody Decree/Parenting Plan/Residential Schedule was entered on October 17, 2012 in King County, WA. A certified copy of the Custody Decree/Parenting Plan /Residential Schedule to be modified is filed with or attached to this petition. If the decree or plan to be modified was entered in another county or state.

## 2.8 Modification Under RCW 26.09.260(1), (2)

Does not apply.

## 2.9 Modification or Adjustment Under RCW 26.09.260(4) or (8)

The custody decree/parenting plan/residential schedule should be modified because the reduction or restriction of the residential time for the person with whom the child does not reside a majority of the time would serve and protect the best interests of the child using the criteria in RCW 26.09.191, as described here:

Since the parties' parenting plan was entered in 2012, the father has failed to exercise the majority of his time with the child. He has failed to appear for the majority of the court ordered Skype visitation with the child. The father blames the mother for this, but it is the father who has failed to make arrangements for the visits and has failed to appear for the Skype visits. When the father does appear for the Skype visits, he routinely makes disparaging comments about the mother and his focus is on the mother rather than bonding with the child.

In June of 2014, the father scheduled a five day visitation with the child in Arizona. The father removed the child from Arizona and would not tell the mother where he had taken the child. The father was supposed to keep the child for five days, but he failed to return the child and kept the child for an additional 7 days. The mother had to get police departments in Washington, Montana and Arizona involved before the father finally returned the child.

The father currently has multiple warrants for his arrest stemming from his driving while license suspended and other driving related offenses. The father has no drivers' license and no insurance. During the father's visit in 2014, the father drove Senna without a valid license or insurance. The mother believes that the father suffers from drug and alcohol addiction.

The father informed the mother and the case manager that he wanted to visit Senna in January of 2015. The case manager cancelled the visit because the father refused to follow the court's orders that required him to arrange for a supervised exchange professional, provide information on where

1 the father and child would be staying in Arizona or travel itinerary information if the father was  
2 planning on removing the child from Arizona.

3 Two weeks after the father's January visit was cancelled by the case manager, someone contacted  
4 CPS in Maricopa County where the mother lives, and reported that the mother was abusing the  
5 child. The person making the report, reported many of the same false allegations against the mother  
6 that the father made during their parties' trial in 2012. It is believed that the father is the person who  
7 contacted CPS and made the false report. CPS investigated the anonymous call and did not find any  
8 of the allegations to be true.

9 The parties' were required to communicate through the online program Our Family Wizard. The  
10 mother has used this program to track information, provide the father with updates regarding the  
11 child's medical and educational needs and to communicate respectfully about the child. The father  
12 has not used OFW for this purpose. The father regularly used OFW to send menacing, threatening  
13 emails to the mother that include name calling, profanity and false allegations of parental alienation,  
14 withholding the child etc.

15 The most recent order of the court requires the parties to stop using OFW and instead orders the  
16 parties to direct all communication through the case manager. The father has failed to pay the case  
17 manager and the case manager withdrew because he did not pay his percentage of the requested  
18 additional retainer (the mother paid her portion, but when the father failed to pay his portion the  
19 case manager refunded the mother her portion).

20 Under the current parenting plan, the parties are to make decisions jointly through the case manager.  
21 The father refuses to participate in making decisions. He routinely refuses to respond in any fashion.  
22 When the mother is forced to make a decision without his input, he then he attacks her for making  
23 decisions without him and accuses her of not following the parenting plan.

24 The father regularly engages in abusive use of conflict that is damaging to the child. The father  
25 withheld the child and would not tell the mother where the child was or when or if he would return  
26 the child. It is believed that the father contacted CPS to make false allegations of abuse against the  
27 mother. During the Skype visits the father makes comments to the child about the mother being  
unfit, doing drugs, being promiscuous, abusing the child etc. The parties' previous counsellor, Joe  
Glassman, retired in 2014. Rather than cooperating in appointing a new case manager the father  
filed a petition to modify the parenting plan making the same false allegations that he made during  
the parties' trial and that were made to the CPS worker in 2015.

28 The father has a history of domestic violence. During the parties' relationship, the father was very  
abusive to the mother. The father was charged with Assault 4 DV for assaulting the mother and the  
mother obtained a domestic violence protection order. After the current parenting plan was entered,  
the father continued to engage in domestic violence behaviors. The mother's mother was forced to  
obtain an antiharassment order against the father because he would not stop contacting the maternal  
grandmother and leaving obscene, graphic, and threatening messages on her voicemail. In 2013,  
the police were called to the father's home during a domestic dispute between the father and his then  
girlfriend. When the police arrived, the girlfriend was outside the home in the bushes wearing  
nothing but a tank top and underwear in thirty degree weather. The woman was too terrified to  
provide a statement to the police and just wanted help getting her belongings out of the father's  
home. This is very alarming.

1  
2      The father was previously convicted of domestic violence against another woman and subsequently  
3      prohibited from owning or possessing firearms. In 2014, police seized three very large gun safes  
4      from the father's businesses and/or residences and confiscated what appears to be an arsenal of  
5      firearms, ammunition, and other deadly weapons.

6  
7      The current parenting plan and subsequent orders regarding the parenting plan and case manager  
8      recommendations cannot be followed. The current orders are not in the child's best interests. All of  
9      the father's time should be professionally supervised in Arizona, where the mother and the child  
10     live.

11     **2.10 Adjustments to Residential Provisions Under RCW 26.09.260(5)(a) and (b)**

12     Does not apply.

13     **2.11 Adjustments to Residential Provisions Under RCW 26.09.260(5)(c), (7), (9)**

14     Does not apply.

15     **2.12 Adjustments to Nonresidential Provisions Under RCW 26.09.260(10)**

16     The following nonresidential provisions of the parenting plan should be adjusted because there is a  
17     substantial change of circumstances of either party or of the child and the adjustment is in the best  
18     interest of the child:

- 19        Dispute resolution.  
20        Decision making.  
21        Transportation arrangements.

22     **2.13 Substantial Change in Circumstance**

23     *(You must complete this part if you request a modification or adjustment in paragraphs 2.8, 2.10,  
24     2.11.1, 2.11.3 or 2.12.)*

25     The requested modification or adjustment of the custody decree/parenting plan/residential schedule  
26     is based upon the following substantial change in circumstance:

27     **2.14 Protection Order**

28     Does not apply.

29     If you need immediate protection, contact the clerk/court for RCW 26.50 Domestic Violence  
30     forms or RCW 10.14 Antiharassment forms.

## **2.15 Servicemembers Civil Relief Act Statement**

**2.15.1 A. Service member status –** 2 - Name - Whistlebl... **is not a service member;**

**B. Factual basis:**

See the attached Department of Defense Manpower Data Center Status Report Pursuant to Servicemembers Civil Relief Act (SCRA) obtained from <https://www.dmdc.osd.mil/appi/scra/>. (You must have the person's social security number to search in this site.)

**2.15.2 A. Dependent of a service member status - 2 - Name - Whistleblo... is not a dependent of a resident of Washington who is on active duty and is a National Guard member or a Reservist.**

## 2.16 Other

N/a

### **III. Relief Requested**

The moving party requests that the court find that there is adequate cause for hearing this petition and enter an order modifying the custody decree/parenting plan/residential schedule in this matter and approving the proposed parenting plan/residential schedule, which is filed with this petition.

**The moving party also requests that the court:**

**Enter an order establishing child support in conjunction with the proposed parenting plan/residential schedule. The child support worksheet and financial declaration are filed with this petition.**

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

Signed at Surprise, AZ on September 22, 2015.

Chestnut Family.

**Christine Peedle**

Page 6 of 5

**VERONICA FREITAS  
V. FREITAS LAW, PLLC.  
210 Summit Avenue East  
Seattle, Washington 98102  
(206) 328-7362  
[v@vfreitaslaw.com](mailto:v@vfreitaslaw.com)**

000200



Status Report  
Pursuant to Servicemembers Civil Relief Act

Last Name:

First Name:

Middle Name: SAM

Active Duty Status As Of: Mar-13-2015

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA

This response reflects the individual's active duty status based on the Active Duty Status Date

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA

This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA

This response reflects whether the individual or his/her unit has received early notification to report for active duty.

*Mary M. Snavely-Dixon*

Mary M. Snavely-Dixon, Director  
Department of Defense - Manpower Data Center  
4800 Mark Center Drive, Suite 04E25  
Arlington, VA 22350

000201

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense (DoD) that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The DoD strongly supports the enforcement of the Servicemembers Civil Relief Act (50 USC App. § 501 et seq., as amended) (SCRA) (formerly known as the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced only a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual was on active duty for the active duty status date, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's status by contacting that person's Service via the "defenselink.mil" URL: <http://www.defenselink.mil/fac/pis/PC09SLDR.html>. If you have evidence the person was on active duty for the active duty status date and you fail to obtain this additional Service verification, punitive provisions of the SCRA may be invoked against you. See 50 USC App. § 521(c).

This response reflects the following information: (1) The individual's Active Duty status on the Active Duty Status Date (2) Whether the individual left Active Duty status within 367 days preceding the Active Duty Status Date (3) Whether the individual or his/her unit received early notification to report for active duty on the Active Duty Status Date.

#### More information on "Active Duty Status"

Active duty status as reported in this certificate is defined in accordance with 10 USC § 101(d)(1). Prior to 2010 only some of the active duty periods less than 30 consecutive days in length were available. In the case of a member of the National Guard, this includes service under a call to active service authorized by the President or the Secretary of Defense under 32 USC § 502(f) for purposes of responding to a national emergency declared by the President and supported by Federal funds. All Active Guard Reserve (AGR) members must be assigned against an authorized mobilization position in the unit they support. This includes Navy Training and Administration of the Reserves (TARs), Marine Corps Active Reserve (ARs) and Coast Guard Reserve Program Administrator (RPAs). Active Duty status also applies to a Uniformed Service member who is an active duty commissioned officer of the U.S. Public Health Service or the National Oceanic and Atmospheric Administration (NOAA Commissioned Corps).

#### Coverage Under the SCRA is Broader in Some Cases

Coverage under the SCRA is broader in some cases and includes some categories of persons on active duty for purposes of the SCRA who would not be reported as on Active Duty under this certificate. SCRA protections are for Title 10 and Title 14 active duty records for all the Uniformed Services periods. Title 32 periods of Active Duty are not covered by SCRA, as defined in accordance with 10 USC § 101(d)(1).

Many times orders are amended to extend the period of active duty, which would extend SCRA protections. Persons seeking to rely on this website certification should check to make sure the orders on which SCRA protections are based have not been amended to extend the inclusive dates of service. Furthermore, some protections of the SCRA may extend to persons who have received orders to report for active duty or to be inducted, but who have not actually begun active duty or actually reported for induction. The Last Date on Active Duty entry is important because a number of protections of the SCRA extend beyond the last dates of active duty.

Those who could rely on this certificate are urged to seek qualified legal counsel to ensure that all rights guaranteed to Service members under the SCRA are protected.

**WARNING:** This certificate was provided based on a last name, SSN/date of birth, and active duty status date provided by the requester. Providing erroneous information will cause an erroneous certificate to be provided.

Certificate ID: V4L94ED0U1AE890

60S000

000202

I BARBARA MINER Clerk of the Superior Court of the State of Washington  
for King County do hereby certify that this copy is a true and perfect transcript  
of said original as it appears on file and of record in my office and of the whole  
thereof IN TESTIMONY WHEREOF I have affixed this seal of said Superior  
Court at my office at Seattle on this date

MAR 30 2017

BARBARA MINER Superior Court Clerk

By  
Deputy Clerk

V. CHOUNRAMANY



808000

000203

FILED  
15 SEP 22 PM 3:20

KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 11-3-03341-8 SEA

CERTIFIED  
COPY

Superior Court of Washington

County of King

In re:

SENNAS DUNCAN.

Child.

No. 11-3-03341-8 SEA

2 - Name - Whistleblower Regarding He...

Petitioner,

and

CHRISTINE E. PEDDLE-CORNISH.

Respondent.

Parenting Plan  
Proposed (PPP)  
Temporary

This parenting plan is proposed by Christine Peddle.

It Is Ordered, Adjudged and Decreed:

**I. General Information**

This parenting plan applies to the following children:

Name	Age
Senna Duncan	5

**II. Basis for Restrictions**

*Under certain circumstances, as outlined below, the court may limit or prohibit a parent's contact with the child and the right to make decisions for the child.*

Parenting Plan  
Page 1 of 7

VERONICA FREITAS  
V. FREITAS LAW, PLLC.  
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Seattle, Washington 98102  
(206) 328-7362  
v@vfreitaslaw.com

000204

1      **2.1 Parental Conduct (RCW 26.09.191(1), (2))**

2      The petitioner's residential time with the child shall be limited or restrained completely, and  
3      mutual decision-making and designation of a dispute resolution process other than court action  
4      shall not be required, because this parent has engaged in the conduct which follows:

5      Willful abandonment that continues for an extended period of time or substantial refusal to  
6      perform parenting functions.

7      **2.2 Other Factors (RCW 26.09.191(3))**

8      The petitioner's involvement or conduct may have an adverse effect on the child's best interests  
9      because of the existence of the factors which follow:

10     Neglect or substantial nonperformance of parenting functions.

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

13     The absence or substantial impairment of emotional ties between the parent and child.

14     The abusive use of conflict by the parent which creates the danger of serious damage to the  
15     child's psychological development.

16     A parent has withheld from the other parent access to the child for a protracted period without  
17     good cause.

18      **III. Residential Schedule**

19      **3.1 Schedule for Children Under School Age**

20     Prior to enrollment in school, the child shall reside with the mother except for the following days  
21     and times when the child shall reside or be with the other parent.

22     The father may have one professionally supervised Skype visit per week at a professional  
23     supervisions facility.

24     The father may have one six hour professionally supervised visit at a professional supervision  
25     facility in the county in which the mother lives per month. The visit shall take place on the second  
26     Saturday of each month. The father must confirm his visit with the mother and the agency no less  
27     than one week before the visit is to occur.

28      **3.2 School Schedule**

29     Upon enrollment in school, the child shall reside with the mother, except for the following days  
30     and times when the child will reside with or be with the other parent:

1           Same as 3.1.

2

3 **3.3 Schedule for Winter Vacation**

4           The child shall reside with the mother during winter vacation, except for the following days and  
5           times when the child will reside with or be with the other parent:

6           Same as school schedule.

7

8 **3.4 Schedule for Other School Breaks**

9           The child shall reside with the mother during other school breaks, except for the following days and  
10          times when the child will reside with or be with the other parent:

11          Same as school schedule.

12

13 **3.5 Summer Schedule**

14          Upon completion of the school year, the child shall reside with the mother, except for the  
15          following days and times when the child will reside with or be with the other parent:

16          Same as school year schedule.

17

18 **3.6 Vacation With Parents**

19          Does not apply.

20

21 **3.7 Schedule for Holidays**

22          The residential schedule for the children for the holidays listed below is as follows:

	<b>With Petitioner (Specify Year <u>Odd/Even/Every</u>)</b>	<b>With Respondent (Specify Year <u>Odd/Even/Every</u>)</b>
New Year's Day	Odd	Even
July 4th	Even	Odd
Veterans' Day	Odd	Even
Thanksgiving Day	Even	Odd
Christmas Eve	Odd	Even
Christmas Day	Odd	Even

23          For purposes of this parenting plan, a holiday shall begin and end as follows:

24          On the father's holidays he may have up to six hours of professionally supervised visitation at a  
25          professional supervision facility in the county in which the mother lives. The father must give at

least two weeks notice that he will be exercising his holiday time and the visit must be confirmed with the mother and professional supervision agency at least one week prior.

### **3.8 Schedule for Special Occasions**

The residential schedule for the children for the following special occasions (for example, birthdays) is as follows:

	<b>With Petitioner (Specify Year <u>Odd/Even/Every</u>)</b>	<b>With Respondent (Specify Year <u>Odd/Even/Every</u>)</b>
<u>Mother's Day</u>	<u>Every</u>	
<u>Father's Day</u>		<u>Every</u>

The father may have up to six hours of professionally supervised visitation at a professional supervision facility in the county in which the mother lives on Father's Day. The father must provide at least two weeks notice that he intends to exercise his Father's Day time and the visit must be confirmed with the mother and the supervised visitation agency at least one week before Father's Day. If the father is not going to exercise his visit, then he may have a professionally supervised Skype visit on Father's Day.

### **3.9 Priorities Under the Residential Schedule**

Does not apply as one parent has restricted visitation.

### **3.10 Restrictions**

The petitioner's residential time with the children shall be limited because there are limiting factors in paragraphs 2.1 and 2.2. The following restrictions shall apply when the children spend time with this parent:

All of the father's time and contact with the child must be professionally supervised at a professional supervision agency in the county in which the mother and child reside.

### **3.11 Transportation Arrangements**

Transportation arrangements for the children, between parents shall be as follows:

The mother will transport the child to and from the professional supervision agency for visits.

### **3.12 Designation of Custodian**

The children named in this parenting plan are scheduled to reside the majority of the time with the mother. This parent is designated the custodian of the children solely for purposes of all other state and federal statutes which require a designation or determination of custody. This designation shall not affect either parent's rights and responsibilities under this parenting plan.

1      **3.13 Other**

2      The father shall not remove the child from the State of Arizona. All of the father's  
3      visitation with the child shall be professionally supervised in the county in which the  
4      mother resides. All visitation must take place at the professional supervision agency.

5      Neither party shall transport the child unless they have a current, valid driver's license  
6      and insurance.

7      **3.14 Summary of RCW 26.09.430 - .480, Regarding Relocation of a Child**

8      This is a summary only. For the full text, please see RCW 26.09.430 through 26.09.480.

9      If the person with whom the child resides a majority of the time plans to move, that person shall  
10     give notice to every person entitled to court ordered time with the child.

11     If the move is outside the child's school district, the relocating person must give notice by  
12     personal service or by mail requiring a return receipt. This notice must be at least 60 days before  
13     the intended move. If the relocating person could not have known about the move in time to give  
14     60 days' notice, that person must give notice within 5 days after learning of the move. The notice  
15     must contain the information required in RCW 26.09.440. See also form DRPSCU 07.0500,  
(Notice of Intended Relocation of A Child).

16     If the move is within the same school district, the relocating person must provide actual notice by  
17     any reasonable means. A person entitled to time with the child may not object to the move but  
18     may ask for modification under RCW 26.09.260.

19     Notice may be delayed for 21 days if the relocating person is entering a domestic violence shelter  
20     or is moving to avoid a clear, immediate and unreasonable risk to health and safety.

21     If information is protected under a court order or the address confidentiality program, it may be  
22     withheld from the notice.

23     A relocating person may ask the court to waive any notice requirements that may put the health  
24     and safety of a person or a child at risk.

25     Failure to give the required notice may be grounds for sanctions, including contempt.

26     **If no objection is filed within 30 days after service of the notice of intended relocation, the  
27     relocation will be permitted and the proposed revised residential schedule may be  
28     confirmed.**

29     A person entitled to time with a child under a court order can file an objection to the child's  
30     relocation whether or not he or she received proper notice.

31     An objection may be filed by using the mandatory pattern form WPF DRPSCU 07.0700,  
32     (Objection to Relocation/Petition for Modification of Custody Decree/Parenting Plan/Residential  
33     Schedule). The objection must be served on all persons entitled to time with the child.

34     The relocating person shall not move the child during the time for objection unless: (a) the  
35     delayed notice provisions apply; or (b) a court order allows the move.

If the objecting person schedules a hearing for a date within 15 days of timely service of the objection, the relocating person shall not move the child before the hearing unless there is a clear, immediate and unreasonable risk to the health or safety of a person or a child.

#### IV. Decision Making

##### 4.1 Day-to-Day Decisions

Each parent shall make decisions regarding the day-to-day care and control of each child while the child is residing with that parent. Regardless of the allocation of decision making in this parenting plan, either parent may make emergency decisions affecting the health or safety of the children.

##### 4.2 Major Decisions

Major decisions regarding each child shall be made as follows:

Education decisions	Mother
Non-emergency health care	Mother
Work related childcare	Mother

##### 4.3 Restrictions in Decision Making

Does not apply because there are limiting factors in paragraphs 2.1 and 2.2 above.

#### V. Dispute Resolution

The purpose of this dispute resolution process is to resolve disagreements about carrying out this parenting plan. This dispute resolution process may, and under some local court rules or the provisions of this plan must be used before filing a petition to modify the plan or a motion for contempt for failing to follow the plan.

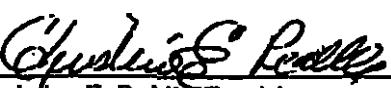
No dispute resolution process, except court action is ordered at this time.

#### VI. Other Provisions

There are no other provisions.

#### VII. Declaration for Proposed Parenting Plan

I declare under penalty of perjury under the laws of the state of Washington that this plan has been proposed in good faith and that the statements in Part II of this Plan are true and correct.

  
Christine E. Pedde-Cornish

September 22, 2015 Surprise, Arizona  
Date and Place of Signature

Parenting Plan  
Page 6 of 7

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210 Summit Avenue East  
Seattle, Washington 98102  
(206) 328-7362  
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000209

KEILIN, JENNIFER 2016-13188LW PAGE 391

1  
2                   **VIII. Order by the Court**

3  
4   It is ordered, adjudged and decreed that the parenting plan set forth above is adopted and approved as an  
5   order of this court.

6  
7   **WARNING:** Violation of residential provisions of this order with actual knowledge of its terms is  
8   punishable by contempt of court and may be a criminal offense under RCW 9A.40.060(2) or  
9   9A.40.070(2). Violation of this order may subject a violator to arrest.

10   When mutual decision making is designated but cannot be achieved, the parties shall make a good faith  
11   effort to resolve the issue through the dispute resolution process.

12   If a parent fails to comply with a provision of this plan, the other parent's obligations under the plan are  
13   not affected.

14   Dated: \_\_\_\_\_

15                   **Judge/Commissioner**

16   Presented by:

17                   **Approved by:**

18                   Veronica Freitas WSBA No.19405  
19                   Attorney for Respondent

20                   2 - Name - Whistleblower ... **Pro Se**  
21                   Petitioner

I BARBARA MINER Clerk of the Superior Court of the State of Washington  
for King County do hereby certify that this copy is a true and perfect transcript  
of said original as it appears on file and of record in my office and of the whole  
thereof IN TESTIMONY WHEREOF I have affixed this seal of said Superior  
Court at my office at Seattle on this date MAR 30 2011



BARBARA MINER Superior Court Clerk  
By \_\_\_\_\_  
Deputy Clerk

V. CHOUNRAMANY

000211

000211



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

December 6, 2016

JENNIFER LEE KEILIN  
1715 114TH AVE SE STE 210  
BELLEVUE, WA 98004-6906

RE: Case # 2016-13188LW

Dear Jennifer Lee Keilin:

The Counselor Programs within the Department of Health, has received a complaint alleging unprofessional conduct on your part, as defined in RCW 18.130.180. The complaint alleges incompetence, negligence, or malpractice. This notice is required by RCW 18.130.095.

The Uniform Disciplinary Act (UDA) provides that the Counselor Programs has the authority to investigate complaints against health care providers. RCW 18.130.050 The Counselor Programs has reviewed the complaint. The issues fall within its jurisdiction, and the Board/Program authorized an investigation to gather the facts in this matter.

We are bound by two different laws, which may seem to conflict. The first requires that we immediately notify you that a complaint has been filed. The second, the whistleblower law (RCW 43.70.075), prohibits us from identifying the name of the complainant until we have received a signed waiver allowing us to do so. We understand that it can be challenging to learn that a complaint has been filed against you, but not know any details about it. As a result, once we receive the signed waiver, an investigator will contact you as soon as practical. At that time, all issues will be discussed as fully as allowed by law. Your case is being assigned to:

**Shaun Atkinson, Health Care Investigator  
Investigation & Inspection Office  
20425 72nd Avenue South, Suite 310  
Kent, WA 98032  
Phone: (253) 395-6788 FAX: (253) 395-8365  
Email: [Shaun.Atkinson@doh.wa.gov](mailto:Shaun.Atkinson@doh.wa.gov)**

You may submit a written statement about the complaint at any time to the investigator listed above. However, you may choose to wait until you are contacted by the investigator and you have had the chance to discuss the complaint. As noted earlier, the investigator will contact you after a confidentiality release has been received, if one is required. You may consult with and engage an attorney, at your expense, to represent you in this matter prior to making a written statement. If you wish to have an attorney represent you, please have the attorney send us a Letter of Representation at the address above. The Letter of Representation will allow us to speak with him or her, if necessary, about the complaint against you and ensure they are copied on any correspondence to you.

Thank you for your anticipated cooperation.

Respectfully,

Tina Crawford  
Health Services Consultant

0-0-0-0

000212





STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

May 10, 2017

Jennifer Lee Keilin  
1715 114th Ave SE Ste 210  
Bellevue, WA 98004-6906

Case No. 2016-13188LW

Dear Jennifer Lee Keilin:

The Secretary of the Department of Health is investigating a complaint against you. The complaint alleges unprofessional conduct, incompetence, standards of care or professional conduct and practice beyond the scope with regards to your treatment as Case Manager for King County Superior Court in the [2 - Name - Whistleblower...] and Christine Peddle's case #11-3-03341-8. RCW 18.130.180(4)(7)(12). Specifically the complaint alleges that you:

1. Failed to address in your Case Manager Report Mr. [2 - Name - Whi...] allegation of sexually inappropriate actions by Ms. Peddle: Ms. Peddle is sparsely clothed and the camera centered on her in a position where her legs are spread during Skype sessions with Mr. [2 - Name - ...] and Senna.
2. Failed to address Ms. Peddle's noncompliance with the court ordered scheduled Skype sessions in your Case Manager Report.
3. Formulated a recommendation that the Skype sessions be supervised by Child & Family Support Services, a facility recommended by Ms. Peddle which are costly to Mr. [2 - Name - ...]. You agreed to join Mr. [2 - Name - ...] during Skype sessions and failed to show up without cancelling and failed to reschedule as agreed.
4. Formulated recommendations to the court that Skype sessions are supervised by Child & Family Support Services in Arizona. You note in your report that this facility prohibits providing any records to any party unless the facility receives a subpoena. This facility is in Arizona and there is litigation with this case in Washington. You cite as reasons based upon what is in the best interest of Ms. Peddle's interest rather than Senna's.
5. Wrote in your report that it is not clear why the Skype visits did not occur although you were provided with supporting documentation that Ms. Peddle simply didn't answer the phone.
6. Proposed structured Skype sessions which are costly to Mr. [2 - Name - ...] reported that Mr. [2 - Name - ...] didn't showed up.
7. Reported to the court a need for reduced contact between the parties while as of the date of your report Mr. [2 - Name - ...] had not seen Senna for ten (10) months.
8. You were instructed by the court as Case Manager to help create a common language between the parents and to address and resolve disputes. In your Case Manager Report you state Mr. [2 - Name - Whi...] use of Our Family Wizard as "...a megaphone to broadcast his emotions."
9. In your report you refer to Mr. [2 - Name - Whi...] calling the school expressing concern about Senna's report that another student had punched. You cite that Mr. [2 - Name - Whi...] concerns seem "inflated and overhyped," and were not supported by the school.

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10. You report Mr. [2 - Name - ...] "increased his rhetoric" on about Senna being abused and mistreated in Ms. Peddle's care.
11. In your Case Manager Report to the court you describe the relationship between the parties in terms as: "...drama and toxic engagement ongoing, sometimes reaching a fever pitch." Without documenting facts supporting your reference.
12. Report Ms. Peddle's goal was to provide Senna with access to Mr. [2 - Name - ...] "in a safe way" and Ms. Peddle is a "good communicator" while "this writer finds communication with Mr. [2 - Name - ...] a challenge."
13. Failed to interview all members of the immediate or extended family or household of both parents and the child as instructed by the court. You report that Ms. Peddle's mother had to obtain a no contact order protecting her from Mr. [2 - Name - ...]. Mr. [2 - Name - Wh...] allegations that Ms. Peddle's father interfered to the point that Mr. [2 - Name - ...] obtained a no contact order and Ms. Peddle's other proxies were fired or reprimanded at their employment because they used their positions to intimidate Mr. [2 - Name - ...] at Ms. Peddle's urging were not included in your report to the court.
14. Refer to Mr. [2 - Name - ...] denying filing the complaint with the Arizona Child Protective Services specifically three (3) different times in your eight (8) page report. Referring to a denial appears that you are insinuating to the court that Mr. [2 - Name - ...] is lying while Ms. Peddle is sanctioned in this case for giving false testimony. Your report calls the referral a complaint against Ms. Peddle and does not reflect the nature referral such as a visible injury on Senna's face or your attempt to interview any potential mandatory reporters around Senna.
15. Failed to report Ms. Peddle previous history of losing custody of her daughter and lying to Mr. [2 - Name - ...] about her diagnosis of ovarian cancer.
16. Did not include in your Case Manager Report that Ms. Peddle had a history of being found guilty of perjury when she self-inflicted injuries in an of accusation of domestic violence with a mandatory arrest against Mr. [2 - Name - ...]. You refer only to "courtroom drama."
17. Reported to the court that Mr. [2 - Name - ...] drove drunk, drove suspended and had warrants in three (3) separate locations in your eight (8) page Case Manager Report without providing what steps you took to verify these allegations.
18. You did not address or attempt to resolve transportation and supervised transfer of the child as the court ordered in the task of walking Senna to Mr. [2 - Name - ...] from Ms. Peddle in January 2015 effectively denying Mr. [2 - Name - ...] his visit.
19. Wrote that there is a negative impact on the child for a 5 day visit in June with Mr. [2 - Name - ...] without providing supporting information.
20. Did not observe Ms. Peddle with the child as directed by the court.
21. Did not observe Mr. [2 - Name - ...] with the child as directed by the court.
22. Did not report to the court that Ms. Peddle had used a protection program which prohibited Mr. [2 - Name - ...] from court ordered visitation. Did not identify information in the application documentation Ms. Peddle provided to enter the protection program as inconsistent with the facts before the court.
23. You reported to the court that Mr. [2 - Name - ...] failed to provide financial support although Mr. [2 - Name - Wh...] financial status was reported to you as bankruptcy. You did not report this to the court. The court orders the Case Manager is not authorized to make

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recommendations affecting child support. In your report you state: "This writer is sympathetic to Ms. Peddle's need for child support."

24. Reported Mr. [redacted] failed to pay you while Mr. [redacted] did not see his son or know where his son was at for a year during your role as court assigned Case Manager.

The Secretary of the Department of Health is authorized to investigate all allegations and complaints. (RCW 18.130.050)

State law requires you to cooperate with an investigation. You must respond to requests for records and documentation. If you do not provide documents, records and other items when they are due, we can charge you a fine of up to \$100 per day. The fine applies to existing documents, records, or items under your control. The maximum fine is \$5,000. We will report the fine to federal databases and it will appear on our Web site. We may also charge you with unprofessional conduct for failure to cooperate. (RCW 18.130.180(8))

You must provide in writing a full and complete explanation of the matter if requested. (RCW 18.130.180(8)(b)) We may use your response if we take disciplinary action, or in a hearing. You may have an attorney assist you prior to making your response. This will be at your expense. If an attorney represents you, please have the attorney send me a Letter of Representation. The letter allows us to speak with him or her about the complaint against you. It will ensure we provide a copy of any correspondence to you to your attorney.

The Health Care Information Act requires you to disclose health care information about a patient without patient authorization. (RCW 70.02.050 (2)(a))

Please provide the following information in writing:

- *A full and complete explanation of each of the allegations in writing.*
- *Your duties as assigned by the court and the time periods for which you served as Case Manager for this case.*
- *List of interviews of all members of the immediate or extended family or household both parents and the child. Including but not limited to names, dates, content of the information revealed in the interviews.*

**The information is due June 2, 2017.** If available, provide records and images in CD format. Mail your response to the address below. Please contact me if you have any questions or cannot provide the information by the due date.

**IMPORTANT NOTICE:**

**RCW 18.130.230 replaced rules about how quickly you must respond to requests for documents, records and other items.**

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May 10, 2017  
Page 4

Thank you for your cooperation.

Sincerely,

*Scott Bramhall*

Scott Bramhall  
Investigator  
20425 72 Ave S, Suite 310  
Kent, WA 98032  
Scott.Bramhall@DOH.wa.gov  
(253) 395-6716 (P)  
(253) 872-6803 (F)

Enclosure

I declare under penalty of perjury under the laws of the State of Washington that I placed this letter addressed to the person named above at the address listed on the date identified in the United States mail in a properly addressed and stamped envelope.

Dated 5-10-17 at  
20425 72 Ave S #310  
Kent, WA 98032, Washington

*Scott Bramhall*

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# Jennifer Keilin, MSW, LICSW

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6/29/17

Scott Bramhall, Investigator  
Washington State Dept. of Health  
20425 72<sup>nd</sup> Ave. S., Suite 310  
Kent, WA 98032

Re: File #2016-13188LW

Dear Mr. Bramhall:

I received your letter of 5/10/17 regarding Mr. [redacted] complaint alleging professional misconduct. I take this complaint very seriously. I have been in private practice for 14 years and have been appointed as Case Manager (also known as Parent Coordinator) in over 30 cases. I have been a member of the Association of Family and Conciliation Courts (AFCC) since 2008 and regularly attend national and state conferences. Attached as EXHIBIT A is my curriculum vitae.

## 1. BACKGROUND INFORMATION

On 6/06/14, I was appointed by King County Superior Court as the Case Manager for [redacted]  
[redacted] and Christine Peddle-Cornish, regarding their child, Senna S. Duncan (dob: 11/30/09). My role was to “make recommendations regarding implementation, clarification, modification and enforcement of any term in the permanent parenting plan, and to make recommendations on the day-to-day issues experienced by the parties in these areas (emphasis added).” EXHIBIT B is the Order of Appointment.

Generally speaking, a Case Manager is appointed to oversee the implementation of the parenting plan in high conflict families. This is an alternate dispute resolution process focused on helping the parties’ minimize conflict and avoid court. No statutory criteria governing Case Manager services exist in Washington State. However, I utilize methods consistent with the Association of Family and Conciliation Courts (AFCC) model guidelines for parenting coordination. EXHIBIT C is the AFCC Guidelines for Parent Coordination.

Relevant history of this family: Ms. Peddle-Cornish and the child reside in Arizona, while Mr. [redacted] resides in the Seattle area. In 2012 Judge Downing issued the Final Parenting Plan, following a contentious trial. Notably, Judge Downing entered RCW 26.09.191 restrictions against both parents for the abusive use of conflict. EXHIBIT D is the Final Parenting Plan dated

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10/17/2012. I was the second Case Manager for this family; the original Case Manager, Dr. Glassman, retired and terminated his role with the family in 01/2014.

## 2. CASE MANAGER PROCESS

On 06/06/2014 I was notified of my appointment as Case Manager in this matter. On 06/19/2014, I provided Mr. [2 - Name - ...] my introductory and consent forms, scheduled a meeting with him, and requested his portion of the retainer payment be paid at that meeting.

I also emailed Ms. Peddle-Cornish my introductory and consent forms, inquired about scheduling a meeting with her (in person or by phone depending on logistics as she resides in Arizona), and requested her portion of the retainer payment at her earliest opportunity.

I requested that counsels provide relevant materials, including the parenting plan.

On 06/26/2014, I held an initial meeting with Mr. [2 - Name - ...]. Mr. [2 - Name - ...] failed to provide his retainer as agreed; Ms. Peddle-Cornish also reported she was unable to provide her portion of the retainer. On 07/02/2014, I notified the parties I could not proceed further until the retainer was paid in full. Ms. Peddle-Cornish provided her retainer portion on 08/14/2014; Mr. [2 - Name - ...] provided his portion on 09/08/2014.

On 09/10/2014, I notified both parties that I was fully retained and ready to proceed with Case Manager services.

During my time as Case Manager, I had substantive contacts with the parties as follows:

Mr. [2 - Name - ...]:

06/26/2014, 1.5 hours, in office;  
09/25/2014, 0.5 hours, phone;  
12/18/2014, 0.5 hours, phone;  
01/06/2015, 0.5 hours, phone;  
02/25/2015, 0.5 hours, phone, and,  
03/13/2015, 0.1 hours, phone.

Ms. Peddle:

09/16/2014, 1.0 hours, phone;  
09/23/2014, 0.5 hours, phone;  
12/17/2014, 0.4 hours, phone;  
12/18/2014, 0.7 hours, phone;  
02/24/2015, 1.0 hours, phone; and,  
03/11/2015, 0.2 hours, phone.

In addition to these contacts, I had numerous email exchanges with each parent. Both parties also provided me with a significant amount of materials to review, related to past events and ongoing issues. I also had contact with the child's preschool in March of 2015 and attempted contact with Arizona Child Protective Services on several occasions in late February/early March.

Both parties raised numerous issues about the other throughout our work together. In accord with my role and duties set forth in the Order of Appointment, I endeavored to help them implement their parenting plan and resolve areas of conflict, with limited success, candidly.

I issued a Case Manager Report on 03/13/2015. EXHIBIT E. In my report I discussed concerns reported by the parties, my observations and efforts to resolve issues, and I made recommendations. I also requested an additional retainer be paid by 04/10/2015, and asked that the court discharges me as Case Manager if not paid by that date.

On 03/13/2015, Mr. [2 - Name - ...] emailed that he was revoking "any and all releases of information" related to him. He further wrote, "Do not speak my name, do not write my name, do not communicate any information at any person other than myself from this point forward." EXHIBIT F. I do not recall any further contact from Mr. [2 - Name - ...].

On 04/06/2015, Ms. Peddle provided her portion of the requested retainer.

On 4/17/15, the court entered an order, noting, "The specific recommendations made by Ms. Keilin all strike the court as being sensible and practical. No objection has been lodged. Accordingly, pursuant to section VII[C] of the Order Appointing Case Manager, the Court will hereby approve and adopt those recommendations." EXHIBIT G.

On 05/20/2015, I issued a formal letter, confirming my services were terminated as of 04/10/2015 due to Mr. [2 - Name - W...] non-payment.

### **3. DUTIES AS CASE MANAGER**

On 06/06/14, I was appointed to a two-year term as Case Manager (See EXHIBIT B). I resigned after 10 months, effective 04/10/2015. The Order is 13 pages long and extensively detailed. I have copied some of the relevant portions below.

#### ***Section II. Case Manager AUTHORITY***

*A. The Case Manager is authorized to make recommendations regarding implementation, clarification, modification and enforcement of any term in the permanent parenting plan, and to make recommendations on the day-to-day issues experienced by the parties in these areas.*

#### ***B. The Scope Of The Authority Of The Case Manager Shall Be:***

- 1. To address and resolve all current and future disputes arising under the parenting plan, including but not limited to disputes over: schooling, daycare, or babysitting, medical and/or psychological care, activities of the child, discipline, daily routine, transportation and supervised transfer of the child, vacation and holiday scheduling or any other 'parenting type' issues, and any issue as the Court may from time to time direct;*

2. *To determine and, as need be, to alter the terms of the present order to mutual 'no contact' between the parents. The parents should have no contact with one another and all information related to Senna, his health, major decisions, scheduling, child support and more shall be posted on OurFamilyWizard or some other place as directed by the Case Manager or go through the Case Manager.*
3. *To help create a common language between the parents regarding discipline, rules, diet, etc., at each house; make recommendations regarding treatment providers for parents and child when necessary; to select a new exchange supervisor if deemed necessary; and to have decision making ability for scheduling telephone calls from the nonresidential parent to Senna;*
4. *To determine and oversee the use of SKYPE or other online access to Senna including the time, duration and context of calls, standard of proof for attempting calls and being there to receive them, altering SKYPE times if mother's employment or father's employment so requires; altering the room of room content and location in with the call(s) occurs, and to suggest call content or activities to improve the experience for Senna.*
5. *To determine and oversee the use of Our Family Wizard including, but not limited to, how each party uses it and the timeliness of their responses to the other, limits to content that can be posted, whether they can alter or remove content posted by the other party and determining the access other professionals (such as the Visitation Supervisor) should have to the site.*
6. *The Case Manager shall follow and monitor both parent's compliance with the Parenting Plan, mediate emails and communications between the parents by providing ongoing parent coordination.*
7. *To have decision making abilities for minor deviations and/or changes to the plan or in other decisions regarding Senna and the schedule that the parents cannot make independently.*
8. *To resolve/decide any issues within the scope of authority of the Case Manager by any dispute-resolution method deemed reasonable by the Case Manager or which may be agreed to by the parties.*
9. *Lined out*
10. *To make decisions and formulate recommendations based upon what is in the child's best interest.*
11. *To interview all members of the immediate or extended family or household of both parents and the child;*

12. To interview and request the participation of any and all persons who the Case Manager deems to have relevant information including the therapists used by each party and the healthcare providers and daycare providers for Senna.
13. To recommend or require that the Court order the parties and/or child to participate in ancillary services, including but not limited to: physical or psychological examinations and assessments, psychotherapy, counseling, and alcohol or drug monitoring and testing.
14. To allocate between the parties the cost of any ancillary service not ordered at the time of the Case Manager appointment.

### **SECTION III. TIME SENSITIVE ISSUES, AUTHORITY AND PROCEDURE**

*When short-term, emerging, and time sensitive situation or dispute with the scope or authority of the Case Manager arises that requires an immediate decision for the welfare or the child and the parties, a Case Manager may make a binding temporary decision...*

### **4. CONCERNS RAISED IN THE LETTER OF COOPERATION**

#### **I. Failed to address in your Case Manager Report Mr. [2 - Name - Wh...] allegation of sexually inappropriate actions by Ms. Peddle.**

In the Case Manager report, I detailed a number of concerns raised by each of the parties. In general, I endeavored to report both parties' primary concerns or themes and did not attempt to include all concerns reported given the number and content. I did not include Mr. [2 - Name - W...] allegation of sexually inappropriate actions by Ms. Peddle due to the lack of supporting data and the scurrilous nature of the report. Specifically, Mr. [2 - Name - W...] first raised concerns about Ms. Peddle's attire during Skype sessions in March of 2015, as I was preparing my report. He provided some undated screenshots to support his statements. My review of the photos and videotaped Skype sessions did not support his allegations.

#### **II. Skype Related Issues**

##### **a. Failed to address Ms. Peddle's noncompliance with the court ordered scheduled Skype sessions in your Case Manager Report.**

Records were provided by both parties relating to Skype. My review of the Skype sessions and supporting information did not support noncompliance by Ms. Peddle.

##### **b. Formulated a recommendation that the Skype sessions be supervised by Child & Family Support Services a facility recommended by Ms. Peddle which are costly to Mr. [2 - Name - W...]**

The Skype sessions were a source of significant conflict and distress between the parties and required them to continue to engage four times per week. Given the ongoing difficulties, I recommended Skype session facilitation by a third party agency. Ms. Peddle located the recommended agency, which is relevant because she was tasked with transporting the child to and from the agency for sessions. I understood both parties to be responsible for payment for services based on their child support proportions. Moreover, Mr. [2 - Name - ...] lodged no objection with the court regarding this recommendation.

- c. *You agreed to join Mr. [2 - Name - ...] during Skype sessions and failed to show up without canceling and failed to reschedule as agreed.*

I made no plan to join Mr. [2 - Name - ...] during Skype sessions. On 12/01/2014 at 2:43 pm, I emailed Mr. [2 - Name - ...] with a tentative idea to remotely observe his Skype session with Senna, and asked for his thoughts. He replied at 4:02 pm that I could remotely observe that evening's Skype session at 6:45 pm. I had not anticipated this response and was not available that quickly.

I responded the following morning and asked for the next opportunity. Mr. [2 - Name - ...] did not respond to my specific question. EXHIBIT H is the aforementioned e-mails. Shortly afterward, Ms. Peddle offered to provide video recordings of the Skype sessions, which seemed the better way to "observe." At no other time did I suggest observing Skype sessions live.

- d. *Formulated a recommendation that the Skype sessions be supervised by Child & Family Support Services in Arizona. You note in your report that this facility prohibits providing any records to any party unless the facility receives a subpoena. This facility is in Arizona and there is litigation with this case in Washington. You cite as reasons based upon what is in the best interest of Ms. Peddle's interest rather than Senna's.*

In my Case Manager report, I noted the proposed agency's policy about providing records. The litigation is based in Washington, but the mother and child are located in Arizona. Utilizing services in Arizona is practical and in the child's best interests. Mr. [2 - Name - ...] lodged no objection with the court regarding this recommendation.

- e. *Wrote in your report that it is not clear why the Skype visits did not occur although you were provided with supporting documentation that Ms. Peddle simply didn't answer the phone.*

Records were provided by both parties relating to Skype. These records did not support Mr. [2 - Name - W...] contention.

- f. *Proposed structured Skype sessions which are costly to Mr. [2 - Name - W...] reported that Mr. [2 - Name - W...] didn't showed up.*

I am unclear as to the meaning of this concern. I am happy to provide an explanation if the question were clarified.

**III. Reported to the court a need for reduced contact between the parties while as of the date of your report Mr. [2 - Name - ...] had not seen Senna for ten (10) months.**

Given the contentious relationship between the parties, I recommended limited direct contact between the parties, through reduced Skype sessions and communication through the Case Manager. Mr. [2 - Name - W...] in-person contact with Senna was not impacted by this recommendation.

In January of 2015, Mr. [2 - Name - ...] requested one visit during my tenure as Case Manager. At noted in my report on page 5, Mr. [2 - Name - ...] did not follow the court ordered protocols and the requested contact did not occur.

**IV. You were instructed by the court as Case Manager to help create a common language between the parents and to address and resolve disputes. In your Case Manager Report you state Mr. [2 - Name - Wh...] use of Our Family Wizard as "...a megaphone to broadcast his emotions."**

In January of 2015, I instructed both parties to follow a specific communication protocol, due to both parties' approach to communication. EXHIBIT I.

In my March 2015 report, I described both parent's styles of communication. I noted Ms. Peddle's communication could be "for the record" and "antagonistic." I noted Mr. [2 - Name - Wh...] use of OFW varied between nonresponsive and "almost as a megaphone to broadcast his emotions." Specifically, regarding Mr. [2 - Name - ...], I was referencing lengthy communications by Mr. [2 - Name - ...] in which he made emotional statements and pleas for Senna's rescue from Ms. Peddle, based on his perspective that something was terribly wrong.

**V. In your report, you refer to Mr. [2 - Name - Wh...] calling the school expressing concern about Senna's report that another student had punched him. You cite that Mr. [2 - Name - Wh...] concerns seem "inflated and overhyped," and were not supported by the school.**

In my report, I noted Mr. [2 - Name - ...] stated Senna reported being punched by another student, and also that Mr. [2 - Name - ...] further stated that he did not believe Ms. Peddle's report that Senna was rough housing with another student, and suggested possible abuse by Ms. Peddle. I contacted the child's school and they reported no concerns about Senna. Given the school information and the lack of other collateral information to support Mr. [2 - Name - W...] beliefs, I noted that Mr. [2 - Name - W...] concerns seemed inflated and overhyped. These beliefs are extensions of his allegations already adjudicated by the Court in 2012.

**VI. You report Mr. [2 - Name - W...] "increased his rhetoric" on about Senna being abused and mistreated in Ms. Peddle's care.**

Throughout my tenure as Case Manager, Mr. [2 - Name - ...] reported an escalating concern about Ms. Peddle mistreating Senna, in the phone and email communication. In the fall of 2014, Mr. [2 - Name - ...] reported a concern about psychological mistreatment. In March of 2015, Mr. [2 - Name - ...] reported seeing cuts and bruises on Senna throughout the last year and speculated Ms. Peddle

missed Skype calls so that Mr. [2 - Name - ...] would not see Senna's injuries. I noted this pattern in my Case Manager Report.

**VII. In your Case Manager Report to the court you describe the relationship between the parties in terms as: "...drama and toxic engagement ongoing, sometimes reaching a fever pitch." Without documenting facts supporting your reference.**

The 2012 permanent parenting plan included RCW 26.09.191 restrictions against both parents based on the abusive use of conflict. In my report to the court, I described the parties' Skype communication and reiterated the nature of their relationship. "The current frequency and nature of Skype (requiring parental supervision and help) creates a constant need for these parties (both of whom the court made abusive use of conflict findings against) to have routine contact, which keeps the drama and toxic engagement ongoing, sometimes reaching fever pitch."

**VIII. Report Ms. Peddle's goal was to provide Senna with access to Mr. [2 - Name - ...] "in a safe way" and Ms. Peddle is a "good communicator" while "this writer finds communication with Mr. [2 - Name - ...] a challenge."**

In my Case Manager Report, I briefly described communications and interactions with each party, for the court's information.

**IX. Interviews/Observations**

- a. Failed to interview all members of the immediate or extended family or household of both parents and the child as instructed by the court.
- b. Did not observe Ms. Peddle with the child as directed by the court.
- c. Did not observe Mr. [2 - Name - ...] with the child as directed by the court.

The Order Appointing Case Manager authorizes but does not require interviews of the family members or the child, or observations of the parents with the child, as per Section 2, #11 (See EXHIBIT B). In my term as Case Manager, interviews with extended family members or the child, or observations of the parties with the child, were not warranted.

**X. You report that Ms. Peddle's mother had to obtain a no contact order protecting her from Mr. [2 - Name - ...], Mr. [2 - Name - Whis... allegations that Ms. Peddle's father interfered to the point that Mr. [2 - Name - ...] obtained a no contact order and Ms. Peddle's other proxies were fired or reprimanded at their employment because they used their positions to intimidate Mr. [2 - Name - ...] at Ms. Peddle's urging were not included in your report to the court.**

I noted concerns reported by both parents in my report. On page two, I noted Mr. [2 - Name - ...] stated: "Their family will follow me, harass me, fire them, etc. I've never had one smooth visit or transport ever." I am not aware that Mr. [2 - Name - ...] sought a protection order against Ms. Peddle's father.

**XI. Refer to Mr. [2 - Name - W...] denying filing the complaint with the Arizona Child Protective Services specifically three (3) different times in your eight (8) page report. Referring to a**

**denial appears that you are insinuating to the court that Mr. [2 - Name - W...] is lying while Ms. Peddle is sanctioned in this case for giving false testimony. Your report calls the referral a complaint against Ms. Peddle and does not reflect the nature referral such as a visible injury on Senna's face or your attempt to interview any potential mandatory reporters around Senna.**

In my Case Manager Report, I noted both parent's statements regarding the report filed with Arizona Child Protective Services. I identified that the report involved an allegation of physical abuse. I detailed that I spoke with Theresa Albright, Director of Phoenix Children's Academy, a mandated reporter. I further noted I contacted Lisa Livermore, CPS investigator, but my calls were not returned.

**XII. Failed to report Ms. Peddle previous history of losing custody of her daughter and lying to Mr. [2 - Name - ...] about her diagnosis of ovarian cancer.**

This information was known to the Court prior to my appointment; it was not relevant during my period as Case Manager.

**XIII. Did not include in your Case Manager Report that Ms. Peddle had a history of being found guilty of perjury when she self-inflicted injuries in an of accusations of domestic violence with a mandatory arrest against Mr. [2 - Name - ...]. You refer only to "courtroom drama."**

The information concerning Ms. Peddle had already been addressed in court prior to my appointment and was not relevant during my period as Case Manager.

**XIV. Reported to the court that Mr. [2 - Name - W...] drove drunk, drove suspended and had warrants in three (3) separate locations in your eight (8) page Case Manager Report without providing what steps you took to verify these allegations.**

In my Case Manager Report, I reported Ms. Peddle's statements regarding Mr. [2 - Name - Wh...] license and legal issues. Ms. Peddle provided court and docket information supporting these concerns. I made no recommendations, but asked the court to "consider addressing whether a lack of a valid license or outstanding warrants for either parent is relevant to parenting, and whether it should impact parenting access."

**XV. You did not address or attempt to resolve transportation and supervised transfer of the child as the court ordered in the task of walking Senna to Mr. [2 - Name - ...] from Ms. Peddle in January 2015 effectively denying Mr. [2 - Name - ...] his visit.**

I requested Mr. [2 - Name - ...] follow the relevant court orders, which tasked him with specific responsibilities. The court had addressed visitation and exchange protocols prior to my appointment. On 4/19/13, Judge Downing ordered Dr. Glassman's recommendations as follows: (1) It shall remain the visiting parent's responsibility to select the exchange supervisor [on the Supervised Visitation Directory or Maricopa County Family Court Roster] and communicate this via email to the Case Manager and post it on OFW; and, (4) Father shall provide Mother with a

minimum of 21 days advanced notice of his intent to exercise parenting time in Phoenix.  
EXHIBIT J.

On 10/30/13, Judge Downing further ordered, as per Dr. Glassman's updated recommendations: (2) Father shall provide Mother and the Case Manager with Senna's travel itineraries, including flight schedules and place of lodging directly through email; and, (3) All visitation exchanges shall continue being supervised with transfers occurring at the Surprise Police Department." EXHIBIT K.

Regarding the January 2015 visit, I emailed Mr. [2 - Name - ...] on 01/07/2015 with a request for Senna's travel itinerary and information regarding the exchange supervisor no later than 01/09/2015. On 01/09/2015, Mr. [2 - Name - ...] emailed a request to change exchange location and to utilize an exchange supervisor not on the approved lists. I declined to deviate from the orders and asked for the requested information ASAP. Mr. [2 - Name - ...] did not respond. EXHIBIT L is the aforementioned communications. On 01/14/2015, I notified the parties the visit would not occur.

**XVI.** *Wrote that there is a negative impact on the child for a 5-day visit in June with Mr. [2 - Name - ...] without providing supporting information.*

This does not accurately reflect my statements. I described circumstances surrounding Mr. [2 - Name - W...] visit in June of 2014; I did not describe impact to the child.

**XVII.** *Did not report to the court that Ms. Peddle had used a protection program which prohibited Mr. [2 - Name - ...] from court ordered visitation. Did not identify information in the application documentation Ms. Peddle provided to enter the protection program as inconsistent with the facts before the court.*

I do not have knowledge of this issue.

**XVIII.** *You reported to the court that Mr. [2 - Name - W...] failed to provide financial support although Mr. [2 - Name - Wh...] financial status was reported to you as bankruptcy. You did not report this to the court. The court orders the Case Manager is not authorized to make recommendations affecting child support. In your report you state: "This writer is sympathetic to Ms. Peddle's need for child support.*

In my report, on page 2, I wrote, "Mr. [2 - Name - ...] acknowledged he is behind in his financial support of Senna, including child support, health insurance, and reimbursing health/other costs." I referenced Mr. [2 - Name - W...] bankruptcy. I did not make any recommendations affecting child support.

**XIX.** *Reported Mr. [2 - Name - W...] failed to pay you while Mr. [2 - Name - ...] did not see his son or know where his son was at for a year during your role as court assigned Case Manager.*

On 04/17/2015 the Court authorized my request for an additional retainer as well as my request to terminate my role if payment was not received. Mr. [2 - Name - ...] failed to remit payment. Subsequently, in accord with the Court authorization, I resigned.

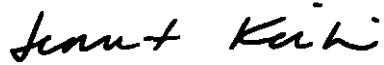
## SUMMATION

I believe the aforementioned addresses the enumerated points in the letter. I am happy to provide any further information or clarification requested of me.

As requested, I am electronically submitting a copy of this letter and referenced exhibits, via a thumb drive.

Please do not hesitate to contact me if anything more is needed.

Best regards,



Jennifer Keilin, MSW, LICSW

Evidence  
On Left Side  
Of Case File

000228  
KEILIN, JENNIFER 2016-13188LW PA

Redaction Summary ( 861 redactions )

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2 Privilege / Exemption reasons used:

- 1 -- "DOH Licensee Social Security Number - RCW 42.56.350(1)" ( 2 instances )
- 2 -- "Name - Whistleblower Regarding Health Care Provider or Health Care Facility - RCW 43.70.075(1), RCW 42.56.070(1)" ( 859 instances )













