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October 29, 2024

**FOR SETTLEMENT PURPOSES ONLY
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VIA EMAIL

The Honorable Steve Rosen (Ret.)
Rosen ADR

Re: *In re the Marriage of Robert Edward Moyer, II and Christine Moyer*
King County Superior Court Cause No. 23-3-05392-7 SEA
Mediation, 9:00 a.m. November 1, 2024 via Zoom

Dear Judge Rosen:

Thank you for agreeing to mediate the issues in this dissolution of marriage proceeding. The undersigned represents Robert Moyer. Christine Moyer is represented by Natalie de Maar.¹ You will recall you assisted the parties in resolving temporary orders on July 12, 2024. A copy of the Temporary Family Law Order is attached at **Exhibit 1**.

This letter and the exhibits provided with it are presented for settlement purposes only and may not be used for any other purpose whatsoever. The issues presented for resolution include parenting, child support, characterization and division of assets and liabilities.

I. INTRODUCTION

This is the dissolution of a 25-year marriage. They date of separation is September 15, 2023, which is when Robert moved out of the family home at Christine's request. Robert is 57 and Christine is 47. The parties have two sons, Robert Edward Moyer, III ("Max"), age 16 and Adrian Moyer, age 12. Christine has an adult daughter, Elsa, from a prior relationship who Robert helped raise from a young age. Elsa is not subject to this proceeding but has been involved behind the scenes because Christine has shared with her the course of this litigation. We believe Elsa has used her relationship with Max and Adrian to influence their relationship with Robert.

¹ For purposes of maintaining the distinction between the parties, we will refer to them by their first names. No disrespect is intended.



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The Honorable Steve Rosen (Ret.)
October 29, 2024
Page 2

II. PROCEDURAL STATUS

Christine filed her petition for divorce on October 16, 2023. At the time, Christine was represented by AnnaLisa Danysh of Inslee Best. Natalie de Maar substituted as counsel on May 9, 2024. Trial was originally scheduled for September of 2024 but was continued by agreement to December 16, 2024 to accommodate the parenting evaluator, Connor Lenz's, request for additional time to complete his evaluation. Judge Rampersad is the assigned judge.

On February 6, 2024, Robert agreed to the entry of a temporary restraining order. **Exhibit 2.** In the fall of 2023, Christine mistakenly thought Robert was surveilling her when she and the boys noticed surveillance cameras in the garage and the exterior of the house that had been installed years earlier. The system never worked properly due to poor internet connection. The day Robert moved out of the family home, with the front door and garage doors open and the WiFi extender in Christine's office more visible to the system, the cameras activated and there was an alert notification on the parties' phones. Christine overreacted and inappropriately involved and frightened the boys by telling them Robert was surveilling them. Adrian also saw the notification on Robert's phone. Robert explained what happened to Christine and Adrian. Christine did not believe him. Robert wanted to assure Christine he respected her boundaries hence his agreement to the restraining order.

Ms. Danysh's office submitted the incorrect version of the order to the court which included a provision that Robert is a "credible threat." There were subsequent negotiations between the first version of the order and the second version which expanded the mode of communication from just OFW to OFW and email. In addition, the attorneys acknowledged in the conversations the "credible threat" box should not have been checked. Attached at **Exhibit 3** are emails from Christine's attorney's office acknowledging the error and an OFW exchange between Christine and Robert correcting the error. Despite the acknowledged error, Christine declined to enter the correct order. Despite Christine's assertions, Robert is not a credible threat to her or the boys. Robert was the sole caretaker of Adrian and Max for 66 days between March and October of last year while Christine was travelling. Nothing happened or has happened since that would indicate he is a danger to the boys. Christine has used the temporary order as a tool to resist and refuse Robert's residential time with Adrian and Max.

Following months of therapy sessions with Monique Brown and Kari Betts and repeated attempts to negotiate a parenting plan with Ms. Danysh, the parties were unable to reach agreement on a residential schedule because Christine would not commit. On April 3, 2024 the parties entered into an agreed order appointing Connor Lenz as their parenting evaluator. Mr. Lenz's report is attached at **Exhibit 4.**



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 3

On May 9, 2024, Ms. de Maar substituted in as counsel for Christine. Up until this point, Robert did not have regular residential time with the boys. Ms. de Maar recognized there should be a residential schedule in place. To that end, the parties agreed to work with Jennifer Kielin for reunification counseling and they entered into a Stipulation Re: Residential Schedule on June 13 which provides:

- Robert has supervised residential time with Adrian every Saturday from 10:00 a.m. to 4:00 p.m. which may be adjusted as agreed to accommodate Adrian's and the supervisor's schedules.
- The parties shall participate in reunification counseling with Jennifer Kielin.
- The parties will follow Ms. Kielin's recommendations unless either party files a motion with the court seeking to amend that recommendation within 7 days.

See **Exhibit 5**.

The parties were operating without temporary financial orders, using Christine's income, Robert's severance package which included eleven months of salary, and the funds in their joint Fidelity account to pay their expenses. The Fidelity account was funded, when needed, from the sale of Robert's Microsoft stock awards. The parties came close to an agreement on the division of expenses. They enlisted your Honor's assistance to reach a final agreement including division of their expenses and use of the timeshares. **Exhibit 1**.

Written and informal discovery has been conducted. At Christine's request, Robert agreed to participate in a vocational assessment conducted by John Fountaine. Mr. Fountain's report is discussed in more detail below.

On his own volition, Robert is undergoing a domestic violence assessment. The assessment has not been completed.

III. FACTUAL BACKGROUND

A. *The Parties.*

Robert:

Robert's Sobriety. Robert is a recovering alcoholic. Before 2019, he drank alcohol excessively during family vacations, holidays and on sometimes on the weekends. He has been arrested for suspicion of driving under the influence twice, once in 2013 and once in 2019. In 2013 he received a deferred prosecution and in 2019 he plead guilty to reckless driving. His drinking contributed to



The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 4

the marriage's turbulence: Christine and Robert would have nasty fights—though never physical altercations between them—and the alcohol made things worse. Unfortunately, the boys witnessed many of the fights. Christine produced in discovery a timeline of her perceived acts of domestic violence dating back to 1997 and damning declarations from family friends and neighbors. The declarations are rife with hearsay. We fully expect Christine will include them in her mediation materials. She provided them to Connor Lenz. The timeline and declarations were provided to Robert's domestic violence assessor.

Robert has been sober for three years and three months. He has taken his sobriety very seriously since his 2019 arrest for suspicion of DUI when he completed inpatient treatment at Driftwood in Austin Texas. In 2019 he had a “New Life Alcohol Assessment” which concluded that he does not meet the diagnostic criteria for a substance abuse disorder. **Exhibit 6.** In 2020 a “New Life Recovery Solutions” letter released and discharged Robert upon successful completion of a 150-hour course, which included 12 randomized ETG UAs. **Exhibit 7.** A letter from Robert’s mental health counselor in July 2021 discusses his then-weekly sessions. **Exhibit 8.** Currently, Robert attends multiple AA / SMART Recovery meetings per week and meets with his sponsor twice a week. All of which are an essential part of his recovery.

Since October 2023, Robert has taken an average of 4 Soberlink tests per day to prove to Christine there is no drinking: 1111 consecutive negative tests as of October 22, 2024, except for one test on May 5, 2024, which showed positive. Another test taken 1 hour and 43 minutes later was negative so Robert could not have drank alcohol because it does not metabolize that quickly, something Connor Lenz acknowledged. **Exhibit 9.** Robert takes Vivitrol shots every 28 days to block any feeling of pleasure from drinking.

At the beginning of the case, he took seven UA Panel Tests between October and December 2023, all of which came back negative for alcohol. An October 2023 New Life Recovery Solutions Assessment diagnosed that Robert is “in full sustained remission” and “do[es] not currently meet diagnostic criteria for an active substance use disorder.” **Exhibit 10.** A November 2023 Millennium Health Drug Test Report found some THC in his system which he used occasionally as a sleep aid, but everything else was negative. **Exhibit 11.** He continues to take both random and on demand 12 panel tests a minimum of four times a month.

On June 25, 2024, I received an email from Ms. de Maar, stating that Adrian thought Robert was intoxicated during their joint therapy session with Jennifer Kielin the previous day. Robert immediately took a 10 panel UA and a hair follicle test. Both came back negative for all categories, except for Amphetamines which is triggered because he takes Vyvanse for his ADHD. His hair follicle test results showed trace amounts of THC because he took CBD gummies in October of 2023 as a sleep aid. **Exhibit 12.** CBD can have trace amounts of THC in it. Robert has not



The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 5

knowingly ingested anything that would contain THC since then. He has not smoked marijuana for years.

Robert will participate in the treatment regimen suggested as a result of the domestic violence assessment. The domestic violence assessment will most likely be concluded in a month.

Robert's Employment and Income History: Robert is 57-years old. He is currently unemployed. Robert has a degree in journalism. Despite not having an education in computer science, he worked in tech for 30 years. Robert was laid off from Microsoft after 24 years due to company restructuring and poor performance. Robert was experiencing substantial stress and anxiety in his role as a Group Program Manager. He could not concentrate, had trouble sleeping and was irritable which led to his receiving negative performance reviews. Accordingly, Robert's total income declined between 2018 and 2022. His salary remained constant but his bonus and variable income decreased dramatically. In 2019, Robert's bonus was \$129,000 but by 2022 it dropped to \$45,500, a 65% decline. In 2018 his variable income was \$465,900 and plummeted to \$160,900 by 2021. In 2022, Robert did not receive any stock awards. Robert's combined variable and bonus income decreased 89.93% over those four years. The Microsoft chart below is an excellent visual of the decline in Robert's income.



At the time of his layoff, Robert met the criteria of Microsoft's 55/15 rule (55 years of age and 15 years of continuous service). Christine and Robert decided he should take advantage of the early retirement opportunity offered in conjunction with his layoff for several reasons. First, it would reduce his stress level. Second, it would allow him to take over much of the day-to-day care of Max and Adrian so Christine could focus on her position and advancing her career at Starbucks. Third, they had sufficient savings and investments to meet their financial needs until Robert was able to find another career path or position in the tech industry that was less stressful. In addition, Robert's Microsoft stock vested upon his *retirement* and he was free to exercise the stock pursuant to the vesting schedule. He received a severance package comprised of a lump sum payment of



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 6

\$160,000, \$246,245 in accelerated stock vesting and an additional \$43,484 in transitional benefits totaling \$449,729. This one-time payout was reported on his 2023 W-2.

Robert's Future Employment Prospects: Robert disagrees with Christine's vocational expert John Fountaine's vocational assessment which suggests Robert could return to work at a senior level in the tech industry earning a salary of between \$509,000 and \$916,000. The assessment is flawed on many levels and includes inaccuracies about Robert's exit from Microsoft, his future prospects there and his earning potential. The most glaring error is Mr. Fountaine's calculation of Robert's income potential, by averaging Robert's W-2 income over the past five years (2019 – 2023) resulting in an inflated average annual income of \$752,938. The W-2s during this timeframe include stock vests from prior grants as ongoing compensation. As reflected above, Robert's stock awards continued to decline and then became nonexistent in 2022 so should not be considered as continuing income. The average also includes Robert's one-time severance package of \$449,729. The projected ongoing compensation of \$752,938 is not accurate and certainly not attainable for Robert for several, irrefutable reasons.

Robert is 57 years old. The tech industry is interested in younger and less expensive prospects for program management positions. Robert does not have a computer science degree. In today's job market, particularly within the tech industry, a degree in computer science or related technical field is often a fundamental requirement for senior positions. Without this qualification and the fact that Robert was laid off, he faces additional challenges to land a position equal to his last position at Microsoft.² Artificial intelligence advancements and outsourcing trends are reshaping the landscape of senior level tech roles. Mr. Fountaine misrepresents that Robert declined a senior position with Microsoft in January of 2023. While he was actively interviewing and despite in-house referrals, no formal offer was extended.

Robert is in treatment with Luis Merced a licensed mental health counselor who specializes in trauma. Mr. Merced diagnosed Robert with PTSD. Attached at **Exhibit 13** is a letter from Mr. Merced explaining Robert's diagnosis and treatment which involves learning better ways to cope with his PTSD other than the use of alcohol and explains that Robert's PTSD was conflated by the significant stress associated with his role at Microsoft. Mr. Merced discusses how Robert is improving but recommends on-going therapy. Robert is in the process of determining what the best avenue for him will be going forward that will balance financial sustainability with his health and well-being. Given his age (57), lack of a degree in computer science, and his need to be mindful of stressors given his PTSD diagnosis and alcoholism, he must carefully choose his next career

² Layoffs in the tech sector, especially at Robert's age, can carry a stigma that affects how recruiters and hiring managers view candidates. Senior tech positions often rely on networking and specialized recruitment processes which the layoff could impact.



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 7

path which most likely will not be a level 67 position at Microsoft or similar position at the “FANG” group (Facebook, Amazon, Netflix and Google).

Robert is exploring owning and operating an Airbnb in the form of a boutique hotel in a desired location with the goal of it eventually evolving into a wellness resort that offers non-traditional, alternative treatment options for persons suffering from trauma and PTSD. In addition, Robert may pursue becoming a psychedelic assisted therapy guide which could take up to 24 months to complete. He may also decide to pursue a non-clinical path which could take up to 11 months to complete the process. In the interim Robert may need to obtain work as a contract employee utilizing his management skills for retail organizations and possibly tech companies. As a new hire, Robert could expect to earn 10 to 20% less than a tenured employee. Deducting this amount from Robert’s salary at Microsoft (\$256,000), Robert could expect to earn a salary of \$204,800. This figure aligns with the Bureau of Labor and Statistics 2023 data of \$204,390 as discussed in Mr. Fountaine’s assessment report. If Robert returns to school, he will not be able to work full-time.

Given Robert’s age, his absence from the tech industry for over a year and a half, and his need to work in a profession that will not exacerbate his PTSD and/or trigger his desire to drink, Robert will not return to the workforce in a position where his income will equal his last income at Microsoft or at the level Mr. Fountaine suggests. Between September 2023 and June of 2024, Robert submitted 64 job applications, eleven of which were product manager positions. The scarcity of response reflects the difficulty securing a comparable role given the issues discussed above. A copy of Robert’s job search log is attached at **Exhibit 14**. Robert continues to look for work.

Robert received unemployment benefits in the amount of \$900 a week. His benefits ended in September. Since division of the joint Fidelity account, Robert has been using his predistribution from the joint Fidelity account (\$381,478) to pay his living expenses. Robert’s monthly expenses total \$32,636 which includes 50% of the boys’ expenses of \$7,731 (the boys attend SAAS), \$1,320 per month for the residential supervisor, and \$1,175 per month for urinalysis testing and Soberlink. Robert’s expenses will increase with the added expense of reunification counseling, domestic violence treatment and a parenting coordinator as suggested by Mr. Lenz. Conversely, Christine has been able to use her salary to pay her living expenses negating or minimizing the need to dip into savings and/or investments to make ends meet.

Christine:

Christine’s Employment History. Christine is 47-years old and works for Starbucks as a Senior Tax Manager. Christine base salary is \$215,347. In 2023 she received a \$24,537 bonus and



The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 8

\$15,000 in stock. **Exhibit 15.** Christine is most likely due for a merit increase in November of 2024. Prior to working for Starbucks, Christine was a tax preparer for Moss Adams.

Christine's Anxiety. Christine is a highly anxious person, some of which may be due to the issues in the marriage that stemmed from Robert's drinking and their volatile verbal exchanges. Because of her anxiety, she often overreacts as she did regarding the surveillance system at the Kirkland residence which led to the entry of the temporary restraining order. Christine's family resides in Hong Kong. Without her family for support here, she has turned to the parties' neighbors, friends, her adult daughter Elsa, and the boys for support. Robert has exercised poor judgment in his communications with Christine following their separation and throughout this divorce proceeding, mostly because of his frustration due to his restricted residential time with Adrian which is no excuse. These communications have no doubt impacted Christine's anxiety level. No one faults Christine for this, but Christine has not been able to separate her issues with Robert from the children. As Jennifer Kielin noted, Christine needs to separate her feelings toward Robert from parenting. Christine has punished Robert for the issues in their marriage by inappropriately involving the children in the divorce and exposing them to her anxiety, which has further impacted the boys' relationship with Robert, mainly Max and Adrian to a lesser degree. Christine told Ms. Kielin she was open to receiving coaching on how to hide her anxiety from the boys. We believe this should be a requirement in the parenting plan. If Christine does not separate her issues with Robert from parenting, reunification with Max will most likely never happen and will impede reunification with Adrian. One example of Christine inappropriately including the children in the divorce is when Christine shared with Max that Robert used a picture of Max as an exhibit to his motion for a temporary parenting plan. Max went into a rage and sent a horrible and threatening text message to Robert. Christine should have never told Max about the motion.

V. MEDIATION RELIEF REQUESTED AND ANALYSIS

A. Parenting.

Parenting History:

From the day the boys were born, Robert took an active role in every aspect of parenting, cooking, grooming and hygiene, bedtime routines, managing medications and health care. He coached their sports teams and volunteered at events. After he was laid off from Microsoft in March of 2023, he became the boys' primary caregiver. His relationship with the boys blossomed more than before. He was in charge of the boys' daily lives and ensured their well-being without incident. He led trips to Whistler, Leavenworth, and the beach. He took them on float trips, went camping, climbing, hiking, kayaking, mountain biking, played lots of basketball, watched Seahawks and Mariners



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 9

games, and attended all the boys' sports events (he also coached), and attended all medical appointments.

Between the end of March and October of 2023 Robert spent 66 days being the *sole* care provider for Max and Adrian while Christine was on work trips or attending luxury spas, such as Mirava Wellness Resort. It was an excellent opportunity for Robert to spend time with the children and support Christine because she was so busy with her job and professional commitments. He loved that part of his new "Stay at home Dad" role. Below is a list of the time Robert spent with the boys last spring, summer and fall without incident:

- March 27-30: Christine was away for a work conference. I was solo with the boys in Kirkland.
- April 8-15: The family was in Cabo on a spring break vacation. We were together as a family.
- April 17-28: Christine was in the UK for work while I was solo with the boys in Kirkland.
- May 18-21: Christine's girl's trip to a resort in Arizona. I was solo with the boys in Kirkland.
- June 26-30: I hosted Adrian all week for beach camp. We were solo in Alki.
- June 18-25: Christine and Max went to Whistler, I watched Adrian at Alki and in Kirkland.
- July 22-30: I hosted Max and two friends' daily activities and trips. Commuted from Alki.
- Aug. 4-10: I watched the boys and hosted Christine's brother and sons (they reside in Hong Kong) for a Whistler trip.
- Aug 12-18: We enjoyed an REI family trip to visit Bryce and Zion as a regular family event.
- Aug. 28-Sept 1: I had Adrian at the beach house all week for beach camp. We stayed at Alki.
- Oct. 5-10: I watched the boys and household while Christine vacationed in New York.

In March 2024, Adrian's behavior changed abruptly. Their previously affectionate interactions became cold and detached, reflecting language tied to Christine's domestic violence accusations. This coincided with Christine limiting Robert's time with Adrian to supervised visits. Their bond weakened rapidly, with a significant reduction in his warmth towards Robert which he believes is directly attributable to Christine's interference.

Attempts to Achieve an Agreed Parenting Plan.

Christine and Robert worked with multiple therapists to address their divorce, co-parenting, individual betterment, and development of a Parenting Plan. They began seeing Dr. Monique Brown in December 2023. They had four joint sessions over the course of three months. Christine and Robert also had two individual sessions, and Max and Adrian had individual sessions. Despite coming up with a comprehensive 50:50 parenting plan with appropriate safeguards to make



The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 10

Christine feel comfortable, she would not commit. For reunification therapy the parties were referred to Kari Betts and participated in sessions with her as well. As a result of their first session with Ms. Kielin, Adrian and Max spent 6 hours with him on Father's Day. This was huge as Robert had not seen Max since Christmas 2023. Despite the visit going without incident, Robert has not spent time with Max since then. Their communications are limited to text messages and phone calls regarding mostly computer related matters and virtually non-existent more recently due to Christine sharing Robert's motion with Max.

In June of 2024, Robert and Christine engaged Jennifer Kielin as a reunification therapist. On July 1, 2024, after having met with the Robert, Christine and the boys, Ms. Kielin requested a joint meeting with counsel for the parties, the parties' and the children's therapists. During the Zoom conference Ms. Kielin relayed:

1. Supervised residential time is not because of risk or physical harm to Adrian and is not necessary. It should be phased out.
2. Adrian and Robert have a strong bond that needs nurturing and support.
3. The current residential time is not enough to build and maintain Robert's relationship with Adrian;
4. For maintenance building, there needs to be contact two times a week for several hours at a minimum;
5. Because Robert is the boys' father, there will be contact, some oxygen (more time with Robert) to allow reunification to happen;
6. Christine should separate her own issues with Robert from parenting.

During the Zoom conference, Ms. de Maar raised Christine's reasons why Robert should not have additional residential time with Adrian, including unsupervised time, which did not dissuade Ms. Kielin from her recommendations. Robert filed a motion to adopt Ms. Kielin's recommendations. Christine vociferously objected to the filing of the motion claiming Ms. Kielin could not make a recommendation regarding the residential schedule and that the confidential therapist relationship had been violated. Robert does not recall having signed a confidentiality agreement but Ms. Kielin confirmed he had. Despite our disagreement regarding Ms. Kielin's authority, we struck the motion. It was our position based on the clear language of the Residential Stipulation (**Exhibit 5**) Ms. Kielin's recommendations would be adopted if no one filed a motion within 7 days of her recommendation. Christine had not filed a motion.

Ms. de Maar copied Ms. Kielin and Conner Lenz on her emails regarding the motion. Ms. Kielin asked to have a conference with counsel. She issued a formal Status Report/Treatment Summary at **Exhibit 16**. Ms. Kielin recommended that steps must be taken to be appropriate for reunification therapy:



The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 11

1. More contact between Robert and Adrian (minimum of 2 contacts of 2 – 4 hours per week)
2. A 60-to-90-day period of stability in the family system prior to starting the intervention (stability equals no major conflicts, no new litigation, compliance with court orders, and no significant boundary violations).
3. Behavioral-based benchmarks for Robert to gain more/liberalized contact hours
4. A structured residential plan that provides for regular increases in contact based on Robert's behavior and Adrian's adjustment
5. A PC to implement the plan, monitor Robert's progress towards benchmarks and compliance with communication stipulations, monitor the children's adjustment, and to facilitate parent communication and minor dispute resolution.
6. This family may benefit from a team approach to family-systems therapy, such as individual therapists and a family therapist, all focused on addressing the resist/refuse dynamics.

I reached out to Ms. de Maar regarding scheduling additional time of 2 to 4 hours twice weekly. Ms. de Maar interpreted Ms. Kielin's recommendation to mean the minimum visit requirement would replace the 6 hours of supervised residential time every other Saturday. I do not believe this was Ms. Kielin's recommendation as she said the current residential time was not enough to build and maintain Robert's and Adrian's relationship.

What is most telling about Ms. Kielin's recommendations is that Christine cannot separate her feelings toward Robert from his parenting of Adrian and Max. This is why, despite their efforts to enter into a parenting plan with appropriate safeguards in place for the boys, Christine has backed out every time. We also believe this is why Christine reacted so violently to the motion for a temporary parenting plan. She does not want Robert to have more time with Adrian.

Since initiating reunification in early May, the situation has statistically worsened each week as follows:

- Despite multiple therapeutic recommendations and legal remedies, there's been no meaningful improvement in Robert's residential time this year.
- Christine preventing Robert from seeing Adrian until September 14th, eliminated their time together for another 28 days.³

Below is a summary of the parenting time Robert had with Adrian since June of 2024:

- June 30 to August 3: 6 hours over 34 days (0.74%)

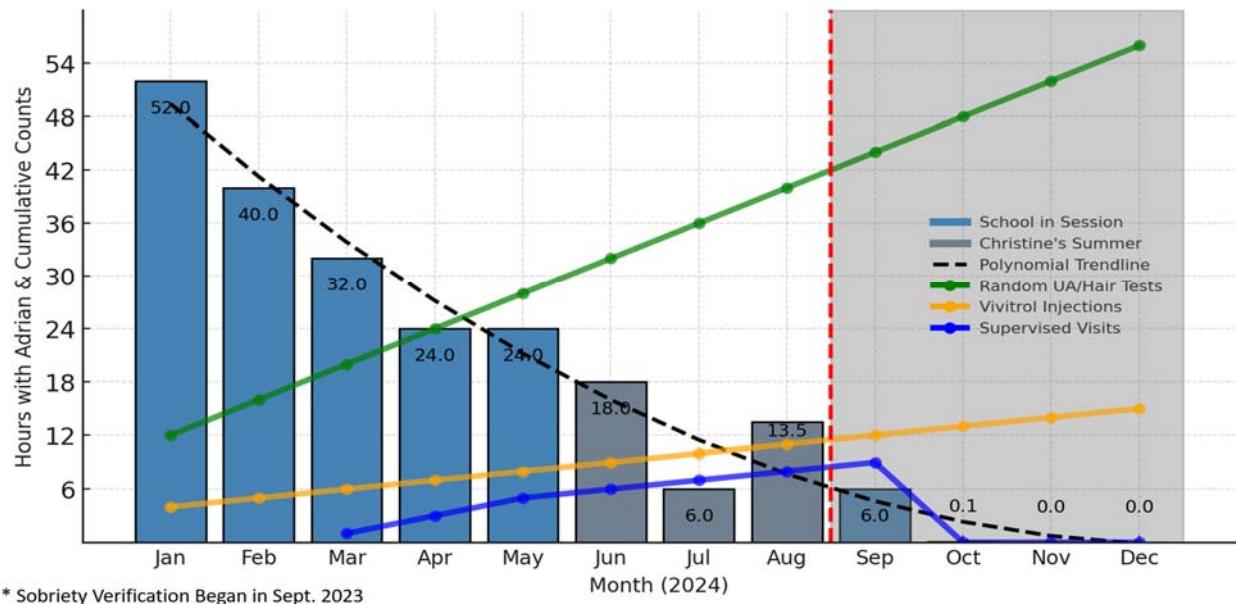
³ On August 24, Robert had a very brief visit with Adrian (90 minutes) which is not counted here because it did not believe it met the bar for a normal visit as stipulated. They could not go anywhere or do anything.



The Honorable Steve Rosen (Ret.)
October 29, 2024
Page 12

- August 17 to September 13: 90 minutes over 28 days (0.22%)

This is a 72.73% reduction in time. The August 18 to September 14 custody split will be Robert 0.22% vs. Christine 99.78%. Below is a chart of how his parenting time has decreased.



The chart shows parenting time and what Robert has done over eight months to demonstrate his suitability as a parent. Despite his efforts, the hours spent with Adrian have consistently decreased. It's the inverse of his actions. His contact with Adrian has declined as follows:

- January: Adrian and Robert spent 52 hours together, indicating a decent start to the year.
- February: Their time decreased to 40 hours, marking the start of a downward trend.
- March: Their time dropped to 32 hours, but they still had sleepovers at Robert's place.
- June: Their time was reduced to 18 hours, a 25% decrease from May with no Basketball because Christine would not sign him up due to Adrian's jam-packed summer schedule including a two-week trip to Hong Kong.
- July: Their time dropped sharply to 6 hours that month, or 67% less than in June.
- August: A slight rebound to 13.5 hours occurred, but it failed to reverse the trend.
- September: There was 27 days between regular supervised visits for Adrian and Robert.



The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 13

This is evidence that Christine has disregarded the stipulation regarding residential time. Ms. Kielin and Mr. Lenz recognize acknowledge the disruption and the need for routine contact and visits between Robert and Adrian.

Robert is well aware of how his alcoholism impacted the family. He is working hard to assure Adrian and Max they are and will be safe with him. But Christine interferes with Robert's attempts by withholding the children and inappropriately including the boys in the divorce. In addition to Christine sharing the motion with Max, Adrian has questioned Robert about the amount of rent he pays. This was during the time the parties were negotiating allocation of expenses. Robert did not share this information with Adrian so it must have been Christine. Elsa reported to Mr. Lenz that Christine shared with Elsa at the age of six that Robert pushed her into a wall. While Ms. Kielin opined Christine struggles to hide her anxiety and distress surrounding Robert and accommodates Adrian's anxiety and that Christine was open to coaching, no such requirement is made of her in Mr. Lenz's report.

The parties' marriage counselor, Debbie Bayer, reported to Mr. Lenz she believed Christine was being coached by an attorney regarding her participation in the 2023 sessions. Ms. Bayer further reported Robert would watch the children for a week during her absence and then Christine would decide it was unsafe for the boys to be with Robert. Ms. Bayer opined there was a lot of power play on Christine's part and told Christine she was weaponizing the children. Ms. Bayer felt Christine was projecting some of "her stuff" onto the children and could have given Robert more space. This mirrors Ms. Kielin's opinion that Christine could not separate her feelings about Robert from parenting. Christine told Ms. Bayer on many occasions that Robert was a good dad.

Connor Lenz's Parenting Evaluation.

What is most striking about Mr. Lenz's report is it is focused on Robert and his behaviors and not at all on Christine's impact on the current family dynamic, including refusing to follow the terms of the residential stipulation. Robert does not deny his role in the marriage and the anxiety it caused the family; however the absence of reporting on Christine's role gives an impression of bias by Mr. Lenz. Robert provided Mr. Lenz copious amounts of material which documented Christine's resistance and refusal to Robert spending time with Adrian. He mentioned in his report that Christine reported Robert was having affairs but failed to mention that Christine had an affair during the marriage. Extra-marital affairs should not be included in a parenting evaluation unless the children were impacted by them, which they were not. It is important to note that the "affairs" Christine raised were relationships Robert and Christine were entering into with third parties and were consensual on Christine's behalf. Despite Robert sharing the amount of times he and Christine used mushrooms together, Mr. Lenz adopted Christine's minimized reporting over Robert's. It is notable that Christine would not sign a release for Mr. Lenz to interview her therapist,



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PLLC

The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 14

while Robert signed all releases requested of him. Christine effectively prevented Mr. Lenz any insight into her, outside of her own narrative.

Mr. Lenz acknowledges and commends Robert's commitment to his sobriety and the lengths Robert has gone to assure Christine and the boys that he is not drinking; however, this acknowledgment is not reflected in his residential recommendations. Nor does Mr. Lenz give credit to Robert for the positive supervised visits with Adrian. Ignoring the seven months of supervised visitation Mr. Lenz's suggested Phase I provides for another three months of supervised.

Much of Christine's reporting and that of her collateral witnesses, specifically, Lisa Rudolph could not be corroborated by Mr. Lenz.

Mr. Lenz recommends a residential schedule with increased time over the course of nine months, three phases at 90 days each culminating in the final phase limited to alternating weekends and one mid-week evening visit every week for the duration. Mr. Lenz fails to include school breaks, Christmas and Christmas Eve in his recommendations. A huge oversight, if not intentional, which it does not appear to be because he makes recommendations for summer vacations and other holidays. Mr. Lenz also recommends sole decision making which is extreme, especially in light of a parenting coordinator coming on board and appropriate parameters that can be put in place such as limited OFW exchanges regarding joint decisions with the ultimate decision to be made by the parenting coordinator if no agreement. Christine should not be given carte blanche to make decisions regarding school and extracurriculars for which Robert is financially responsible. More importantly, Robert has always been engaged in the children's education and healthcare and managed both almost exclusively after he was laid off from Microsoft.

Robert has proven over and over that he will do whatever it takes to ensure Adrian and hopefully, one day, Max will trust him again and want to spend time with him. Robert's interactions with Christine are concerning and it is understandable why Mr. Lenz finds there was domestic violence in this marriage. Robert does not disagree with the recommendations for domestic violence treatment, reunification counseling, individual therapy and continued monitoring via Soberlink and drug testing. All of which Robert has voluntarily done for over a year now. Robert agrees a parenting coordinator is necessary. Robert is committed to understanding his past and present behaviors and working on improving them to de-escalate the family dynamics.

Robert's proposed Parenting Plan is attached at **Exhibit 17** and provides the following residential schedule:

Phase one as proposed by Mr. Lenz, 90 days supervised one weekend day each week, is too restrictive and maintains the status quo. This does not corroborate Ms. Kielin's recommendation



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 15

that Robert have more frequent contact with Adrian. Supervised visits have been in place for the past 7 months. Mr. Schneider's visitation reports have all been positive with Mr. Schneider reporting that Adrian always enjoys his time with his father.⁴ Robert proposes that phase two, 6 hours every Sunday and Wednesdays from after school until 7:30 p.m. become phase one for a period of 90 days (11/1/2024 – 1/31/2025). Robert has commenced the domestic violence assessment and treatment process. He is waiting for the completed assessment and treatment recommendations. Robert is already providing Soberlink reports to Christine. He takes random drug tests and Christine receives the results. Robert will participate in all counseling recommendations made by Mr. Lenz.

Phase three should become phase two with residential time from every other Saturday at noon to Sunday at noon and Wednesday after school until 7:30 p.m. for a period of 90 days, starting February 1, 2025 to April 30, 2025.

Phase four should become phase three with residential time from Friday after school until Sunday at 6:00 p.m. and every Wednesday after school from May 1, 2025 to August 31, 2025.

If he is in compliance with all guidelines recommended by Mr. Lenz, Robert should be able to request expanded residential time in September of 2025. Meeting the adequate cause threshold should not be required.

Summer vacations shall commence in phase three, the summer of 2025, with Robert receiving one week of vacation and expanded to two weeks in the summer of 2026.

Holidays should be as set forth in Mr. Lenz's recommendations. School breaks, not addressed by Mr. Lenz, shall be included and commence in January of 2026 or sooner if recommended by the reunification therapist, Kari Betts or the Parenting Coordinator.

B. Spousal and Child Support.

For settlement purposes, Robert is not seeking spousal support and proposes that income be imputed to him at \$204,000 a year for purposes of calculating child support. He further proposes a 50:50 split of the children's uninsured medical and agreed upon extracurricular activities and post-secondary educational support.

⁴ The visitation reports are not provided here but can be made available upon request.



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 16

The parties' 2022 and 2023 tax returns, Christine's W-2s and most recent available pay stub are attached at **Exhibits 18, 19, 20 and 21**, respectively.

Robert's proposed Order of Child Support and Child Support Worksheets are attached at **Exhibit 22**.

D. Characterization of Assets.

All assets are community with the exception of Starbucks stock issued post-separation and vests following separation. The separate and community character of this asset is reflected on the proposed asset allocation spreadsheet. See also the *Short* analysis at **Exhibit 23**.

E. Allocation of Assets.

All property is to be divided in a manner that is just, equitable and according to the factors set forth in RCW 26.09.080. The statute provides:

Disposition of property/liabilities – Factors.

In a proceeding for dissolution of the marriage or domestic partnership, legal separation, declaration of invalidity, or in a proceeding for disposition of property following dissolution of the marriage or the domestic partnership by a court which lacked personal jurisdiction over the absent spouse or absent domestic partner or lacked jurisdiction to dispose of the property, the court shall, without regard to misconduct, make such disposition of the property and the liabilities of the parties, either community or separate, as shall appear just and equitable after considering all relevant factors including, but not limited to:

- (1) The nature and extent of the community property;
- (2) The nature and extent of the separate property;
- (3) The duration of the marriage or domestic partnership; and
- (4) The economic circumstances of each spouse or domestic partner at the time the division of property is to become effective, including the desirability of awarding the family home or the right to live therein for reasonable periods to a spouse or domestic partner with whom the children reside the majority of the time.

Although no one factor is given greater weight, of paramount concern to the Court are the economic circumstances of the parties when the divorce becomes final. *DeRuwe v. DeRuwe*, 72 Wn.2d 404, 433 P.2d 209 (1967). These statutory requirements, however, are not exclusive and courts consider other relevant factors in determining a just and equitable property division such as the parties' health, ages, education, and employability. *In re Marriage of Mathews*, 70 Wash. App. 116, 121,



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The Honorable Steve Rosen (Ret.)

October 29, 2024

Page 17

853 P.2d 462, *review denied*, 122 Wn.2d 1021 (1993). All property of the parties is before the court for distribution and courts have wide discretion in disposing of property and liabilities. *Davis v. Davis*, 13 Wash. App. 812, 537 P.2d 1048 (1975); *In re the Marriage of Irwin*, 64 Wash. App. 38, 822 P.2d 797 (1992).

Robert W. Winsor, former King County Superior Court Judge, opined that marriages be defined as short (five years or less), long (25 years or more) and mid-range (all others). This is a long-term marriage.

“In dissolving a marriage of 25 years or more, the trial court must put the parties in roughly equal financial position for the rest of their lives.” *In re the marriage of Rockwell*, 141 Wash. App. 235, 243, 170 P.3d 572 (2007), citing *Washington Family Law Deskbook* § 32.3(3) at 17 (2d. ed. 2000 “[F]or a marriage lasting over 25 years, ‘after [which] a husband and wife have toiled on together for upwards of quarter of a century in accumulating property the ultimate duty of the court is to make a fair and equitable division under all the circumstances” *Rockwell* at 576 citing *Sullivan v. Sullivan*, 52 Wash. 160, 164, 100 P.321 (1909). “Future earning potential is a substantial factor to be considered by the trial court in making a just and equitable property distribution.” *Rockwell* at 579 citing *In re the Marriage of Hall*, 103 Wash. 2d 236, 248, 692 P.2d 175 (1984). “[I]n considering a party’s future earnings capacity, a trial court may consider the age, health, vocational training and work history of the party.” *Rockwell* at 579, citing *Washington Family Law Deskbook*, § 32.3(4)(a) (1st ed.)

Christine is 10 years younger than Robert. She has a lucrative position at Starbucks as a Senior Tax Manager. She earns a handsome salary and receives bonuses and stock awards. She has many productive work years ahead of her where she can continue to advance at Starbucks and grow her estate.

At age 57 and in light of his lay off from Microsoft, his more than a year and a half absence from the work force and the tech industry in particular, a degree in journalism as opposed to a computer science degree, Robert’s PTSD diagnoses, Robert’s future career paths are limited and most likely not as lucrative as Christine’s. He must be careful not to return to work in a position which may trigger his PTSD and possibly cause him to drink again. With 10 fewer years to work than Christine he will not have the opportunity to grow his estate as much as Christine.

Given the factors above, Robert is entitled to a disproportionate award of assets. Robert proposes a 53:47 division of the assets in his favor as set forth on his proposed Asset Allocation provided at **Exhibit 24**.

We look forward to a productive mediation session with your valuable assistance.



The Honorable Steve Rosen (Ret.)
October 29, 2024
Page 18

Very truly yours,

Lisa Ann Sharpe
DIRECT LINE: (206) 654-2404 EMAIL: sharpe@lasher.com

LAS/lms
Enclosures
cc: Robert Moyer
Natalie de Maar



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The Honorable Steve Rosen (Ret.)
October 29, 2024
Page 19

EXHIBIT INDEX

The following documents are provided in order to facilitate the mediation process:

1. July 12, 2024 Temporary Family Law Order
2. February 26, 2024 Temporary Restraining Order
3. Emails and OFW Exchange Re: Correcting Restraining Order
4. Connor Lenz Parenting Evaluation Report
5. June 13, 2024 Residential Stipulation
6. 2019 New Life Alcohol Assessment
7. 2020 New Life Recovery Solutions letter
8. July 2021 Luis Merced letter
9. Soberlink Results
10. October 2023 New Life Recovery Solutions Assessment
11. November 2023 Millennium Health Drug Test Report
12. June 2024 10 panel UA and Hair Follicle Test Results
13. June 27, 2024 Luis Merced Letter
14. Job Search Log
15. Christine's 2023 Compensation/Rewards Planning Summary
16. Jennifer Kielin Status Report/Treatment Summary
17. Robert's Proposed Parenting Plan
18. 2022 Tax Return⁵
19. 2023 Tax Return⁴
20. Christine's 2023 W-2
21. Christine's 9/27/2024 Pay Stub
22. Robert's Proposed Order of Child Support and Child Support Worksheets
23. Short Analysis – Starbucks RSUs
24. Robert's Proposed Asset Allocation Spreadsheet

⁵ First two pages only are provided. The complete return can be made available upon request.

1
2
3
4
5 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
6 **COUNTY OF KING**

7 In re the Marriage of:
8 CHRISTINE MOYER,
9 Petitioner,
10 and
11 ROBERT EDWARD MOYER II,
12 Respondent.

NO. 23-3-05392-7 SEA

AGREED TEMPORARY FAMILY
LAW ORDER
(TFO)

13 **Temporary Family Law Order**
14

15 *Use this form in marriage/domestic partnership cases only. For other cases, use FL Parentage*
16 *324, FL Non-Parent 424, or FL Modify 624, depending on the type of case.*

17 **1. Money Judgment Summary**

18 No money judgment is ordered.

19 **2. Findings**

20 The Petitioner and Respondent entered into this Agreed Order and the court finds there is
21 reason to approve this order.

22 **3. Active duty military**

23 *(The federal Service members Civil Relief Act covers:*

- 24 • Army, Navy, Air Force, Marine Corps, and Coast Guard members on active duty;
- 25 • National Guard or Reserve members under a call to active service for more than 30
26 days in a row; and

RCW 26.09.060, .110,
.120, .194, .300(2)
Mandatory Form
(07/2019)

FL Divorce 224

TEMPORARY
FAMILY LAW ORDER
p. 1 of 7



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2600 TWO UNION SQUARE
601 UNION STREET
SEATTLE WA 98101-4000
TELEPHONE 206 624-1230
Fax 206 340-2563

- 1 • *commissioned corps of the Public Health Service and NOAA.*

2 The **state** Service Members' Civil Relief Act covers those service members listed above who
3 are either stationed in or residents of Washington state, and their dependents, except for
4 the commissioned corps of the Public Health Service and NOAA.)

5 None of the parties are covered by the state or federal Service Members' Civil Relief Act, OR
6 no party covered by the Acts has asked for a stay.

7 **The Court Orders**

8 **4. Care and safety of children**

9 No request made. See paragraph 5 below.

10 **5. Provide support**

11 The parties shall temporarily pay 50% of the following children's expenses:

- 12 1. SAAS tuition, bus, lunches, trips and other miscellaneous school related expenses
13 2. Summer camps and other camps scheduled during school breaks.
14 3. Extracurricular activities
15 4. Tutoring expenses – including, but not limited to, Stephanie Claros and Nora Martin-
16 Cooley.
17 5. Cellular phones
18 6. Ski passes, sports equipment, and other expenses to allow participation in
19 extracurricular activities.
20 7. Health insurance premiums
21 8. Uninsured medical, dental and vision expenses
22 9. Uninsured therapy expenses
23 10. Clothing and haircuts

24 The parties shall select either of the following to pay above expenses:
25 The parties shall pay for the children's expenses on the joint Bank of America ("BofA")
26 debit card for savings account 77188654. The account shall be funded in an agreed amount
each month to cover expenses, and shall always have a minimum of \$10,000.00. Future
funding shall be paid from the parties' respective predistribution or earnings. To the extent
expenses are not paid using the joint BofA debit card, the parent who has paid the expenses
shall exchange expenses at the end of each month with supporting documentation (receipts,

1 email verification). The parent who is asked to pay shall have 7 days to pay their 50% share
2 of the above expenses.

3 In the alternative, the parties shall exchange expenses at the end each month with
4 supporting documentation (receipts, email verification). The parent who is asked to pay
5 shall have 7 days to pay their 50% share of the above expenses. Future funding shall be
paid from the parties' respective predistribution or earnings.

6 Monthly funding for the children's Fidelity college accounts and Vanguard savings account,
7 will be paused, until final determination of each parties proportional share.

8

9 **6. Family home**

10 No request made. Christine is in temporary possession of the family home.

11

12 **7. Use of property**

13 *Predistribution.* Robert and Christine shall divide Fidelity X5828 50/50 with the stock
14 shares divided in like kind. The parties have a margin account balance of \$42,000 (approx.)
15 and they shall either each take 50% of the margin balance when the account is split or if they
cannot split the account with the margin balance, then they will pay it off, and then split the
account 50/50.

16 *Tesla.* Robert shall use of the Tesla. Christine shall have use of the Subaru.

17 *Use of Bank Accounts.*

18 Robert shall BofA account X6398 after this Order is agreed.

19 Christine shall use BofA account 138133331026 after this order is agreed.

20 *HELOC.* Neither party shall access the HELOC.

21

22 **8. Protect property**

23 Robert's property in the family home shall not be removed. If Christine agrees, then
24 Robert can come to the family home and pack and remove his personal items,
25 otherwise this is "reserved" for a later date.

26
RCW 26.09.060, .110,
.120, .194, .300(2)
Mandatory Form
(07/2019)

TEMPORARY
FAMILY LAW ORDER
p. 3 of 7



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Fax 206 340-2563

1
2 **9. Household expenses**

3
4 Household expenses must be paid as follows:

Expense	Who pays
First Mortgage - Kirkland residence *	Petitioner
HELOC payment (if any)	Petitioner
Rent or lease payment and related rental expenses, utilities, garbage, Wifi, house cleaning, for Respondent's rental home	Respondent
Utilities, garbage, home exterminators, house cleaning, garbage, gardener, Wifi, at the Kirkland residence	Petitioner
Homeowner's Insurance – Kirkland residence	Petitioner
Property Taxes – Kirkland residence	Petitioner
Vehicle: Subaru insurance, gas, tolls, maintenance, repair, registration, parking, car wash	Petitioner
Vehicle: Tesla insurance, charging, tolls, maintenance repairs, registration, parking, car wash	Respondent
Other: Petitioner's personal clothing, beauty, haircare, pedicures, manicures, skin care, gym membership, vacations, dry cleaning, personal ski pass, pet expenses (cat and dog), cellular phone, groceries, dining out, entertainment, personal medical insurance and uninsured medical expenses.	Petitioner
Other: Respondent's personal clothing, beauty, haircare, pedicures, manicures, skin care, gym membership, vacations, dry cleaning, personal ski pass, cell phone, groceries, dining out, entertainment, Care Fund personal medical insurance (i.e. COBRA approx. \$800/mo.), uninsured medical expenses, Vivatrol shot,	Respondent

Expense	Who pays
Soberlink, weekly random drug/alcohol tests, supervised visits with the children	

Other:

The parties shall each pay one-half of agreed upon routine maintenance and repairs for the Kirkland residence and earthquake insurance, Seahawk tickets if not already purchased and the games shall be split evenly between the parties; Cabo time share maintenance fees were split 50:50 for 2024. Maintenance fees for 2024 have been paid. Robert shall have use of the timeshare as follows:

- The 3 bedroom fixed week in 2024 and 2025
- The 2 bedroom in 2024 at Rancho that was banked
- The 2 bedroom in 2025 at Rancho
- The fixed week (unit 9101) canceled in 2023 due to the hurricane and to be rescheduled in 2024 or 2025

Fixed weeks are defined as the weeks the parties receive annually on specific weeks of each year. Developer weeks are defined as weeks that the parties received at the time of purchase of the timeshares and are flexible weeks the parties can use throughout their ownership of the timeshares.

Robert shall pay the maintenance fees for 2025.

No one shall use the “developer weeks” absent written agreement or order of the court. Use of the fixed weeks beyond 2025 are reserved for further order or agreement of the parties.

All disputes regarding timeshares or the provisions related to timeshares contained in this Temporary Order shall be resolved on written submittals via arbitration with Judge Rosen (ret.). Fees and costs of any arbitration shall be split 50-50 subject to reallocation by the arbitrator.

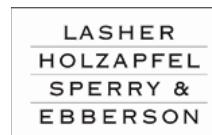
10. Divide debts

All credit card balances shall be paid in full using funds from the joint Fidelity account ending in x5828. Thereafter Christine Moyer shall have sole exclusive use of and be responsible for payment of the Chase, American Express, Nordstrom and Bank of America

RCW 26.09.060, .110,
.120, .194, .300(2)
Mandatory Form
(07/2019)

FL Divorce 224

TEMPORARY
FAMILY LAW ORDER
p. 5 of 7



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601 UNION STREET
SEATTLE WA 98101-4000
TELEPHONE 206 624-1230
Fax 206 340-2563

1 Visa and any other credit card accounts held in her name. Robert Moyer shall have sole
2 exclusive use of and be responsible for payment of the Bank of America Visa and the joint
3 American Express account (Christine Moyer shall not use this account) and any other credit
card accounts held in his name.

4 **11. Do not change insurance**

5 No request made.
6

7 **12. Pay fees and costs**

8 Each party shall each pay one-half of Jennifer Kielin's and Connor Lenz's fees. Wife shall
9 be 100% responsible for John Fountaine's fees and costs.

10 Each party shall each pay their own legal fees and one-half of mediation fees.

11 **13. Restraining order**

12 No request is being made.
13

14 **14. Other temporary orders**

- 15 A. There shall be no further margin activity in the Fidelity accounts.
- 16 B. There shall be no further withdrawals from the Fidelity accounts (except to pay for
17 the SAAS tuition for the 2024/2025 school year) unless otherwise agreed in writing
18 or otherwise ordered by the Court.
- 19 C. Christine Moyer shall receive 100% of her wages from her employment.
- 20 D. Robert Moyer shall receive 100% of his unemployment income.
- 21 E. Parenting issues are not resolved by this order. The parties shall continue with the
22 reunification therapy with Jennifer Keilin and are undergoing a parenting
23 evaluation.

1 **Ordered.**

2

3 *Date*

4

5 *Judge or Commissioner*

6

7 **Petitioner and Respondent or their lawyers fill out below.**

8 This order:
9 Is an agreement of the parties;
10 Is presented by me.

11

12 This order:
13 Is an agreement of the parties;
14 May be signed by the court without notice to
15 me.

16 Lisa A. Sharpe
17 Lisa A. Sharpe, WSBA No. 21047

18

19 *Michael de Maar*

20 Date: _____

21 Michael de Maar

22 ROBERT EDWARD MOYER II
23

24

25 *Christine Moyer*

26

27 Christine Moyer, WSBA No. 21047
28 CHRISTINE MOYER

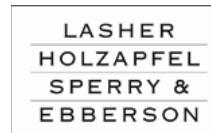
29

30 RCW 26.09.060, .110,
31 .120, .194, .300(2)
32 Mandatory Form
33 (07/2019)

34 **FL Divorce 224**

35

36 TEMPORARY
37 FAMILY LAW ORDER
38 p. 7 of 7



King County Superior Court
Judicial Electronic Signature Page

Case Number: 23-3-05392-7
Case Title: CHRISTINE MOYER AND ROBERT EDWARD MOYER II
Document Title: AGREED ORDER

Signed By: Paul Eagle
Date: July 12, 2024



Commissioner: Paul Eagle

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 3DFED83B90F24570A825767E212CAC6CF882A544
Certificate effective date: 9/27/2021 4:36:36 PM
Certificate expiry date: 9/27/2026 4:36:36 PM
Certificate Issued by: C=US, E=KCSCEFILING@KINGCOUNTY.GOV,
OU=KCDJA, O=KCDJA, CN="Paul Eagle:
Sryq/CJ16hGMYjY1/CyjcQ=="

Superior Court of Washington, County of King

In re:

Petitioner:

CHRISTINE MOYER

And Respondent:

ROBERT EDWARD MOYER, II

No. 23-3-05392-7 SEA

Restraining Order

Temporary (TMRO)

Clerk's action required: 6, 7

Surrender Weapons Ordered: no

Restraining Order

This order replaces all earlier Restraining Orders with the same Restrained Person, issued under this case number.

1. This Order restrains (*name*):Robert Edward Moyer, II

Restrained Party's distinguishing features:

Restrained Party's Identifiers

Sex	Race	Hair
Male	Caucasian	Brown
Height	Weight	Eyes
6'1"	175 lbs	Hazel

Caution: Access to weapons: No**2. This Order protects: Christine Moyer****and the following children, who are under 18 (if any)**

Child's name	Age	Child's name	Age
1. Robert Edward Moyer, III	15	2. Adrian Rex Moyer	9

3. To the Restrained Person listed in 1:This Order starts immediately, and ends in 12 months or on (*date*): _____

Warning! You must obey this order. Violation of this order with actual notice of its terms is a **criminal offense** under Chapter 7.105 RCW and will subject the violator to arrest (*RCW 7.105.450*). This order is enforceable in all 50 U.S. states, the District of Columbia, and U.S. territories and tribal lands (*18 U.S.C. § 2265*).

4. Findings

Authority: The court has jurisdiction over the parties, the children listed in 2, and the subject matter.

Notice: The Restrained Person had reasonable notice and an opportunity to be heard. They were notified of the hearing by [] personal service [] service by mail allowed by the court [] service by publication allowed by the court.

The Restrained Person [] was [] was not present at the hearing.

[X] The Restrained Person had actual notice of the hearing.

[X] other: The Restrained Person reviewed this Order with assistance of counsel and consented to its entry. Such consent is evidenced by the signature of counsel for the Restrained Person, below.

[x] **Credible Threat:** The Restrained Person represents a credible threat to the physical safety of the Protected Person.

[x] **Intimate Partner:** The Restrained Person and the Protected Person are/were intimate partners because they are (*check all that apply*):

[x] current or former spouses or domestic partners.

[x] parents of a child-in-common (unless a child was conceived through sexual assault).

[] current or former dating relationship (age 13 or older) and
[] never lived together. [] live or have lived together.

[] **Military:** The (*check one*): [] Petitioner [] Respondent lives in the state of Washington, but was not able to go to the hearing because they are an active-duty member of the National Guard or Reserves (or a dependent of one). A failure to act despite the absence of the service member will result in a manifest injustice to the other party.

5. Court Orders to the Restrained Person listed in 1:

Warning! You must obey this order until it ends. If you know about this order but do not obey, you may be arrested and charged with a crime.

[x] **Do not disturb**

Do not disturb the peace of the Protected Person or of any child listed in 2.

[x] **Stay away**

Do not go onto the grounds of or enter the Protected Person's home, workplace, or vehicle.

[] Do not knowingly go or stay within _____ feet of the Protected Person's home, workplace, or school, or the daycare or school of any child listed in 2..

[x] **Do not hurt or threaten**

Warning! If the court checks this box, the court must consider if weapons restrictions are required by state law; federal law may also prohibit the Restrained Person from possessing firearms or ammunition.

Do not:

- Assault, harass, stalk, or molest the Protected Person or any child listed in 2; or

- Use, try to use, or threaten to use physical force against the Protected Person or children that would reasonably be expected to cause bodily injury.

[] **Prohibit weapons and order surrender (separate order required)**

The Restrained Person must:

- Immediately surrender to law enforcement all firearms, dangerous weapons, and concealed pistol licenses in the party's custody, control, or possession;
- Not access, possess, have in their custody or control, purchase, receive, or attempt to purchase or receive firearms, other dangerous weapons, or concealed pistol licenses; and
- Comply with the ***Order to Surrender and Prohibit Weapons*** (form WS 001) filed separately.

Findings – The court (*check all that apply*):

[] **must** issue the orders referred to above because:

[] the court ordered the **do not hurt or threaten** restraints above and the court finds that the restrained person had **actual notice** and an **opportunity to participate**.

AND:

- the Restrained Person represents a **credible threat** to the physical safety of a protected person, OR
- This order explicitly prohibits the use, attempted use, or threatened use of **physical force** against any protected person.

Therefore, the weapons restrictions are required by state law. RCW 9.41.800(2).

[] the court finds by a preponderance of the evidence that the Restrained Person:

[] has used, displayed, or threatened to use a firearm or other dangerous weapon in a felony; or

[] is ineligible to possess a firearm under RCW 9.41.040.

[] **may** issue the orders referred to above because the court finds by a preponderance of the evidence that the Restrained Person presents a serious and imminent threat to public health or safety, or the health or safety of any individual by possessing a firearm or other dangerous weapon.

Other restraining orders:

The Restrained Person may not text, email, or telephone the Protected Person. Communication between the parties is limited to the Our Family Wizard application, and the Restrained Person will communicate with the Protected Person solely for the purpose of co-parenting the parties' children.

6. Washington Crime Information Center (WACIC) and Other Data Entry

Clerk's Action. The court clerk shall forward a copy of this order immediately to the following law enforcement agency (*county or city*): City of Kirkland

(**check only one**): [] Sheriff's Office or [x] Police Department (*List the same agency that entered the temporary order, if any*)

This agency shall enter this order into WACIC and National Crime Info. Center (NCIC).

7. Service

[] **Required.** The Restrained Person must be served with a copy of this order.

Important! The Protected Person has a right to have law enforcement serve this order free of charge if the “Do not disturb,” “Stay away,” “Do not hurt or threaten,” or “Prohibit weapons and order surrender” boxes are checked above.

[] The **law enforcement agency** where the Restrained Person lives or can be served shall serve the Restrained Person with a copy of this order and shall promptly complete and return proof of service to this court.

Law enforcement agency: (*county or city*) _____
 (check only one): [] Sheriff's Office or [] Police Department

[] The **Protected Person** shall make private arrangements for service.
(This is only an option if surrender of weapons is not ordered)

After serving, the server fills out a *Proof of Personal Service* (form FL All Family 101) and gives it to you. File the original *Proof of Personal Service* with the court clerk, and give a copy to the law enforcement agency listed in section 6 above.

Clerk's Action. The court clerk shall forward a copy of this order on or before the next judicial day to the agency and/or person checked above. The court clerk shall also provide a copy to the Protected Person.

[x] **Not required.** The Restrained Person does not have to be served because the Restrained Person or their lawyer signed this order, or was at the hearing when this order was made and the court finds sufficient notice.

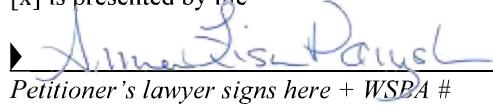
Ordered.

Date	Time	Judge or Commissioner
------	------	-----------------------

Petitioner and Respondent or their lawyers fill out below.

This order (*check any that apply*):

- [x] is an agreement of the parties
 [x] is presented by me


 Petitioner's lawyer signs here + WSPA #

AnnaLisa C. Danysh

1.23.2024

Print Name

Date

This order (*check any that apply*):

- [x] is an agreement of the parties
 [x] may be signed by the court without notice to me


 Respondent's lawyer signs here + WSBA #

21047

Lisa Ann Sharpe

1/24/2024

Print Name

Date

Important! Protected Person: you must fill out a *Law Enforcement and Confidential Information* form, PO 003, and give it to the court clerk.

King County Superior Court
Judicial Electronic Signature Page

Case Number: 23-3-05392-7

Case Title: CHRISTINE MOYER AND ROBERT EDWARD MOYER II

Document Title: AGREED ORDER

Signed By: Paul Eagle

Date: February 06, 2024



Commissioner: Paul Eagle

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 3DFED83B90F24570A825767E212CAC6CF882A544

Certificate effective date: 9/27/2021 4:36:36 PM

Certificate expiry date: 9/27/2026 4:36:36 PM

Certificate Issued by: C=US, E=KCSCEFILING@KINGCOUNTY.GOV,
OU=KCDJA, O=KCDJA, CN="Paul Eagle:
Sryq/CJ16hGMYjY1/CyjcQ=="

From: AnnaLisa C. Danysh
Sent: Friday, February 9, 2024 1:05 PM
To: Vanessa G. Woods <woods@lasher.com>; Lisa Ann Sharpe <sharpe@lasher.com>
Cc: Kirsten A. Serkin <kserkin@insleebest.com>
Subject: RE: Moyer: Agreed Temporary Order - earlier draft entered

Vanessa and Lisa Ann,

Following up on Vanessa and Kirsten's communications, below, I am forwarding an Amended Restraining order. It has been changed slightly since the last version that you signed and which we were supposed to file but erroneously did not. First, it indicates Adrian's correct age: 11, not 9. Second, in the "other restraining orders" section, it is rephrased slightly to more clearly present the content. I do not believe it makes material changes from the last version.

If acceptable, please sign and return and we will get the correct version filed.

Regards,

AnnaLisa

Lisa Summers

From: Kirsten A. Serkin <kserkin@insleebest.com>
Sent: Friday, February 9, 2024 9:31 AM
To: Vanessa G. Woods; AnnaLisa C. Danysh
Cc: Lisa Ann Sharpe
Subject: RE: Moyer: Agreed Temporary Order - earlier draft entered

[EXTERNAL]

Hi Vanessa,
Yes, I accidentally filed the wrong version. We will be in touch soon with an Amended TRO.
Sorry about that!
Thanks,
Kirsten



Kirsten A. Serkin | Paralegal
Skyline Tower, Suite 1500 | 10900 NE 4th Street | Bellevue, WA 98004
P: 425.450.4205 | F: 425.635.7720
[vCard](#) | [website](#) | kserkin@insleebest.com

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From: Vanessa G. Woods <woods@lasher.com>
Sent: Friday, February 9, 2024 9:23 AM
To: AnnaLisa C. Danysh <adanysh@insleebest.com>; Kirsten A. Serkin <kserkin@insleebest.com>
Cc: Lisa Ann Sharpe <sharpe@lasher.com>
Subject: Moyer: Agreed Temporary Order - earlier draft entered

Good morning,

In reviewing the temporary restraining order filed by your office earlier this week it appears that the earlier draft from Jan 24th was entered instead of the most recent version agreed and signed on Feb 5th. Can you please confirm the later updated draft was received and advise why the earlier superseded version was entered? I have attached our email enclosing the latest approved Agreed Temporary Restraining Order as well as the signed order itself for your reference.

Best regards,

From: AnnaLisa C. Danysh <adanysh@insleebest.com>
Sent: Tuesday, February 6, 2024 11:16 AM
To: Vanessa G. Woods <woods@lasher.com>; Kirsten A. Serkin <kserkin@insleebest.com>; Lisa Ann Sharpe <sharpe@lasher.com>
Subject: RE: Letter from AnnaLisa Danysh and TRO - Moyer

[EXTERNAL]

Received. Thank you.



AnnaLisa C. Danysh | Shareholder
Skyline Tower, Suite 1500 | 10900 NE 4th Street | Bellevue, WA 98004
P: 425.450.4234 | F: 425.635.7720
[vCard](#) | [website](#) | adanysh@insleebest.com

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From: Vanessa G. Woods <woods@lasher.com>
Sent: Tuesday, February 6, 2024 11:01 AM
To: Kirsten A. Serkin <kserkin@insleebest.com>; Lisa Ann Sharpe <sharpe@lasher.com>
Cc: AnnaLisa C. Danysh <adanysh@insleebest.com>
Subject: RE: Letter from AnnaLisa Danysh and TRO - Moyer

Good morning,

Please see attached Temporary Restraining Order signed by Lisa Sharpe.

Best regards,

Vanessa G. Woods

Legal Assistant
DIRECT +1 206-654-2488



601 UNION STREET ■ SUITE 2600 ■ SEATTLE WA 98101
FAX 206-340-2563 ■ WWW.LASHER.COM
WE MAKE LAW MAKE SENSE.®

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From: Kirsten A. Serkin <kserkin@insleebest.com>
Sent: Monday, February 5, 2024 4:27 PM
To: Lisa Ann Sharpe <sharpe@lasher.com>
Cc: AnnaLisa C. Danysh <adanysh@insleebest.com>; Vanessa G. Woods <woods@lasher.com>
Subject: Letter from AnnaLisa Danysh and TRO - Moyer

[EXTERNAL]

Hi Lisa,
Attached is a letter from AnnaLisa Danysh and accompanying TRO.

Thank you,
Kirsten



Kirsten A. Serkin | Paralegal

Skyline Tower, Suite 1500 | 10900 NE 4th Street | Bellevue, WA 98004

P: 425.450.4205 | F: 425.635.7720

[vCard](#) | [website](#) | kserkin@insleebest.com

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Message Report



Generated: 02/26/2024 at 07:15 AM by Robert Moyer

Number of messages: 1

Timezone: America/Los_Angeles

Parents: Robert Moyer, Christine Moyer

Child(ren): Adrian Moyer, Max Moyer

Third Party:

OurFamilyWizard
701 N Washington Ave Suite 700
Minneapolis, MN 55401
ourfamilywizard.com
info@ourfamilywizard.com

Message 1 of 1

Sent: 02/26/2024 at 07:12 AM
From: Christine Moyer
To: Robert Moyer (*First Viewed: 02/26/2024 at 07:12 AM*)
Subject: Re: Round II: RO Updates

Agree to RO updates. Thank you

On 02/26/2024 at 07:10 AM, Robert Moyer wrote:

To: Christine Moyer (*First Viewed: 02/26/2024 at 07:11 AM*)
Subject: Round II: RO Updates

Updates for the next RO-

Thanks for the constructive feedback. We will adhere to all the "child or property" related constraints as well as the civility and tone standards that need to be observed. We will do this in a way that addresses your very real concerns about feeling like the mediums below are misused for attacks and threats. Ideally, this is a baby step in a phased approach to normalcy.

Below is what I think we can agree on. I included "urgent updates" to the OFW call approvals and will adhere to the spirit. The purpose is if we have plans that go sideways that result in an inconvenient hardship or an urgent FYI but are not technically an "emergency". School nurse call or missed drop off is what I am thinking. It has to be real. It has to be urgent.

Blessed Updates:

- Use OFW email for urgent updates but allow for OFW-facilitated phone calls if necessary and always for emergencies.
- Allow emails with 3rd parties as proposed, and for "fyi" 1-1 initiated updates and inline responses, as necessary.

Other Updates:

- We sent Anna Lisa a request to remove a "credible threat for physical violence" last week, which I'm sure you saw.

I think this covers the most critical obstacles to a constructive working protocol. I even think it could accommodate a "running list" format if we mutually agree it fits the definition proposed. If you do not, I am open to updating if you like, or just not facilitating that discussion for now. But I think we desperately need it, and just need to be disciplined not to pervert the intent.

I truly hope this is an accurate interpretation of your wishes and accommodates your concerns. If you feel like I am trying to nefariously manipulate you or the situation, I am all ears. That is not my intent. It would be great to have this in place this week and see what it gets us. If you green light, I will send to Lisa this AM. You may need to push Anna Lisa. tbh, she is slow. I am hopeful.

best
robert

Message Report

Generated: 03/19/2024 at 12:53 PM by Robert Moyer

Number of messages: 1

Timezone: America/Los_Angeles

Parents: Robert Moyer, Christine Moyer

Child(ren): Adrian Moyer, Max Moyer

Third Party:

OurFamilyWizard
ourfamilywizard.com
info@ourfamilywizard.com
(866) 755-9991

Message 1 of 1

Sent: 02/06/2024 at 09:49 AM
From: Christine Moyer
To: Robert Moyer (*First Viewed: 02/06/2024 at 09:51 AM*)
Subject: Re: Domestic Abuse

I am confused. Was the RO filed yesterday? What exactly was filed yesterday?

Credible threat- if you disagree please let Lisa know and respond accordingly requesting to remove. I'll connect with AnnaLisa on that box checked.

Communications - can you propose something that you feel is more appropriate. I'm concerned about calls or emails and texts as it is demonstrated they have been ugly, tone is confrontational, scary etc. nothing in recent history demonstrates that will change. I am open to your suggestion.

On 02/06/2024 at 08:57 AM, Robert Moyer wrote:

To: Christine Moyer (*First Viewed: 02/06/2024 at 09:44 AM*)
Subject: Re: Domestic Abuse

Good Morning,

I have your revised RO. Thank you for getting Anna Lisa to send. Two questions on the terms that I hope that you and I can discuss more cost-effectively than the lawyers.

WRT - [x] Credible Threat: The Restrained Person represents a credible threat to the physical safety of the Protected Person.

Yesterday you told the court I had committed domestic violence. Today you are asking me to sign something that says I am a physical threat to you and the kids. My hands have been there to tie shoes, wipe tears, hold ice packs, make love, walk hand in hand, morning hugs, and make love. That is all they are for with you and the boys.

That is what you have seen and I hope you know is true this morning. Do we need to say you believe that I will beat you and my children? I can't imagine in the deepest depths of my despair over our dissolution I would seek you out and physically harm you or our boys. Must you say that you believe this to be untrue and you think I will beat you all?

WRT - The parties may also communicate via email with third parties included to facilitate business concerning their minor children and/or managing the parties' shared assets.

Thanks again for this. Very helpful. But as I have noted on many occasions that OFW is a terrible platform for much of our communications. It is better as a single subject, single reply, 124 characters, non-copy paste, short burst text tool. Most of the time we communicate on emails we have several things we are trying to resolve in somewhat complex multi-point situations.

And more often than not, we actually do not want to conduct our "sausage-making" in front of the diner who will eat it. But your offer

SEALED

**SUPERIOR COURT OF WASHINGTON
COUNTY OF KING**

Christine Moyer,

Petitioner,

and

Robert Edward Moyer II,

Respondent.

NO. 23-3-05392-7 SEA

**PARENTING PLAN EVALUATION
REPORT**

The information in this report was obtained from a variety of sources. Given the extensive amount of information provided by both parents, this report is likely to contain some inaccurate or contradictory information. It represents the undersigned evaluator's best understanding of the circumstances and is presented here to inform the court of the data reported by the parties and others. This investigation was conducted for the current litigation and should not be used for other purposes except for being shared with treatment providers and other agencies involved with the family.

I. NATURE OF THE CASE AND BACKGROUND INFORMATION

This is a dissolution case involving two minor children, Robert "Max" Moyer (16) and Adrian Moyer (12). The court entered a Stipulation and Agreed Order Appointing Parenting Plan Evaluator on 4/3/24. Per the order, the undersigned is to address "all issues related to making a parenting plan for the children; allegations of domestic violence of the respondent, mental health issues of the petitioner, the respondent, and the children; substance abuse of the respondent, whether both parties are willing to share decision making authority and/or whether shared decision making is in the children's best interests; and any other issues discovered that could affect the safety of the children."

The parents met in 1994 and were married on 9/5/98. The parents separated on 9/15/23. On 10/16/23 the mother filed a Petition for Dissolution. A Temporary Restraining Order was entered on 2/6/24 protecting the mother and children and prohibiting the father from contacting her via text, email, or telephone, and limiting communication to Our Family Wizard for purposes of co-parenting the parties' children.

The mother is employed as Senior Manager for Starbucks. She works 8:00 a.m. to 5:00 p.m. Monday through Friday with some additional work calls she takes in the morning or evening. The father is retired from Microsoft. The mother resides in the four-bedroom family home in Kirkland. The father lives in a three-bedroom house in Bellevue.

II. INFORMATION REVIEWED

The following information was reviewed for this report:

1. In-office interviews with the mother on 6/7/24, 6/11/24, and follow up phone interviews on 9/30/24 and 10/11/24.
2. In-office interviews with the father on 6/21/24, 7/9/24, and follow up phone interview on 10/9/24.
3. Telephone calls and emails with the parents and their attorneys.
4. Review of the questionnaires from both parents.
5. Review of the reference forms returned from the mother's references:
 - Lisa Rudolph, see Collateral Contacts section below.
 - Elsa Moyer, see Collateral Contacts section below.
6. Review of the reference forms returned from the father's references:

The father did not include the names and contact information on his parent questionnaire for any references. Instead, he provided the name and phone number of one reference, Katharine Holdsworth, see Collateral Contacts section below.

 7. Home visit and observation of the mother and minor children on 9/5/24.
 8. Home visit and observation of the father and minor children on 8/24/24.
 9. Review of Washington State Patrol WATCH Reports on each parent indicates the mother has no guilty convictions in Washington State. The father has one guilty conviction for Reckless Driving on 8/4/19.
 10. Review of pleadings and orders provided by counsel for King County Superior Court case number: 23-3-05392-7 SEA.
 11. All written materials and documents provided by the mother/mother's counsel, including:
 - Allegro Pediatrics Medical Records for Adrian dated 7/12/12 to 3/28/24, indicate that for the thirty medical visits where a parent was identified as having attended the visit with Adrian, the mother is listed 28 times, the father is listed one time, and both parents are listed together for one visit. There are no indications of acute illnesses or injuries for Adrian in the record.
 - Text messages between Adrian and the father dated January 29th, with Adrian asking "Why did you do what did [sic] in Hawaii, Las Vegas, Hong Kong, Canada and the other times" The father acknowledges drinking, "but not Vegas though is that what you mean?" Adrian states, "I am just wondering why Because you really traumatized me" The father responds, texting "It is a terrible disease" and asks Adrian to talk directly.

- An undated page reportedly from Adrian's diary with content including "Like I already feel dead inside. I'm so fuked [sic]. I would jump off a cliff like my friends and die. They both killed themselves. IDK I don't talk about it. I hate my dad. Fuck you dad. You really fucked me up dad. Like you alcoholic bitch. I wish I was like Jason and Amari, dead."
- Undated picture of Max with a Skyy vodka bottle.
- Text of September 11th (no year provided) between Adrian and the mother requesting the use of a safe word with the mother to indicate when he felt unsafe.
- Our Family Wizard messages between the parents dated 1/11/24, 1/13/24, 1/14/24, 1/15/24, 1/17/24, 1/23/24, 1/31/24, 2/1/24, 2/2/24, 2/14/24, 2/15/24, 2/16/24, 3/18/24, 3/22/24, 4/20/24, 5/9/24, 6/14/24, 7/2/24, 7/11/24, 7/12/24, 7/13/24, 7/14/24, 7/17/24, 7/28/24, 8/3/24 and 9/1/24.
- Text messages from the father to the mother dated 7/22/19 and 7/23/19, in which the father calls the mother a "cunt," tells her she will regret it if she takes a screenshot of the message, tells her to answer her phone, telling her "you will be collateral damage," and telling the mother "you are not legal and you know it." The mother responds telling the father she is taking the children to a hotel because she and the children feel unsafe.
- Email thread between the parents dated 9/6/22, indicating that the mother had blocked the father's communication with her, and the father demanded she unblock him. The mother responds stating she asked the father not to return home due to "anxiety and discomfort it brings. You deliberately lied to me then faked taking pills after I indicated this was the last chance. I am no longer willing to live in a state of anxiety or being terrified of you. You can't force love or shame or guilt me into staying."
- Journal Timeline provided by the mother dated 9/10/23-9/13/23, describes arguments, requests to leave the home, the father appearing at the family home at 11:00 p.m. and turning on the lights and screaming at the mother, Adrian expressing he did not want to be alone with the father, and that the father called the mother deranged.
- Call logs documenting calls from the father to the mother between 10/10/23 and 5/29/24, include 5 missed calls on 10/10/23, 8 missed calls on 10/11/23, 9 missed calls on 4/20/24, 6 missed calls on 5/2/24, 6 missed calls on 5/4/24, 4 missed calls on 5/5/24, 6 missed calls on 5/10/24, 7 missed calls on 5/29/24, and 10 missed calls with no date identified.
- Emails between the parents dated 6/5/23 and 7/6/23.
- Emails between the father and Yurushka Martin from 9/1/23 through 9/26/23.
- Emails between the parents from 9/21/23 to 10/15/23.
- Separation and Co-Parenting Draft from the father, no date listed.
- Emails between the mother and Yurushka Martin dated 8/4/23 through 10/10/23.
- Email to both parents from Yurushka Martin dated 10/12/23.

- Municipal Court of Santa Clara County Amended Citation and Complaint against the father for driving with a suspended license on 8/24/97 and failure to use a seatbelt. The matter was dismissed on 12/20/98.
- Superior Court of California County of Santa Clara Misdemeanor Complaint dated 6/17/05 against the father “who did use and was under the influence of a controlled substance, opiates,” and for “driving under the influence of alcohol.” The complaint references “Prior Conviction (Driving Under the Influence),” and notes “It is further alleged that the defendant committed a separate violation of Vehicle Code section 23152, on or about December 20, 1998, and was convicted of that offense in the California Municipal Court, Stana Clara County (C9916497).”
- Kirkland Municipal Court pleadings dated 7/20/13 for the charge of DUI, reflect the father’s admission that the citation for DUI “was the result of or caused by Alcoholism,” that the father had tested at a .231/.228 BAC level on 7/20/13, and had two prior DUIs in 1998 and 2005 while living in California. A Drug and Alcohol evaluation from Assessment and Treatment Associates notes the father was diagnosed with Alcohol dependence and he was referred to an ASAM Level 1 and 2.1 treatment program. Treatment records of 8/27/13, 10/7/13, and 11/7/13, suggest the father was in compliance with treatment at Assessment and Treatment Associates. The records also indicate an Intoxalock system was installed on a vehicle for the father on 8/30/13.
- King County District Court West Division, Statement of Defendant on Plea of Guilty – Reckless Driving dated 9/19/21, includes the father’s signed statement that on 8/14/19 he “drove a motor vehicle with willful disregard for the safety of property. I was driving on SR-520 and made an erratic movement toward the skip line, and drove onto the shoulder twice, then continued swerving within my lane.”
- King County District Court West Division Order of Judgement and Sentencing for the Crime(s) of Reckless Driving with a violation date of 8/4/19, indicates the father received a suspended sentence for 24 months, was required to comply with substance abuse treatment, and not have any criminal law violations, alcohol-related infractions or drug-related infractions.
- Correspondence from Monique Brown, PsyD, ABPP, to and from the parents dated 12/19/23 through 4/24/24. The email from Monique Brown to the parents of 2/10/24 states that Dr. Brown met with Adrian individually on that date and she concluded “it does not appear that Adrian is influenced by any negative talk from Christine. His feelings appear to be his own feelings and are not influenced by anything but his experience with you, Rob.”
- Subpoena Duces Tecum and For Deposition issued to Monique Brown, Psy.D., dated 4/26/24, and undated Role Specification & Financial/Retainer Agreement and Forensic Informed Consent Contract and billing invoices from Monique Brown, Psy.D., emails,

billing statements, parenting plan templates, and other treatment materials related to participation by the parents in counseling with Monique Brown, PsyD.

- Unsigned and undated Final Parenting Plan with the parents listed in the case caption.
- Correspondence between the father and Kari Betts, LMFT, CMHS, MHP, dated 12/14/23.
- Summary of “Surveillance Activities: Temp Restraining Order Details,” includes an overview of the mother’s discovery of Blink cameras at the family home, images of what appears to be a camera in a garage, and image of wifi connected devices.
- Bank of America Checking Account Activity record for “Moyer Checking – 8654,” reflecting a transaction in the amount of \$303.00 at Higher Leaf in Bellevue on 6/3/24.
- American Express Card Transaction History for the father dated 3/29/24 through 4/28/04, lists a transaction in the amount of \$319.54 on 4/10/24 at Wine.com.
- Soberlink Client Detail Report for the father dated 10/19/23 through 6/9/24, indicates negative tests for the father for all tests taken during this time period except 5/5/24 when a positive test was received. At 10:02 p.m. the father’s test reflected a BAC of .013, a positive retest was received at 10:18 p.m. of .007, and a “compliant test” was received at 10:34 p.m.
- Soberlink Client Detail Report for the father dated 7/1/24 through 7/17/24 indicates negative tests for the father during this time period for all tests taken.
- Timeline summary of events 1997-2022 with attachments.
- Email communication between the parents of 7/5/18 through 9/17/18.
- An unsigned order regarding Soberlink.
- Phone records for the father’s cell phone dated 8/5/23 through 9/6/23.
- Emails dated 4/28/22, 4/29/22, 5/2/22, 5/5/22, and 5/6/22 to/from the mother and Seattle Public Schools and Hamlin Robinson School officials regarding testing and school enrollment for Max.
- Undated list of admissions activities for various prospective schools for Max.
- Emails between the parents dated 8/27/18 regarding treatment for the father’s neck pain.
- Stipulation RE Residential Schedule signed by attorneys for both parents dated 6/13/24, providing for professionally supervised visits for the father and Adrian every other Saturday from 10:00 a.m. to 4:00 p.m.
- Declarations (some unsigned/undated) from Lisa Rudolph, Olivia Slape, Connie Stark, Matthew Slape, and Christina Koczarski.
- Seattle Academy of Arts and Sciences (SAAS) Attendance, Student Credit, and Grade Reports for Max and Adrian for the 2023-2024 school year indicate no attendance issues, and that Adrian received a 3.91 grade point average for his spring trimester. Adrian had transferred from another school to SAAS on 3/13/24. Max’s records indicate no attendance issues and he received a 3.59 cumulative GPA for his ninth-grade year.

- Neuropsychological Evaluation for Max dated 6/30/15 through 7/2/15 conducted by Guy Oram, Ph.D., indicates that Max was diagnosed with Specific Learning Disorder with impairment in reading, ADHD, and dysgraphia. Accommodations were suggested for Max at school to support his academics.
- Neuropsychological Evaluation for Max dated 11/2/22 through 11/16/22 conducted by Philip Dunbar-Mayer, Psy.D., indicates that Max was diagnosed with ADHD, Dyslexia, Dysgraphia, Other Specified Anxiety Disorder, and was identified as a “twice exceptional” student. Recommendations for academic accommodations were included in the report.
- “Moyer Travel Timeline” reflecting communication and correspondence related to travel with the children from 12/28/23 through 7/31/24.
- Flight receipt for the purchase of a plane ticket dated 2/5/24 and 5/21/24.
- Email to/from Jennifer Keilin from Natalie de Maar dated 7/3/24.
- Consent for Minor to Travel from the father dated 6/13/24, 7/3/24 and 7/25/24. Undated and unsigned travel authorization with the father’s name for travel by the mother and children to Mexico in April 2024.
- Travel emails from the mother to her counsel, and from the mother’s counsel to the father’s counsel dated 5/30/24 and 6/3/24.
- Email between Jennifer Keilin and the parents dated 6/19/24.
- Undated texts between the father and Adrian.
- Emails between the parties from 7/22/24 through 7/29/24.
- Canceled check for storage of the father’s vehicle dated 8/22/19 and undated/unsigned declaration of Greg Long regarding storing the father’s vehicle at his business.
- Substance Abuse Timeline submitted by the mother on 9/4/24 detailing a report of the father’s abuse of substances starting in “Spring/Summer 2023” through 7/31/24.
- Texts and communications between the mother and a neighbor, John Rudolph, concerning a trip to Hawaii in 2019, flight confirmation records, and an email to Debbie Bayer, LMFT.
- Emails between the parents of December 2022 regarding the events of Christmas 2022, texts between the parents, and journal entries of the mother dated 12/25/22-12/27/22.
- Text messages between the mother and paternal grandmother dated 8/18/21-8/22/21 regarding a trip to Alabama and Florida in 2021 to visit the paternal family.
- Driftwood contract for services dated 8/25/18 for the father and communication between the mother and Driftwood staff of 7/16/18.
- Text messages between the mother and John Rudolph dated 8/20/24 through 8/29/24 regarding the father’s admission to Driftwood for treatment.
- Written summary of “Substance Timeline” from summer 2023 to present dated 9/4/24, includes the father’s substance abuse evaluation of October 2023 from New Life Recovery Solutions, urinalysis testing for the father dated 11/16/23 and 6/25/24 which

were negative for all non-prescribed substances tested, a hair follicle test of 6/25/24 which was positive for cannabinoids, and a letter from the father's individual counselor, Luis Merced dated 6/27/24.

- Hotel reservations, Lyft receipts, and flight confirmation reports of August 2023 regarding a family trip to Las Vegas.
12. All written materials and documents provided by the father/father's counsel, including:
- Invoices and e-mail Correspondence and attachments related to parenting plan matters to/from Monique Brown, PsyD, ABPP, and the parents dated 12/18/23 through 4/24/24.
 - Draft of undated and unsigned parenting plan with the names of the parents and cause number for this case in the caption.
 - Supervised Visitation Reports of Alan Schneider dated 3/30/24 through 10/12/24, as well as attached pictures from the visits and summary/commentary of the father for each visit except 4/27/24 and 5/11/24.
 - Multiple versions of proposed parenting plans, with alternate drafts of provisions and proposals from 2023 to 2024.
 - New Life Recovery Solutions Substance Use Disorder Assessments dated 8/20/19 and 10/11/23. The father was diagnosed with Severe Alcohol Use Disorder and was referred to level 2.1 intensive outpatient treatment and level 1.0 outpatient treatment on 8/20/19 after the father self-reported his use as "I drink a half a fifth of vodka a day during the week and a whole bottle on the weekends." The assessment of 10/11/23 for the father includes a diagnosis of Alcohol Use Disorder, In Full Sustained Remission, he was participating in the assessment "preemptively for family court reasons." According to the record, the father reported he was sober from 8/20/19 when he entered outpatient treatment until 7/3/21 when he relapsed. He was administered a urinalysis at that time which was positive for cannabis and negative for all other psychoactive drugs. His risk for relapse at the time of the assessment "may be high," and he was recommended to continue mental health services.
 - Soberlink Client Detail Report for the father dated 10/19/23 through 6/10/24 (see record summarized above).
 - Summary letters from New Life Recovery Solutions dated 7/8/21 and 11/20/2020, indicating the father had successfully completed IOP and Relapse Prevention programs at the program.
 - Family photos and videos provided by the father.
 - Texts between the father and Adrian 5/7/23 through 4/28/24.
 - Emails from the father to the mother (with couple's counselor, Yurushka Martin included on some correspondence), dated 9/1/23 through 10/13/23 regarding couples counseling, communication, and related resources.

- OFW messages between the parents dated 12/24/23, 12/25/23, 12/26/23, 12/27/23, 12/28/23, 12/29/23, 12/31/23, 1/1/24, 1/2/24, 1/3/24, 1/5/24, 1/31/24, 2/2/24, 3/1/24, 3/6/24, 3/10/24, 4/16/24, 8/16/24, 8/23/24, 8/25/24, 9/4/24, 9/5/24, 9/6/24, and 9/17/24.
- “DUI Records” for the father from 2013 through 2021 including arrest records, Complaint filings for the 2013 and 2019 DUI cases, assessment and treatment records.
- “Parenting Plans” records, including summaries of different versions of proposed parenting plans exchanged between the parents, correspondence between the father, mother, and Yurushka Martin, and correspondence regarding parenting plans and a restraining order from the father’s counsel.
- “Sobriety Verification” records including urinalysis testing for the father from ARCpoint labs, Millenium Health, and Sharetek, Soberlink testing reports, email correspondence from the father to the mother, letters of 3/21/24 and 7/2/24 from Scott Fanin, DO, letters of treatment status and completion from New Life Recovery Solutions.
- “Supplemental Information,” including emails between the parents and Adrian’s counselor, Kari Betts, regarding Adrian, email from the father to the undersigned of 9/4/24, text between the father and Adrian of 7/29 (no year listed), “Parenting Plan History” memorandum, email from the father to Jennifer Keilin dated 8/28/24, email from the father to Monique Brown and the mother dated 12/16/23 and 12/28/23, email from the father to the mother of 12/30/23 and email exchanges between the parents of 1/1/24, and texts between the parents of 12/31/23.
- “Therapist Engagement” materials, including a letter from Luis Merced, MS, LMHC regarding the father’s therapy with Mr. Merced.
- Text messages and emails between the parents on 8/15/24.
- Emails between Assistant General Counsel for Children’s Hospital and the father’s counsel of 9/12/24.
- An 18-page document from the father titled “Digitally Driven Resist/Refuse A Comprehensive Analysis” dated 9/10/24.
- Text messages with a date listed of 9/12/24 between Max and the father regarding Max’s request for his father not to attend curriculum night at his school in 2024.
- Undated statement from Elsa Moyer transmitted via email on 10/11/24.
- Phone call record of a telephone call between Elsa and the father with a date listed of 9/17/24.

13. Review of the following:

- Driftwood Recovery Records dated 8/29/18 through 9/27/18, indicate the father was admitted to inpatient treatment at Driftwood on 8/29/18 and was treated for pain predating treatment for a two-year period for which he had received opiates and muscle relaxers previous to his treatment admission. The father’s chief complaint was “Came for pain treatment and alcohol.” The records indicate the father “has been abusing alcohol,”

that he “uses alcohol and drinks to control pain,” and was diagnosed with “substance disorder alcohol.” The father admitted a prior treatment program for substance use in approximately 2013 described “the drinking style is vacation drinking and then winding down afterward,” and that he would drink excessively approximately once per month, consuming 3/4ths of a pint of liquor per occasion. The records state that the father’s binge drinking episodes last for about two weeks and occur four times per year, despite using Antabuse to curb drinking. The father disclosed “periods of hypomania lasting 3-5 days every few weeks with decreased need for sleep, high energy, euphoria, racing thoughts, invincibility, increased goal directed activity, and reports ‘this never happens when I am drinking.’” The father was noted to exhibit “a pattern of moderate or severe substance use and/or addictive disorder as evidenced by significant impairment in social familial, scholastic or occupational functioning,” there was “evidence for, or a clear and reasonable inference of, serious, imminent physical harm to self or others directly attributable and related to current abuse of substances such as medical and physical instability which would prohibit safe treatment in a less-intensive setting.” On 9/1/18, the father’s diagnoses were alcohol use disorder, moderate, Bipolar II disorder, and generalized anxiety disorder. The father was successfully discharged from treatment on 9/27/18 with follow-up care to include intensive outpatient treatment for substance abuse and individual therapy.

- **Psychological Test Results Report for the father from Gary Wieder, Ph.D., dated 7/10/24 (attached).**
- **Psychological Test Results Report for the mother from Dr. Gary Weider, Ph.D., dated 7/10/24 attached).**
- **Moyer Family Status Report/Treatment Summary dated 9/26/24, issued by Jennifer Keilin, MSW, LICSW,** lists dates of treatment with each of the family members between 5/30/24 and 8/21/24, and notes that Ms. Keilin’s work was focused on the resist/refuse dynamics. She recommended a minimum of 2 contacts of 2-4 hours per week between Adrian and the father and a period of 60-90 days of stability within the family system “prior to starting the intervention.” She recommends a parent coordinator and regular increases in the father’s contact with Adrian based on the father’s behavior and Adrian’s adjustment.
- **Overlake Emergency Department Medical Records for the father dated 12/18/17 and 5/8/18,** indicate the father was admitted to the emergency room on 5/8/18 with a complaint of neck pain and was accompanied by the mother. He reported being in significant pain, and within fifteen minutes of admission he became agitated, stating “I don’t want to be here, I don’t have to be here.” The records note “[Patient] yelling at wife, cursing at staff. Wife trying to keep patient here in ED ‘can’t you just give him an epidural?’ Security was called after the parents had been taken to an examination room and “loud voices heard from room, including exclamations that ‘you are a bitch!’” The father was noted to “continue to verbally threaten staff. Wife again confirm [sic] that

[patient] is not a danger to her and has not made (suicidal ideation) statements." The records indicated that medical staff noted "patient had given knife to wife to put in purse, in lobby [patient's] wife was asked about knife, she willingly gave knife to this writer for safe keeping." The father was admitted to the emergency department on 12/18/17 due to neck pain. The father was noted as cooperative at this time, and indicated use of cannabis for pain control, stating "it is the kind that does not get you high." He was discharged with a recommendation for follow-up with his PCP.

14. Collateral contacts listed below.

III. INTERVIEW WITH CHRISTINE MOYER (this section is self-reported)

The mother was born in Hong Kong and moved to the U.S. in 1998. Her parents remain in Hong Kong along with one older brother, while her younger brother lives in London. She reports having contact with her parents and brothers via phone and online platforms. She reports one other child from a prior relationship with Leonardo Macatangay, Elsa Moyer, who is 31 years old and lives in Seattle who she sees regularly.

The mother reports the parents met while she was attending the University of Hong Kong in 1994. The father was employed there at the time for approximately six months and the parents began dating immediately. She notes the father was transferred back to the U.S. and returned periodically, and during one of his visits, the first incident of physical violence occurred. She describes that while in the father's hotel room, the parents began arguing about a passport issue and the father "chased me into the stairway of the hotel" as she attempted to leave. The father "had his hands on my shoulders. He was holding me and I remember looking at my hand and it was bleeding. I don't know how my hand started to bleed. I was trying to get away." She indicates the parents separated at least once prior to their wedding.

The earliest memory the mother has of problematic alcohol use by the father was in 1997 in California when the father was arrested after a car accident and was suspected of driving under the influence. The mother was in the vehicle at the time, but "I don't know what he had to do from that charge." When asked to describe the father's alcohol consumption at that time, she states she would purchase bottles of vodka for the father, and "he would just drink from the bottle, he would take a swig" and put the bottle back. As a result, the mother did not know the amount of alcohol the father used at this time. She also describes he used cannabis, smoking flower out of a bong as well as concentrates. She acknowledges using cannabis with him. In December 1998 the father was cited for DUI in Santa Clara County, but she does not recall the circumstances or the outcome of any charges associated with the incident.

The mother said around the time they were married, the couple worked with the father's employer to facilitate the mother's immigration process and "the lawyers were working on the

paperwork. For whatever reason he wouldn't sign the legal documents to start the application for the green card." As a result, she was unable to obtain a driver's license and couldn't work for the first six months after arriving in California. The parents made the decision for her to remain home with Elsa, although she enrolled in community college "so I wasn't fully dependent or reliant on him. I came to this conclusion because I saw the drinking and the volatility. I couldn't be in the position to be dependent on him."

The mother observes that after moving to the U.S. the father was involved in Elsa's care and "would show up for big events and would go to parent-teacher conferences." She indicates his use of substances was excessive on the weekends, but that he was able to function at work until approximately 2003. Additionally, she notes, "I remember him telling me that he was doctor shopping for prescriptions while we were [in California]. He had lots of medications," although she acknowledges he suffered from back pain and had surgery. She states he mixed his prescription medication with alcohol. She denies confronting the father about his substance use during this time because, "the operating environment was to try to keep the calm and keep the peace. You do everything so he wouldn't become upset." She describes the father as angry at times, and that she left the home briefly with Elsa on occasion to avoid the father's hostile conduct. She notes police were contacted on one occasion in California by the neighbors when the father became escalated, but denies he was arrested at that time.

The family relocated to Washington in 2003 and the mother pursued a master's degree and was hired in an administrative position with an accounting and tax business. She reports the father expressed some dissatisfaction with her decision to work as, "he saw me going back to work as my plan B. He would say 'if [the mother] gave up the insurance policy of having a job,' he would focus and give himself to sobriety. He was saying, you have this plan B because you aren't fully committed. If I had stopped working he would stop drinking." During the years following their move from California, and after having moved into their current home in 2007, arguments between the two would escalate and she would leave the home to avoid the father. On one such occasion, she states she had gone to the garage after which he locked the door to the garage and the front door to the home preventing her from reentry. As a result she walked to their prior house which was vacant at the time and slept on the floor.

She became pregnant with Max in 2007 and notes it was a healthy pregnancy with no complications at the time of delivery. She remained home with the child for five months but denies the father took any parental leave. Max was enrolled at Bright Horizons for child care which she researched and toured, and while she was primarily responsible for well-child checkups she notes father attended some of the medical appointments. Max continued at Bright Horizons until he started kindergarten and she was responsible for delivering him and picking him up as well as communicating with his teachers there. Because of Max's strong will, "I didn't leave it to [the father] to manage his behavior." She states "it was more about not

exposing Max to [the father].” The mother did not recall the father using physical punishment with Max, but notes that “Max has said that [the father] beat him when he was younger. I don’t have this recollection.” She denies any significant arguments about Max’s care but attributes this to her serving in the role of primary parent for the child. Usually, “if [the father] was drunk I wouldn’t leave [Max]. But there were times that [the father] wasn’t and I would leave [the father] with Max.” The first incident she recalls she was concerned about the father’s care of Max occurred in approximately May 2009 when the father and his brother “got really drunk.” She asserts he had taken Max to the park while under the influence and she solicited the assistance of her friends and neighbors John and Lisa Rudolph to retrieve the child “and get Max back home safely.” Mr. and Ms. Rudolph were aware of the father’s drinking. The father was subsequently cited for an alcohol-related driving incident on 5/14/05 while in Santa Clara County after having hit a deer. She notes the father had to return to California for several weekends to complete community service as a result of that citation.

As Elsa got older, the mother notes she began to rebel and experience conflict with the father. Elsa began to leave the home in the evenings without her parents’ consent and the father removed her bedroom door and on one occasion “he took her phone and put a knife through her phone.” She also states the father took Elsa’s computer on one occasion and “went through everything.” While she does not recall any physical confrontations between Elsa and father, Ms. Rudolph “told me that she remembers picking up Elsa and taking her to a friend because [Elsa] was afraid.”

When she became pregnant with Adrian in 2011, she reports having mixed feelings as it was around this time she had discovered multiple affairs by the father. The father took several months of paternity leave and would change diapers and participate in the child’s care. She noted a continued pattern of the father using alcohol and becoming escalated, including an occasion shortly after Adrian was born when the family had flown to Mexico and a passenger adjusted their seat pushing the chair back into one of the children resulting in the father yelling at the passenger and making a scene on the flight. She notes having concerns also during this trip when she injured her hand and was seen at the hospital for surgery and she had to rely on him to supervise the children during the procedure. She states “I remember him getting so wasted while I was in the hospital waiting for surgery,” and she experienced anxiety about his condition and care for the children. She notes the couple began seeing a marital counselor in 2011 or 2012 to address the affairs and the father’s drinking, yet problems continued on both accounts. When the mother discovered the father’s affairs around this time she confronted the father resulting in a physical altercation. She reports that while in the family home she observed emails confirming the affair on his computer and there was a struggle over the laptop during which she sustained bruises to her arms and shoulders. She subsequently deleted the pictures she took of the injuries and “I wouldn’t call the police because he would say he would get me deported if the police were called.” The mother cites that when arguments became escalated she often retreated to the

parent's walk-in closet and would sit in the corner. The father would "lock the door and wouldn't leave me alone." During these episodes the mother states "I would be down on the ground. He would come over to me and grab me around my shoulders. He would hold me there for maybe 10 seconds. When I would try to move he would hold me there."

In 2013 the father was cited for DUI in Washington state. Following this charge the father received a substance abuse evaluation from Lakeside Milam and was diagnosed with moderate to severe substance abuse disorder. The father enrolled in services and sober support meetings, but the father had signatures forged on his AA attendance records. The father received a five-year deferred prosecution for the DUI and had to abstain from alcohol but, "was clearly not abstaining." A breathalyzer was installed in his vehicle and he attended inpatient treatment around this time. During another family vacation to visit the paternal grandfather and stepmother the father became so inebriated that he was unable to get out of the car to enter a restaurant to eat and there were difficulties navigating the airport in order to board the plane.

During Max's first few years of elementary school he struggled academically and was subsequently diagnosed with dyslexia and dysgraphia. Max was transferred to Lakeview Elementary School and an IEP was established to assist him with specialized support. Max was then enrolled at Hamlin Robinson, a private school for children who experience dyslexia and other learning disorders. She describes the father was not involved in coordinating enrollment or transfers of school for Max but did attend an IEP meeting and some parent-teacher conferences. She states on these occasions, "He would come in and would present as if he was actively engaged at the time. But, he wasn't. He would just present well."

On several occasions in 2016 the father's behavior was out of control, including when the family visited Seabrook, WA and the father drank to excess throughout the visit. In September of 2016 during the mother's 40th birthday on San Juan Island, she said "His behavior started to change" while the couple drove to the ferry and she was worried because "I was headed toward an island with no way off." While in the courtyard of the resort where they stayed, "another guest starts to set him off. He starts a verbal altercation with the guest. They were screaming obscenities. He pulled out a knife. He got a knife, maybe from the table. I remember that I had to try to corral him." She was able to get the father back to their room and "I was looking for bottles. On the boat later that weekend, I could see him not able to function." She states, "We were trying to leave the island. We checked out of the hotel and we go to a restaurant. In the restaurant, I saw that he was kind of woozy. I wasn't sure how I would get him from the restaurant to the plane. I got the cab driver to get us back the hotel where we stayed. The next day, I was supposed to be at work, but we had to stay over because he was too drunk. He was drunk in the morning." She reports, "he starts to climb the fence at the airport. I didn't know what I was going to do. It was taking care of him and problem-solving to address his consumption."

In 2017, Elsa was married in Mexico and “during that trip he was so wasted he had passed out after the wedding.” She states during this trip the father had “gone missing” and wasn’t able to be located for hours until he was found in the hotel lobby. During a trip to Hong Kong to visit the maternal family, the mother states the father became so inebriated that he fell and broke his collar bone. During a trip to Alderbrook Resort the father drank to excess and entered Bill Gates property next door and knocked on the door of his residence. While on another trip to Hong Kong in July of 2018 the father disappeared twice for hours after drinking, requiring the mother’s family to look for him. The mother states that in the morning following these episodes when the father had sobered up, “he recognized that he had been out of control drunk.” The father began working with a therapist around this time and subsequently entered inpatient treatment in 2018 at Driftwood Recovery in Texas. The father completed 30 days of treatment and attended outpatient treatment in Seattle thereafter and received medication management to stop him from drinking, although he swapped the pills for others to continue his alcohol consumption.

By 2019 she observed the father’s behavior to return to his previous patterns and she noted continued excessive drinking during trips to Mexico and Hawaii. The family traveled to Maui in April of 2019 and “He was drunk. He was belligerent, angry and that was when I made the decision to leave him at the condo in Maui.” She states she took the children and went back to Seattle while the father remained in Maui. During communication over the course of that week, she learned the father “had got a knife and he made marks on his arms.” She consulted with the provider the father had been seeing locally, Debbie Bayer, to “stabilize him enough to get him back.” She made arrangements with friends in Kirkland to remove the father’s car before he returned so that he couldn’t drink and drive. She arranged for a hotel for the father where he stayed for several days and during consult with Ms. Bayer, the substance abuse and marriage counselor, Ms. Bayer “said that in her experience, she had never seen anybody swap the (Antabuse) pills as he did.”

In August of 2019 the father was cited again for DUI after swerving on 520. His DUI attorney struck a plea deal that prevented the father from serving a year of confinement. She does not recall all of the terms of the plea agreement, but his license was suspended. Nevertheless, on a trip to Florida and Alabama to visit the maternal grandmother, “He was drunk this whole time and angry.” She took the children back to Seattle and left the father in Florida where he lost his wallet and there were complications arranging for his return to Seattle. Upon his return, “He would agree to the safeguards, he agreed to the pills, he would make commitments to get sober.” However, while traveling with Adrian for a vacation in Cabo San Lucas in 2022, Adrian called the mother back in Washington to report “dad is missing. I don’t know where dad is. I think he has been drinking. I finally got a hold of [the father] and he said he was just sitting outside. Adrian recalled to his therapist later that [the father] had gotten angry

and hit the television.” Max and the mother later joined Adrian and the father in Cabo and during this visit Max and the father were wrestling in the pool and Max kicked the father, breaking some ribs. She notes Max sustained some bruising as a result of the incident.

During the pandemic, the family elected to purchase a condo on Alki, and they used the residence on weekends to get away. The father modified the two-bedroom condo to create a home office for himself and he also began growing psilocibins in an area of the residence. She reports the father had worked with a therapist who provided instruction on growing psychedelic mushrooms. The mother admits to microdosing with the father with the psychedelics on one occasion.

By Christmas of 2022 the arguing and conflict between the parents had intensified, and the father began calling, texting, and emailing the mother excessively, including at work. The father’s emails to her work account were often vulgar and she feared her employer would discover the communications. The father would berate her before and after international calls she had with Starbucks executives and managers which made it difficult to concentrate during meetings and interfered with her ability to accomplish work tasks. The father also made claims that she was in the United States illegally, despite that she had obtained U.S. citizenship in October of 2022. The father then began accusing her of obtaining her citizenship illegally and threatened that she would be deported. The harassing conduct continued when in May of 2023 she visited an exclusive spa and resort with friends where personal cell phones were prohibited and he called the receptionist at the resort to locate the mother. When the mother refused to communicate further with him he threatened to call police to the resort for a welfare check. The mother asked for separation in July of 2023.

The mother contends, the father was “very angry I wanted a divorce” during a family trip to Las Vegas in August of 2023, and began arguing with her while the family was walking on the strip. Upon their return to the hotel room, the father began throwing items off of the bed, “was slamming the door and started shouting.” The mother took the children and returned to Seattle at that time and the father called her phone repeatedly to locate her. The mother believes the father was continuing to drink at that time. As with other instances, the mother describes that when she would take the children home during vacations due to the father’s behavior, “He said the kids would be taken away from me. He said what I was doing was illegal. The threats of deportation (of the mother) is what that would mean.”

The father had been laid off in 2023 by Microsoft and he moved out of the family home in September of 2023. Nevertheless, the father returned to the family home in September and October of 2023 and had become agitated and disruptive during these visits. In September the father had agreed to go to Bend, Oregon to “give us some space,” and he had asked the mother if he could stop by the house to shower and gather some personal belongings before his trip to

Oregon. The mother states the father asked to take a nap for 30 minutes and when she woke him up, "he started to shout at me." She states, "He screamed 'you are a cruel human being. I am so ashamed I had a child with you. You are so much worse than my mom.'" The father then grabbed the mother's phone from her hand and "runs out of the house with my phone and starts screaming 'you are the domestic violence perpetrator.'" She went into the garage to get in the car to leave and before she could close the driver's side door the father stood in the way so she couldn't leave. She exited the vehicle to walk away from the residence and while walking toward a main road saw her neighbor, Ms. Rudolph, while the father followed her on foot. The father attempted to intervene when Ms. Rudolph picked her up, taking the mother back to Ms. Rudolph's home where the father arrived shortly thereafter. Ms. Rudolph intercepted the father at her front door and instructed him to leave. In October of 2023 the mother reports that he "came in late at night and he flipped on the lights while I was asleep." The father yelled at her about his Tesla key, stating that he didn't have the key card. The couple began seeing a discernment counselor in 2023 and she recalls relaying another incident of violence by the father to the counselor, Ms. Martin, when the father had approached her while she was in the bathroom of their home and he had a knife in his hand, striking the wall of the bathroom with the knife. The mother does not recall the exact date of this episode or the argument precipitating the event. The mother reports other property damage committed by the father in the home, including punching a kitchen cabinet and damaging the stainless steel refrigerator in the kitchen. One of the doors to the master bedroom had to be repaired also because he had hit it. The mother reports numerous times she would take the father's keys to prevent him from driving drunk and on one such occasion when the father had pulled out of the garage, she attempted to block the car from leaving. When he had maneuvered around her she "got on top of the hood," and the father drove with her on the vehicle to the end of the cul-de-sac where she got off of the vehicle. The mother denies that her access to financial resources was restricted by the father until after she filed for divorce, when he changed the password to a Fidelity account the couple had. Concerning other coercive conduct, the mother reports that the father has taken compromising pictures of her, and has sent her "a couple of emails where he said, 'hey, I've got these pictures of you. Your face and your tattoo.'" The father claimed to have deleted them but has since sent her text messages with some of the pictures and "will insert them in a text string. It wasn't in a loving way."

By January of 2024 it was discovered that the father had installed security cameras without the mother's knowledge at the family home and he was monitoring activities at her residence. She states that she learned of the cameras after the father dropped Adrian off and "Adrian comes up and he says, 'mom did you just get home?' Adrian says he watched me get out of the car on [the father's] phone." The father later admitted to installing the cameras. She elected to pursue a restraining order against the father in February of 2024. Following entry of the restraining order she met the father at Starbucks near her home to exchange mail that had been sent to the residence, and when an argument escalated about their timeshare, "I just said,

‘this isn’t helpful, gave him the package and I went to my car to leave.’ The father stopped her from closing her door, attempted to continue the argument, but she was eventually able to close the door to her car. She states, “I backed out and started to drive,” and “I heard this bang where he hit my car because I had stopped.” The father followed her through the Starbucks parking lot to a grocery store parking lot and “banged on the back of my car.” When she sent the father a message on Our Family Wizard, the father complained that he only hit her vehicle because she hit him with her car. The mother denies hitting the father with her car.

Since separating Adrian has had supervised visits with the father with Alan Schneider. A psychologist they consulted with suggested reunification with the father and Max before initiating visits and Max had resisted visits with the father until mid-June when he went on a visit with the father around Father’s Day. The mother contends the parties have attempted to resolve the dissolution case by agreeing on a parenting plan, but “He was always pushing for 50/50. I didn’t think that was appropriate. I was concerned about the substance abuse.” The mother notes that Adrian has expressed some suicidal ideation, although this has decreased recently.

During a follow-up phone call with the mother on 9/30/24, she discussed both children having recently been seen by medical professionals, with Adrian sustaining a concussion at school, and Max being treated for an irregular heartbeat. When Max was at Children’s for this condition, the mother contends that Max pleaded with the father directly not to come to the hospital and “he was getting anxious.” She reports that Max was treated for the condition and interacted with medical professionals separate from the mother so she is unsure what was said to providers by Max at that time. The mother notes she went out to the lobby to speak to the father at which time he placed his hand on her lap or her elbow and “I just said stop, I don’t want you to touch me.” She left the lobby and both parents went outside where a hospital visitor asked if she was okay. After going back inside the father attempted to discuss their prior sex life and she discontinued all communication with him at that time. She indicates the father has accused the mother of harming Max by taking him off his ADHD medication, but that this was a decision made by Max during the summer and he has historically used the medication to help him concentrate at school. The mother states that medical professionals have indicated that discontinuing the medication did not result in his irregular heartbeat, despite that “[the father] has tried to use this as an example of neglectful parenting by me.” Since consulting with a cardiologist following Max’s treatment at Children’s in August, medical authorization has been given to restart Max on his ADHD medication which he is now taking.

She states that despite the father’s involvement in activities and vacations in the year prior to her filing the current case, the children continue to have resistance to the father because “they were exposed to quite a bit. They were exposed to a lot of the abusive behavior.” She reports that Adrian still discusses seeing the video camera footage on the father’s phone. She notes that the decision to have supervised residential time for the father was at the suggestion of

his own attorney. She contends the father's history of substance abuse still isn't accurately reflected in the father's reports to various providers, including that his 2023 substance evaluation did not address his use of psilocybin. She notes the father has continued to send her inflammatory correspondence, including sending her information about the Hague Convention accusing her of kidnapping the children, and an article about a man that shot his ex-girlfriend which he claimed was a joke. She indicates that despite allowing the father to care for the children on several occasions in 2023, she elected not to do so during her trip to Milan, Italy in December 2023 because he had "stormed into the house" in October and became verbally abusive toward her at that time. With regard to the father's claims that she knew there were cameras located around the home, she indicates she never knew there was a camera located in the garage. She also indicates that if the outdoor cameras had received a signal and began working when the father removed belongings from the home as he asserts, he would have been alerted of this on Monday when the move occurred, and it was not until Wednesday when the father dropped Adrian off that Adrian saw the images on the father's phone so he knew they were operating for at least two days before Adrian alerted the mother to the cameras. The mother denies telling the children in July 2023 that she intended to divorce the father. Adrian has reported to Kari Betts that he felt unsafe with the father through their sessions in 2024. In July of 2024 Adrian and the father had an appointment with Kari Betts but he failed to appear at the appointment as scheduled. She denies having uninvited the father to this counseling session. She asserts greater safeguards should be in place to address potential relapse and the father's angry and abusive conduct as well as provisions for travel and decision making.

IV. INTERVIEW WITH ROBERT MOYER (this section is self-reported)

The father reports having retired from Microsoft in 2023 after 23 years of employment there. He indicates occasional volunteer work that occupies his time and that he plans to return to work but is unsure when. He was born in Tuscaloosa, Alabama to parents who separated when he was six years of age due to addiction issues, and reports that police responded to his childhood home when he was a youth, and that there were socioeconomic challenges for his family. He has one younger brother who he speaks to in Bend Oregon as well as stepsiblings in Indiana and Kentucky with whom he has annual contact. His father has passed, but his mother remains in Florida and he speaks with her several times per week. He witnessed domestic violence in his family home with his biological parents as well as his mother and stepfather, and he was disciplined as a child by physical means including belts, and was sent to a military academy. He began residing in Washington in 2003 after having lived overseas and in California.

He reports having met the mother in 1995 in Hong Kong when he was working for a data corporation while she was a student, a model, and a mother. He acknowledges drinking to excess during this period in the relationship and comments "My alcoholism is very real." He

denies any physical confrontation with the mother while he was staying at Bishop Lee Hotel in Hong Kong, stating "There were no arguments, not to say it couldn't happen. I don't remember a disagreement in a hallway of the Bishop Lee," and "I don't recall attempting to follow her as she left the hotel." After returning to the U.S., he describes having been separated by distance from the mother and Elsa for about a year. He acknowledges having been arrested for DUI in August of 1997 in Santa Clara County when with the mother. He blew a .002 and the matter "never went to court." The mother arrived to California to reside permanently one week before the wedding. The father contends there was limited drug use, "maybe some hash now and then, that was it." He describes drinking to excess primarily on the weekends and during holidays and vacations.

With respect to their life after they were married in September of 1998 in Los Gatos, California, the father notes that the mother's immigration process was handled by attorneys from his employer and he assumed she had a green card shortly after arriving because she worked at a bakery near their home. He denies impeding the mother's immigration process and recalls visiting the consulate with her. He notes the mother took classes, worked for his employer for a period of time, and cared for Elsa.

The father reports experiencing significant back pain during this period and was prescribed hydrocodone as, "There were points where I couldn't get out of bed." He was also cited for DUI in 1998, and was required to attend sober support groups as well as a victim's impact panel. He reports this is the first DUI that resulted in any charges, and that he was under the influence of opiate pain medication when he was contacted by police. He describes "it was an amazing time. One of the things that was bad was that [the mother] and Elsa were seeing what it was like to be around an alcoholic. [The mother] explained to Elsa that (the alcohol) was daddy's medicine." The father describes "I got into a terrible cycle," and he would take shots out of a bottle of vodka "straight from the bottle." He notes, "I would drink fast. I would do shots and put the bottle back." He reports hiding the alcohol containers "all over the place, everywhere."

The family relocated to Washington in 2003 when he received a work transfer to Kirkland for Microsoft. At that time the mother began working in an accounting office. He states, "for me, my memory is that is when the high-performing alcoholic had to step in. It would be (drinking) on weekends and then tapered off to vacations. I spent a lot of years being a weekend drunk. Once I was out of work (for a weekend or vacation) I would drink in an excessive way." He notes he used cannabis with the mother during this time approximately once per week at most. While traveling for work in 2005, the father indicates having been cited again for DUI after hitting a deer on the road. He reports having returned to his hotel room after the incident drinking mixed drinks and returning to the location where he previously struck the deer, at which time a tractor-trailer collided with his car. He indicates having participated in substance

abuse treatment following his arrest.

When the mother became pregnant with Max in 2007 both parents were happy, and they began looking for a new residence which they found in Kirkland. After Max was born, the mother pumped, allowing him to bottle feed Max at night. The parents both toured several childcare programs for Max but the mother was primarily responsible for his delivery to and pick up from daycare. As for other responsibilities, the father notes “we had pretty clear lines of delineation. I did all the cooking, the meal prep, so that has always been my job. She always did laundry.” He notes, both parents attended to Max when he was fussy or required diaper changes.

He indicates there was some increased tension in the marriage around this time resulting in “ridiculous arguments.” He states their disagreements were verbal only, and included “lots of yelling, slamming doors, we were terrible fighters, awful.” He notes, “I think in general, you realize you left a path of destruction on them. My alcoholism had a disproportional impact. I know it had to be a negative impact.” The father does not recall any instances in which the mother attempted to leave an argument by entering the garage and was subsequently locked out of the home, staying the night at their old residence. He does acknowledge damaging a kitchen cabinet once and causing damage to the refrigerator in the kitchen. He states, “I think it is safe to assume that [the mother] was present” during these episodes. He denies making any threats to harm other household members and denies threatening the mother’s immigration status at any time. He notes once the mother obtained her license, she always had access to her own vehicle and full access to the family resources, aside from his employer-based account with Microsoft. He acknowledges “a fight in the new house” in December 2007, and states the mother tried “to get me to stop (leaving) by standing in front of the car. I don’t remember how that was resolved and it got unnecessarily escalated.”

Compounding those issues was Elsa’s behavior. He states “She had a cell phone that she was doing stuff on that I ended up banging in half with a hammer” when Elsa continued to take the phone back from the parents after she had been placed on restriction. He noted later that he may have destroyed the phone with a cleaver instead, but couldn’t recall for certain. He contends that Elsa, “will say I was a strict disciplinarian.” He describes “There was a point where I realized that my discipline was inappropriate. That is when I stopped disciplining Elsa altogether.” The mother’s discipline often revolved around Elsa’s grades, and the mother regularly checked the online grade report database for Elsa’s school, which would cause the mother to become enraged and to berate Elsa for her missing assignments, which weren’t accurately accounted for in the online database. The mother would yell at Elsa, often with Max in her arms, and he notes, “At the time I did talk to [the mother] about the exposure to the yelling. But since I am an alcoholic, I am not in a position to judge anyone else.”

The mother became pregnant with Adrian in 2012 and while she was off of work for an

extended period, he was only able to take two weeks of family leave. After the mother's leave, Adrian was enrolled at Bright Horizons where Max had been attending and he states "I remember taking on more responsibility at this point. We couldn't just tag team one (child). I remember taking more time with [Adrian]," and that his involvement in the children's care increased when the mother damaged her hand on a zipline in Mexico and required surgery. The father notes that while he drank excessively during that trip to Mexico, he does not recall any conflict with another passenger during that trip as alleged by the mother when the other passenger hit Adrian with their seatback. He states that when on vacation, "I would do a couple of shots through the day, and at nighttime, it would be a third of a bottle," and "I would drink in a hotel room or it would be hidden" from others. The father was cited again for DUI while in Kirkland after driving through a yellow light. He doesn't recall what his BAC was at the time, but attended intensive outpatient treatment and probation for at least two years. In treatment, he was diagnosed with alcohol abuse disorder – moderate. From treatment, he learned "I wasn't the only one who had these problems." He notes he was self-medicating to avoid discomfort in other areas of his life and to detach from stressors. He notes he was able to refrain from alcohol for extended periods when he was completing urinalysis testing and was on probation, but would return to drinking.

When the family was not on vacation, both parents worked sixty or more hours per week, eventually resulting in the mother's decision to adjust her schedule so that she worked part-time and had three-day weekends. The parents were both involved in the search for an elementary school for Max, touring several schools before deciding to enroll Max. Max attended the Little School and the parents were told he was of limited intellect and he had a speech impediment that caused delays. The parents held him back a year but eventually enrolled him in Lakeview Elementary School for kindergarten and his academics improved. By third grade Max had an IEP, was diagnosed with dyslexia and dysgraphia and "he was borderline ADHD." For a period of time, the parents elected not to give Max medication for ADHD. He reports both parents attended parent-teacher conferences and "we equally showed up."

While the father was able to refrain from alcohol for a period of time, he began drinking again and was hiding his alcohol consumption from the family, including his father when they visited him in Tennessee in 2016. He denies having been so intoxicated that he couldn't help the children when they were playing in a body of water with snakes in it. He also denies being unable to get out of the car to go to a restaurant with the family as the mother alleges. However, he notes, "I had drunk my father's liquor while I was there."

At the time of the mother's 40th birthday, the father states "there were two incidents." The father describes "alcoholic behavior" on his part during the trip, noting the first incident involved another guest that was "making fun of us. I remember that being an issue. I remember us yelling at each other. There was nothing else. I never picked up anything like an implement.

I do recall a restaurant later. She told me I picked up a knife at the restaurant and I recall needing to get an uber driver. I needed help getting to the car.” He denies threatening anyone with the knife. He notes the family also missed their flight back home from Friday Harbor. While in Mexico for Elsa’s party in 2017, the father denies drinking excessively but admits that “Based on my history, the passing out was completely plausible.” He also reports that during this trip, “I have no recollection of getting drunk and wandering off.” His alcohol consumption continued to cause issues in the relationship and the mother began to communicate with family friends, John and Lisa Rudolph, to assist her when the father became inebriated. The father continued to have issues with back pain and in one instance he went to the urgent care department at Overlake Hospital and “got really upset.” He states “I was crazed because of my pain and I was drinking again. I know that I created a scene. I remember being inappropriate, belligerent, like a drunk gets. I remember [the mother] saying I had a knife, like a kitchen knife.” He reports he left the hospital without arrest. He indicates that at this time, while receiving pain medication from a provider at Bellevue Family Medicine, he completed a urinalysis test and was positive for methamphetamine, which he believes was mixed with cocaine he and the mother had used while on a trip in Mexico. As a result, restrictions were imposed on his access to pain medication for his back injury. With regard to trips to Hong Kong in 2017 and 2018, he denies being so intoxicated that he injured himself. In 2017 he “fell over the kids’ luggage in our hotel room in the dark and I hurt my arm.” In 2018 he asserts the family visited Hong Kong and would visit shops and go on other outings without the other members of the family, but “I never missed phone calls or was not present at any event. I never went missing.” However, he admits to drinking alcohol in Hong Kong during those trips. He states, “I think my alcoholism had a disproportionate effect on my ability to be on time or to act with best intentions. There is no question that I was a terrible timekeeper and it had a negative effect on my family and myself.”

By 2018, the father was enrolled in inpatient treatment in Driftwood, Texas when “I was just not in a good place. I couldn’t function at my job very well.” However, he claims that he attended the inpatient treatment “on the pain track and not on the alcohol track.” He reports “I equally could’ve gone down (to treatment) just for being an alcoholic.” After thirty days of inpatient, the father established a sponsor and remained sober until 2019. The parents began seeing a marriage counselor, Dr. Day, as well as a therapist experienced with the impact of addiction. He received medication management, taking Antabuse pills, but he began swapping the Antabuse pills to make it appear that he was continuing to take the medication. He described the mother would ask to see the pills as he took them, but “I would hide bottles, I was dishonest, wouldn’t be forthcoming about alcohol,” and that he “didn’t take [Antabuse] so I could drink.” The mother discovered his use while the family was in Maui in early April 2019 and took the children back to Seattle while he remained in the timeshare for the duration of the scheduled vacation. He denies communicating to the mother during this time that he wanted to hurt himself, and notes “I don’t remember cutting myself with the knife.” However, he states “I could have

sent images (of the knife/injuries) to her.” On return to Washington state, the father notes his car was secured in a location where he could not access it because, “I guess they thought that would be a safe way to make sure that I was not able to do anything that would harm myself. I think it was best intentions.”

The father was then arrested again in August 2019 for DUI. He does not recall his blood alcohol content but remembers participating in sober support groups. He asserts he had been involved in New Life Recovery at that time. In 2020 after the pandemic began, the family had a condominium on Alki where they would stay on weekends. He acknowledges growing psilocybin and using mushrooms at that time, including with the mother but notes that they took them in small doses 3 to 4 times total. The father admits to a relapse in July 2021 when he drank a beer and a hard cider. The family traveled again for vacation to Alabama and Florida in 2021 where he drank again and the mother returned home prior to the end of the vacation. At that time, while in Florida he lost his identification and was unable to return home for several days. The father worked with a new therapist to address PTSD, Luis Merced, but does not recall informing Mr. Merced of his relapses. The father notes that his last drink was on 8/16/21. The last time he used any other non-prescribed mood altering substances was during the summer of 2023 when he microdosed psilocybin.

The father notes the family traveled to Mexico in 2022 for vacation, during which he was responsible for Adrian for a period of time before the mother and Max arrived. He admits Adrian contacted the mother during this period as he couldn’t locate the father and believed the father had left him at the hotel. However, the father asserts he was present and supervised Adrian. He acknowledges a time while in the pool with Max during this trip when “Max and I were wrestling and he got really physical. I was very surprised he kicked me in the ribs.” The father was playing keep away with the children and denies that Max would’ve felt threatened prompting him to strike the father and injure him. He denies Max had any bruises at that time. The parent’s relationship continued to deteriorate in 2022 during the winter break when “we got in a fight on Christmas morning that was pretty brutal.” He states both parents “would say mean things verbally and I was doing that at the time with her,” and “that’s when I realized that regardless of sobriety, I had to work on anger management.”

The father notes, “2023 was a reckoning for me,” and that “[the parents] had made up. We had been doing regular praise, regular date nights, support of the kids.” At this time, because he had retired from Microsoft, “[the father] became the primary caregiver. I took care of the kids a lot more after I stopped working.” He notes that circumstances in their marriage improved dramatically, until the mother left for a retreat in Arizona in 2023 and began “screaming at me,” as she left for the airport. While the mother was at the retreat, he denies threatening to call for a welfare check on the mother by police at the resort as she has alleged. He notes there were restrictions on cell phones but the parents spoke at night when the mother was in her room.

The mother traveled to Hong Kong in June and July 2023, and while there called the father to report her intent to separate from him. Nevertheless, in August 2023 the family went on an outdoor adventure in Nevada and Utah, and upon return to the hotel in Las Vegas at the end of the trip, the parents began arguing about activities she had scheduled for the father and children which were of no interest to Max. He states “it was an instant explosion. The kids were in the other room.” He states “I don’t recall pushing anything off the bed” or “slamming the door.” The couple began discernment counseling around this time, the counselor expressed concerns about domestic violence in the marriage. The father believes the counselor overstepped her boundaries in coordinating conversations with the mother separate from him. He also indicates the mother had begun an affair with another man and that he had seen a picture of this individual on the mother’s laptop, but denies searching through the mother’s computer. He began staying more frequently at the residence on Alki as agreed upon in counseling, but returned to the family home, including in September 2023 shortly before he was scheduled to fly to Bend, Oregon. At that time he asked the mother to take a nap at the family home which he did, but “she woke me up and started yelling at me for sleeping on the couch and staying in the house.” At that time the parents began arguing and while standing in the hall telling father he needed to leave, the mother threatened to call police. He states “I don’t remember taking her phone from her,” but he does recall her going to the front yard and “screaming back into the house” where he was located. He states that she began walking down the driveway away from the residence when Lisa Rudolph “pulled up right in front of us” and the mother got into Miss Rudolph’s vehicle and left. The father does not recall an incident at the family home in October 2023 as alleged by the mother. He does admit the mother went to Milan, Italy in December of 2023 and that there had been confusion about childcare while she was away. He notes “I remember her telling me that someone (from work) was looking at her (while the parents were on the phone arguing),” and that this was causing [the mother] distress. He states “it was just confusing and I was feeling out of the loop about when I was supposed to take care of the kids.”

The father claims that when the mother filed for divorce in October 2023, “it was a new legal tact. I think that because my sobriety was increasingly not in question, that sobriety issue was losing its teeth because I’m establishing a history of being a sober person.” He notes claims of abusive behavior are intended to ensure that “I should not have contact with the kids.” With respect to the mother’s claims that he was intentionally monitoring the family residence at this time, he describes that the Xfinity cameras had been installed seven years prior and hadn’t worked in approximately four years so they installed two Blink cameras in 2020 but those were inoperable as well. When he swapped out two new cameras to replace the two Blink cameras he acknowledges not having told the mother at the time, but asserts “it didn’t work. This was the same thing we had the whole time.” He contends none of the cameras were functional so he felt it unnecessary to make mention of it. In January 2024 during moving of belongings from the family residence many of the doors in the residence were open for hours allowing the cameras to

pick up a signal and connect. At that time he received an alert on his phone which Adrian saw when he dropped the child off to the mother. He states “at that point, she was convinced I was spying. I tried to explain to her what was going on and she wouldn’t let me.” He notes the mother threatened to file a protection order thereafter, but instead, a restraining order was entered.

The father notes that after the filing of the dissolution petition, he saw Max for two hours on Thanksgiving in 2023 and for Christmas Day. He indicates having seen Adrian “a couple of times in September,” to play basketball, and upon picking him up in October 2023 “[the mother came out in the driveway one day as we were leaving and she said, ‘stop you aren’t going anywhere with him.’ She said I wasn’t allowed to see Adrian unless she drove.” He believes this was part of the mother’s strategy to limit his contact with the children. Nevertheless, he would visit Adrian and “[the mother] would drive us to the park.” The father signed up to coach Adrian’s basketball team and in November and December spent three days per week coaching practices and games. In December 2023 the mother withdrew plans to share time with the children over Christmas and instead “was going to a theme park vacation tour for winter.” Adrian visited the father in December approximately three times but never spent the night. He saw Adrian 2 to 3 times in January during basketball season. The parents exchanged ideas for a parenting plan while working with Debbie Bayer and Dr. Brown, with Dr. Brown devising a graduated residential schedule to include four or five months of sober Link testing and therapy, as well as a new intake for substance abuse treatment. While they began to implement a plan in January 2024, this was “when [the mother] brought up the DV stuff. [The mother] said I wasn’t allowed to see the kids anymore.” Dr. Brown established a “new plan,” and “we talked about gradually reintegrating Adrian. She said it was important for me to see Adrian.” Nonetheless, the mother refused to permit the father to see the children in February 2024. In March or April 2024 Adrian spent an overnight at the father’s residence, and the children began seeing a counselor named Kari Betts. The first supervised visit also occurred in March 2024 and Max joined a visit on Father’s Day 2024. He contends that the mother has intentionally shared the terms of proposed parenting plans with the children, causing Max to confront the father, saying “you are trying to take us to court and separate us. Mom said we have a vote and we are not on board with getting split up.” The father thinks he has made good progress with Adrian in therapy addressing Adrian’s response to experiencing the father’s substance abuse. The father notes reunification therapy has started with Jennifer Kielin, but that his time has been limited with Adrian to six hours every other week. He is concerned about the mother’s plans for summer vacation with the children in Hong Kong for three weeks between July and August and the impact on the reunification process.

The father believes that in order to reconnect with Max they will need “time and opportunity.” He believes the mother’s influence will have a detrimental effect on reestablishing his relationship with the children, and notes that the mother has removed all pictures and

memories of him around the family home. He states “they have all been taken away. Any notion of me has been stripped out of the house.” He reports concerns that Adrian has largely blamed himself for the parent’s separation and that “he is in the middle.” He notes sometimes his conversations with Adrian are difficult and he has “asked to establish some ground rules for conversations that won’t be intrusive.” He indicates concerns of gatekeeping by the mother and continued hostile conduct by her including after a recent reunification therapy appointment when walking to the car “she starts screaming and pointing her finger at me. Max had to come out and take her into the car.” He states “I can’t imagine Christine bad-mouthing me. But I think they just see her actions toward me.” He requests increasing visits and therapeutic interventions to help reestablish his connection with the children.

During a follow up call with the father on 10/9/24, he noted that he has never been contacted by CPS regarding child maltreatment. He is unaware of any prior DCYF referrals or investigations. He acknowledges having thrown a commuter mug during a family vacation in Whistler as alleged by the mother, and reports that the children were either in the doorway or present in the other room. When asked to describe the psychological testing results that he can hear sounds so well it bothers him, he notes that he has a medical disorder “where loud noises like people chewing or clipping their nails causes some irrational response in my brain.” He notes that the medical events of summer 2024 with Max being admitted to the emergency department have been distressing as he wants to provide input to medical providers as “I have always been the one in charge of Max’s heart condition, ADHD, and I have sat in on all the meetings with doctors.” He notes it is important that he is involved to the extent that Max will permit his involvement. With respect to the OFW message that included a screenshot of a title of an article involving a woman being killed by her former partner due to a custody dispute, the father states that it was sent as an inside joke, as the article was sent to him through “targeting” which he commented on in his OFW message. He notes that in addition to the subsequent OFW messages he sent explaining it was a joke, the mother also called him and he apologized for sending the material. With regard to a picture of Max from October 2023 with a Sky Vodka bottle, the father acknowledges the bottle was found while he was cleaning the house and it was an old bottle that had been stashed and subsequently discovered during the cleaning. He indicates when he found the bottle at the house he placed the bottle in the glove box of his car to conceal it, which was found by Max when he “kicked the glove box” and discovered it. He states, “It doesn’t in any way reflect that I was drinking it. I was hiding it. That was my behavior as an alcoholic.” Despite reports from his addiction medicine doctor that his last use was reported as December 2022, he asserts he hasn’t had a drink since August 2021. He could not explain this discrepancy. When asked about communications regarding the mother’s travel overseas and his requests for extensive information about the children’s trip with the mother, he acknowledges that “I think that some of (the requests) is overkill.” He reports that he hasn’t had the opportunity to travel with the children as the mother has, has had a lack of contact with the children, and he admits, “It was an overstatement of the detail that I needed.”

Concerning testing for use of substances, the father acknowledges that he did not use Soberlink while on vacation in Bali in July 2024 because “the straw broke,” and he communicated that he could not test due to this issue at the time. He notes the mother “said she had a problem with it later,” and that he tested the day before he left and the day he returned. Moreover, the Vivitrol shot would nullify any effects of alcohol consumption and he denies any use while on vacation. With regard to financial transactions attributed to him in January of 2024 and April 2024 at a cannabis store and Wine.com, he states he purchased cannabis for a friend in January and noted, “I have no idea what I purchased.” He reports having purchased “four bottles of a particular champagne (a friend) likes” as a gift, but that he consumed no alcohol. With respect to a Soberlink test of 5/5/24, he indicates that he tested positive at that time after having eaten a protein bar which had “sugar alcohol,” and that “If I eat that and don’t wait long enough, it’s going to pop positive.” Regarding a hair follicle test that was positive for cannabis in June 2024, he notes that his urinalysis of the same day tested negative for cannabis, but because hair follicle tests “can go back over a year, that was probably the sleep gummies I was taking,” which may have a small amount of THC in them that caused the positive test.

The father acknowledges having contacted the mother at her work email address in September 2024 despite that this is a violation of the restraining order. He notes that the mother was changing his settings on his email account and “she was in my emails. It felt like an emergency situation to me. So, I contacted her at her work email address.” Regarding his recent participation in a domestic violence assessment, he notes he made contact with A&TA because “I need to learn more about it.” He states the parents “had a bad screaming sort of relationship,” and that “our arguments were two-sided.” He reports he continues to receive treatment for depression and ADHD, receiving medication management from his doctor. He reports having been in counseling with his individual therapist for many years to address childhood trauma. He notes that Ms. Keilin’s September 2024 report of reunification efforts was confusing to him as “it says we are months away from reunification therapy,” despite that they have been in reunification therapy since May of 2024. He noted that Adrian has said in therapy that he doesn’t feel it is necessary for the father to use the Soberlink device when he sees him and hasn’t requested for the father to use Soberlink for approximately eight to ten months.

V. CHILDREN

This GAL conducted a home visit to the father’s residence on 8/24/24. The house is located in a residential area of Bellevue near Lake Washington. The home includes three bedrooms, is well kept and organized and the father had breakfast for Adrian who was sitting with the visitation supervisor, Alan Schneider at the kitchen table. Max was not present for the visit. The father offered the GAL a tour of the home and encouraged Adrian to show the undersigned around the home, which Adrian agreed to do. There are two floors with a kitchen,

two living rooms, the father's bedroom and en suite bathroom as well as a guest bathroom on the top floor. The bottom floor includes a laundry room, another living room, and Adrian's bedroom where there was a bed, a desk and a television. There are multiple decks and patio areas outside with a basketball hoop and a covered ping pong table.

As the visit began, the father engaged Adrian in a game of ping pong on the patio outside, a game they reported playing regularly at the father's. Adrian assisted with preparations for the game by wiping down the table and gathering paddles and a ping pong ball while the father lit outdoor patio heaters as it was a relatively cold day outside. Adrian expressed interest in what the father was doing, noting "I never see you use those heaters," and the father described to him the steps for turning on the heaters. The father noted that they are "cutthroat" ping pong players and Adrian and humorously chided Adrian to pick the right paddle saying, "I don't want you to have an excuse for losing." Adrian shot back a smile at the father and laughed at him, at which time they began to play. After Adrian scored his first point and served the father reminded him to call out the score before each service and when Adrian hit a shot and missed the table the father gave him pointers about striking the ball with the great surface area of the paddle. The father occasionally spoke to the supervisor, Mr. Schneider, and discussed a trip to Taiwan, to which Adrian inquired, "You have been to Taiwan?" The father confirmed he had. As the game progressed and the father was winning, he said to Adrian, "If you aren't feeling it we don't have to play," but Adrian said it was okay and he wanted to continue. The father suggested they go back to taking practice shots which Adrian agreed with and the conversation returned to international travel, with the father noting that he wanted Adrian to travel to Japan some day, which was appealing to Adrian and to which he added that his school has an international program for travel that includes trips for students to Japan. Adrian then took the lead during conversation while they played the game and reported he also wanted to go on a school sponsored trip to Alaska. The father asked Adrian about this trip, his prior trip on a sailboat cruise he had taken with his school, and another school trip to Camp Orkila. Adrian told the father a story of his assignment on "anchor watch" during sailing and the responsibilities of the role. He noted he was required to share the boat with other students and take turns laying in the whisker nets of the boat. The father interjected and offered empathy to Adrian that taking turns can be difficult when enjoying an activity. Adrian became more animated and seemingly comfortable taking up more space in the conversation, sharing his experiences on boats and joining in when the father recounted prior boat trips the family had taken together. Adrian smiled at times remembering times he had jumped from the bridge of the boats they were on and that the father jumped multiple times with his brother.

As their ping pong game was ending Adrian continued to bring up other trips they had been on, joking about Max's inability to stay with others during hikes while camping, and having seen a bear during one of the trips. Adrian then shared some of the details of his recent trip with the mother to Hong Kong, and noted his disappointment that his older brother and cousins were

often on their phones and disinterested in planned activities during their trip. Adrian lamented their lack of social etiquette, and the father then shared his memory of one of their family trips to Whistler, B.C. Adrian noted his disdain for mountain biking during the trip, and the father commended him on biking anyway in light of the interest others had in the activity and noted Adrian had been a good sport to go along with the others. It was evident from the dialogue that the father and Adrian had numerous bonding experiences while on vacations they'd taken and could share cherished memories of those times. After ping pong the father asked if Adrian wanted to play Uno, which Adrian agreed to do and Mr. Schneider agreed to play as well. While playing, the two discussed Adrian's birthday, some of his friends that had attended previous birthdays, and the father was able to list three friends of Adrian's, one of whom Adrian noted he no longer spends time with. During Uno, Adrian seemed to relax more, chiding the father each time he forced the father to draw more cards, and taunting the father that he was going to beat him. The father said to Adrian jokingly "you stink" when Adrian would foil the father's strategy, and during the time they weren't playfully chiding one another Adrian asked questions about his family and a family reunion, asking the father how many cousins he had, and what countries they live in. As Adrian was winning, the father jokingly insinuated he was cheating, which prompted a wry smile from Adrian and resulted in the father picking up a pillow and hitting Adrian's leg with it while Adrian laughed and rolled on the couch. Adrian then began to engage the father to conspire against Mr. Schneider and they shared with one another what cards they believed Mr. Schneider had. When their strategy failed and Mr. Schneider won the game the father and Adrian laughed with one another about their efforts. As the visit concluded, the father and Adrian discussed the upcoming basketball season that was starting with AAU and Adrian talked about his hope to join other teams as well, asking the father if he was considered a point guard, which the father confirmed. The bond they have is apparent from their interaction and Adrian gave his father a hug before departing. From the observation, it was apparent that the father and Adrian have shared interests in sports, games, and have fond memories of experiences during family vacations and trips which they reflected on extensively during the visit.

On 9/5/24 this evaluator conducted a home visit to the mother's residence, a four-bedroom residence located in Kirkland. The house is set back in a cul-de-sac and there is a fenced in yard with a deck and hot tub. At the time of the visit the mother, Max, and Adrian were home with the family dog and a cat. Upon greeting the undersigned at the door, introductions of each child, and Harry, a well-behaved Aussie-Labradoodle mix, the mother asked what particular activities the undersigned had in mind for the visit, and a tour of the home was suggested. Max volunteered to provide a tour, taking the undersigned upstairs to his room while the mother and Adrian remained in the kitchen downstairs. Max has a bed, desk and multiple screens, aside from gaming hardware, Funko Pop collectible dolls were organized throughout the room and Max commented that many were as yet unopened but that he intended to open them when the mother moves from the residence, which he inferred would be an eventuality. When asked if he knew why the undersigned was conducting the visit, he noted it

was to have someone “check in,” to ensure the cleanliness of the home and that the mother provided proper care for he and his brother. He readily agreed to answer the questions of the undersigned after having been told he could pass on any question. As his closet was adorned with Kansas Softball posters the undersigned asked about his older half-sister and he noted he has contact with her weekly and they go shopping together. He expressed having a close bond to her and as they have matured, his relationship with his brother, Adrian has been less conflicted which was comforting to him. While showing the undersigned his dolls, he described his relationship with his mother as close and that he respects her work ethic, organization, and cleanliness. He described her as dedicated to his care and to ensuring his needs are met. He expressed an appreciation for her sacrifices to support him. When asked what he would change about his mother, he described that he would want her to listen to him more, and when asked to give an example he noted he tells her to relax and to not work as hard as she does, which he associates with the care required for he and his brother. He could not think of other things he would change about her. When asked what the rules are at the mother’s house, he emphasized cleaning up messes and caring for personal belongings, and he noted that when a rule is broken the mother gives a verbal reprimand and may remove phone privileges. He did not report that this occurs often.

When asked about his interests he reported he is a part of the drama production crew at school and that theater is a passion of his as is riding his bike, drawing, and playing video games. When asked to describe his first week of 10th grade and academic interests he noted math is his strongest subject, that health science is his least favorite class, and he enjoys arts of which he is taking animation currently and will take fiber arts next semester. Max has a group of peers at school he identifies with as well as staff. He noted he has not determined what professional pursuits interest him after completing school, but planned to attend college.

Max was asked if he was surprised when his parents separated and he denied such, stating that he had told his mother multiple times to separate from “Robert.” He commented that the father took issue when he referenced him by his first name and that he has experienced a litany of interactions with his father he similarly found hurtful, offering an example that his father could be hypercritical, and had ridiculed him for not knowing what a foyer was on one occasion. Max described his father as self-centered, and he believes that while the father has expressed an intention to change past behavior, he is unlikely to do so. Max was unequivocal in his position that he does not wish to spend time with his father, and when asked about his visit with him on Father’s Day he noted he chose to go after witnessing a phone call during which he overheard the father “throwing a fit” and imploring the mother to compel Max to go. He indicated he experienced the father’s behavior to be superficial during the visit. He conveyed that his feelings toward his father have been influenced by a number of episodes where the father was explosive in his reactions to others, yelled at the mother, and threw objects, and reported needing to avoid the father at times when he consumed alcohol. He recalled that he also experienced the father as “in his own

world," noting that he came home late from work often and would listen to music or watch television at 10 or 11 when Max was trying to sleep. Max was asked when he had spoken to his father last and he indicated it was the prior Sunday and when he does have contact with the father it is due to the father canceling streaming subscriptions or changing log-in information. He also texts the father to ask him not to contact the mother which he does when the mother is working from home and in meetings. Max was asked about a picture when he held a Vodka bottle and the circumstances at the time the image was taken. He noted he found the bottle in the glove box of the father's car in 2023 after they had been driving together. When asked about efforts to improve his relationship with his father, Max indicated he had been to reunification counseling twice and he didn't know if sessions would continue. He remarked he hadn't been attentive during counseling due to being tired and doesn't believe it is productive. When asked about what his brother has shared of the father, he noted Adrian doesn't like going to see him and described that his brother has been fearful of the father in the past. He believes the most helpful development would be if the divorce was finalized and the mother "can be done dealing with [the father]."

Adrian then volunteered to show this evaluator his room and he noted the undersigned was visiting to "figure out the parenting situation." Adrian is in 7th grade, and he transferred to SAAS last year due to issues with teachers at his prior school. He noted his best subject is math and his least favorite is science. He enjoys improv class because he can make up games to play with his friends of which he reports he has many at Seattle Academy. When he isn't at school he enjoys basketball, cross country running, flag football, and watching movies. He described his mother as "nice, caring, beautiful, generous, awesome, very outgoing, and laid back." His favorite memory of the mother is when she bought him boba tea and candy before he went to Camp Coleman. When asked to describe his father he noted he is extroverted, wild, and outgoing, but he noted "two years ago I couldn't tell you anything (about the father) because he was either working or sleeping on the couch." Adrian noted it was the father's recent retirement that prompted the change. When asked what his favorite memory of the father is, he reported two live sports events, including Slam Ball in Las Vegas and a Seahawks game when the family had attended the game together. Adrian recounted that while he enjoyed the game, he recalls the father leaving for an hour to get food, but he later learned the father had gone to purchase beer, and on the drive home the father argued with the mother and "was going super fast in the car." When asked what he would change about the mother, he noted that she was not perfect but he couldn't think of anything at the time. When asked what he would change about his father he said "drinking addiction," and that the father's substance abuse has resulted in the father shouting at him and his brother, and it has "ruined trips when he argued with my mom a lot." Adrian recalled a time the father drank alcohol after the family had arrived in Hawaii for a vacation, the father's drinking disrupted extensive plans the family had, and that the mother and children left the accommodations and stayed separately from him. Adrian notes the father's drinking has impacted "people outside our family," including his grandparents on both sides. He recounted times when the father has thrown objects while vacationing in Canada, slammed a television screen in Mexico, and that he experienced his father driving him and his

brother home while intoxicated.

When asked to describe what if anything he would change about his schedule with the parents, he noted “I like my schedule,” but also stated “I don’t want to see my dad anymore.” Adrian stated “you can’t fix trauma with money.” He noted he does feel safe when Alan, the visitation supervisor is present, but doesn’t know if he would want to see the father without a supervisor. He described feeling safe with the mother, but has felt unsafe with the father in the past.

Both children continued the tour after Adrian’s interview, and the tour ended in the living room where the mother was working on her laptop. The children and mother exchanged ideas about various topics including Adrian’s cross-country team, neighbors, and Max’s recent AFIB diagnosis and emergency treatment. The mother explained Max will see a cardiologist the following week to determine further measures to address his condition. The mother discussed the potential for relocating from the home in the near future, and Max and Adrian threw a football in the backyard as the visit concluded.

VI. COLLATERAL CONTACTS

Luis Merced, MS, LMHC, the father’s therapist, indicates that he has been providing therapy to the father since December 2020 when he was referred to Mr. Merced through Debbie Bayer, the counselor the parents had been seeing. At that time Mr. Merced was seeing the father once per week, but increased sessions when the father retired from Microsoft. The father had been cited for DUI shortly before Mr. Merced began therapy with the father, he was “overwhelmed, agitated, it was affecting his sleep and encapsulating most of his life.” The father exhibited poor emotional insight, and difficulty with emotional regulation, and “he was compartmentalizing in a maladaptive way.” As a result, he worked with the father on “connecting with his own emotions.” With respect to his marriage, during the first two years of therapy, the father described his relationship with the mother in positive terms but “he was concerned about how much [Max and Adrian] were participating in activities and not having time to do kid things. They had lots of extracurricular activities that were placed on their schedule and he didn’t feel like he could have a conversation with [the mother] about that.” Although he described his relationship to the mother as “perfect and idyllic,” the father additionally reported issues in his marriage prompting the marital therapy with Ms. Bayer, and the father did report “they had a solid foundation, but because of his active addiction and verbal abuse they were experiencing marital problems.” The father has reflected on guilt he’s experienced during the time he was abusing alcohol, and “being drunk and inebriated during family vacations in the past.” He notes, “He has also identified the issue of ensuring that he is not repeating those experiences by giving his kids everything he can, and his daughter as well,” and “to not repeat the cycles of his own stepdad and father.” The father acknowledged when the

parents were together, “When he was inebriated and would yell and have arguments, he does deny that it happened often, but it happened.” When asked about other acts of abusive or coercive behavior, Mr. Merced states the father never discussed monitoring the mother’s whereabouts, property damage, or other physical or sexual abuse. Mr. Merced indicates that the last relapse he is aware of for the father was in 2019. The father is not on any psychotropic medications according to Mr. Merced.

Mr. Merced also provided EMDR treatment specific to trauma the father had experienced in his family of origin, and that “the trauma was more pronounced because of his work stress.” He notes the father “was very functional despite his trauma but he was still traumatized.” Following the mother’s request for divorce, the therapeutic focus “shifted predominantly to his grief,” and this has remained the case to date. Through the years of therapy he has provided to the father, he diagnosed him with PTSD due to his family of origin issues. There have been no other diagnoses. Since the parents separated, the father has presented concerns related to parental alienation and “not seeing the children and stress around that.” When asked for examples of parental alienation provided by the father, he reports that “anytime [the mother] goes away [the father] isn’t able to be with his children. [The mother] blocks and threatens him with police contact if he were to come to the home or interact in any way,” and that efforts to have joint therapy between the father and Max were canceled. The father has indicated that prior to the separation his relationship with the children was positive, but that “Now he identifies his relationship with Max as distant. Max yells at him, doesn’t want to interact with what happened, and he hasn’t interacted with supervised visits.” The father describes his relationship with Adrian as “distant because of not being able to interact with him. His supervised visits he says are still fun, they do have positive interactions.” Instead of EMDR he has used DBT as the therapeutic approach to address the grief from the demise of his marriage, they have continued to work on relapse prevention skills and have been focused on helping the father establish relationships and supports separate from those the father had while still married to the mother. Mr. Merced states that through EMDR the father has “done a lot of clearing of past traumas,” and the father has been consistently engaged in DBT and “utilizing some of the resources.” Mr. Merced referred the father to Northwest Family Life for a domestic violence assessment, “because of the case presented against him and not due to any present DV concerns within their sessions together.” Once the divorce is finalized and grief and loss therapy concludes with the father, Mr. Merced indicates he will resume EMDR to work through remaining childhood trauma and anticipates approximately one year of EMDR before the father is discharged from treatment.

Leah Koenig, MA, LMHC, parent coach for the father, indicates she began seeing the father for parent coaching in December 2023 after he was referred to Ms. Koenig by his attorney. She notes he paid for 12 appointments at that time, and she provided consultation to the father to address the terms of a temporary parenting plan which the parents were processing

with another provider, Dr. Brown. She states, “[the father] presented the boys' academic and summer schedules, provided personal and family background that led to the separation, and shared details about the boys' personalities. He also outlined a few proposed communication goals for the parents. [The father] sought [Ms. Koenig's] feedback on the types of schedules that tend to work best for teens in similar situations, based on the information he had provided regarding his family and his own personal background.” She notes he wanted Ms. Koenig's opinion about the perspective of the children living between their two homes and to discuss the “best-case scenarios to try to make the schedule he had in mind work.” She describes the conversations she had with the father at that time about best practices for the parenting plan and the children's experience were different in May 2024 when he resumed sessions with Ms. Koenig again. In May 2024 she states “[the father] wanted more help connecting, especially with Adrian because there were a lot of stories the boys held. There was a resist-refuse dynamic.” Ms. Koenig notes that from the information relayed by the father, “[the mother] had shared some of the legal issues and the parenting plan (with the children) and Max was upset. Max called [the father] and begged him not to force them into a parenting plan.” However, with Adrian, “[the father] didn't see a lot of resistance from him. Adrian seemed to come pretty easily (to visits).” The father relayed to Ms. Koenig that during some visits Adrian took time to warm up initially and she helped with providing the father ideas to start residential time with low-intensity activities such as movies and museums before moving to more involved activities. While the father's last visit with Max was in June 2024, and the father reported the visit “went really well,” Max hasn't agreed to more visits, but “[Max] will still voluntarily call [the father],” and that this occurs when Max needs assistance with technology related problems that Max has, such as “a technology glitch on a game.” The father enjoys these opportunities because they allow the father and Max to work together to solve a problem. The goals for her work with the father include helping him with perspective-taking, and feelings of powerlessness in the legal process. She has worked with the father to help him appreciate the position the children are in and to remain empathetic with them. She observes that the father “seems very stable,” and that they address the father's past use of alcohol and the resulting impacts on his relationship with the children. She states despite the father being sober for three years, Adrian would bring up the father's alcohol use and question whether the father was using alcohol during interactions they had. Adrian had established a safe word with the father and when he said the word the father would test using Soberlink and show Adrian the results so Adrian understood the father was not using alcohol. She notes that one of the issues the father has raised more recently in parent coaching is his confusion that the year prior to the parent's separation “they had this beautiful year together where he took care of the boys. Their relationship seemed stronger in his opinion, but he understands now that there were so many cracks that they hadn't worked on in the relationship,” and that those issues still influence the dynamics between the father, Adrian, and Max. With respect to anger or abusive conduct, Ms. Koenig notes that the father “is getting to a place of talking about anger. In his mind, he hasn't expressed a lot of anger to Adrian or Max, but he recognizes that they have seen the anger

directed towards others and know that he is capable of it." She has not conducted a domestic violence screening, but the father has acknowledged that "when [the parents] fought they were loud." Aside from this, the father has not disclosed any domestic violence history with the mother. The father updates Ms. Koenig on his testing and his Vivitrol treatments. Ms. Koenig has not met the children or the mother. She notes the father is very willing to participate in services that will improve his relationship with the children. She states, "[The father] seems so supported in my mind in terms of sobriety, seeing a parenting coach, seeing a treatment provider. I don't see risk with him."

Chris Trimis, MA, LMHC, School Counselor for Adrian, Seattle Academy of Arts and Sciences (SAAS), indicates that Adrian transferred in March of 2023 to SAAS. At the time he transferred, Mr. Trimis observed that Adrian presented as anxious, quiet, and withdrawn, and Mr. Trimis promoted connections for Adrian with peers at the school. Mr. Trimis "saw a massive evolution and shift" since. He states, "This year he is very outgoing and well-liked by many peers. He is sharing a lot more of himself." On reflection, Mr. Trimis states, "I got a sense there was more going on under the surface," and he was curious about different factors that could have been impacting Adrian's presentation. Since the start of the 2024-2025 school year, Adrian has scheduled one-on-one check-ins with Mr. Trimis. Through meetings with Adrian this year, "it has become clear that things he has experienced at home have been difficult for him. He has shared with me that his parents have a very contentious relationship. He and his dad, and his dad and brother have a contentious relationship. He shared that he doesn't think his dad is a safe person. He shared that his dad has a history of alcohol abuse, and this has led to interactions that have made him feel unsafe emotionally and psychologically." Adrian shared one example of his brother running away from his father out of fear. Mr. Trimis notes "Adrian didn't discuss further details" of that event. When discussing Adrian's current contact with the father, Mr. Trimis states "he doesn't feel comfortable around him, doesn't want to have to see him. He feels a lack of safety with his dad." When asked about disclosures of any incidents that would have caused Adrian to feel uncomfortable, Mr. Trimis indicates Adrian described a trip to Florida during which "they had to leave early due to his dad's behavior, drinking and screaming and yelling." He notes times Adrian has discussed verbal aggression by the father and that Adrian also reports being uncomfortable during his visits when the father takes pictures and, "his dad is trying to show them off, he said that specifically. Like [the father] was taking pictures to make it appear that the visits were happy, and he was comfortable. But he wants to leave and wants it to be over." Adrian has no disciplinary issues at school and performs well academically. When asked about Adrian's disclosures concerning the mother, Adrian identified the mother as safe and caring. When asked about influences on Adrian's observations and opinions, Mr. Trimis notes "I get this sense he is being very straight up, not that anyone is attempting to sway him either way." Mr. Trimis intends to continue to see Adrian for the remainder of the school year and is advocating for Adrian academically as needed.

Yurushka Martin, MA, LMCHA, former couple's counselor, indicates she began providing counseling to the parents on 7/27/23 and had eleven sessions with them until 10/12/23. Ms. Martin states, "From the first session it was clear there were issues around communication," and the parents were determining whether they were going to separate. She describes that her sessions were with the parents jointly, that she conducts counseling through telehealth, and at times they logged on separately. She provided two individual sessions for the mother and father and never met them in person. The goals for treatment included "to learn how to communicate," but by the time of the final session they had not made progress and elected to pursue the support of a mediator, and "I didn't feel I was the appropriate venue for them." Ms. Martin notes the mother "reported a history of feeling threatened, feeling unsafe, that [the father] made a reference to her immigration," and that "at some point, both had reported physical aggression around property. They had both been getting angry at one another." Ms. Martin could not recall what property damage was alleged, and it was reported that the threats and property destruction had occurred in the past. She states, "When I checked in (with the mother) in the present, she said she felt safe at that time." She did not conduct any safety planning with the mother or conduct domestic violence screening. Ms. Martin denies that there was any deliberate effort by the mother to undermine the father or orchestrate a plan to establish a narrative related to domestic violence by him. She notes the parents became verbally aggressive towards each other but she did not witness direct physical assault or harm perpetrated directly by one parent toward the other. She notes, "Sometimes when they fought they talked about the past and I tried to keep it about the present." When asked if either parent had disregarded advice she was giving them, she notes that "they would not give each other space when requested by the other party" as directed but that there were no other examples of deliberately violating agreements or instructions from the therapy process. She notes she didn't have sufficient information to conclude the mother had been the victim of abuse by the father. Ms. Martin provided no directions to the parents about managing the children or arranging time and contact with them. She was not informed of any information indicating there was child maltreatment and she made no CPS referrals.

Scott Fannin, M.D., indicates he initially met with the father for one in-office appointment in August 2022, but began seeing the father for regular monthly appointments beginning in October 2023. At the time of the initial visit, the father was referred by New Life Recovery Solutions where he had been a client previously. The father was seeking Vivitrol shots to manage his alcohol misuse, but in August 2022 Dr. Fannin couldn't provide the treatment because the father was using Kratom, which he took for restless leg syndrome. Despite that Kratom was available over the counter, it activates the opioid receptor and would have caused the father to experience sickness if he had taken it with the Kratom. The father and mother returned to Dr. Fannin in October 2023 and "he had come off the Kratom and by that point he was off the alcohol as well." He notes he did not take any historical information about the father's substance use from the mother at the time of that appointment. The father started taking

intramuscular Vivitrol shots in 2023. The father discussed his substance use history, and Dr. Fannin states he reported his last use of alcohol as having occurred in December of 2022, and that “is when he became fully sober.” Dr. Fannin is unaware of how many DUIs the father received or other consequences of his use, as this information is unnecessary to provide treatment. He notes that he does address relapses with clients, that the father has shown no indications of having relapsed since he began treating him in October 2023, and the father has consistently attended appointments except for once recently when one of the children was sick. With respect to psilocybin use, Dr. Fannin noted it is not a drug of dependency and doesn’t typically result in “chronic change and impact” to behavior as depressants and stimulants tend to. The father did not disclose use of psilocybin to Dr. Fannin. When asked, he noted if there were indications of a potential relapse as reflected in financial charges or other documentation, he reports he would “try to parse out where that came from,” and may supplement treatment with oral medicine or schedule injections more frequently. He states that “if [the father] is having some slip-ups here and there, it all comes out. They don’t maintain their instability without it being visible.” Insofar as treatment compliance, Dr. Fannin states, “he is doing well.”

Kari Betts, LMFT, CMHS, MHP, Lake Sammamish Therapy, indicates she first started working with the family on 3/6/24 after the father contacted her. At the time of intake, it was determined she would meet with the children individually as a child therapist and to try to involve the parents “as much as possible.” She met with Max and conducted “a handful of sessions,” with him, and while the intention was to provide individual counseling to Max, “Max wasn’t interested in that.” Max has not been involved in recent therapy sessions given his position. She observed both parents together initially, but “with the parents in the same room, it was a bit difficult for [the mother]. She looked uncomfortable, so I agreed to see [the parents] individually.” She met with Adrian and included each parent separately at the end of Adrian’s sessions to provide them with information about the therapeutic process. She states, “most of the things that Adrian talks about are his challenges with his dad.” The first joint session she had with Adrian and his father occurred on 4/20/24 and there have been several other sessions when the father participated in counseling “for a few minutes with Adrian.” The only time the mother was present with Adrian in session was at intake in March 2024, and at that time Ms. Betts inquired of Adrian “who he wanted (to have in session). He wanted his mom to come.” At that time Adrian was experiencing suicidal ideation which became the focus of her work with the child. She notes “to me it sounded like he had this ongoing feeling of being sad, feeling misunderstood, feeling like things were hard.” Adrian reported being bullied at times by peers at his prior school and this was addressed through therapy with Ms. Betts. She diagnosed Adrian with adjustment disorder and has formulated no other diagnoses since treatment began. Goals for treatment included increasing his level of communication about his emotions and decreasing suicidal ideation. Adrian has made “significant progress,” and his suicidal ideation has dissipated.

A joint session between the father and Adrian in August 2024 was prompted when Adrian offered specific concerns he had “about how Adrian interprets his dad’s body language. Adrian has eagle eyes on his dad, looking for his dad to be mad. It’s good to have [the father] know that his body posture and tone of voice play a big role in how Adrian feels. We discussed communication styles, how [the father] speaks when he is standing, how that makes him feel. He mentioned he doesn’t want [the father] to talk about his mom unless Adrian asks. Adrian said, ‘that is what we do at [the mother’s] house in regards to dad.’” Adrian has confirmed that “[the mother] won’t talk about dad” in Adrian’s presence unless Adrian asks her questions. Adrian described that when the child ‘has talked about feeling on edge, there was anticipation that Adrian had. His dad would seem like everything is okay, then would have an outburst and would be really upset.’” As an example, Adrian identified a time when the father threw a drinking glass “and it really scared him. He also said his dad drove when he was in the car and was drunk.” She notes that while she was not provided exact dates when events such as this occurred, the father shattering a glass “sounded like it was around 5th grade when that happened. Around that time, he also said when he went camping in 4th or 5th grade, he realized not all dads get drunk and mad.” The example Adrian described when the father drove while under the influence also reportedly occurred when he was in elementary school. Adrian offered other examples of “feeling uncomfortable about his dad, him being intoxicated,” and mentioned a time at a Seahawks game when “[the father] was excited and gregarious. [Adrian] felt like his dad was out of control so we had conversations around that.” In response to sharing this example, the father offered to complete breathalyzer testing if Adrin felt uncomfortable, and although Adrian felt that the exchange of ideas was helpful, Adrian said “he wouldn’t want to prompt his dad (for a breathalyzer). He doesn’t want the responsibility of asking.” When asked whether it was Adrian’s idea to discuss this with the father, Ms. Betts states, “I was the one that brought that up. Adrian was feeling mad toward his dad. Dad apologized to Adrian so he let Dad come into the room.” Adrian has additionally referenced times during family vacations when he was prompted by the mother to leave due to the father’s conduct and anger, and that “He never said mom said it was unsafe,” but Adrian did describe “leaving and feeling scared.”

She made several CPS referrals due to this and Max’s report of “wrestling in the water (with the father) and he felt the play was aggressive. Max kicked him because he felt like he was under threat.” with the father in a pool. On another occasion, Max described the father “threw him into a wall during elementary school.” Because of the time that had elapsed, Ms. Betts did not believe these referrals were accepted for investigation by CPS. Adrian has discussed that “he is satisfied with the amount of time he sees [the father] presently.” She notes, “At this time, I feel like supervised visits seem to be going okay. He hasn’t complained a lot about them, he says he is fine with having a supervisor there. He is very nervous about the idea of [the father] potentially having a relapse or [the father] getting upset. That third person there helps him feel more at ease because nothing is going to happen.” She anticipated that with further counseling and support, Adrian and the father could “work towards something more,” but at present she is

focused on his current level of comfort with arrangements for contact. In sessions with the father, she observes that Adrian can present as somewhat tense when discussing “the hard stuff. Adrian is not as relaxed. He worries about becoming like his dad. He says his dad changes who he is, where he is at, and how he is going to act.” With respect to Adrian’s presentation in his mother’s presence, she observes “he is relaxed with his mom. He is at ease. His body language with Dad is huddled up, arms crossed.” She notes that Adrian can feel anxious when he believes his mother is experiencing stress, “but it isn’t something Adrian has talked about.” She intends to continue seeing the child and include the parents when warranted.

Lisa Rudolph, neighbor, indicates she has known the parents for approximately two decades and met them when they shared a driveway in the prior family home, and her residence is nearby the home the parents shared until their separation. She notes that the parents separated because of the father’s addiction issues and the mother “couldn’t do it anymore. It became obvious for the safety and mental health of the children, she could no longer do this.” She notes, her husband, John, was very involved with the Moyer family as well, and escorted the father to treatment in Austin, Texas. She has known both children for their entire lives, spent holidays with the family and her house served as a “safe house,” when arguments escalated and the mother needed to leave the residence. Ms. Rudolph reports that when arguments would escalate between the parents, “[The mother] would flee and she would come over and I was trying to make sure that she was okay. She told me at the time when he would lock her out of the house. John would try to go over and talk to [the father]. It was traumatic.” She indicates there were instances of property destruction which included “There was a cabinet in the kitchen that he hit, slammed it, or threw something at it,” and that “John said [the father] put a knife into the wall to scare [the mother].” She recalls the father would make statements about the mother “that she wasn’t a citizen, was going to send her back, and it was really threatening,” and that she recalls while the parents were at Ms. Rudolph’s house on one occasion “he had come over completely inebriated and was going off on [the mother]. He said she would never be able to take the kids because she is an illegal alien.” She states, “He was threatening to send her back to Hong Kong. The kids were scared,” and had witnessed the threats at that time. One of the worst incidents she recalls occurred when she was driving near the parent’s home and “I saw [the mother] with [the father] right behind her. I looked over, she was not okay and she came right up to the backdoor of the car. [The father] tried inserting himself and keeping her from getting in. She was shaking. She was telling me to drive.” The mother was able to get into the car and they returned to Ms. Rudolph’s house where the father arrived shortly thereafter and she met him at the door and spoke to him for forty-five minutes. She notes he did not try to enter her home. She became aware of conduct by the father that posed a risk to the children when “Max was a baby and I remember [the mother] called our house, called for John and said, ‘you need to go find Robert, he has taken Max and he is drunk.’” Prior to the separation she observed prescription medications within reach of the children, and the father “would just leave his bong out on the counter in the bathroom.”

The mother has disclosed to Ms. Rudolph more recently that she thought the father was stalking her, as after she had put some boxes with his belongings “in front of the house she got a message from him saying ‘you leave my things alone,’” prompting the mother to make arrangements to spend the night at Ms. Rudolph’s house. She did not observe the cameras around the home but notes it is not something she would have noticed. She states that “when things were good and [the father] was sober he really is an incredibly sensitive person and can be very caring and intelligent. Given the opportunity, when he had those times with his sons, he was good. He was a good dad. Having said that, there was a grandiose part of [the father] that would convince us, and he would say he was doing everything for the kids, taking them to their sports, he was a super dad. But he wasn’t.” She states, that when the father was working, “there was a lot of fluctuation with his schedule, there was travel involved, extended weekends, two weeks being gone,” and that when he was home “he was never home to take over and care for the kids. When he was home it always involved him doing something else.” She describes that one of the things she admired about the mother was “She would never say anything defamatory about their dad in front of the boys,” and that “She never discussed custody.” She notes concerns for the mother’s safety and is worried that the father “becomes more unhinged as the process moves forward,” noting the father has sent the mother a news story of a man who had killed his domestic partner. She does not believe the parents should have regular communication with one another.

Gary Wieder, Ph.D., indicated he conducted psychological testing for both parents in July 2024. In addition to the summaries of test results (above), Dr. Wieder states that the father demonstrated “honesty and openness on testing” related to his alcohol abuse, which is contrary to most litigants who may be inclined to deny such problems. With respect to testing results for the father that indicated he is likely non-aggressive and values harmony, Dr. Wieder notes that on the PAI, “if someone wants to present themselves as a peaceful person, they can,” and “a person can make themselves appear non-aggressive.” He notes that with a subject that scores highly on scales reflecting optimistic or “pollyannish,” as reflected in the father’s testing, “they may sugarcoat things,” and the testing on aggression scales may not be accurate. Concerning any impact related to impairment of functioning due to stress as reflected in the PAI results, Dr. Wieder notes that the stress would not be likely to impact his ability to parent. Concerning the mother, Dr. Wieder states that “there were no critical items for testing that rose to a level of concern,” and that in light of the current litigation, “all the testing items would be expected.” While the individual and subscale scores of the MMPI noted some personality features that might be relevant, this was only considered relevant if tendencies toward introversion prevented a parent from promoting social relationships for their children and engaging in activities that would support socialization.

Elsa Moyer, the mother’s oldest child, and stepdaughter to the father, describes that

she has contact with her stepfather approximately four times per year and talks to her mother daily or weekly. She indicates the parents separated because “[The father] was volatile and awful to [the mother] for no reason,” the father’s history of alcoholism, and that “he is emotionally, physically, and mentally abusive.” She indicates the mother was responsible for the majority of the care of Max and Adrian and cites the mother’s efforts to promote academic testing and applications to private schools for the children as critical to their educational success, stating the father was rarely involved in these responsibilities. When asked to describe incidents of abuse by the father, Ms. Moyer notes that when she was six and living with the parents in an apartment in California, the family had purchased bicycles which they rode regularly and the mother had an accident and cut her elbow causing it to scab. She reports, a couple of days later she observed the “scab was gone and it was all bleeding. I asked what happened and she said that dad pushed her, she hit the wall and her scab came off.” Ms. Moyer notes another time when she was thirteen and had been given a personal cell phone, but had been placed on restriction from the phone by the father due to having been in trouble. She notes that after having been instructed to go to her room, “I heard a loud banging and walked out and I see my dad with a butcher knife banging on my phone. He told me to leave. I went to my room. I could hear everything.” She reports waking up the next day to find her phone still in the kitchen with a steak knife in the screen. She describes the father used a knife in the home on another occasion when he “was angry at [the mother] and stabbed a knife in the wall next to her.” She reports she did not witness the event, was not in the home at the time it occurred, and her mother informed her of this episode within the last year. Ms. Moyer recalled another incident when she was nineteen and home from college for winter vacation when the father “was really drunk, yelling at my mom, and he came downstairs to see us.” As the father became upset and was escalating the mother asked him to remove himself and go upstairs, and “I got up and confronted him, and he shoved me.” She describes seeing “doors that have been broken, holes in doors which is embarrassing. He threw a cup at my mom in Whistler.” She recalls “waking up to see things broken or the house in disarray was common.” She observed the father would interact with Max in a way that was dismissive and would “snap” at the child, and that when she was young she was often accused of lying. She states that in October 2023 while cleaning up the garage she found a bottle of vodka, and had previously discovered bottles of booze in the house and in the father’s car subsequent to his substance abuse treatment, and that the father tended to hide his use from others. She notes she has asked her father why he is requesting equal time with Adrian as he was uninvolved for much of Adrian and Max’s childhood, and that prior to resigning from Microsoft “[the father] chose to work significant hours.” She notes that despite the mother also working long hours, she provided care for the children, managed their daily needs, and “is able to make the room for it.” When she has asked Adrian about his time with the father, “he says it’s okay, it’s fine,” but that unless either of the children bring up the father, she doesn’t discuss him or their relationship with him. She states “I have not heard my mom say things to damage their relationship. [The father] has done enough at early ages for the boys that they have made the decisions about their dad themselves.” She indicates that Adrian does want a father-son

relationship and enjoys seeing the father at his basketball games, stating “he’s a sports kid and that’s [the father’s] way of connecting. I have that connection with him and those memories as well.” With respect to the cameras installed at the mother’s home, she notes that the camera that the father had previously mounted near the front entryway was white and had been there for years, but that she noticed the cameras were switched to black cameras near the same location and in the garage. She asserts the father installed the new cameras around the time he moved out of the home and contends that this was done to surreptitiously monitor the home. She states that Adrian should have some choice over his time with the father.

Connie Curlett, LMHC, the father’s former therapist, indicates she met with the father from April 2024 through June 2024 for seven individual counseling sessions. She states the presenting issues were “working through the anxiety of being alienated from his kids, the stress of that, the distress of the divorce process. Our sessions were mostly around his kids and his love for his kids.” She diagnosed the father with “adjustment disorder with anxiety and depression, mostly anxiety,” The father’s anxiety was related to the legal process and when it would conclude, the uncertainty of the divorce process, and custody related matters. She was not aware of any other individual counselors working with the father during the time she saw him, and she primarily worked on strategies for managing anxiety, self-regulation, grounding techniques, and “what would be helpful for him to get through this.” She assessed the father’s progress toward treatment goals as “very eager to improve, he was open to any help he could get. He was very amenable to treatment.” Sessions were discontinued when the father did not schedule follow-up appointments with Ms. Curlett, but counseling “ended on good terms.” When asked to describe any examples of alienation the father had noted in therapy, Ms. Curlett stated, “He hadn’t seen his kids, not having one-on-one time with them. There was a lack of being able to see them to really know what was going on in their lives. He wasn’t able to parent.” She notes he discussed some acts of the other parent and how they undermined his relationship with the children, stating “We talked about things including how she was manipulating the legal system which impacted how he was seeing his children, was manipulating the schedule so he couldn’t see the children, and discrediting his reputation.” As an example, he indicated she was prolonging the legal process or engaging in administrative delays. Ms. Curlett could not recall more specific examples of manipulation of the schedule but notes that the father referenced a trip or vacation with the children the mother took. With regard to discrediting his reputation, “it seems like she was really leaning into the substance abuse issue, but he did a lot of digital monitoring through a testing program to discredit the allegations.” The father made no disclosures of ongoing substance abuse and she notes “he really loves his kids and seemed to know a lot about them,” and that “I didn’t get a sense of concerns regarding his parenting.”

Debbie Bayer, LMFT, SUDP, CIP, CSAT, CPTT, marital therapist, indicates she started working with the parents after the father was referred to her through someone he had been seeing for treatment in 2019. She notes that between sessions that began in 2019 and a final

couple's counseling session she had with them on 3/13/20, she saw the father for a couple of individual sessions, and saw the parents in joint sessions seven or eight times. At the time of those sessions, she notes “[the father] was in and out of addiction and so he was having trouble staying sober. He would be sober for a while and would relapse again. [The mother] was reacting to it.” She notes, “It was really a dance, a pattern of him relapsing, her reacting, and then him getting back in line.” She describes when “[the father] would relapse, he was a mess. He would get it back together again, but they weren’t able to resolve to where there was a long enough period of sobriety coupled with treatment. It would be a crisis, then ignoring the crisis, and then treatment and it was an unhealthy pattern.” She states, “I was helping him with his thinking around his relapses.” She described sessions stopped in March 2020 when the father went to treatment.

The second set of counseling sessions with the parents occurred from October 2023 to December 2023, and were focused on helping to address the separation, and the father’s related anxiety and depression. She describes “What I really got out of the last sessions is that both were posturing, wanting to have a witness to the posturing.” When asked to cite examples of posturing she states “[The mother] was coming to treatment and it felt like she was being coached by an attorney,” and that the mother often presented as rigid. She acknowledges that the mother “has to have strong boundaries with [the father] because he doesn’t adhere to boundaries, but there was a little extra.” She states in 2023 the father would care for the children in the mother’s absence for a week, and thereafter the mother “would decide he was unsafe for the kids. It was a lot of power plays on her part.” She states, “[the father] seemed to want to level the playing field by telling me [the mother] was currently having an affair.” Ms. Bayer notes that when the mother would establish boundaries, “[The father] was reacting in self-destructive ways,” and that “His reaction was very adolescent.” She notes the father’s self-destructive behavior was a trauma response to perceived abandonment. Ms. Bayer reported she had informed the mother she was “weaponizing the children. If he was being sober and having clean UAs, [the mother] said what a good dad he is. Then he would have a positive UA and would minimize and she would be appropriately concerned. [The father] didn’t want to be held to her standards.” She indicates that at times, “[The father] was trying his best to manipulate [the mother] and this made her have to have her boundaries a bit stronger. I would say to [the father] that he doesn’t hear her. You come over when she has asked you not to, She gives you a bit of leeway and you just go storming in. She is in a difficult position, but also his difficulty was that he was cut off from his kids.” She notes the parents were unable to negotiate a “middle ground” in their sessions which was one of the primary reasons for the counseling. There were no clear plans in place as a result of the sessions for the holidays in 2023. She notes the father “felt he was entitled to be in the (family) home.” She does not know what occurred during the holidays in 2023 as her last session with the parents was 12/19/23. She never met the children. When asked if any of her sessions involved reports of either parent disparaging the other parent in the presence of the children, Ms. Bayer states “I can’t think of any specific examples of alienation.

I don't think she was being very encouraging of his relationships, but it was his own fault because he was being emotionally dysregulated." Eventually, he aborted treatment. I was just too confrontational." She notes in these final sessions the mother "was trying to be generous (toward the father)," but that "he would push the boundaries and at one point something just clicked inside of her and she put the wall up and he just kept being reactive." She notes that "[The mother] was feeling like she was supporting the kids who didn't feel like they could tell their dad about their feelings of his behavior. What I think was that she was projecting some of her stuff onto the child, but could have given more space. She said many times in sessions that he was a good dad." She denies making any projections about what would happen following the end of treatment in December 2023, but "I thought probably if [the father] wasn't clean and sober she was going to protect the kids. I would support her 100% in doing that." She believes that if the father is engaged in recovery and sober, having contact with him in a therapeutic setting will assist in their relationship with him and that eliminating all contact under those circumstances would be counterproductive. When asked, she denied conducting a domestic violence screening, but notes that she was informed of "some incidents of screaming and yelling. [The mother] talked about feeling intimidated and unsafe. But when he was activated, he was big. He was the type of person who was animated and could be loud." When the mother became upset with the father's behavior "she would get quieter but very cold, which he would react to." She notes, "I think she told me about property destruction. I don't recall if he had hit her. I think it was mostly yelling but I don't know what kind of property destruction." She states, "There was verbal abuse and he was like a petulant child when she tried to set boundaries." She contends it would benefit the family for the children to have individual therapy, for the father to receive substance abuse counseling and individual treatment for his past trauma history, and for the children and father to have some joint counseling to process the past.

Natasha Holian-Ryan, ACC, Domestic Violence Program Manager, Assessment and Treatment Associates (A&TA), indicates the father initiated a domestic violence assessment with A&TA in September 2024 which is not complete. During intake, the father disclosed three instances of property destruction including damaging a cabinet in the kitchen, damaging a refrigerator, and breaking a travel mug. While the father did not disclose the use of knives or other weapons, "I do have [the mother] reporting that he stabbed a knife through a phone." The father denied removing the mother's phone from her. There is a report from the mother of having to leave hotel rooms due to the father's escalated behavior. The father "engaged in some blame that she caused arguments to be in front of the children." She states there was a disclosure "of computer monitoring, possibly of the oldest daughter. I don't think there was anything specific about [the father] monitoring [the mother's] whereabouts." Ms. Holian-Ryan indicates the mother provided messages between the parents and "many of them are in violation of the court orders. The messages are emotionally abusive, there is abusive language." As an example, Ms. Holian-Ryan reports that a message states, "You are so completely clueless about anything that plugs into the wall, you are crazy," and another message that states "How dare you after all

the crazy bullshit accusations, you have pushed me over the edge. I will be taking countermeasures.” She describes the messages as “ongoing,” and “Some of them rise to the level of threats, covertly worded threats.” The mother reported to A&TA that the father threatened her immigration status, and “There’s a lot of involvement of the children, using them to continue to try to control her.” As an example, Ms. Holian-Ryan notes the father sent the mother an article about a man who killed his ex-partner due to conflicts over the children, and “talking to her about his discussion with the reunification therapist and blaming her for it not working.” Ms. Holian-Ryan noted that overall, “where [the father] takes accountability is the emotional abuse he engaged in during active addiction. It would appear to me that post active addiction, he does not take accountability for his actions.” She asserts that from the information she has gathered, “There’s a pattern of alcohol abuse and a pattern of domestic violence. In this relationship, we see that when the substance abuse stopped, the harassing messages and borderline threatening messages continued.” Ms. Holian-Ryan notes that the A&TA assessment will be completed within the next month.

Monique Brown, Psy.D., ABPP, indicates that she began work with the Moyer family in September 2023 to address parenting plan issues and discontinued work in February 2024. She met with each child one time and met with the parents separately and together. The purpose of her work was to help the parents agree to a fair parenting plan without needing further legal system involvement. During the course of her work with the parents, they each submitted drafts of parenting plans and she helped identify areas of agreement and disagreement. She notes the parenting plans that the parents had submitted and discussed with Ms. Brown were not ultimately accepted and implemented by both on an ongoing basis due to points of contention on the part of each of the parents. Dr. Brown states that for the mother, those points of contention included that “There were concerns about DV that were separate from parenting stuff that needed to be addressed,” and that “[the mother] was uncomfortable with jumping into a 50/50 parenting plan.” The father was requesting an equally shared schedule and “didn’t want to jump through excessive hoops.” Dr. Brown did not conduct a domestic violence assessment as that was not her role. When the mother discussed domestic violence, Dr. Brown stated she reported “much of it related to his alcoholism and angry outbursts. I don’t recall (some details the mother may have reported) without looking at notes, but she might have mentioned a door slamming.” Dr. Brown notes, “I don’t know if possessiveness is an accurate word, but he definitely did not want to let go of the relationship. [The mother] felt like he was obsessed with her. I imagine that doesn’t feel safe, regardless of the motivating factor behind the behaviors.” As she was not appointed to conduct a domestic violence assessment, she provided the mother with resource information for a state-certified domestic violence treatment program. When she met with Adrian, the child reported concern that “[the father] was possibly surveilling them,” as he was privy to a conflict concerning a camera system in the home where the mother and children had been residing. She notes, “there was some discussion about Adrian being brought into that conversation,” as well as disagreement about the timing and the intent of the camera system. Adrian did discuss having

seen the video on his father's phone. Adrian's remarks to Dr. Brown reflected that he loves the father, wants time with him, "but wasn't sure if he could trust [the father]." In session with Dr. Brown, Adrian discussed his reservations about the father's history of alcoholism, and "He didn't know which version of his dad would show up. That's a normal child's way of describing a parent that has a substance abuse problem." When she spoke with Max, "Max reported that he didn't want to see his dad anymore. He said he had given his dad enough chances and his dad was out of chances. The angry outbursts and drinking were things [Max] described." Dr. Brown notes that she had limited information and worked with the family for a short period of time. While she did not conduct a thorough investigation of the family, she notes that based on the information she had, "I did not see a strategic and malicious effort to alienate the children. I think [the mother] was scared and concerned." She reached no definitive conclusion on risks posed to the children by either parent. Because of the allegations of abusive conduct by the father, the level of conflict between the parents, and substance abuse history, she suggested a parallel parenting arrangement instead of active co-parenting between the mother and father. Because of her role, she only made suggestions and offered no directives to the parents about the terms and conditions of a parenting plan or therapeutic support. She notes that suggestions she made regarding parenting plans "in [the father's] mind needed to be followed, but my suggestions were simply that and this was not any sort of legally binding parenting document." At the time of discharge, services she believed would be of help included therapy for both parents, reunification counseling for the father and Adrian, and individual counseling for the children.

Jennifer Keilin, LICSW, reunification therapist, indicates that aside from her report dated 9/26/24, she issued no other reports or written treatment summaries for the Moyer family. While she met with both children individually during her therapeutic work, insofar as joint reunification sessions, "Max just refused." In regard to her recommendations, "I focused more on Adrian because that is the relationship that is amenable to repair." To promote the relationship between Max and the father, a team approach with multiple professionals providing support would likely be necessary, "because it's an uphill battle."

When asked about the reference in her report to "chaos in the system," Ms. Keilin described that the parents would participate in appointments, and would communicate their intentions to address issues in their family system, but "then Robert would have communication with someone that would then put everything back in a tizzy again." As an example, she cites a message sent by Robert to the mother with an article about a man who killed the mother of his children due to custody disputes. In another instance, the father was advocating for contact or communication with the children related to their trip to Hong Kong, resulting in attorney communications and a focus on that single issue rather than the broader family issues. She notes that the father struggled with his limited contact with the children. His urgency was so high that it interfered with his insight into his behavior. An additional example included the filing of a

motion for temporary orders by the father while Ms. Keilin and the attorneys were in discussions about moving the family forward, which undermined those efforts.

Ms. Keilin stated the father's impulsive behavior was a concern. She advised the father to cease communication with the mother as "It was keeping things stirred up," and "disrupting the system." She notes "[the father] couldn't maintain that. I wasn't tracking it, but it became clear to me that he resumed contact with her."

As examples of necessary changes in the father's behavior, she notes he must refrain from inappropriate communication with the mother and other professionals, as well as "showing up on time, keeping sessions, following the other criteria you are supposed to do," including any treatment or therapeutic interventions. She declined to identify ways in which the mother had struggled to hide her anxiety and distress related to the father's behavior as described in her 9/26/24 report, but instead noted "I would say it was observational data. Nothing more specific than I can say on that." She notes, "[the mother] needs to feel less anxious by [the father] doing less anxiety-provoking things." She recommended more frequent contact between the father and Adrian as the "amount of contact they have right now keeps the relationship on life support. It doesn't allow for it to build through frequent interactions, and it is in restart mode. It just stays tentative." She notes that continued counseling for Adrian would help with his anxiety. She cites the father and Adrian need an opportunity for their relationship to progress, and for the father to "manifest enough behavior changes to make progress occur. For [the father] it is unknown. How will he respond to the interventions? It is hard to say." Due to her caseload with other matters, she would not be in a position to serve as a reunification counselor in the near future.

Katharine Holdsworth, friend of the family who was identified by the father as a reference for him in this evaluation. Ms. Holdsworth indicated "I probably don't have sufficient detail on the family at home. My interactions have been during holidays or outside of the home so I am not going to give [this evaluator] the information that will be useful." She noted that she believes stability will be important for both children and that "I want to make sure the children's wishes are well understood." She indicated "I don't want any of my words to end up in court," and provided the name of another family friend, Milo Brooling, who could speak on these matters. She then elected to discontinue the call with this evaluator.

Maribel, Laboratory Technician, at United States Drug Testing Laboratories (USDTL), provided information about hair follicle testing at USDTL. She indicated that for head hair, cannabis would be detected for up to a 90 day period prior to sample collection, whereas cannabis can be detected in body hair for up to one year from the date of collection.

The mother declined to sign a release of information for her current therapist,

Amal Hasting.

VIII. CONCLUSIONS

This is a dissolution case involving two children, Max, who is sixteen years old, and Adrian, who is twelve years old. The court entered a Stipulation and Agreed Order Appointing Parenting Plan Evaluator on 4/3/24. Per the order, the undersigned is to address all issues related to making a parenting plan for the children; allegations of domestic violence of the respondent, mental health issues of the petitioner, the respondent, and the children; substance abuse of the respondent, whether both parties are willing to share decision making authority and/or whether shared decision making is in the children's best interests; and any other issues discovered that could affect the safety of the children." The work of the parenting plan evaluator began on 4/14/24 after the retainer was received.

Before discussion of the issues in this case, the undersigned highlights records and information, that were not available that could have some bearing on the analysis and conclusions of the report. Despite the history of claims, complex family dynamics, and length of time since the petition was filed in this case, the pleadings, declarations, and orders are limited, reducing the material for consideration by this evaluator. The mother declined to sign a release of information for her current therapist, Amal Hastings, so the undersigned was unable to address some issues related to the question of her mental health and current therapy. One of the couple's counselors seen by the parties prior to their marital counseling with Ms. Bayer, Merrie Day, Ph.D. was not listed by either parent as a collateral and was not consulted for this evaluation. Both parties denied CPS involvement at the time of their interviews, claimed they had never been contacted by a DCYF social worker, and although Adrian's counselor reported having made several referrals to CPS, those referrals pertained to concerns of child maltreatment dating back several years, and it does not appear CPS was involved aside from receiving a referral at intake. CPS records were not obtained or reviewed given the reports of both parents and the late notice to the undersigned of prior referrals. While the mother provided medical records for Adrian in this case, no such records were made available pertaining to Max, and neither parent identified a provider seeing Max specifically for ADHD treatment in collateral requests from the undersigned. However, the undersigned gathered educational records, academic and psychological testing records, spoke to Max directly and gathered information from two separate mental health professionals who had seen Max within the last year.

While there have been multiple allegations regarding risks posed to the children by each parent, before analysis of these issues the undersigned recognizes some of the many positive attributes of the parties and strengths of this family. For his part, the father should be credited for having served as a significant source of financial support and has made many efforts to engage various services of providers to address multiple issues including substance abuse,

childhood trauma, couple's counseling, and parent coaching, among others. Several of his providers note his openness to any support he can access, and in addition to locating and soliciting the help of counselors and coaches, he has voluntarily committed to Soberlink testing and a domestic violence intake assessment with a state-certified provider. For the mother's part, she too has been a financial contributor, working extensive hours to support the family. She has engaged in counseling with providers to address parenting, has facilitated the children's involvement with counselors, and has also taken great pains to coordinate care and treatment for the father for physical ailments and substance abuse. Moreover, both children are exceptional students, with grade reports reflecting high academic achievement at a private school with rigorous academic standards. Despite emotional struggles for both, they are reportedly engaged in numerous extracurricular activities and volunteer opportunities that will serve to anchor them and provide valuable life experiences. The parents should take pride in having raised two intelligent and capable children who are on track developmentally by all accounts.

Although there are other issues that appear to have contributed to the demise of the marriage, the father's alcoholism had the most profound and damaging impact to this family system. While the father claims in his declaration of 9/16/24 that he had "been arrested for suspicion of driving under the influence twice, once in 2013 and once in 2019," he was also arrested for such in 2005 in Santa Clara County, and on at least one other occasion in approximately 1998 as noted in records from California and Kirkland Municipal Court. As with many alcoholics, his pattern of use was often secretive, involved extensive binge drinking, and he admits to refraining at times when he was required to complete testing or was on probation but would return to drinking again thereafter. Based on the information available, he has been in inpatient treatment at least once, outpatient treatment at least twice, has had ignition interlock devices installed in his vehicle, and his license was suspended. He is currently receiving treatment from an addiction medicine specialist who administers Vivitrol shots to nullify the effects of alcohol and has received counseling about addiction from at least two other therapists (Merced and Bayer) within the last five years. He has used alcohol at times when he was being prescribed disulfiram, has admittedly swapped this medication for other pills to make it appear to those around him that he was compliant with medication management, and he has acknowledged that in addition to formal legal systems involvement, his drinking caused problems at work and "left a path of destruction" impacting the mother and children. The harm that has been caused by the father's addiction has altered the terms of his relationship with each family member in different ways. To his credit, he has offered accountability for his drinking and articulated this impact to treatment providers and counselors in therapeutic settings, although on at least two accounts there are discrepancies related to his date of sobriety and the number of arrests he's had for drinking and driving.

Notwithstanding the above history of decades of substance abuse and efforts by the father to establish and maintain sobriety, the mother noted several current concerns on this account.

The mother alleges, and the father admits that after discontinuing his alcohol use, there was a period of time when he was growing and using psilocybin and that this was not considered during his most recent drug and alcohol evaluation at New Life Recovery in 2023. When asked to speak to this, one of the father's treatment providers, Dr. Fannin, noted that hallucinogenic mushrooms tend not to result in "chronic change and impact" to behavior as depressants and stimulants do. As is typical for most drug testing, none of the more recent substance abuse test results for the father submitted with recent pleadings include panels for psilocybin. Given the information available, while it's undisputed the father and the mother had microdosed mushrooms as recently as 2023, there is not enough information to indicate this is a drug the father is abusing currently. As to the father's use of cannabis, it's not disputed he has smoked cannabis and used edibles in the past, he was positive for marijuana metabolite at the time of a urine test collected on 11/1/23, and his hair follicle test report dated 7/1/24 reveals a positive result for cannabinoids. As the specimen collected was head and not body hair, it appears the father's use occurred within a 90-day window prior to the date of collection, or sometime between March 2024 and June 2024. This time period coincides with the timeframe of a purchase the father admittedly made at a cannabis dispensary on 5/5/24, when he asserts he bought cannabis products for a friend. He denied using cannabis at that time stating his last use was with the mother in October of 2023 or earlier. The results of the hair follicle test are particularly perplexing given this claim. He also contends that he has used CBD edibles for restless leg syndrome and it seems plausible that trace amounts of THC could be detected in CBD products and would result in a positive hair specimen test. There is some evidence that the father may consume cannabis from time to time, although it is not considered by the undersigned to be an immediate risk to the children currently.

As for concerns about alcohol, Soberlink test results of 5/5/24 were positive with a .013 BAC on that date. According to Soberlink records, within 32 minutes of that test, a compliant (negative) test was subsequently received, and it seems unlikely that there would be such a dramatic reduction in his blood alcohol content in that short span of time if he were actually consuming alcohol. This evaluator can't explain these results with the information available, but the father has offered his account that he consumed a protein bar with sugar alcohol in it. The father also admits to purchasing alcohol from Wine.com on 4/10/24 when he bought champagne for a friend, and there were conflicting accounts provided as to the date of the father's last use of alcohol. The date the father cites as his last use of alcohol (8/20/21) was over a year prior to the date that Dr. Fannin identified as his date of reported sobriety and the father could not explain this discrepancy. There was also some discrepancy between the father's sober date of August 2021 and Mr. Merced's report that the father has not consumed alcohol since 2019, although the father admits he did not recall reporting to Mr. Merced that he drank in 2021.

While there are no other test results revealing he has used alcohol since he began Soberlink testing, and multiple providers working with the father indicate there are no

indications of relapse, as he says, "My alcoholism is very real," as are the prospects for relapse for anyone with his history. The undersigned commends him for his work in treatment and willingness to participate in regular testing via Soberlink for the last year, and it's apparent that maintaining sobriety will require a lifelong effort. The father's abstinence from alcohol will likely be the most important variable in his relationship with his children as well. Relapse is always a possibility despite commitments to recovery, and this evaluator recommends Soberlink testing for another two years with random urinalysis testing once per month to screen for any other mind-altering substances. All test results should be transmitted to the mother, as well as quarterly reports from Dr. Fannin confirming the father's compliance with his monthly Vivitrol injections, and all providers for the father should receive a copy of the sealed version of this report. It is the opinion of this evaluator that an RCW 26.09.191 restriction should apply to the father for a history of substance abuse that impaired his parenting functions.

Evaluations of family issues in the context of child custody matters warrant universal screening and assessment of domestic violence, and the undersigned was directed to address this matter per the order of appointment. For purposes of this evaluation, domestic violence is defined as physical harm, bodily injury, assault, or the infliction of fear of physical harm, bodily injury, or assault; nonconsensual sexual conduct or nonconsensual sexual penetration; coercive control; unlawful harassment; or stalking of one intimate partner by another intimate partner, or of one family or household member by another family or household member. This evaluation focuses on the nature and context of intimate partner violence, the effects, and the implications of this history vis-à-vis the terms of a final parenting plan.

The history of domestic violence claims dates back to the parent's time residing in Hong Kong, when the mother reports the father pursued her out of a hotel room as she was attempting to leave, held her in a hallway, and she sustained an injury to her hand. While the mother notes only one instance of police becoming involved during an episode that occurred while the couple were residing in California, she states no arrests were made. After arriving in Washington in 2003, violent and threatening acts by the father appear to have escalated, with numerous examples of psychological aggression, throwing of objects, use of implements to damage property that likely inflicted fear for the mother and other family members, threats to the mother related to her immigration status, efforts to impose control over the mother's physical movement and access to sources of support, as well as excessive calls and communication via email that seem to constitute violations of the Temporary Restraining Order. The mother also reported the father arrived at the home uninvited after the parents had separated and harassed and instigated unnecessary conflict, as well as monitored the family residence via video cameras he installed.

For his part, the father admits to yelling and slamming doors, striking and damaging a kitchen cabinet and refrigerator, and acknowledges having recently contacted the mother at her work email in violation of restraints. As confirmed by the father's mental health counselor, Mr.

Merced, the parents experienced marital problems because of his reported verbal abuse and alcoholism. The father possessing and using knives in a threatening manner was a theme in this case, with his acknowledgment of a disturbing act in 2005 or 2006 of plunging a knife through a cell phone belonging to Elsa, who was thirteen at the time. Elsa contends he used both a butcher knife as well as a steak knife to damage the phone, that there were multiple instances in which she “woke up to see things broken or the house in disarray,” and described her stepfather as emotionally, physically, and mentally abusive. Another report of the father’s use of a knife, while denied by the father, included that he had stabbed a wall near the mother while agitated during an argument. Elsa notes the mother informed her of this incident last year, but that she was not at the home to witness the event when it occurred. Lisa Rudolph, a friend and neighbor to the parents for twenty years, noted that her husband had reported to her that the father had put a knife through the wall in the parent’s home. A third incident when the father was in possession of a knife at the emergency department while seeking treatment was documented in hospital records obtained by this evaluator, although no direct threats with the implement are noted in the materials provided. A fourth incident is alleged by the mother and denied by the father when he was intoxicated on San Juan Island and an argument with another hotel guest resulted in the father brandishing a knife in a threatening fashion. This episode could not be corroborated with the information available, as was the case with an episode alleged to have occurred in a Starbucks parking lot on 4/20/24 when the mother contends the father pursued her to her vehicle, held her car door ajar so she couldn’t leave, and hit the trunk of her car when she was attempting to drive away.

While evidence of direct physical assaults of the mother by the father were limited and could not be corroborated by medical or law enforcement records, Elsa and Ms. Rudolph both report witnessing injuries to the mother that they considered suspicious for physical abuse or were directly informed by the mother that the injuries were caused by physical violence by the father. Elsa describes the mother informing her at the age of six that the father pushed her into a wall causing reinjury to a scratch that had healed over, and Ms. Rudolph relates seeing bruises on the mother’s arms which the mother disclosed to her were the result of physical aggression by the father, and that the mother appeared scared, was crying and in shock while confiding in Ms. Rudolph. The mother offered a description of an episode in 2012 when she sustained bruises to her arms and shoulders after a struggle over a laptop when confronting the father about infidelity which was consistent with the account reported by Ms. Rudolph. Elsa has relayed the father assaulted her during the holidays in approximately 2011 when she was 19 and he pushed her as she attempted to intervene in an argument between the parents. Although there was a lack of information to corroborate that the father specifically confined the mother to the walk-in closet and held her there to engage in verbal assaults as she has asserted, there are credible reports of the mother feeling unsafe, with accounts from two witnesses of the father pursuing the mother on foot when she attempted to flee the home in September 2023. As reported by Ms. Rudolph and her son-in-law who issued a statement, they witnessed the mother emotionally “shaken up” and

“terrified,” far from her front door with the father “trailing behind her walking quickly” and pursuing her as she attempted to enter Ms. Rudolph’s car. The statement from Ms. Rudolph included that the father attempted to prevent the mother from entering Ms. Rudolph’s vehicle. When the mother was driven to Ms. Rudolph’s home to remove her from the situation, the father arrived and attempted to contact the mother and children. Ms. Rudolph notes that there were numerous occasions when the father became hostile and confrontational toward the mother and her home was considered a safe location where the mother and children would stay the night to avoid him.

The mother has disclosed property destruction and verbal abuse to several mental health providers, including Ms. Bayer and Ms. Martin consistent with admissions by the father of such. Despite that they were still together at the time of discernment counseling with Ms. Martin, she states the mother “reported a history of feeling threatened, feeling unsafe, that [the father] made a reference to her immigration,” and that “at some point, both had reported physical aggression around property.” Ms. Bayer, whom the parents had seen since 2019, described disclosures of property damage and verbal abuse as well. Some of the more troubling instances of coercive control by the father which were corroborated by text messages and communications provided by the mother as well as reports of third parties included statements the father made toward the mother about her immigration status. There are documented reports of the father calling the mother names in public such as “bitch” and written communication referring to the mother as “cunt” and informing her “you will be collateral damage.” Text messages from the father to the mother during disputes between the two include the father telling the mother “you are not legal,” and Ms. Rudolph reports having witnessed firsthand the father’s verbal threats to “send her back” to Hong Kong because she “was an illegal alien.” It is difficult to conceive of these threats as anything other than an attempt to intimidate and coerce the mother. It is noteworthy, that Ms. Rudolph reports such threats were also made in the presence of the children. The mother has additionally provided call records of dates between 4/20/24 and 5/29/24 reflecting 38 individual contacts the father made to the mother’s phone that went unanswered, with some back-to-back calls within one minute or less of the prior contact. It appears that such continuous calls when no response was received were harassing in nature and violations of the restraining order of February 2024. Moreover, the father admits to recently sending the mother emails to her work address which also seems to violate the terms of restraints, and these violations raise concerns about the father’s ability to comply with binding court orders. In July of 2024, despite the pending litigation, a restraining order, and the domestic violence allegations by the mother that were known to the father, he sent her an image of an article describing a man killing the mother of his children after a custody dispute. Despite that he claims this was “a joke” with additional commentary that “It’s an olive branch extended you [sic] to heal,” this evaluator finds it is more likely than not that this communication was coercive and threatening. Finally, the mother reports that the circumstances prompting her request for a restraining order in February involved the discovery of cameras she states were installed by the father for purposes of

monitoring the residence. The father has indicated the cameras were present for a period of time prior to the separation, and as with other cameras that were located around the home, they weren't able to operate due to a lack of signal from the home router. He notes that he was only able to see video on one occasion in January 2024 when numerous doors were left open allowing access to the router and activating the cameras. The only information from third-party sources made available regarding the allegations of video monitoring was Elsa's report that the cameras were of a different color than the prior devices, suggesting that the new cameras were installed without notice to other family members, and Ms. Rudolph's statement that the mother was contacted by the father after he moved out complaining that she was placing boxes of his belongings outside, something he would have only known if he had been monitoring the front entrance of the house remotely. The father's explanation for the circumstances surrounding the cameras involves extensive knowledge of the home and technical knowledge of how the devices operate. Without additional information, the undersigned did not have sufficient basis to conclude that the father used the cameras for monitoring the mother, although this is just one of many claims that the father engaged in domestic violence.

Based on the data reviewed, this evaluator concludes that an RCW 26.09.191 restriction should apply to the final parenting plan due to a history of acts of domestic violence. He notes his recent participation in a domestic violence assessment with A&TA, stating that "I need to know more about (domestic violence)," and this evaluator concurs with the father's conclusion. It is the opinion of the undersigned that recognition of how violence, verbal, and psychological abuse have harmed other family members is an important component of the healing process for this family, and developing skills to avoid such conduct in the future can serve to prevent those patterns of conduct from repeating in future relationships.

Regarding the impact of this history of behavior for multiple family members, Adrian's anxiety and hypervigilance was noted by his mental health counselor. Adrian has disclosed that when the father threw a glass it caused him fear, Max has commented to the same therapist that the father threw him into a wall when he was in elementary school, and it's not disputed that Max and the father became physical with one another in a pool in Mexico in 2022, when Max reported he was scared that his father was going to hurt him so he kicked the father in the ribs causing injury. Adrian has reported to his counselor "feeling scared" when arguments escalated and vacation plans were canceled and the mother and children had to leave because of the abuse. The opinion of this evaluator is that the father's domestic violence has shaped the children's perceptions of him, and remains a significant factor in their willingness to spend time with him and lack of a sense of safety. In addition to recommendations that the father complete the pending domestic violence assessment and comply with recommendations for treatment, this evaluator recommends that the father participate in the DV Dad's Program to further understand the children's experience of this history of abuse.

Between the prior acts of domestic violence and the legacy of the father's addiction, the impact to the mother and children is evident. There are valid fears and insecurities which continue to be expressed by both children to mental health providers, school counselors, and the reunification therapist. As reported by his mental health counselor, Adrian remains vigilant when in the father's presence, with hypersensitivity to the father's mood and physical movement. Adrian's apparent trepidation and reactions to the father as reported in sessions with Ms. Betts as recently as August 2024 are common for children who have been subjected to unpredictable and erratic behavior by a caregiver. As an example, while it has been several years since Adrian has reportedly been a passenger in a car driven by the father after he'd been drinking, he continues to persevere about the prospects for a repeat of such circumstances. It is telling that Adrian's experiences prompted his use of a safe word when he was concerned about his father. The passage of time, a dedicated commitment to demonstrating marked change by the father in his conduct, and domestic violence treatment are all factors that will determine whether and how Adrian's relationship with his father will progress. As Ms. Betts reports, Adrian "is very nervous about the idea of [the father] getting upset," but with further counseling, Adrian could "work towards something more."

To this end, the father has been included in sessions, and has articulated his understanding of his son's anxiety, and how his behavior in the past contributes to Adrian's reactions in the present. This is a sign of progress, although it appears that at times the father may still have challenges in appreciating and anticipating Adrian's anxiety and stress responses. He was under the influence during various incidents of volatile and abusive behavior Adrian witnessed, and the father's interactions with Adrian since March 2024 have been under professionally supervised conditions or in therapy, settings where Adrian has explicitly stated he feels greater degrees of comfort when with the father. March of 2024 is also the first time that Adrian began to process these experiences in a therapeutic setting. Although reunification therapy was discontinued recently limiting the number of opportunities that Adrian has to address these issues, in the near term, to the extent that Ms. Betts concludes the father's involvement in Adrian's counseling is prudent, the father should be permitted to participate in counseling as directed by Ms. Betts.

With respect to concerns the father has raised about the mother, he alleges she has engaged in a pattern of alienating the children, and that their current disposition toward him is a product of her efforts. Among other acts, he reports the mother has shared the terms of parenting plan proposals with them, removed pictures of him and other mementos from the family home, and rescinded agreements for him to care for them in December 2023 while she was away. The claim that the mother has engaged in manipulation of the children to isolate their affection for the father has been considered and three mental health professionals who have worked with the family reported a lack of evidence to conclude that she has actively and intentionally discussed the father in negative terms in their presence. Instead, multiple professionals who have met with

the children attribute their feelings about the father to his drinking, anger, and the escalation of conflict they have witnessed firsthand. The father acknowledges that many of the parent's arguments were witnessed by the children, and exposure to such tends to create loyalty divides and alignment with a parent, which appears to have occurred over many years, rather than any sudden or dramatic shift in their affections toward either parent. The father contends that Adrian's behavior changed abruptly in March 2024, and he was less affectionate with the father, which he believes is attributable to the mother. However, it appears Adrian was communicating the struggles he was having with his historical experiences with the father to the father directly months before this, when he relayed his upset about times when the father was inebriated, describing in text messages to him "I am just wondering why Because [sic] you really traumatized me." As Dr. Brown notes in her written correspondence to the parties directly after meeting with the children, "it does not appear that Adrian is influenced by any negative talk from Christine. His feelings appear to be his own feelings and are not influenced by anything but his experience with you, Rob." The children have likely developed stronger tendencies toward alignment with the mother after experiencing the father's anger and abuse, and that they may be protective of her at times is not surprising. As reported by the parent coach, the father believed that the year prior to the parent's separation his relationship was improving with stronger ties to Max and Adrian, "but he understands now that there were so many cracks that they hadn't worked on in the relationship," which continue to influence those father-son relationships. Based on the information available, there is insufficient evidence to conclude the mother is engaged in intentional or malicious alienation.

While the mother has been active and primarily responsible for many aspects of the children's care, the father was present for school events and academic support meetings for the children and he has consulted on medical decisions, particularly for Max in the last year. It is not disputed that he has promoted and participated in team sports with Elsa. Sports have been a source of important bonding with Adrian as well, and the father was involved in coaching basketball within the last year. While it is apparent that more progress is needed in the father's relationships to his sons, it is a sign of hope that the father can demonstrate some insight as noted by the parent coach, and offer productive responses to the children on several accounts. He articulates responsibility for his substance abuse history in relating to his children, has communicated effectively with Max in written correspondence when the child was escalated, and offered an apology to Adrian in therapy. As Ms. Rudolph and Elsa have observed, there are examples of the father's ability to be caring and sensitive when he is not abusing substances.

With respect to the mental health issues of each parent and the children, despite the mother declining to execute a release for her current therapist, multiple mental health professionals who have worked with the family and have seen the mother for marital and reunification counseling were consulted, and the mother completed the psychological testing as a component of this evaluation. The reunification counselor and Adrian's therapist have both

remarked that the mother appears to exhibit signs of anxiety about and in the presence of the father, prompting Ms. Betts to see the parents separately. Ms. Keilin remarked that the father's behavior is anxiety-inducing for the mother, and observed that “[the mother] needs to feel less anxious by [the father] doing less anxiety-provoking things.” The adverse effects of dysfunctional patterns of interaction between the parents, volatility, and abuse over a twenty-five-year relationship likely contribute to increased apprehension and stress in the mother, particularly as she continues to work toward establishing personal boundaries with the father and navigating the resolution of the legal issues in this case. However, there were no items in the mother’s psychological testing that required follow-up and her profile did not reveal indications of major psychological problems. Ongoing therapy can serve as a source of support and guidance as she manages future interactions with the father and would be of additional benefit to a coordinated approach to reunification with Adrian and the father.

As for Max and Adrian’s mental health, perhaps the most troubling development in the last year is Adrian’s suicidal ideation in March 2024. Ms. Betts confirmed he no longer has thoughts of self-harm, and to the credit of the parents, they have encouraged his participation in counseling where he has made progress toward treatment goals. Adrian is developing the skills to communicate some of the ways he feels emotionally burdened by the father’s prior conduct, he has more insight as to how he can manage his anxiety when with the father, and his work with Ms. Betts should continue to promote his wellbeing. According to the information available, Max is a twice exceptional student, who is intellectually gifted but has challenges with ADHD and anxiety. He has reportedly used techniques recommended through a neuropsychological evaluation of 2022, including physical exercise to manage his ADHD, and now that there is reduced exposure to conflict in the home, he reports his day-to-day living environment is less stressful. Max was discharged from counseling by Ms. Betts after he declined to engage, and there are limitations to compelling a child of Max’s age to participate in therapy. Max should be afforded therapeutic support to the degree that he is willing to engage in such moving forward.

Regarding mental health issues for the father, his work in counseling to address extensive prior childhood trauma, grief and loss, and limitations in his contact with the children is ongoing. His therapist projects his EMDR treatments will require another year to fully address traumas from his past, he receives medication management for ADHD and depression, and counseling for grief and loss. Treatment records from 2018 noted a diagnosis of Bipolar II, which hasn’t been a diagnosis formulated or confirmed by any of the other providers involved with the father’s mental health treatment, nor was it identified through the psychological testing conducted by Dr. Wieder. Based on the available information, mental health concerns for the father are being addressed with current resources. However, both Mr. Merced and the father’s medication management provider should have a full copy of this report to assess additional treatment needs and address some of the father’s recent maladaptive behavior.

With respect to other issues related to making a parenting plan, by all accounts, including the father's, Max and the father's relationship has become so estranged that he is not advocating for specific times of contact with this child presently as reflected in his motion of 9/16/24. Max participated in a visit only once thus far in 2024. Upon speaking with multiple mental health professionals who've worked with Max, as well as interviewing him directly, it is the opinion of this evaluator that the nature of the father's relationship with Max presently is not conducive to ongoing requirements for specific periods of residential time. It is noteworthy that Max reports intermittent communications with the father via text, and appears to have communicated to the father as recently as 9/11/24 via text that he is willing to speak to him via phone and wants to have a relationship with the father, despite not wanting him to attend his curriculum night. The undersigned endorses the father's proposal that Max have discretion over the extent of his contact with him.

Concerning decision-making, the father requests to have joint decision-making and has advocated for a co-parenting relationship that involves regular and coordinated communication and engagement of both parents together. The mother expresses resistance to arrangements that would require her to consult with the father to any significant degree on matters pertaining to the children. Several factors which complicate prospects for effective communication and cooperation include multiple examples of the father's failure to adhere to boundaries, such as the violations of the temporary restraining order, and messages he has sent that undermine trust and security. The father has made unreasonable requests that the mother provide unnecessary details for travel with the children, has resisted and delayed consent to travel at times despite that the travel was not considered detrimental to contact and communication between the father and children, and sent correspondence by email to the mother citing the Hague Convention and insinuating she was coordinating the children's abduction. Third-party professionals have remarked that the father has had difficulty letting go of the relationship, that he causes "chaos in the system" which is antithetical to the co-parenting relationship he claims he wants, and that the parents have a very dysfunctional pattern of maladaptive behavior by the father, prompting the mother to react and establish boundaries, and the parties were reported as unable able to reach a compromise on numerous issues in couple's and discernment counseling raising questions as to their capacity to make decisions together for the children in the future. Additionally, a mandatory limitation restricts joint decision-making, and it is the opinion of the undersigned that while there should be a process for communicating decisions about the children, it would be antithetical to the children's best interests for all major decisions to be negotiated and agreed upon jointly.

When confronted with what appear to be violations of the temporary restraining order as well as derisive and unproductive conduct and communication between the parents, the father notes that he will "make mistakes in the future." While this may be true, such mistakes and

violations will likely serve to damage relations further and are not conducive to a healthy parenting environment. To reduce the potential for those mistakes and avoid interactions that escalate hostilities, this evaluator endorses a parallel parenting arrangement, which was also supported by Dr. Brown when she discontinued her work with the family. The longstanding pattern of emotional entanglement, codependency, and dysfunctional communication must cease, and a shift in relations of this sort likely requires the suspension of any interface between the parents that does not involve emergency circumstances. The undersigned recommends cessation of contact between the parents aside from OFW communications related only to the children's residential schedule, medical care, extracurricular activities, and adjustments to contact between the father and Adrian. Separate participation in certain activities involving the children is advisable, at least for a period of time while roles are redefined and benchmarks for treatment and healing are met. A specific schedule and set of provisions related to communication and contact provide the structure that can serve as a measure of whether many of those benchmarks are met. Moreover, a parent coordinator should be appointed and authorized to monitor and manage correspondence and intervene if needed, facilitate adjustments to contact as circumstances warrant, and direct therapeutic support to promote Adrian's contact and relationship with the father in the future.

The recommendations below are issued based on conditions that are apparent from the information gathered, namely that the children will continue to reside primarily with the mother as the father has proposed in recent pleadings, that because of the ongoing healing and reconciliation of prior harms, the father's involvement with Adrian should include joint therapy and/or reunification therapy which may need to be altered and revised by third party professional such as a parent coordinator consistent with Adrian's adjustment, and that there is critical need for a period of limited to no contact between the parents reflecting acceptance and withdrawal from the dynamics of divisiveness and dysfunctional patterns of interaction. Final orders in this case will represent case resolution and settling of the legal matters, but an emotional settlement is also needed and this will require new methods of coordination and communication. It is the opinion of this writer that increased and unsupervised time between Adrian and the father is an important goal, that Adrian desires a relationship with the father as indicated by his half-sister, therapist, and reunification counselor, and that such contact is safe as long as the father is committed to substance abuse supports, mental health therapy, substance monitoring, domestic violence treatment, and consistent and weekly contacts with Adrian to include graduated increases of time with the child that are unsupervised so as to provide for the child to process the prospects of unsupervised and increased contact in counseling. Since 2023 there has been a reduction in the father's involvement and contact with the children, and during the summer of 2024 there were periods when his visits weren't occurring regularly or were disrupted. As Ms. Keilin notes, there must be an emphasis on routine contact and visits between Adrian and the father to help improve their relationship and for the father to have opportunities to utilize skills developed through therapeutic interventions. Recommendations for long-term periods of contact

between the father and children during vacations and holidays, and suggestions for a long-term parenting plan without consideration of the myriad number of variables impacting how the children will respond to the father, progress in treatment, and the family's ability to address the trauma of the past are unlikely to be reliable or productive and this case presents with a number of circumstances that may be subject to change. As such, the provisions offered below are a framework that should be used for the purposes of establishing benchmarks for progress, and to designate near-term goals that can serve as the foundation for a more sustained period of healing, sobriety, and reconciliation of past harms.

IX. RECOMMENDATIONS

- 1. There be restrictions against the father under RCW 26.09.191 for a history of acts of domestic violence and a long-term impairment resulting from substance abuse that interferes with the performance of parenting functions.**
- 2. Treatment recommendations:**
 - A continuing restraining order should be entered preventing email communications, text, and telephone calls between the parents. All communication should be through Our Family Wizard unless in the case of an emergency requiring medical care or other life-threatening circumstances.
 - The father to enroll within four weeks and complete a state-certified domestic violence treatment program (at the level recommended by the program). The father to sign a release so the mother may receive copies of his progress reports and notice of completion of the program directly from the provider. Providers include: ACT&T, A&TA, and Northwest Family Life.
 - The father to enroll in DV Dads when he has completed enough of the DV treatment program to do so, and complete the DV Dads program. The father to sign a release so the mother may receive copies of his progress reports and completion of the program directly from the provider.
 - A parent coordinator should be appointed for a period of two years from the date of the final parenting plan. Some resources include Jodie Nathan (206-669-2515), Yoshimi Pelczarski (206-683-2754), or Elizabeth Selleck (206-261-6367). The role of the parent coordinator should include assisting the parties in reaching a resolution of the matters involving the children's residential schedule, recommending any other services for the parties and/or the children including, but not limited to, parenting classes, further evaluation or assessment, and individual psychotherapy for the parties and/or child or family counseling or reunification counseling, establishing and enforcing communication guidelines for the parents and/or the child pursuant to provisions of the Final Parenting Plan, recommending to the parents non-substantive changes to the Final Parenting Plan, and providing dispute resolution as specified in the Final Parenting Plan.

- Adrian to continue in counseling with his current provider, meeting at least twice a month, or for a longer time or more frequent sessions if recommended by the therapist. The father should be included in Adrian's counseling at the direction of the provider. Within the next sixty days, Adrian's therapy should include a focus on skills and resources needed to accommodate future visits of additional time and unsupervised contact.
 - The father should continue treatment with Dr. Fannin to include regular Vivitrol shots and medication management necessary for continued sobriety. Dr. Fannin should issue a quarterly status report to be provided to the mother detailing the father's compliance with treatment. A copy of this report (64 pages) should be made available to Dr. Fannin.
 - The father to continue in therapy with Luis Merced at least twice monthly or more frequently as directed by Mr. Merced.
 - A copy of this report (63 pages) to be given to all providers referenced above as well as the father's medication prescriber within 10 days of beginning or continuing treatment.
 - The father should participate in hair follicle testing once every 90 days. The panel for testing should include THC, Opiates, PCP, Cocaine, Amphetamines, and Psilocybin. The father shall sign a release so that test results can be sent directly to the mother. Some resources for testing include Arc Point Labs (206-455-8970), American Diagnostics (206-762-4456), or Any Lab Test Now (425-200-6072).
 - The father to participate in Soberlink testing three times per day every day for at least two years. The father should be enrolled in the text reminder program, must maintain the necessary technical requirements to test (facial recognition technology, charged testing device, and internet connectivity), and should test within 30 minutes of the designated testing time. The father should provide approval for weekly test results to be emailed to the mother and parenting coordinator and for the mother to receive instantaneous test results via text message. The father should be permitted a maximum of one missed test per quarter. A second missed test or a failed test should result in suspension of the father's time with the children pending further court orders.
3. **School schedule:** The children will reside with the mother except that the children will reside with the father as follows:
- Max** – The child shall have contact with the father on days and times as agreed upon between the two. Max should be permitted to stop contact with the father at any time at his discretion.
- Adrian – Phase I:** For a period of 90 days, Adrian should have professionally supervised visits with the father every week on Saturday or Sunday (dependent on the supervisor's availability) for up to six hours. Barring injury or illness, visits should not be interrupted or canceled during this time. Vacation/travel plans should not interfere with regular supervised visits during Phase I. **Phase II:** Once the father has enrolled in any recommended domestic violence treatment program, has submitted Soberlink tests as recommended above for 90 days, participated in any joint counseling sessions if directed by Ms. Betts, and upon the appointment

of a parent coordinator who has approved plans for an increase in time, for a period of 90 days Adrian should reside with the father unsupervised twice per week on Sunday for six hours, and every Wednesday from after school until 7:30 p.m. If Adrian is scheduled to participate in extracurricular activities during the father's designated residential time, the father should be permitted to transport Adrian and attend those activities. **Phase III:** Upon proof of compliance with domestic violence treatment, Soberlink tests as recommended above, participation in any joint counseling sessions if directed by Ms. Betts, or reunification therapy if directed by the parent coordinator, for a period of 90 days Adrian should reside with the father every other Saturday from noon until Sunday at noon, and every Wednesday from after school until 7:30 p.m. If Adrian is scheduled to participate in extracurricular activities during the father's designated residential time, the father should be permitted to transport Adrian and attend those activities. **Phase IV:** Upon proof of compliance with domestic violence treatment, Soberlink tests as recommended above, participation in any joint counseling sessions if directed by Ms. Betts, or reunification therapy if directed by the parent coordinator, Adrian should reside with the father on alternating weekends from Friday after school until Sunday at 6:00 p.m., and every Wednesday from after school until 7:30 p.m. If Adrian is scheduled to participate in extracurricular activities during the father's designated residential time, the father should be permitted to transport Adrian and attend those activities.

4. **Vacations:** Until the commencement of Phase IV above, the mother should be permitted two consecutive or nonconsecutive weeks of vacation time with the children each year. The father should be permitted Zoom/Skype/Facetime contact with Adrian twice per week during the mother's vacation. After the commencement of Phase IV above, and starting in the summer of 2025, the father should be permitted one week of vacation time with Adrian each year. With continued compliance with the requirements of Phase IV above, starting in the summer of 2026, the father should be permitted two consecutive or nonconsecutive weeks of vacation time with Adrian each year. The parents should be required to submit their plans for vacation with the children to one another by March 1st of each year. If the parent's plans conflict, the mother's plans should have priority in even years, and the father's plans should have priority in odd years. Each parent to provide the other with dates of travel, flight numbers, location of stay, and an emergency phone contact where the traveling parent/child may be reached at least 30 days in advance of travel. For international travel, the nontraveling parent shall execute a signed and notarized letter permitting travel within 30 days of notice by the traveling parent of their plans. The mother should maintain possession of passports for the children. Permission for travel should not be unreasonably withheld.
5. **Summer:** Same as school schedule except for vacations as recommended above.
6. **Holidays:** Beginning with the commencement of Phase IV, the parents will alternate the following holidays: July 4th (mother even, father odd). July 4th should begin on July 4th at noon and end on July 5th at noon. Memorial Day, Labor Day, and Martin Luther King Jr. Day shall be spent with the parent with whom Adrian resides for the adjoining weekend, with the weekend ending on the Monday holiday at 6:00 p.m. Thanksgiving Day (mother odd, father

even). Thanksgiving will be defined as after school the day before Thanksgiving to 6 pm the day after Thanksgiving.

7. **Special Occasions:** Mother will have Adrian for her birthday and Mother's Day. Upon commencement of Phase IV, the father will have Adrian for his birthday and Father's Day, and the parents will alternate Adrian's birthday with the mother having Adrian on his birthday in even years, and the father having Adrian for his birthday in odd years. If a special occasion falls on a school day, the special occasion shall be defined as beginning after school until 7:30 p.m. If the special occasion falls on a weekend, the special occasion shall be defined as beginning at 10:00 a.m. on the day of the special occasion and ending at 6:00 p.m.
8. **Decision making:** Each parent will make decisions regarding the day-to-day care and control of the children while the children are residing with that parent. Either parent can make emergency decisions affecting the health or safety of the children. Due to a restriction against the father and the parents' inability to effectively make decisions, the mother will have sole decision-making for major decisions such as education, non-emergency health care, counseling, driver's license, evaluations and treatment providers.
9. **Dispute Resolution:** If the parents have disputes regarding the parenting plan, they will submit the disputes to arbitration or the court.
10. The mother should populate the Our Family Wizard calendar with any extracurricular activities, camps, planned vacations, and school-related trips. The father should have access to the calendar and shall be responsible for providing transportation and supervision for those activities that are scheduled during his regular residential time.
11. Any transfers of the children to be at a public place within 2 miles of the halfway point between the parents' homes, chosen by the mother.
12. Both parents to notify each other promptly of any change in residence via OFW.
13. Both parents should be self-informed of the children's academic status and school attendance.
14. The children will have unrestricted telephone/social media contact with the parents.
15. Each parent shall notify the other parent as soon as reasonably possible when there is an issue related to the children's emergency medical care.
16. Neither parent shall advise the children of the status of child support payments or other legal matters regarding the parents' relationship.
17. Neither parent, nor any other adult in their presence, shall make any disparaging remarks about the other in the presence of the children.

Respectfully submitted this 18th day of October, 2024.


Connor Lenz, MSW

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PSYCHOLOGICAL TEST RESULTS

Name: Robert Moyer
DOB: 01/05/1967(57)
Date of Testing: 07/02/2024
Purpose of Testing: Adjunct to evaluation by Connor Lenz
Tests Administered: Personality Assessment Inventory (PAI)
Minnesota Multiphasic Personality Inventory – 2 (MMPI-2)

Referral

Robert Moyer was referred for testing by Connor Lenz as an adjunct to a more comprehensive evaluation for a family law proceeding. Robert described himself as a separated male with three children. Currently retired from Microsoft, he indicated that he has been diagnosed with ADHD and had taken prescribed Vyvanse on the day of testing. He reported no learning disabilities or any major health problems. Testing was administered testing in the office after the signing of informed consent and an authorization to release information.

Test Disclaimer

Psychological test results described below represent hypotheses about an individual's personality or behavioral tendencies. They should not be considered conclusive or definitive. Before drawing conclusions about the individual being tested, hypotheses should be verified by data collected from other sources. The interpretations contained below are designed to facilitate the evaluation process by a professional and should be used only by those who are trained and qualified to interpret psychological testing. The results were obtained for a specific purpose and at a specific time and should not be used for any other purpose. Test results can change over time and as a result of changing life circumstances. They provide data on an individual only for a particular time and context. Results should be considered confidential,

legally privileged, and sensitive and should not be disclosed to any party other than those who have received legal authorization to receive them.

Personality Assessment Inventory

The Personality Assessment Inventory (PAI) is an objective measure of personality and psychopathology. It consists of four sets of scales, assessing validity, personality and psychopathology, treatment and case management orientation, and interpersonal approaches. It has very good validity and reliability, and exceeds other personality inventories in its psychometric properties. In clinical and forensic settings, it is becoming one of the most widely used and accepted instruments for the assessment of personality.

Responses were consistent and non-bizarre, suggesting that this subject attended well to items and understood their content. Unlike most subjects in this setting, he was non-defensive in responding to test items. He appeared to be very frank about his struggles, and he exhibited no effort to minimize them.

The clinical profile revealed evidence of a likely problem with the misuse of alcohol. Individuals with this profile often struggle with their drinking and have suffered negative consequences as a result. He now reports experiencing significant levels of stress, and that stress is likely having an impact on his daily functioning. He seems have diminished energy and an inability to endure his usual level of activity, though he does not seem to be suffering from major depression. He is reporting some turbulence in his relationships and a tendency to become easily frustrated and angry.

His openness to the testing suggests that if he is now sober and in recovery, he is demonstrating a good degree of honesty and is able to acknowledge his problems. His high level of stress might then be the result not only of actual stressful life events, but also possibly a result of his abandonment of his usual coping strategy (i.e., using alcohol to numb).

In interpersonal relationships, and possibly parenting, he showed normal levels of dominance. This suggests the capacity to set limits and structure, and to assertively, but not aggressively, advocate for the interests and care of his children. Warmth was also at normal levels, suggesting the capacity to attach and bond, to empathize with others, and to value harmony.

Minnesota Multiphasic Personality Inventory – 2 (MMPI-2)

The MMPI-2 is an objective measure of personality and emotional disorders. It is one of the most highly researched psychological tests and shows very good reliability and validity. Items on the inventory are scored and grouped into scales consisting of both validity scales and clinical scales. Validity scales measure the test-taking approach of the client, whereas clinical scales

measure the presence of emotional and psychological issues. The clinical scales are also looked at in combination, called the profile, which is often interpreted as well.

Like his results on the PAI, no evidence was found of defensive responding. Again, he appeared to approach the test items with honesty and frankness.

Findings suggest the presence of high levels of stress in an individual who might seek overly simplistic and naïve solutions to problems. He is acknowledging having a problem with addiction, as well as a good amount of guilt and self-reproach. He reports having imbibed alcohol excessively and having gotten into trouble with the law, and also reports having engaged in unusual sexual practices and having had very peculiar and strange experiences. He reports that at times he hears so well that it bothers him. These responses might deserve more specifics than the testing can provide.

He seems to be an individual who seeks harmony and tries to be optimistic. Though he likely prefers looking at the world through rose-colored glasses, when faced with challenges and difficulties, he might be apt to deny that they exist until he can no longer avoid acknowledging their presence. But facing them will probably not be easy for him.

He likely is experiencing an atypical depression, characterized by some dysphoric mood, bouts of crying, fatigue and loss of energy, anxiety, and insecurity, but he may deny feeling this way. In relationships with others, he might become dependent on a partner and be apt to adopt the persona of a martyr, carrying around feelings of having been mistreated. Others may view him as a bit immature.

He probably bottles up his feelings and is sensitive to criticism, but likely is non-aggressive by nature. He probably is conscientious and responsible, but overly self-critical when he stumbles.

Under penalty of perjury under the laws of the State of Washington I declare that the foregoing is true and correct to the best of my abilities.

Dated this 10th day of July 2024 in Seattle, WA.

Signed:

Gary Wieder, PhD (electronic signature)

Dr. Gary Wieder
Clinical and Forensic Psychology

Dr. Gary Wieder
2101 Fourth Avenue, Suite 1380
Seattle, WA 98121
206/728-4217

Dr. Gary B. Wieder, PLLC
2101 Fourth Avenue, Suite 1380
Seattle, WA 98121
206/728-4217

PSYCHOLOGICAL TEST RESULTS

Name: Christine Moyer
DOB: 09/26/1976 (47)
Date of Testing: 07/05/2024
Purpose of Testing: Adjunct to evaluation by Connor Lenz
Tests Administered: Personality Assessment Inventory (PAI)
Minnesota Multiphasic Personality Inventory – 2 (MMPI-2)

Referral

Christine Moyer was referred for testing by Connor Lenz as an adjunct to a more comprehensive evaluation for a family law proceeding. Christine described herself as a separated female with three children and employment as a tax accountant. Born in Hong Kong and mixed race, Asian-Caucasian, she reportedly came to this country in 1998 where she received post-graduate education and her Master's Degree. She reported having no learning disabilities or any major health problems or diagnosis of ADHD. Testing was administered testing in the office after the signing of informed consent and an authorization to release information.

Test Disclaimer

Psychological test results described below represent hypotheses about an individual's personality or behavioral tendencies. They should not be considered conclusive or definitive. Before drawing conclusions about the individual being tested, hypotheses should be verified by data collected from other sources. The interpretations contained below are designed to facilitate the evaluation process by a professional and should be used only by those who are trained and qualified to interpret psychological testing. The results were obtained for a specific purpose and at a specific time and should not be used for any other purpose. Test results can change over time and as a result of changing life circumstances. They provide data on an

individual only for a particular time and context. Results should be considered confidential, legally privileged, and sensitive and should not be disclosed to any party other than those who have received legal authorization to receive them.

Personality Assessment Inventory

The Personality Assessment Inventory (PAI) is an objective measure of personality and psychopathology. It consists of four sets of scales, assessing validity, personality and psychopathology, treatment and case management orientation, and interpersonal approaches. It has very good validity and reliability, and exceeds other personality inventories in its psychometric properties. In clinical and forensic settings, it is becoming one of the most widely used and accepted instruments for the assessment of personality.

Responses were consistent and non-bizarre, suggesting that this subject attended well to items and understood their content. She exhibited an average degree of defensive responding for this testing context, showing some likely apprehension about how test results might be interpreted, but not significant enough to invalidate them. Testing is likely valid, but may underestimate some personal difficulties.

The clinical profile was within normal range and showed no evidence of any major psychological problems (anxiety, depression, mania, paranoia, disordered thought or personality, antisocial tendencies, alcohol or drug abuse, or aggression).

She seems to be experiencing some moderate degree of stress that might be normal for her circumstances and are not apt to render her impaired. She also is describing some relationship turbulence that might also have to do with her current situation.

In interpersonal relationships, and possibly parenting, she showed normal levels of dominance. This suggests the capacity to set limits and structure, and to assertively, but not aggressively, advocate for the interests and care of her children. Warmth was also at normal levels, suggesting the capacity to attach and bond, to empathize with others, and to value harmony.

In sum, no significant concerns were evident from any scores.

Minnesota Multiphasic Personality Inventory – 2 (MMPI-2)

The MMPI-2 is an objective measure of personality and emotional disorders. It is one of the most highly researched psychological tests and shows very good reliability and validity. Items on the inventory are scored and grouped into scales consisting of both validity scales and clinical scales. Validity scales measure the test-taking approach of the client, whereas clinical scales measure the presence of emotional and psychological issues. The clinical scales are also looked at in combination, called the profile, which is often interpreted as well.

Results showed more defensiveness than was evident on the PAI. It suggested some denial of problems and possible lack of insight. She might also be slow to adapt to unpredictable situations and to be somewhat morally rigid. Though test results probably are valid, they might also minimize the presence of problems.

The overall clinical profile was within normal range, suggesting an absence of serious psychological difficulties. Individual scale and subscale scores do suggest some personality features that might be relevant.

She appears to be a person who is likely to perform well and succeed in structured environments, where expectations are clear, and she might be a person who is dutiful and invested in following "shoulds" and "oughts." She is likely to be self-reliant and independent, and to keep her emotions well under control. She may not find socializing all that fun or energizing, and might seek to avoid some social gatherings as a result. She also probably is uncomfortable disclosing personal details to others about her life, preferring instead, to keep her own counsel.

She is reporting a tendency to cry easily and seems to have numerous fears. She also indicates a pattern of getting mad easily, but also getting over her anger quickly.

Under penalty of perjury under the laws of the State of Washington I declare that the foregoing is true and correct to the best of my abilities.

Dated this 10th day of July 2024 in Seattle, WA.

Signed:

Gary Wieder, PhD (electronic signature)

Dr. Gary Wieder
Clinical and Forensic Psychology

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5 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**

6 **COUNTY OF KING**

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In re the Marriage of:

CHRISTINE MOYER,

Petitioner,

and

ROBERT EDWARD MOYER II,

Respondent.

NO. 23-3-05392-7 SEA

STIPULATION RE: RESIDENTIAL
SCHEDULE

COME NOW the parties, by and through their attorneys of record and hereby stipulate as follows:

1. Robert Moyer shall have supervised visitation with their son, Adrian Moyer, for 6 hours every other Saturday from 10:00 a.m. to 4:00 p.m. The visitation schedule may be adjusted as agreed including the day and hours to accommodate both Adrian's schedule and that of the supervisor.

2. Alan Schneider shall supervise the visits unless otherwise agreed by the parties.

3. The parties and the children shall participate in reunification counseling with Jennifer Kielin. They do not have to participate in joint sessions unless requested by Ms. Kielin.

4. The parties shall follow Ms. Kielin's recommendations unless either party files a motion with the Court seeking to amend or change that recommendation within 7 days.

STIPULATION RE:
RESIDENTIAL
SCHEDULE

p. 1 of 2

LASHER
HOLZAPFEL
SPERRY &
EBBERSON

ATTORNEYS AT LAW
2600 TWO UNION SQUARE
601 UNION STREET
SEATTLE WA 98101-4000
TELEPHONE 206 624-1230
Fax 206 340-2563

1 Stipulated to this 13th day of June, 2024.

2 LASHER HOLZAPFEL
3 SPERRY & EBBERSON PLLC

DE MAAR LAW

4 *Lisa Ann Sharpe*
5 Lisa Ann Sharpe, WSBA No. 21047
6 Attorney for Respondent

7 *Natalie de Maar*

8 Natalie de Maar, WSBA No. 24836
9 Attorney for Petitioner

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STIPULATION RE:
RESIDENTIAL
SCHEDULE

p. 2 of 2

LASHER
HOLZAPFEL
SPERRY &
EBBERSON

ATTORNEYS AT LAW
2600 TWO UNION SQUARE
601 UNION STREET
SEATTLE WA 98101-4000
TELEPHONE 206 624-1230
Fax 206 340-2563

New Life Recovery Solutions
Substance Use Disorder Assessment
Summary Short Form

SEALED

Client Name: Moyer, Robert E.

DOB: 01-05-1967

Case#: 19-017170

Date of Assessment: 08-20-2019

Diagnosis: Client does meet diagnostic criteria for Substance Use Disorder (SUD) **Alcohol Use Disorder 303.90**

F10.20 (severe) as established by *American Society of Addiction Medicine PPC (2013); Diagnostic Statistical Manual-(DSM-V, 2013)*.

Data Notes: The purpose of the present assessment was to determine the named client's current and historical involvement with alcohol and other drugs and to recommend appropriate treatment if indicated. This assessment is provided on behalf of Mr. Robert E. Moyer who completed a SUD evaluation at this facility on August 20th, 2019. As part of the assessment process, Mr. Moyer underwent a diagnostic interview based in-part on the self-report of the client, a full review of client use history, previous treatment/detox history, family history.

Collateral information procured: Driving abstract, DCH, arresting officers report, and Bio-Psycho-Social data collected from the client were considered as part of the before stated assessment process.

Clinical methods of assessment applied: the application of standardized methods of testing utilized ACES, MAST/DAST-10 screening tools and 8-panel urinalysis w/ETG.

This counselor met with Mr. Moyer at the offices of New Life Recovery Solutions (NLRS) to complete the present evaluation for SUD. Any pertinent information derived from the before stated review was applied to criteria established by the *American Psychiatric Association (DSM-V, 2013; Pg. 490-491)* and the *American Society of Addiction Medicine PPC (ASAM, 2013)*.

Throughout the assessment process, the client's observed behavior was consistent with his response. The client was oriented times three (person, place, and time). The client's over-all affect (expression of feelings through body language, tone of voice, and facial expression) was consistent/appropriate to the subject matter and assessment process. The client is self-described as a 52-year-old male, currently living in Kirkland, WA. level of education was described as, "*I did some college.*" Client reported as being employed (MicroSoft). Client endorsed a family history of SUD. Client denied any history of suicidal ideation/attempts (SI) and denied any history of homicidal ideation / attempts (HI). Client denied any history of military service.

Presenting Problem: Client self-referred citing concerns that he may have AUD following arrest for DUI and marital / familial distress due to client drinking of alcohol. "Client stated, "*I have a big drinking problem.*"

History of Drug Use:

Alcohol: Client reported first use of alcohol as occurring on or about the age of 24 with regular use reported by the client as commencing by age 26. Client self-described alcohol use as, "*I drink half a fifth of vodka a day during the week and a whole bottle on weekends*". Last use of alcohol was reported by client as occurring on or about 08-07, 2019.

Client denied the use of any other psycho-active drugs.

DCH/Driving Abstract History: Mr. Moyer's DCH / Driving Abstract were reviewed and endorsed client's assertion of a history of DUI with 02 prior to the present charge. Nothing indicated other than pending charges.

Detox/Treatment History:

Client acknowledged a history of both inpatient and outpatient SUD treatment, and denied any history of medically managed detox. (Driftwood, Austin Texas 2019, ATA Bellevue.

This notice accompanies a disclosure of information concerning a client in chemical dependency treatment, made to you with the consent of such client. This information has been disclosed to you from records protected by Federal confidentiality rules (42 CFR Part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2.

New Life Recovery Solutions

Substance Use Disorder Assessment Summary Short Form

MAST Scoring and interpretation: A score value of “1-5” is given for each YES response, except for items 4, 5, and 7, for which a NO response is given a score of “1-2.” Scores range from 1-53. Any score above 12 is indicative of an alcohol problem. Mr. Moyer scored a 35. Indicative of significant alcohol problem.

DAST-10 Scoring and Interpretation: A score of “1” is given for each YES response. A score of three or higher indicates potential Substance Use Disorder requiring further investigation / intensive assessment. Mr. Moyer scored a 01. No problem indicated.

ACES (adverse childhood experience score): Client scored a 06 indicating an extensive degree of childhood trauma.

UA Results: As part of the assessment process, the client was administered a urinalysis (UA) w/ETG test. UA tested NEGATIVE for all other psycho-active drugs. This was consistent with self-report of client.

Current Medications: Client Denied.

ASAM PPC:

Dimension One (Acute Withdrawal): No Reported History/ client denied any history of seizures / DT's: L 0.0

Dimension Two (Bio-medical Conditions): None Reported / None Observed: L 0.0

Dimension Three (Cognitive, Emotional, and Behavioral Conditions):

Cognitive – client denied however, given client history client seems to lack insight into risks involved with continuing with alcoholic drinking. Client denied any diagnosis of cognitive deficit.

Emotional –Client reported struggling with anxiety/depression (diagnose by PCP). Client denied any history of SI/SA, HI/HA.

Behavioral: Client may benefit from developing coping skills / gaining insight that supports ongoing recovery lifestyle. Nothing that would preclude client from. L-1.0

Dimension Four (Readiness to Change): Client is currently in the preparation stage of change. At this point appears externally motivated to change (wife/family) w/internal emergent. Client demonstrates a degree of ambivalence toward treatment / 12-step recovery. Client most likely lacks insight, cognitive dissonance / cognitive distortion preventing client from recognizing severity of AUD. Nothing that would preclude client from engaging in treatment: L-2.1

Dimension Five: (Relapse Risk): Likelihood of relapse w/o clinical intervention: **High**. Client acknowledged high risk of drinking again w/o clinical intervention. Client will benefit from developing an understanding of personal relapse pattern and the coping mechanisms necessary to achieve / sustain sobriety. L 2.1

Dimension Six (Recovery Environment): Client living environment is stable, however, client would benefit from development of an ongoing / sustainable recovery plan, fellowship community. Nothing that will preclude client from entering treatment. L 2.1

Diagnostic Criteria Applied (DSM V, 2013; Pg. 490-491)

- A. A problematic pattern of alcohol / drug use leading to clinically significant impairment or distress, as manifested by at least two of the following, occurring within a 12- month period:
 1. Substance is often taken in larger amounts over a longer period than intended.
 2. There is a persistent desire or unsuccessful efforts to cut down or control substance use.
 3. A great deal of time is spent to obtain, use or recover from a substance.
 4. Craving or a strong desire/urge to use a substance.

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New Life Recovery Solutions

Substance Use Disorder Assessment

Summary Short Form

5. Recurrent substance use resulting in a failure to fulfill obligations at work, home or school.
6. Continued substance use despite having persistent or recurrent social or interpersonal problems caused or exacerbated by the substance use.
7. Important social, occupational, or recreational activities are given up or reduced because of substance use.
8. Recurrent substance use in situations in which it is physically hazardous.
9. Substance use is continued despite knowledge of having a persistent or recurrent physical or psychological problem that is likely to have been caused or exacerbated by substance.
10. **Tolerance:** as defined by either of the following.
 - a. A need for markedly increased amounts of the drug/alcohol intoxication / desired effect.
 - b. A markedly diminished effect with continued use of the same amount of drug/alcohol.
11. **Withdrawal:** as manifested by either of the following:
 - a. The characteristic withdrawal syndrome for opioids/meth (refer to Criteria A and B of the criteria set for alcohol withdrawal, pp. 499-500).

Diagnostic Criteria Met: Client meets 07 of the 11 above stated criteria indicating a diagnosis of severe Alcohol Use Disorder 303.90 / F10.20 (uncomplicated).

Treatment Recommendation: Client meets criteria for ASAM PPC Level 2.1 IOP. Duration and intensity of treatment is contingent upon client progress toward individual treatment goals at said level of care. As a general guideline, based on ASAM and our experience, most clients will benefit from the plan stated above to achieve their goals / objectives.

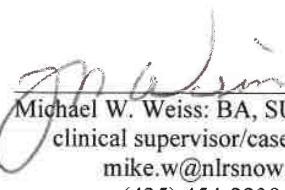
Treatment Protocol to include the following:

Phase I: ASAM Level-2.1 Intensive Outpatient. 72 hours of group therapy, one on one counseling randomized urinalysis w/ETG, 12-step meetings (sponsor, home group, step work) are required.

Phase II: ASAM Level-1.0 Outpatient. 36 sessions of group therapy (two-hours each session), two one on one sessions. UA w/ETG randomly administered throughout the duration of said treatment. Moreover, Mr. Moyer will be encouraged to attend one self-help support groups a week.

The data derived from the before mentioned resources / screening methods was applied to this assessment and does support a diagnosis of SUD (in early/partial remission).

Falsification of information or failing to report all relevant and pertinent information could nullify this evaluation-report resulting in an additional assessment and ensuing financial obligation.



Michael W. Weiss: BA, SUDP, NCAC-I
clinical supervisor/case manager
mike.w@nlrsnow.com
(425) 454-2238

This notice accompanies a disclosure of information concerning a client in chemical dependency treatment, made to you with the consent of such client. This information has been disclosed to you from records protected by Federal confidentiality rules (42 CFR Part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2.



Electronically Filed

9/20/2021 8:30:00 AM

New Life Recovery Solutions

9Z0718572-WSPKINCKD

SEALED

King County District Court

Letter of Completion of Treatment

Date: 11-20-2020

Client Name: Moyer, Robert E.

DOB: 01-05-1967

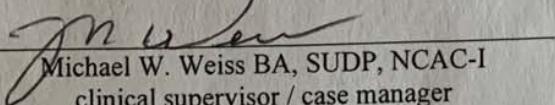
Case#: 9Z0718572

Court: King County District Court

The present letter provides a summary of Mr. Robert Edward Moyer's Participation / completion of this agency's one-year Intensive Outpatient (IOP) treatment program. New Life Recovery Solutions is state certified (DASA 17142100) to provide the treatment services outlined below.

- Mr. Moyer commenced Phase I of this agency's ASAM: L-2.1 Intensive Outpatient (IOP) treatment program, on August 20th, 2019. This phase of treatment included the client attending three, two-hour group therapy sessions a week, over the first three months of said treatment program (36 sessions / 72 hours total). Also included with this level of care were three individual counseling sessions, and random UA's w/ETG. Mr. Moyer successfully completed IOP treatment on November 15th, 2019, in full compliance.
- On November 20th, 2019, said client commenced Phase-II of his continuum of care, ASAM L-1.0 Relapse Prevention (OP). This phase included the client attending one two-hour group therapy session a week, for the remaining nine months of the before stated treatment program. One on one sessions and random UA's were also included throughout this stage of care. In addition, the client was expected to attend one self-help support group meeting a week (AA/NA, etc.).
- On October 01st, 2020, Mr. Moyer was discharged from the care of New Life Recovery Solutions in full compliance. Said client completed 150 hours of treatment, including 12 randomized urinalysis screens w/ETG (all testing **Negative** for any psycho-active substances), required attendance at a minimum of one self-help group meeting a week throughout the duration of the previously outlined recovery program. Mr. Moyer has been sober 14 months. Discharge status was noted as "*fully compliant, client in remission.*" The current prognosis for Mr. Moyer was determined to be optimistic, good / guarded. It is apparent to this counselor that Mr. Moyer's approach to all levels of treatment were executed with the highest degree of commitment and sincerity.

If you have any questions or concerns regarding the above stated matter, please feel free to contact me.


Michael W. Weiss BA, SUDP, NCAC-I

clinical supervisor / case manager

mike.w@nlsnow.com

(425)-454-2238

c.c. client file

This notice accompanies a disclosure of information concerning a client in alcohol/drug abuse treatment, made to you with the consent of such client. This information has been disclosed to you from records protected by Federal confidentiality rules (42 CFR Part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2.

(425) 454-2238 | admin@nlsnow.com | www.nlsnow.com

12330 NE 8th Street Suite 100 Bellevue, WA 98005

Sealed RESP40

Electronically Filed

LA PERLA COUNSELING &
TRAUMA RESPONSE SERVICES, INC.

1611-116th AVE NE SUITE #221 & #215

BELLEVUE, WA, 98004

425-449-8171

9/20/2021 8:30:00 AM

870718572-WSPIKINCTKCD

King County District Court



SEALED

July 1, 2021

To Jon Fox,

I am a Licensed Mental Health Counselor who is currently working with Robert Moyer weekly since 12/3/2020 to the present. Robert has agreed to work with me on a weekly basis (60-minute sessions), addressing mood and emotional concerns and developmental trauma/PTSD (F.43.10) stemming from his history and present concerns using cognitive behavioral strategies and EMDR.

Robert has been an active participant in therapy and presents with someone who wishes to continue working on his past and present concerns. Robert has been able to address uncomfortable personal topics as well as understand this objective observer's challenging statements and questions. Robert has agreed to work with me until his treatment objectives have been reached. Due to Robert's father's recent health concerns, the focus of his therapy have been centered on this as well as his parent's role in his development.

Thanks for your time,

Luis Merced, MS, LMHC, NCC, CCTP-II, EMDR
Certified Complex Trauma Professional Level II
He/Him/His
La Perla Counseling &
Trauma Response Services, Inc.
1611-116th Ave N.E. Suite 215
Bellevue, WA, 98004
425-406-7265

Client Detail Report

Client Name: Robert Moyer

Device ID: 3600A25E, Activation Date 10/14/2023, Report Range 10/14/2023 - 10/22/2024, Report Date 10/22/2024

1112 Tests	 Compliant Tests Tests that follow testing guidelines	1111
	 Non-Compliant Tests Positive tests or tests where the identity is declined	1

October 2023						
Sun	Mon	Tue	Wed	Thur	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19  11:51 AM  12:03 PM  5:08 PM  9:04 PM	20  4:19 AM  12:37 PM  4:09 PM  8:46 PM	21  5:38 AM  11:05 AM  2:19 PM  6:06 PM  8:38 PM
22  4:56 AM  10:05 AM  11:59 AM  3:37 PM	23  7:47 AM  11:41 AM  3:21 PM  9:43 PM  11:43 PM	24  7:31 AM  12:15 PM  2:34 PM  9:24 PM	25  5:53 AM  12:36 PM  6:26 PM  9:58 PM	26  8:05 AM  1:34 PM  7:32 PM	27  6:57 AM  11:59 AM  4:45 PM  8:15 PM  10:44 PM	28  4:57 AM  12:05 PM  4:15 PM  6:57 PM  10:39 PM
29  6:06 AM  11:49 AM  8:01 PM  8:05 PM  10:38 PM	30  5:00 AM  3:26 PM  5:16 PM  7:16 PM  7:57 PM  9:41 PM	31  3:31 AM  12:21 PM  5:06 PM  7:48 PM				

November 2023						
Sun	Mon	Tue	Wed	Thur	Fri	Sat
			1 ✓ 7:38 AM ✓ 11:48 AM ✓ 2:19 PM ✓ 6:07 PM ✓ 10:17 PM ✓ 11:55 PM	2 ✓ 8:04 AM ✓ 1:06 PM ✓ 5:45 PM ✓ 7:01 PM ✓ 7:06 PM ✓ 10:30 PM	3 ✓ 8:34 AM ✓ 2:18 PM ✓ 7:09 PM ✓ 9:16 PM ✓ 10:11 PM ✓ 10:30 PM	4 ✓ 8:59 AM ✓ 10:39 AM ✓ 1:01 PM ✓ 4:07 PM ✓ 9:42 PM
5 ✓ 9:17 AM ✓ 12:02 PM ✓ 3:55 PM ✓ 7:16 PM	6 ✓ 7:42 AM ✓ 4:06 PM ✓ 8:43 PM ✓ 10:20 PM	7 ✓ 5:52 AM ✓ 11:52 AM ✓ 8:31 PM ✓ 10:17 PM	8 ✓ 6:55 AM ✓ 11:56 AM ✓ 1:41 PM ✓ 6:20 PM	9 ✓ 7:13 AM ✓ 12:26 PM ✓ 6:27 PM ✓ 10:44 PM	10 ✓ 6:59 AM ✓ 4:14 PM ✓ 9:41 PM	11 ✓ 8:57 AM ✓ 12:44 PM ✓ 4:14 PM
12 ✓ 7:48 AM ✓ 11:13 AM ✓ 12:24 PM ✓ 6:46 PM	13 ✓ 12:54 PM ✓ 3:00 PM ✓ 7:26 PM ✓ 11:30 PM	14 ✓ 7:30 AM ✓ 12:56 PM ✓ 3:28 PM	15 ✓ 8:15 AM ✓ 12:51 PM ✓ 6:04 PM ✓ 9:38 PM	16 ✓ 4:30 AM ✓ 12:27 PM ✓ 6:22 PM ✓ 9:30 PM	17 ✓ 7:08 AM ✓ 1:23 PM ✓ 4:52 PM ✓ 7:07 PM	18 ✓ 7:44 AM ✓ 12:50 PM ✓ 3:28 PM ✓ 10:19 PM
19 ✓ 10:50 AM ✓ 12:41 PM ✓ 4:22 PM ✓ 9:24 PM	20 ✓ 7:08 AM ✓ 3:13 PM ✓ 8:32 PM ✓ 10:29 PM	21 ✓ 12:54 PM ✓ 3:18 PM ✓ 9:54 PM ✓ 11:29 PM	22 ✓ 1:39 PM ✓ 5:08 PM ✓ 6:45 PM ✓ 10:44 PM	23 ✓ 11:42 AM ✓ 2:54 PM ✓ 4:20 PM ✓ 8:24 PM	24 ✓ 9:45 AM ✓ 12:31 PM ✓ 3:00 PM ✓ 7:23 PM	25 ✓ 7:36 AM ✓ 11:57 AM ✓ 6:46 PM ✓ 9:51 PM
26 ✓ 7:32 AM ✓ 12:16 PM ✓ 8:09 PM	27 ✓ 6:24 AM ✓ 12:57 PM ✓ 4:55 PM ✓ 9:02 PM	28 ✓ 7:24 AM ✓ 11:28 AM ✓ 8:30 PM	29 ✓ 4:31 AM ✓ 10:30 AM ✓ 4:37 PM ✓ 8:36 PM	30 ✓ 7:35 AM ✓ 1:28 PM ✓ 7:38 PM ✓ 9:37 PM		

December 2023						
Sun	Mon	Tue	Wed	Thur	Fri	Sat
					1 ✓ 7:15 AM ✓ 12:26 PM ✓ 4:36 PM ✓ 9:40 PM	2 ✓ 8:06 AM ✓ 12:02 PM ✓ 8:42 PM
3 ✓ 9:13 AM ✓ 1:50 PM ✓ 4:23 PM ✓ 6:18 PM ✓ 9:10 PM	4 ✓ 7:08 AM ✓ 6:49 PM ✓ 7:58 PM ✓ 10:23 PM	5 ✓ 7:09 AM ✓ 6:17 PM ✓ 8:46 PM	6 ✓ 9:05 AM ✓ 12:20 PM ✓ 5:11 PM	7 ✓ 4:57 AM ✓ 7:37 AM ✓ 11:18 AM ✓ 3:04 PM ✓ 8:54 PM	8 ✓ 9:06 AM ✓ 12:41 PM ✓ 4:54 PM ✓ 11:52 PM	9 ✓ 6:27 AM ✓ 2:02 PM ✓ 5:16 PM ✓ 10:18 PM
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January 2024

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February 2024						
Sun	Mon	Tue	Wed	Thur	Fri	Sat
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March 2024

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April 2024

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28 ✓ 7:46 AM ✓ 3:13 PM	29 ✓ 1:24 PM ✓ 4:28 PM ✓ 10:58 PM ✓ 11:40 PM	30 ✓ 1:11 PM ✓ 3:13 PM ✓ 10:07 PM ✓ 10:52 PM ✓ 11:51 PM				

May 2024						
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Non-Compliant Tests (1)

✗ Sunday 05/05/2024 @ 10:02 PM PDT | A positive test was received.

10:02 PM PDT A positive test was received (.013 BAC).

10:18 PM PDT A positive retest was received (.007 BAC).

10:34 PM PDT A compliant retest was received.

June 2024

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July 2024						
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14 ✓ 11:56 AM ✓ 4:55 PM	15 ✓ 1:19 PM ✓ 7:01 PM ✓ 10:21 PM	16 ✓ 1:39 PM ✓ 9:56 PM ✓ 10:54 PM ✓ 11:05 PM	17 ✓ 5:09 PM ✓ 7:20 PM ✓ 7:56 PM ✓ 10:03 PM ✓ 10:18 PM	18	19	20
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August 2024

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4 ✓ 2:03 AM ✓ 5:04 PM ✓ 8:04 PM ✓ 11:31 PM	5 ✓ 12:17 AM ✓ 3:46 PM	6 ✓ 1:04 AM ✓ 10:02 AM ✓ 11:58 PM	7 ✓ 12:43 AM ✓ 8:30 AM ✓ 3:56 PM ✓ 10:13 PM	8 ✓ 12:31 AM ✓ 12:54 PM ✓ 4:15 PM ✓ 9:55 PM	9 ✓ 1:34 AM ✓ 6:48 PM ✓ 11:44 PM	10 ✓ 1:21 PM ✓ 7:28 PM
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September 2024

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29 ✓ 12:34 PM ✓ 4:57 PM	30 ✓ 1:58 PM ✓ 5:36 PM ✓ 7:14 PM					

October 2024

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27	28	29	30	31		

New Life Recovery Solutions

Substance Use Disorder Assessment

Summary Short Form

SEALED

Patient Name: Robert Moyer

DOB: 01/05/1967

Date of Assessment: 10/11/2023

Diagnosis: F10.20 Alcohol Use Disorder, In Full Sustained Remission. Mr. Moyer does not currently meet diagnostic criteria for an active substance use disorder (SUD) as established by *American Society of Addiction Medicine PPC (2013); Diagnostic Statistical Manual-(DSM-V, 2013)*.

Data Notes: The purpose of the present assessment was to determine Mr. Moyer current and historical involvement with alcohol and other drugs and to recommend appropriate treatment if indicated. This assessment is provided on behalf of Mr. Moyer who completed a drug and alcohol evaluation at this facility on October 11, 2023. As part of the assessment process, Mr. Moyer underwent a diagnostic interview based in-part on the self-report of Mr. Moyer a full review of Mr. Moyer use history, previous treatment/detox history, family history.

Collateral information procured: Defendant Criminal History, driving abstract reviewed.

Clinical methods of assessment applied: the application of standardized methods of testing utilized ACES, MAST/DAST-10 screening tools and 8-panel urinalysis w/ETG.

This counselor met with Mr. Moyer at the offices of New Life Recovery Solutions (NLRS) to complete the present evaluation for SUD. Any pertinent information derived from the before stated review process was applied to criteria established by the *American Psychiatric Association (DSM-V, 2013; Pg. 490-491)* and the *American Society of Addiction Medicine PPC (ASAM, 2013)*.

Throughout the assessment process, Mr. Moyer observed behavior was consistent with his response. Mr. Moyer was oriented times three (person, place, and time). Mr. Moyer over-all affect (expression of feelings through body language, tone of voice, and facial expression) was consistent/appropriate to the subject matter and assessment process. Mr. Moyer is self-described as a 56-year-old male, currently living in Seattle, WA. Mr. Moyer reported no history of suicidal ideation (SI) or attempts, no history of homicidal ideation (HI) / attempts and denied any history of military service.

Presenting Problem: Mr. Moyer is completing an assessment preemptively for family court reasons.

History of Drug Use:

Alcohol: Mr. Moyer reported his first use of alcohol occurred at or about the age of 24 with regular use starting at age 26. Mr. Moyer reported that between the ages of 26-29 he would consume alcohol 1-3 times per week and 2-4 drinks per occasion. Mr. Moyer reported that between the ages of 30-40 he would consume alcohol. 1-5 times per week consuming 1-5 drinks per occasion. Mr. Moyer reported that between the ages of 41-50 he would consume alcohol 1-2 times per week consuming 1-3 drinks per occasion. Mr. Moyer reported that between the ages of 51-52 he would consume $\frac{1}{2}$ a fifth of vodka per night, 5 times per week. Mr. Moyer reported that after he completed inpatient in 2018, he was sober for approximately 1 year. Mr. Moyer reported that in 2019 he relapsed for 1 day and he had gotten a DUI charge. Mr. Moyer entered outpatient treatment on 8/20/2019 and was sober until July 2021 where he again had another 1-day relapse. Mr. Moyer reported that his sober date is July 4, 2021.

Marijuana: Mr. Moyer reported his first use of cannabis occurred at or about the age of 19 with regular use starting at age 19. Mr. Moyer reported he had regular use between the ages of 19-20. Mr. Moyer denied any regular use of cannabis between the ages of 21-53. Mr. Moyer reported between the ages of

This notice accompanies a disclosure of information concerning Mr. Moyer in chemical dependency treatment, made to you with the consent of such Mr. Moyer. This information has been disclosed to you from records protected by Federal confidentiality rules (42 CFR Part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part2.

New Life Recovery Solutions

Substance Use Disorder Assessment

Summary Short Form

54-56 he has consumed CBD/THC gummies 5-7 days per week for sleep. Mr. Moyer reported his last use of a CBD/THC gummy was 10/10/2023.

Mr. Moyer denied the use of any other psycho-active drugs.

DCH History: Mr. Moyer DCH contained 2 DUI charges, which is consistent with his self report.

Detox/Treatment History: Mr. Moyer reported that he completed inpatient treatment at Driftwood in Austin Texas in approximately 2019. Mr. Moyer reported that he completed 14 months of outpatient treatment at New Life Recovery Solutions in 2020.

MAST Scoring and interpretation: A score value of “1-5” is given for each YES response, except for items 4, 5, and 7, for which a NO response is given a score of “1-2.” Scores range from 1-53. Any score above 12 is indicative of an alcohol problem. **Mr. Moyer scored a 9.**

DAST-10 Scoring and Interpretation: A score of “1” is given for each YES response. A score of three or higher indicates potential substance use disorder requiring further investigation / intensive assessment. **Mr. Moyer scored a 1.**

UA Results: As part of the assessment process, Mr. Moyer was administered a urinalysis (UA) w/ETG test. UA tested **positive for Cannabis**, negative for all other psycho-active drugs. This was consistent with the self-report of Mr. Moyer.

Current Medications: Mr. Moyer reported that he is currently prescribed escitalopram, Xanax, and testosterone.

ASAM PPC:

Dimension One (Acute Withdrawal): No Reported History/None Observed: **L 0.0**

Dimension Two (Bio-medical Conditions): None Reported/None Observed: **L 0.0**

Dimension Three (Cognitive, Emotional, and Behavioral Conditions):

Cognitive: Denied any history of cognitive conditions

Emotional: Mr. Moyer denied any history of SI/attempts, HI/or attempts. Mr. Moyer reported that he has been diagnosed with anxiety, depression, and PTSD. Mr. Moyer reported that he has been seeing a mental health provider weekly.

Behavioral: Denied any history of behavioral conditions. **L-0.0**

Dimension Four (Readiness to Change): Mr. Moyer reported that he had completed prior treatment due to legal interactions due to his substance use as well as familial pressures. Mr. Moyer reported that he is internally motivated to continue to maintain his sobriety from alcohol. **L-0.0**

Dimension Five: (Relapse Risk): Mr. Moyer acknowledged a history of periods of problematic substance use. Without clinical intervention, Mr. Moyer relapse risk may be high. Mr. Moyer will benefit from gaining understanding / insight into Mr. Moyer personal relapse pattern and furthering coping mechanisms. **L 0.0**

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New Life Recovery Solutions

Substance Use Disorder Assessment

Summary Short Form

Dimension Six: (Living Environment): Mr. Moyer's living environment is stable and conducive to recovery. Mr. Moyer reported that he engages in sober support community meetings at least 2 times per week and feels well supported in his recovery efforts. - **L 0.0**

Diagnostic Criteria Applied (DSM V, 2013; Pg. 490-491)

- A. A problematic pattern of alcohol / drug use leading to clinically significant impairment or distress, as manifested by at least two of the following, occurring within a 12- month period:
1. Substance is often taken in larger amounts over a longer period than intended.
 2. There is a persistent desire or unsuccessful efforts to cut down or control substance use.
 3. A great deal of time is spent to obtain, use or recover from a substance.
 4. Craving or a strong desire/urge to use a substance.
 5. Recurrent substance use resulting in a failure to fulfill obligations at work, home or school.
 6. Continued substance use despite having persistent or recurrent social or interpersonal problems caused or exacerbated by the substance use.
 7. Important social, occupational, or recreational activities are given up or reduced because of substance use.
 8. Recurrent substance use in situations in which it is physically hazardous.
 9. Substance use is continued despite knowledge of having a persistent or recurrent physical or psychological problem that is likely to have been caused or exacerbated by substance.
- 10. Tolerance:** as defined by either of the following.
- a. A need for markedly increased amounts of the drug/alcohol intoxication / desired effect.
 - b. A markedly diminished effect with continued use of the same amount of drug/alcohol.
- 11. Withdrawal:** as manifested by either of the following:
- a. The characteristic withdrawal syndrome for alcohol (refer to Criteria A and B of the criteria set for alcohol withdrawal, pp. 499-500).

Diagnostic Criteria Met: Mr. Moyer reported no alcohol use in 12+ months.

Treatment Recommendation: Mr. Moyer does not have any SUD treatment recommendations. Mr. Moyer reported that he has been sober from alcohol since July 2021. Mr. Moyer denies any concerns or consequences in his life due to his use of marijuana. Mr. Moyer is recommended to continue to engage in mental health services and address any concerns with his established provider.

The data derived from the above-mentioned resources / screening methods was applied to this assessment and does support a diagnosis of SUD. Falsification of information or failing to report all relevant and pertinent information could nullify this evaluation report resulting in an additional assessment and ensuing financial obligation.



Kaelyn Hewson: AA, SUDP
Kaelyn.h@nlrsnow.com
(425) 454-2238

This notice accompanies a disclosure of information concerning Mr. Moyer in chemical dependency treatment, made to you with the consent of such Mr. Moyer. This information has been disclosed to you from records protected by Federal confidentiality rules (42 CFR Part 2). The Federal rules prohibit you from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2.



SEALED

MILLENNIUM UDTSM

RADAR® Report

Consistency and Validity Results

RADAR® Hotline

866.866.0605

Patient Name: MOYER, ROBERT

Patient SSN:

Patient DOB: 01/05/1967

Requesting Provider: Kaelyn Hewson

NPI: 1891209599

Requesting Practice: New Life Recovery Solutions

Specimen Outcome: LC-MS/MS POSITIVE

Specimen Validity Outcome: NORMAL

Specimen Type: Urine

Specimen ID: MH00473971

Accession ID: AC5875338

Original Report (Final)

11/04/2023 Original (Final)

Collected: 11/01/23 07:00 PM

Received: 11/03/23 08:40 AM PT

Tested: 11/03/23

Completed: 11/04/23

CONSISTENT RESULTS - REPORTED MEDICATION DETECTED (PARENT DRUG AND/OR METABOLITE)

REPORTED MEDICATION	ANTICIPATED POSITIVE(S)	TEST OUTCOME	TEST RESULT (ng/mL)	DETECTION WINDOW ¹	COMMENTS
NONE REPORTED					

INCONSISTENT RESULTS - REPORTED MEDICATION NOT DETECTED (NEITHER PARENT DRUG NOR METABOLITE)

REPORTED MEDICATION	ANTICIPATED POSITIVE(S)	TEST OUTCOME	DETECTION WINDOW ¹	COMMENTS
NONE REPORTED				

INCONSISTENT RESULTS² - ANALYTE DETECTED BUT NO CORRESPONDING MEDICATION REPORTED

DETECTED ANALYTE	TEST OUTCOME	TEST RESULT (ng/mL)	DETECTION WINDOW ¹	COMMENTS
cTHC (Marijuana metabolite)	POSITIVE	97	Single use: 2-3 days; Moderate use (4 times/wk): 5-7 days; Heavy use: 10-15 days; Chronic use: 19-40 days; Oral ingestion: 1-5 days	cTHC was detected and is found in marijuana. Marijuana is a DEA Schedule I controlled substance with very limited pharmaceutical application. Historical cTHC creatinine-corrected levels may be useful when monitoring for abstinence from marijuana. Consider contacting a toxicologist for assistance with interpretation of historical levels.

(1) The following may affect detection window: elimination half-life of the analyte, administered dose, acute versus chronic drug use, drug interactions, sensitivity of the detection method, cutoff levels and physiological differences between patients. (2) If prescribed medications are not reported to Millennium Health on the test requisition form, any positive results will appear in the inconsistent results section. Please call the RADAR® Hotline if you would like to amend a report to include prescribed medications not reported.

SPECIMEN VALIDITY RESULTS

TEST (MEASUREMENT UNIT)	TEST OUTCOME	MEASURED RESULT	REFERENCE RANGE
CREATININE (mg/dL)	Normal	48.2	>20 mg/dL
OXIDANT (ug/mL)	Normal	0	<200 ug/mL
pH	Normal	6.2	4.5 - 9.5
SPECIFIC GRAVITY (NONE)	Normal	1.005	1.003 - 1.035

OTHER REPORTED PRESCRIBED MEDICATIONS (NOT TESTED BY LC-MS/MS OR NOT QUANTIFIED)

NONE

The consistency section provides interpretive assistance based on available data, but may not cover all drug use scenarios or clinical circumstances. In making treatment decisions, it should be used in the context of a clinical evaluation. Consultation is available through RADAR® Hotline. The medication information reported here and on the requisition form has been provided by the requesting provider and has not been verified by Millennium Health. The consistency section utilizes LC-MS/MS test results and does not include results for EIA, ELISA or Chemical assays.

MILLENNIUMUDTSM

RADAR® Report

Historical Results

RADAR® Hotline

866.866.0605

HISTORICAL RESULTS - TESTING HISTORY¹

Specimen ID	N/A	N/A	N/A	N/A	X22352142	MH00473971
Collection Date	N/A	N/A	N/A	N/A	10/11/2023	11/1/2023
Test Date	N/A	N/A	N/A	N/A	10/13/2023	11/3/2023
Analyte²						
cTHC (Marijuana metabolite)					71	202

(1) Table Definitions: **Negative**- test was ordered, and was found negative (below the cut-off) **Not Ordered**- test was not ordered on the test date displayed; **N/A**- Creatinine was not ordered on the specimen validity test; **Specimen validity abnormal**- creatinine was abnormal on specimen validity test (2) Expressed as the creatinine-corrected concentrations (ng drug/mg creatinine).



MILLENNIUMUDTSM
RADAR® Report
 LC-MS/MS Tabulated Results

RADAR® Hotline
866.866.0605

TEST	TEST METHOD	TEST OUTCOME	MEASURED RESULTS (ng/mL)	CREATININE NORMALIZED RESULTS (ng/mg)	CUTOFF (ng/mL)
NATURAL AND SEMI-SYNTHETIC OPIOIDS					
Oxycodone	LC-MS/MS	Negative		-	50
Noroxycodone	LC-MS/MS	Negative		-	50
Oxymorphone	LC-MS/MS	Negative		-	50
SYNTHETIC OPIOIDS					
Fentanyl	LC-MS/MS	Negative		-	1
Norfentanyl	LC-MS/MS	Negative		-	8
Methadone	LC-MS/MS	Negative		-	100
EDDP (Methadone metabolite)	LC-MS/MS	Negative		-	100
Tramadol	LC-MS/MS	Negative		-	100
O-desmethyl-tramadol	LC-MS/MS	Negative		-	100
N-desmethyl-tramadol	LC-MS/MS	Negative		-	100
Tapentadol	LC-MS/MS	Negative		-	50
STIMULANTS					
Amphetamine	LC-MS/MS	Negative		-	100
Methylphenidate	LC-MS/MS	Negative		-	50
Ritalinic Acid	LC-MS/MS	Negative		-	50
OTHER					
Phentermine	LC-MS/MS	Negative		-	50
ILLICITS					
Methamphetamine	LC-MS/MS	Negative		-	100
Cocaine metabolite	LC-MS/MS	Negative		-	50
cTHC (Marijuana metabolite)	LC-MS/MS	POSITIVE	97	202	15
MDMA	LC-MS/MS	Negative		-	100
6-MAM (Heroin metabolite)	LC-MS/MS	Negative		-	10
Phencyclidine	LC-MS/MS	Negative		-	10
FENTANYL ANALOGUES					
4-ANPP	LC-MS/MS	Fen Neg ¹		-	2
Acetyl fentanyl	LC-MS/MS	Fen Neg ¹		-	2
Acetyl norfentanyl	LC-MS/MS	Fen Neg ¹		-	5
Acryl fentanyl	LC-MS/MS	Fen Neg ¹		-	1
Carfentanil	LC-MS/MS	Fen Neg ¹		-	2
Para-fluorofentanyl	LC-MS/MS	Fen Neg ¹		-	1
ILLICITS - SYNTHETIC OPIOIDS					
2-methyl AP-237	LC-MS/MS	Negative		-	10
Borphine	LC-MS/MS	Negative		-	15
Metonitazene	LC-MS/MS	Negative		-	5
ILLICITS - BENZODIAZEPINES					
8-aminoclonazepam	LC-MS/MS	Negative		-	10
Etizolam	LC-MS/MS	Negative		-	10
Alpha-hydroxyetizolam	LC-MS/MS	Negative		-	10
Flualprazolam	LC-MS/MS	Negative		-	10
Flubromazolam	LC-MS/MS	Negative		-	10
RECREATIONAL SUBSTANCES					
Ethyl Glucuronide	LC-MS/MS	Negative		-	500
Ethyl Sulfate	LC-MS/MS	Negative		-	500

(1) When a test for fentanyl and analogues is ordered, a LC-MS/MS test is initially performed for fentanyl and norfentanyl. If both are negative, the analogues will not be tested; in this case, fentanyl and norfentanyl were both negative and the test for analogues was not performed.

COMMENTS

Original Report (Final)

Specimen Outcome: **LC-MS/MS POSITIVE**
 Validity Outcome: **NORMAL**
 Specimen Type: **Urine**
 Specimen ID: **MH00473971**
 Accession ID: **AC5875338**

Patient Name: **MOYER, ROBERT**

Patient SSN: **DOB: 01/05/1967**
 Requesting Provider: **Kaelyn Hewson**
 NPI: **1891209599**
 Requesting Practice: **New Life Recovery Solutions**

SPECIMEN VALIDITY RESULTS

TEST (MEASUREMENT UNIT)	TEST OUTCOME	MEASURED RESULT	REFERENCE RANGE
CREATININE (mg/dL)	Normal	48.2	>20 mg/dL
OXIDANT (ug/mL)	Normal	0	<200 ug/mL
pH	Normal	6.2	4.5 - 9.5
SPECIFIC GRAVITY (NONE)	Normal	1.005	1.003 - 1.035

THE FOLLOWING MEDICATIONS WERE REPORTED ON THE REQUISITION FORM²

NONE

(2) The medications reported here and on the test requisition form have not been verified by Millennium Health.

Specimen History

Collected: 11/01/23 07:00 PM Received: 11/03/23 08:40 AM PT
 Tested: 11/03/23 Completed: 11/04/23

Report History

11/04/2023 Original (Final)



MILLENNIUM UDTSM
RADAR® Report
LC-MS/MS Tabulated Results

RADAR® Hotline
866.866.0605

MILLENNIUM UDT RADAR NOTES

ALL TESTING IS PERFORMED BY MILLENNIUM HEALTH, LLC ("Millennium Health"). This test was developed and its performance characteristics determined by Millennium Health. It has not been cleared or approved by the US Food and Drug Administration (FDA). The laboratory is regulated under CLIA as qualified to perform high-complexity testing. This test is used for clinical purposes. It should not be regarded as investigational or for research. The test results should be used with other clinical and diagnostic findings for patient case management. Millennium Health is accredited by the College of American Pathologists (CAP) and maintains certification in accordance with the Clinical Laboratory Improvement Amendments of 1988 (CLIA). The information provided in this report is not intended to indicate a patient's adherence to a prescribed medication dosage. All test results should be evaluated utilizing professional judgement in the clinical context of the patient. Specimen collection date is reported by the referring provider and is not verified by Millennium Health. Reference ranges have not been established for urine specimens. Creatinine normalized values are for clinical pharmacokinetic comparison only.



MILLENNIUM UDTSM
RADAR® Report
Immunoassay Tabulated Results

RADAR® Hotline
866.866.0605

This section reports only ordered and/or reported immunoassay (IA) results. Immunoassay results are considered presumptive (preliminary).

IA is typically limited to indicating only positive or negative results (qualitative results) and does not differentiate the specific drugs and/or metabolites present in the sample. IA results may be subject to false positives and false negatives.

In the event of a contrary IA vs. LC-MS/MS result, Millennium Health recommends relying on the LC-MS/MS results. Interpretation of these results must be combined with clinical observation and professional judgement. For help with interpretation, please call the RADAR hotline to consult with one of our toxicologists.

TEST	TEST METHOD	TEST OUTCOME	CUTOFF (ng/mL)
NATURAL AND SEMI-SYNTHETIC OPIOIDS			
Buprenorphine	EIA	Negative	10
BENZODIAZEPINES			
BENZODIAZEPINES	EIA	Negative	200
OTHER			
BARBITURATES	EIA	Negative	200
RECREATIONAL SUBSTANCES			
Ethanol	Enzymatic	Negative	20 mg/dL

Original Report (Final)

Specimen Outcome: **LC-MS/MS POSITIVE**
Validity Outcome: **NORMAL**
Specimen Type: **Urine**
Specimen ID: **MH00473971**
Accession ID: **AC5875338**

Patient Name: **MOYER, ROBERT**

Patient SSN: DOB: 01/05/1967

Requesting Provider: Kaelyn Hewson
NPI: 1891209599
Requesting Practice: New Life Recovery Solutions

THE FOLLOWING MEDICATIONS WERE REPORTED ON THE REQUISITION FORM¹

NONE

(1) The medications reported here and on the test requisition form have not been verified by Millennium Health.

Specimen History

Collected: 11/01/23 07:00 PM Received: 11/03/23 08:40 AM PT
Tested: 11/03/23 Completed: 11/04/23

Report History

11/04/2023 Original (Final)

MILLENNIUM UDT RADAR NOTES

ALL TESTING IS PERFORMED BY MILLENNIUM HEALTH, LLC ("Millennium Health"). This test was developed and its performance characteristics determined by Millennium Health. It has not been cleared or approved by the US Food and Drug Administration (FDA). The laboratory is regulated under CLIA as qualified to perform high-complexity testing. This test is used for clinical purposes. It should not be regarded as investigational or for research. The test results should be used with other clinical and diagnostic findings for patient case management. Millennium Health is accredited by the College of American Pathologists (CAP) and maintains certification in accordance with the Clinical Laboratory Improvement Amendments of 1988 (CLIA). The information provided in this report is not intended to indicate a patient's adherence to a prescribed medication dosage. All test results should be evaluated utilizing professional judgement in the clinical context of the patient. Specimen collection date is reported by the referring provider and is not verified by Millennium Health. Reference ranges have not been established for urine specimens. Creatinine normalized values are for clinical pharmacokinetic comparison only.

*** END OF REPORT ***

Millennium Health, LLC 16981 Via Tazon, Bldg 1, San Diego, CA 92127 - FAX 858.451.3636 Lab Director UDT: Miriam J. Bloch, MD, CLIA ID# 05D1078705

Patient Name: MOYER, ROBERT

Specimen ID: MH00473971

Page 5 of 5

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Sealed RESP64

Specimen Detail for ROBERT MOYER, POCT Urine - CONFIDENTIAL

ARCpoint Labs of Seattle/Renton

SEALED



ARCpoint Seattle - Self-pay

Seattle/SODO
CLIA# 50D2185058
Seattle, WA
206-455-8970

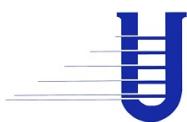
Donor	ROBERT MOYER
Donor ID	6941
Overall Result	Non-Negative
Flag	Observed
Date/Time Collected	6/25/2024 10:45 AM
Type	Pre-Employment (POCT Urine)
Panel	Urine 10-Panel + EtG (Alcohol) Instant
Specimen ID	

Test	Result	Screen Cutoff
Alcohol	Negative	500 ng/mL
Amphetamine	Non-Negative	1000 ng/mL
Barbiturates	Negative	300 ng/mL
Benzodiazephines	Negative	300 ng/mL
Cocaine	Negative	300 ng/mL
Marijuana	Negative	50 ng/mL
Methadone	Negative	300 ng/mL
Methamphetamine	Negative	1000 ng/mL
Opiates	Negative	2000 ng/mL
Oxycodone	Negative	100 ng/mL
Phencyclidine	Negative	25 ng/mL

Collected By:
TAYLOR COLLYER

Additional Notes

OBSERVED BY TAYLOR COLLYER



Laboratory Final Report

UNITED STATES DRUG TESTING

1700 S. MOUNT PROSPECT ROAD
DES PLAINES, ILLINOIS 60018-1804
Phone 847-375-0770
Fax 847-375-0775

Report To: Antonia Lopez
ARCpoint_Seaattle
4636 E Marginal Way S
Suite B250
Seattle, WA 98134

Client ID: F111008AS
Client: ARCpoint_Seaattle
Location:
Collector: TAYLOR COLLGER

Sample Information

Specimen ID:	7808201	Test Reason:	Not given
Donor ID:	6941	Type:	Hair
Lab Sample ID:	4078645	Collected:	06/25/2024 10:50
Donor:	ROBERT MOYER	Received:	06/26/2024 10:45
		Report Date:	07/01/2024 16:37

Tests Requested

HAIR10ETG	Hair10 +ETG	Sample Result:	POSITIVE
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Results

Test	Results	Quantitation	Screen Limit	Confirm Limit
AMPHETAMINES	POSITIVE		500 pg/mg	
Amphetamine (LCMSMS)	POSITIVE	887 pg/mg	100 pg/mg	
Methamphetamine (LCMSMS)	negative		100 pg/mg	
MDA (LCMSMS)	negative		100 pg/mg	
MDMA (LCMSMS)	negative		100 pg/mg	
MDEA (LCMSMS)	negative		100 pg/mg	
BARBITURATES	negative	200 pg/mg		
BENZODIAZEPINES	negative	200 pg/mg		
COCAINES	negative	500 pg/mg		
METHADONES	negative	200 pg/mg		
OPIATES	negative	200 pg/mg		
PCP	negative	300 pg/mg		
OXYCODONE	negative	200 pg/mg		
PROPOXYPHENE	negative	200 pg/mg		
CANNABINOID	POSITIVE	0.81 pg/mg	1 pg/mg	
Carboxy-Delta-9-THC (GC/MS)	POSITIVE			0.05 pg/mg
ETHYL GLUCURONIDE (LCMS)	negative		20 pg/mg	

Additional Sample Information

Head Hair

Comments

Test developed and characteristics determined by United States Drug Testing Laboratories, Inc. See Compliance Statement on our website http://www.usdtl.com/compliance_statement.

All screen methods are immunoassay unless otherwise noted.

Certification

Data approved by Keon Choi on 07/01/2024

Monday, July 1, 2024 4:37:53 PM
Dates and times are displayed using
(-05:00) America/Chicago.
Page 1 of 1

Laboratory Director: Donna Coy, Ph.D.
President: Douglas Lewis



Sealed RESP67



SEALED

Mercy Trauma Recovery
Burien, WA
425-406-7265
Office@mercytraumarecovery.com

June 27, 2024

I am writing to provide an update on the treatment and progress of my client, Robert Moyer, whom I have been treating since December 3rd, 2020. As a licensed mental health counselor with seven years of experience and credentials as a National Certified Counselor and Certified Complex Trauma Professional Level II, I have been working with Robert for nearly four years.

Robert initially sought therapy to address significant stress and anxiety related to his position as a Group Program Manager at Microsoft. His symptoms included difficulty concentrating, trouble sleeping, and increased irritability. These issues, coupled with negative performance reviews and placement on a performance improvement plan, led to Robert negotiating a layoff from Microsoft.

I diagnosed Robert with PTSD conflated from his stressful work environment. Our treatment has focused on introducing healthier coping mechanisms and supporting his abstinence from alcohol, which he previously used to manage stress. We have utilized Dialectical Behavioral Therapy (DBT) and Attachment-Focused Eye Movement Desensitization and Reprocessing (AF-EMDR) to process and alleviate his trauma.

Robert has made considerable progress, as he is now leading a healthier lifestyle and actively addressing issues related to his separation from Microsoft and family dynamics. Robert's retirement and our continued work together has seen a massive shift with Robert in his emotional and mental well-being and his ability to cope with current life stressors. Continued therapy is essential to support his ongoing recovery and general mental wellness.

Luis Merced, MS, LMHC, NCC, CCTP-II
Mercy Trauma Recovery LLC
Luismercedlmhc@gmail.com
Office@mercytraumarecovery.com
425-406-7265
www.mercytraumarecovery.com

eServices- Job Search Log

Week Ending	Contact Date	Employer Name	Job Title	Contact Method	Contact Type	Contact Information	Activity
Jun 15 2024	Jun 14 2024	TIKTOK	TikTok Shop - Senior Product Manager - Creator and Content Governance	Online	Application	https://careers.tiktok.com/spread=5MWH5CQ	
Jun 15 2024	Jun 12 2024	REDDIT	Senior Group Product Manager, Content Operations	Online	Application	https://boards.greenhouse.io/src=8a8a4d8a1us&sc	
Jun 15 2024	Jun 10 2024	WARNER BROTHERS	Principal Product Manager, Personalization	Online	Application	https://careers.wbd.com/Product-Manager-Personalization?utm_source=linkedin&utm_medium=feeds&utm_campaign=SPLIX0248M&source=link	
Jun 8 2024	Jun 7 2024	SNOWFLAKE	Senior Manager, Product Management - Snowpark	Online	Application	https://careers.snowflake.com/Manager-Product-Management-Snowpark?utm_medium=phenomenal-feeds&utm_source=link	
Jun 8 2024	Jun 6 2024	AMAZON	Principal Product Manager-Tech, Principal Tech Product Manager- SCOT	Online	Application	https://www.amazon.jobs/en/product-manager-tech-principal-tech-product-manager-scot?cmpid=SPLIX0248M&ss	
Jun 8 2024	Jun 4 2024	AIRBNB	Platform Product Manager, Strategic Trust Defenses	Online	Application	https://careers.airbnb.com/gh_src=34ewj2	
Jun 1 2024	May 29 2024	SPLUNK	Principal Product Manager - Data Lakehouse	Online	Application	https://jobs.jobvite.com/careers/job/oI0ksfwR?__jvst=Job%20Board&__jv	
Jun 1 2024	May 28 2024	POLARIS INC.	Principal Digital Product Manager-Connected Infotainment	Online	Application	https://polaris.wd5.myworkforce.com/MN-USA/Principal-Digital-Product-Manager-Connected-Infotainment_R22892?Codes=W-LINKEDIN&source=LinkedIn	
Jun 1 2024	May 28 2024	THE TRADE DESK	Sr Staff Product Manager	Online	Application	https://boards.greenhouse.io/src=0c4ebc182&source=link	
Jun 1 2024	May 27 2024	META	Product Manager, Reality Labs	Online	Application	https://www.metacareer.com/campaign=Linkedin18	
May 25 2024	May 22 2024	TWITCH	Principal Product Manager - Machine Learning	Online	Application	https://boards.greenhouse.io/src=0c4ebc182&source=link	
May 25 2024	May 21 2024	AMAZON	Senior Manager, Product Management - Tech, Prime Video Advertising , Ad CX	Online	Application	https://www.amazon.jobs/en/manager-product-management-tech-prime-video-advertising-ad-cx?cmpid=SPLIX0248M&ss	
May 25 2024	May 20 2024	ORACLE	Principal Product Manager	Online	Application	https://echo.fa.us2.oracle.com/jobs/utm_medium=jobboard&source=link	
May 18 2024	May 14 2024	UBER	Senior Manager, Platform Security	Online	Application	https://www.uber.com/guclick_id=46ad9ffb-09df-4b13-a9f4-b4cbcc912bd9	
May 11 2024	May 7 2024	SNOWFLAKE	Principal Product Manager - Developer Experience	Online	Application	https://careers.snowflake.com/Manager-Developer-Experience	
May 11 2024	May 6 2024	JOBOT	Director of Product	Online	Inquiry	https://jobot.com/search?q=Director+of+Product&	

eServices- Job Search Log

Week Ending	Contact Date	Employer Name	Job Title	Contact Method	Contact Type	Contact Information	Activity
Dec 30 2023	Dec 28 2023	PRINCIPAL ENGINEER - COMMERCE	Sr. Staff Product Manager, Growth	Online	Application	https://www.linkedin.com/jobs/view/principal-engineer-commerce-sr-staff-product-manager-growth-373805203	
Dec 30 2023	Dec 27 2023	CROSSOVER	Director of Product Management, Trilogy	Online	Application	https://www.linkedin.com/jobs/view/director-of-product-management-trilogy-currentjobId=378845162	
Dec 30 2023	Dec 26 2023	PRIME VIDEO & AMAZON STUDIOS	Principal Product Manager - Tech, Prime Video Ads, Prime Video	Online	Application	https://www.linkedin.com/jobs/view/prime-video-amazon-studios-principal-product-manager-t-378822048	
Dec 23 2023	Dec 21 2023	UPWORK	Principal Product Manager, Work Management	Online	Application	https://www.linkedin.com/jobs/view/upwork-principal-product-manager-work-management-currentjobId=377554281	
Dec 23 2023	Dec 19 2023	MOZILLA	Senior Staff Product Manager, Firefox Extensions	Online	Application	https://www.linkedin.com/jobs/corporation/jobs/	
Dec 23 2023	Dec 18 2023	HIMS & HER'S	Director of Product Management, Mobile	Online	Application	https://www.linkedin.com/jobs/view/hims-her-s-director-of-product-management-mobile-currentjobId=366921887	
Dec 16 2023	Dec 14 2023	EMBARK VETERINARY	Director, Product Management	Online	Application	https://www.linkedin.com/jobs/view/embark-veterinary-director-product-management-currentjobId=378237895	
Dec 16 2023	Dec 13 2023	LEARNING A-Z	Senior Vice President, Product Strategy	Online	Application	https://www.linkedin.com/jobs/view/learning-a-z-senior-vice-president-product-strategy-currentjobId=378494768	
Dec 16 2023	Dec 11 2023	OPTUM	Director of Product Management, Payment Card Services - Remote	Online	Application	https://careers.unitedhealthgroup.com/search-results/?keyword=optum&parent	
Dec 9 2023	Dec 7 2023	SIMPPLR	Principal Product Manager - Enterprise Search	Online	Application	https://www.linkedin.com/jobs/view/simpplr-principal-product-manager-enterprise-search-currentjobId=378263093	
Dec 9 2023	Dec 5 2023	FUSION92	VP of Product	Online	Application	https://www.fusion92.com/jobs/	
Dec 9 2023	Dec 4 2023	NORMAL COMPUTING	Founding Staff Product Manager	Online	Application	https://usguide.webflow.com/jobs/ashby_jid=a4572b0d-2b4f-4ea7-a294-c0731acd49e1&utm_source=normalcomputing.com	
Dec 2 2023	Nov 29 2023	NEXTDATA	Head of Product	Online	Application	https://www.linkedin.com/jobs/view/nextdata-head-of-product-currentjobId=368840695	
Dec 2 2023	Nov 28 2023	CARE.COM	VP of Product	Online	Application	https://www.linkedin.com/jobs/com/jobs/	
Dec 2 2023	Nov 27 2023	NEON FLUX	Director of Product	Online	Application	https://apply.workable.com/neonflux/?lang=en	
Nov 25 2023	Nov 21 2023	INTENTIONAL FUTURES	Digital Strategy & Innovation Director	Online	Application	https://www.linkedin.com/jobs/view/intentional-futures-digital-strategy-innovation-director-currentjobId=374094486	
Nov 25 2023	Nov 21 2023	SHOP	Principal Product Manager - Shop	Online	Application	https://boards.greenhouse.io/shop/jobs?gh_src=a64ea43e3us&so=desc	
Nov 25 2023	Nov 20 2023	EBAY	Sr Product Manager	Online	Application	https://jobs.ebayinc.com/Product-Manager-eBay-Motors	
Nov 18 2023	Nov 18 2023	STARBUCKS	technical product manager sr	Online	Application	https://www.starbucks.com/jobs/a-job/corporate/	
Nov 18 2023	Nov 16 2023	ISOVALENT	Senior/Principal Product Manager	Online	Application	https://isovalent.com/company-us/	
Nov 18 2023	Nov 13 2023	LOOM	Staff Product Manager, Core Product	Online	Application	https://www.loom.com/company	
Nov 11 2023	Nov 9 2023	OCTOML	Principal Technical Product Manager	Online	Application	https://jobs.lever.co/octoml	
Nov 11 2023	Nov 7 2023	SALESRABBIT	Principal Product	Online	Application	https://salesrabit.breezyrecruiting.com/jobs/1000000000000000000	

64 Rows

eServices- Job Search Log

Week Ending	Contact Date	Employer Name	Job Title	Contact Method	Contact Type	Contact Information	Activity
Manager							
Nov 11 2023	Nov 6 2023	CAMBIA HEALTH SOLUTIONS ·	Director of Digital Product Management	Online	Application	https://cambiahealth.wd1.mywaffle.com/jobs/1000000000000000000	
Nov 4 2023	Nov 4 2023	ZAPPOS	Lead Product Manager, Technology	Online	Application	https://zappos.wd1.mywaffle.com/jobs/1000000000000000000	
Nov 4 2023	Oct 31 2023	D2L	Senior Director of Product Management	Online	Application	https://www.d2l.com/careers/	
Nov 4 2023	Oct 30 2023	LUXURY PRESENCE	Senior Product Manager	Online	Application	https://www.luxurypresence.com/positions/	
Oct 28 2023	Oct 28 2023	PRO FOOTBALL FOCUS	Senior Product Manager	Online	Application	https://www.paycomonline.com/job/99560&clientkey=C7	
Oct 28 2023	Oct 25 2023	INFOBLOX	Director, Product Management	Online	Application	https://www.infoblox.com/careers/	
Oct 28 2023	Oct 25 2023	DOCUSIGN	Lead Product Manager	Online	Application	https://www.linkedin.com/jobs/	
Oct 21 2023	Oct 20 2023	SEAT GEEK	Lead Product Manager - Enterprise Data	Online	Application	https://seatgeek.com/jobs/	
Oct 21 2023	Oct 18 2023	HIM & HER'S	Director of Product Management, Mobile	Online	Application	https://boards.greenhouse.io/him-and-her-s/positions	
Oct 21 2023	Oct 16 2023	APPTIO	Principal Product Manager	Online	Application	https://careers.apptio.com/jobs	
Oct 14 2023	Oct 13 2023	AURORA SERVICES	Staff Technical Product Manager, Aurora Services	Online	Application	https://careers.remitly.com/jobs	
Oct 14 2023	Oct 11 2023	REMITLY	Principal Product Manager, Customer Success	Online	Application	https://careers.remitly.com/jobs?_gl=1%2Acabb3s%2A_gcl	
Oct 14 2023	Oct 10 2023	LARK	Senior Product Manager/Engineer (E-discovery)	Online	Application	https://jobs.bytedance.com/careers?keywords=lark	
Oct 7 2023	Oct 6 2023	CITRINE INFORMATICS ·	Sr. Product Manager	Online	Application	https://citrine.io/contact	
Oct 7 2023	Oct 4 2023	ARENANET	SENIOR PRODUCT MANAGER	Online	Application	https://www.arena.net/jobs	
Oct 7 2023	Oct 3 2023	JERRY	Senior Product Manager, Retention	Online	Application	https://getjerry.com/careers	
Sep 30 2023	Sep 29 2023	FANDUEL	Commercial Analyst	Email	Application	no-reply@us.greenhouse-mail.io	
Sep 30 2023	Sep 27 2023	VENTUS SOLUTIONS	Engineer/Program Manager	Email	Application	notification@jobvite.com	
Sep 30 2023	Sep 27 2023	ANDURIL	Technical Program Manager, Robotics Software	Email	Application	contact@anduril.com	
Sep 23 2023	Sep 23 2023	WORKDAY	Senior Product Manager	Online	Application	https://trimble.wd1.mywaffle.com/jobs/1000000000000000000	US/TrimbleCareers/User1
Sep 23 2023	Sep 23 2023	RIPPLING	Senior Program Manager	Email	Application	no-reply@ats.rippling.com	
Sep 23 2023	Sep 23 2023	OSTRO	Product Manager	Email	Application	no-reply@us.greenhouse-mail.io	
Sep 16 2023	Sep 16 2023	SERVICENOW	Principal Inbound Product Manager, Customer Workflows	Email	Application	notification@smartrecruiter.com	

eServices- Job Search Log

Week Ending	Contact Date	Employer Name	Job Title	Contact Method	Contact Type	Contact Information	Activity
Sep 16 2023	Sep 16 2023	FABRIC	SENIOR PRODUCT MANAGER	Email	Application	no-reply@hire.lever.com	
Sep 16 2023	Sep 16 2023	BETTERSLEEP	Senior Product Manager, Content	Email	Application	noreply@candidates.wor	

64 Rows



FY23 Rewards Planning



Partner Name: Christine Moyer
Partner Number: 1481827

Currency: USD
Manager Name: Julie Wieting

FY23 Reward Decisions		=	\$254,884
Base Pay	+ Bonus	+ Stock	
\$215,347	\$24,537	\$15,000	

Base Pay

Base Pay	\$207,064	Base Pay Range		
Merit Increase	\$8,283	4.00%	Min	Mid
New Base Pay	\$215,347		170,900	213,600
			267,000	

Effective 11/27/2023 - paid on 12/8 or 12/15 depending on pay cycle

Compa-Ratio: 100.82%

Bonus

Bonus Target x (50% of Business Performance + 50% of Individual Performance)

Bonus Target (as of 6/30/2023)	\$20,706	10.00%	Bonus Opportunity Range		
Business Performance ¹	112.00%		Min	Target	Max
Individual Performance	125.00%		0	20,706	41,413
Total Bonus Payout	\$24,537				

Paid on 12/8 or 12/15 depending on pay cycle

[1] FY23 Business Performance is based on your bonus measure of Total Company (Total Company OI of 120.00%, Total Company Rev of 100.00%).

Stock

Stock Target x Individual Modifier

Stock Target	\$12,000	Stock Opportunity Range		
Individual Multiplier	125.00%	Min	Target	Max
Total Stock Grant	\$15,000	0	12,000	24,000

Granted 11/14/2023

JENNIFER KEILIN, MSW, LICSW

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Issaquah, WA 98027

Phone: 425-526-6556
Jkeilin@comcast.net

Moyer Family Status Report/Treatment Summary

9/26/2024

Service agreement stipulation: Clients agree that Ms. Keilin's written treatment summaries will be the only information shared with the court or other parties about therapy. Written summaries detail attendance, participation, goals, progress towards goals, relevant collateral information, current status, status at termination, and referrals and recommendations. You agree that you will not otherwise attribute behavior, statements, opinions, conclusions or recommendations to Ms. Keilin or any other participant as coming from or related to therapy.

This family was referred to me by their legal counsel in May of 2024. The presenting issue was "the impaired relationship between the father and children." I agreed to assess the family's readiness family systems therapy and to develop a treatment plan.

I had the following individual and joint sessions:

Christine Moyer

5/30/2024
6/11/2024
6/13/2024 – Christine, Max and Adrian
7/16/2024

Robert Moyer

5/28/2024
6/24/2024 – Robert and Adrian
7/17/2024
8/09/2024
8/21/2024 – Robert and Adrian

Adrian Moyer

7/16/2024
8/14/2024

Max Moyer

7/16/2024
8/14/2024

Collateral

Kari Betts - 6/25/2024, 8/14/2024

Residential Time: Adrian has six hours supervised visitation every other week. Max has no regular contact with Robert.

Assessment Process

I met with each parent individually several times, with the children (except for Max with Robert), and individually with each child twice. Both parents and the children attended sessions as requested. Max participated quite reluctantly, but he did participate. My focus was to assess the resist/refuse dynamics present.

There was a fair amount of chaos in the system which would die down and then re-emerge. This made the assessment process difficult. Robert's desire/need for contact with the children was very strong and he exhibited some impulsive behavior and poor boundaries. His insight into his behavior was poor.

Regarding factors contributing to and sustaining parent-child contact problems¹:

- Intense marital conflict before/after separation - yes
- Humiliating separation - no
- Lack of functional co-parenting - yes
- Divorce conflict and litigation – yes
- Rejected parent's reactions, negative beliefs and behaviors – Robert blames Christine for the parent-child contact problems
- Personality of rejected parent – Robert has big energy, poor insight, and is impulsive
- Parenting of rejected parent – Children report exposure to parent conflict
- Child's age, cognitive capacity, and temperament - Adrian, 12, runs anxious, but sees positives in both parents; Max, 16, is outspoken and firm in his negative beliefs regarding Robert, his reasoning and problem-solving seem immature
- Child's vulnerability – unknown beyond already identified
- Sibling relationships – mixed, it is unknown if Max influences Adrian against Robert; Max likely influences Adrian some just by the fact that he is refusing contact.
- Aligned parent's parenting - Christine struggles to hide her anxiety and distress related to Robert's behavior and accommodates Adrian's anxiety. She is open to coaching.
- Personality of aligned parent - Christine also runs anxious
- Aligned professionals – not to my knowledge
- Extended families – not to my knowledge

Key challenges I noted in the family included:

- Very limited time between Robert and Adrian
- Robert's poor boundaries and impulsive behavior related to Christine
- Christine's porous boundaries related to Robert
- Max's strong rejection of Robert
- Adrian's anxiety related to Robert

Adrian's resistance to contact with Robert is low-moderate. He wants contact and it makes him anxious. Adrian is anxious about Robert's self-control, behavior, judgement and decision making. Christine has

¹ Kelly & Johnston, 2001

accommodated Adrian's anxiety, but it remains active. I don't think accommodation is helping to decrease Adrian's anxiety. Christine's anxiety towards Robert is generally pretty high and easily activated. Christine needs to feel less anxiety about Robert's behavior so that she can better support Adrian in addressing his anxiety.

Robert and Adrian's very limited time was a significant barrier to reunification services. Robert's behavior also was a barrier, keeping the system in chaos. I'm concerned about Robert's impulse control and whether he can sustain appropriate behavior. I do not recommend this family for family-based systems/reunification currently.

To be appropriate for therapy, I recommend the following:

1. More contact between Robert and Adrian (minimum of 2 contacts of 2 – 4 hours per week)
2. A 60-to-90-day period of stability in the family system prior to starting the intervention (stability equals no major conflicts, no new litigation, compliance with court orders, and no significant boundary violations).
3. Behavioral-based benchmarks for Robert to gain more/liberalized contact hours
4. A structured residential plan that provides for regular increases in contact based on Robert's behavior and Adrian's adjustment
5. A PC to implement the plan, monitor Robert's progress towards benchmarks and compliance with communication stipulations, monitor the children's adjustment, and to facilitate parent communication and minor dispute resolution.
6. This family may benefit from a team approach to family-systems therapy, such as individual therapists and a family therapist, all focused on addressing the resist/refuse dynamics.

Best regards,



Jennifer Keilin, LICSW

***For Settlement Purposes Only
Not to be Used in Litigation
Pursuant to ER 408***

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

In re the Marriage of:

CHRISTINE MOYER,

Petitioner,

and

ROBERT EDWARD MOYER II.

Respondent.

NO. 23-3-05392-7 SEA

RESPONDENT'S PROPOSED FINAL PARENTING PLAN (PPP/PPT/PP)

Clerk's action required: 1

I. Parenting Plan

1. This parenting plan is a *(check one)*:

Proposal (request) by a parent (*name/s*): Robert Edward Moyer II. It is not a signed court order. (PPP)

Court order signed by a judge or commissioner. This is a (*check one*):

[] Temporary order. (PPT)

[X] Final order. (PP)

This final parenting plan changes the last final parenting plan.

- 2. Children** - This parenting plan is for the following children:

3. Reasons for putting limitations on a parent (under RCW 26.09.191)

a. Abandonment, neglect, child abuse, domestic violence, assault, or sex offense. (If a parent has any of these problems, the court **must** limit that parent's contact with the children and that parent's right to make decisions for the children, and may not require dispute resolution other than court.)

[] Neither parent has any of these problems. (Skip to 3.b.)

[X] A parent has one or more of these problems as follows (*check all that apply*):

Abandonment - (*Parent's name*): intentionally abandoned a child listed in 2, for an extended time.

Neglect - (Parent's name): _____ substantially refused to perform his/her parenting duties for a child listed in 2.

[] **Child Abuse** - (*Parent's name*): (or someone living in that parent's home) abused or threatened to abuse a child. The abuse was (*check all that apply*): [] physical [] sexual [] repeated emotional abuse.

[X] **Domestic Violence** - (*Parent's name*): Robert Edward Moyer II (or someone living in that parent's home) has a history of domestic violence as defined in RCW 7.105.010.

Assault - (*Parent's name*): (or someone living in that parent's home) has assaulted or sexually assaulted someone causing grievous physical harm, causing fear of such harm, or resulting in a pregnancy.

[] **Sex Offense -**

(Parent's name): _____ has been convicted of a sex offense as an adult.

[] Someone living in (*parent's name*): _____ 's home has been convicted as an adult or adjudicated as a juvenile of a sex offense.

b. Other problems that may harm the children's best interests (*If a parent has any of these problems, the court **may** limit that parent's contact with the children and that parent's right to make decisions for the children.*)

[] Neither parent has any of these problems. (Skip to 4.)

[X] A parent has one or more of these problems as follows (*check all that apply*):

[] **Neglect** - (*Parent's name*): neglected his/her parental duties towards a child listed in 2.

[] **Emotional or physical problem** - (*Parent's name*): has a long-term emotional or physical problem that gets in the way of his/her ability to parent.

[X] **Substance Abuse** - (*Parent's name*): Robert Edward Moyer II has a long-term problem with drugs, alcohol, or other substances that gets in the way of his/her ability to parent.

[] **Lack of emotional ties** - (*Parent's name*): has few or no emotional ties with a child listed in 2.

[] **Abusive use of conflict** - (*Parent's name*): uses conflict in a way that may cause serious damage to the psychological development of a child listed in 2.

[] **Withholding the child** - (*Parent's name*): has kept the other parent away from a child listed in 2. for a long time, without good reason.

[X] **Other (specify)**: Robert Edward Moyer, II has a history of alcoholism. He has been sober for over three years and continues to participate in therapy, AA, and other programs to help him maintain his sobriety.

4. Limitations on a parent

[] Does not apply. There are no reasons for limitations checked in 3.a. or 3.b. above. (Skip to 5.)

[] **No limitations despite reasons** (*explain why there are no limitations on a parent even though there are reasons for limitations checked in 3.a. or 3.b. above*):

[X] **The following limits or conditions apply to** (*parent's name*): Robert Edward Moyer II (*check all that apply*) :

[] No contact with the children.

[X] Limited contact as shown in the Parenting Time Schedule (sections 8 - 11) below.

1 [] Limited contact as follows (*specify schedule, list all contact here instead of in the*
2 *Parenting Time Schedule*):

4 [X] **Supervised contact.** All parenting time shall be supervised. Currently, there shall not be
5 any supervised residential time. In the event future supervision is necessary any costs of
6 supervision must be paid by (*name*): Robert Edward Moyer II.

7 The supervisor shall be

8 [X] a professional supervisor (*name*): Alan Schneider or other agreed upon supervisor if
9 Mr. Schneider is not available.

10 [] a non-professional supervisor (*name*): .

11 The dates and times of supervised contact will be

12 [] as shown in the Parenting Time Schedule (sections **8 - 11**) below.

13 [x] as follows (*specify*): As may be determined in the future.

14 (*Specific rules for supervision, if any*):

15 [] Other limitations or conditions during parenting time (*specify*):

16 [X] **Evaluation or treatment required.** (*Name*): Robert Edward Moyer II must:

17 [] be evaluated for: .

18 [X] start (or continue) and comply with treatment:

19 [X] as recommended by the evaluation. See paragraphs 14A, 14B, 14D, and 14E.

20 [] as follows (*specify kind of treatment and any other details*):

[X] Provide a copy of the evaluation to treatment providers as set forth in paragraph 14J.
Compliance reports shall be provided to Christine Moyer as set forth in paragraphs 14A,
14B, 14D, 14G and 14H.

If this parent does not follow the evaluation or treatment requirements set forth in paragraphs
14A, 14B, 14D, 14E, 14G and 14H, his time with the children shall be suspended pending
further court orders.

5. Decision-making

When the children are with you, you are responsible for them. You can make day-to-day decisions
for the children when they are with you, including decisions about safety and emergency
healthcare. Major decisions must be made as follows:

a. Who can make major decisions about the children?

Type of Major Decision	Joint <i>(parents make these decisions together)</i>	Limited <i>(only the parent named below has authority to make these decisions)</i>
School / Educational	[X]	[] (Name):
Health care (not emergency) including counseling, evaluators and treatment providers.	[X]	[] (Name):
Other: Extracurricular Activities	[X]	[] (Name):
Other: Driver's License	[X]	[] (Name):
Other:	[]	[] (Name):

Important! Parenting involves decision-making in many areas. If you believe there are other decisions that are important to your family, list them under "Other" above. Some examples include: extracurricular activities, international travel, cell phones, driver's licenses, tattoos, and haircuts.

b. Reasons for limits on major decision-making, if any:

[] There are no reasons to limit major decision-making.

[] Major decision-making **must** be limited because one of the parents has problems as described in **3.a.** above.

[] Major decision-making **should** be limited because (*check all that apply*):

[] Both parents are against shared decision-making.

[] One of the parents does not want to share decision-making and this is reasonable because of :

[] problems as described in **3.b.** above.

[] the history of each parent's participation in decision-making.

[] the parents' ability and desire to cooperate with each other in decision-making.

[] the distance between the parents' homes makes it hard to make timely decisions together.

[X] Other: Because the father is financially responsible for his pro rata share of the children's expenses and because a parenting coordinator will be in place to assist the parties with decision making there shall be joint decision making. If the parties are unable to reach agreement after one email exchange on OFW, the parenting coordinator will make the final decision. The parenting coordinator may request additional information from the parties prior to making her decision.

If either parent wants to enroll a child in an activity that does not financially obligate the other parent, they may do so as long as it does not impact the other parent's residential time.

When a parenting coordinator is no longer in place, disagreements re: decision making shall be submitted to Judge Rosen on written materials only.

6. Dispute Resolution

Important! After this parenting plan is signed by a judge or commissioner, if you and the other parent disagree about shared decisions or what parts of this plan mean, the court may require you to use a dispute resolution provider before going back to court. The court may only require a dispute resolution provider if there are **no** limitations in **3.a.** above. If a dispute resolution provider is checked below, the parents may, and sometimes must, use this provider before filing a Petition to Change a Parenting Plan or a Motion for Contempt for not following the plan. Check your county's Local Court Rules.

a. The parents will go to (*check one*):

[X] the dispute resolution provider below (before they may go to court):

[] Mediation (*mediator or agency name*):

[X] Arbitration (*arbitrator or agency name*): Parenting coordinator in place for first two years following entry of the parenting plan, thereafter, Judge Steve Rosen (Ret.).

[] Counseling (*counselor or agency name*):

If a dispute resolution provider is not named above or if the named provider is no longer available, the parents may agree on a provider or ask the court to name one.

Important! Unless there is an emergency, the parents must participate in the dispute resolution process listed above in good faith, before going to court for disagreements about joint decisions or what parts of this plan mean. This section does **not** apply to disagreements about money or support.

[] court (without having to go to mediation, arbitration, or counseling). *(If you check this box, skip to section 7 below and do not fill out 6.b.)*

- b. If mediation, arbitration, or counseling is required, one parent must notify the other parent by (check one): [] certified mail. [X] other (*specify*) :

Our Family Wizard.

The parents will pay for the mediation, arbitration, or counseling services as follows (check one):

[X] (*Name*): Christine Moyer will pay 50%, (*Name*): Robert Edward Moyer II will pay 50%.

[] based on each parents' Proportional Share of Income (percentage) from line 6 of the *Child Support Worksheet*.

[] as decided through the dispute resolution process.

What to expect in the dispute resolution process:

- Preference shall be given to carrying out the parenting plan.
- If you reach an agreement, it must be put into writing, signed, and both parents must get a copy.
- If the court finds that you have used or frustrated the dispute resolution process without a good reason, the court can order you to pay financial sanctions (penalties) including the other parent's legal fees.

- 1
- You may go back to court if the dispute resolution process doesn't solve the disagreement
2 or if you disagree with the arbitrator's decision.
- 3

7. Custodian

4 The custodian is (*name*): Christine Moyer solely for the purpose of all state and federal statutes
5 which require a designation or determination of custody. Even though one parent is called the
6 custodian, this does not change the parenting rights and responsibilities described in this plan.
7

8 *(Washington law generally refers to parenting time and decision-making, rather than custody.
9 However, some state and federal laws require that one person be named the custodian. The
10 custodian is the person with whom the children are scheduled to reside a majority of their time.)*

Parenting Time Schedule (Residential Provisions)

Check one:

[] **Limited schedule only** – The children live with (*name*): and have no contact with
the other parent except as described in section 4.

*(You may skip the parenting time schedule in sections 8 - 11, unless you want a different Summer
or Holiday schedule, including to give uninterrupted time for vacation and holidays to the parent
not subject to limitations.)*

[X] Complete the parenting time schedule in sections 8 - 11.

8. School Schedule

a. Children under school-age

[X] Does not apply. All children are school-age.

b. School-age children

This schedule will apply (*check one*):

[X] immediately.

[X] Other: The children will reside with the mother except that the children will reside with
the father as follows:

1 **Max** — The child shall have contact with the father on days and times as agreed upon
2 between the two. Max should be permitted to stop contact with the father at any time at his
discretion.

3 **Adrian** —

4 **Phase I (11/2024-1/2025)**: The father will enroll in the recommended domestic violence
5 treatment program at A&TA. He has voluntarily submitted Soberlink tests since October of
6 2023, and will continue to do so consistent with paragraph 14H. He will participate in any
7 joint counseling sessions if directed by Ms. Betts, and upon the appointment of a parent
8 coordinator who has approved plans for an increase in time, for a period of 90 days Adrian
9 should reside with the father unsupervised twice per week on Sunday for six hours, and every
Wednesday from after school until 7:30 p.m. If Adrian is scheduled to participate in extracurricular activities during the father's designated residential time, the father should be permitted to transport Adrian and attend those activities.

10 **Phase II (2/2025-4/2025)**: Upon proof of compliance with domestic violence treatment,
11 Soberlink tests as recommended above, participation in any joint counseling sessions if
12 directed by Ms. Betts, or reunification therapy if directed by the parent coordinator, for a
13 period of 90 days Adrian should reside with the father every other Saturday from noon until
14 Sunday at noon, and every Wednesday from after school until 7:30 p.m. If Adrian is scheduled to participate in extracurricular activities during the father's designated residential time, the father should be permitted to transport Adrian and attend those activities.

15 **Phase III (5/2025-8/2025)**: Upon proof of compliance with domestic violence treatment,
16 Soberlink tests as recommended above, participation in any joint counseling sessions if
17 directed by Ms. Betts, or reunification therapy if directed by the parent coordinator, Adrian
18 should reside with the father on alternating weekends from Friday after school until Sunday
19 at 6:00 p.m., and every Wednesday from after school until 7:30 p.m. If Adrian is scheduled to participate in extracurricular activities during the father's designated residential time, the father should be permitted to transport Adrian and attend those activities.

20 The father may request a modification of the residential schedule in September of 2025 if he
21 is in compliance with the treatment and monitoring provisions set forth in Section 14. No
22 adequate cause threshold shall be required.

23 **Vacations**: Until the commencement of **Phase III** above, the mother should be permitted
24 two consecutive or nonconsecutive weeks of vacation time with the children each year. The
25 father should be permitted Zoom/Facetime contact with Adrian twice per week during the
26 mother's vacation. After the commencement of Phase III above, and starting in the summer
of 2025, the father should be permitted one week of vacation time with Adrian each year.
With continued compliance with the requirements of Phase III above, starting in the summer

1 of 2026, the father should be permitted two consecutive or nonconsecutive weeks of vacation
2 time with Adrian each year. The parents should be required to submit their plans for vacation
3 with the children to one another by March 1st of each year. If the parent's plans conflict, the
4 mother's plans should have priority in even years, and the father's plans should have priority
5 in odd years. Each parent to provide the other with dates of travel, flight numbers, location
6 of stay, and an emergency phone contact where the traveling parent/child may be reached at
7 least 30 days in advance of travel. For international travel, the nontraveling parent shall
execute a signed and notarized letter permitting travel within 30 days of notice by the
traveling parent of their plans. The mother should maintain possession of passports for the
children. Permission for travel should not be unreasonably withheld.

8 9. Summer Schedule

10 Summer begins and ends [X] according to the school calendar.

11 [X] OTHER (*specify*):

12 **Summer:** Same as school schedule except for vacations as recommended above.

13 10. Holiday Schedule (includes school breaks and special occasions)

14 **Holidays:** Beginning with the commencement of **Phase III**, the parents will alternate the
15 following holidays:

- 16 • July 4th (mother even, father odd). July 4th should begin on July 4th at noon and
end on July 5th at noon.
- 17 • Memorial Day, Labor Day, and Martin Luther King Jr. Day shall be spent with
the parent with whom Adrian resides for the adjoining weekend, with the
18 weekend ending on the Monday holiday at 6:00 p.m.
- 19 • Thanksgiving Day (mother odd, father even). Thanksgiving will be defined as
after school the day before Thanksgiving to 6 pm the day after Thanksgiving.

21 **School Breaks:** Commencing January 1, 2026 or as otherwise recommended by the
22 reunification therapist, Kari Betts or the Parenting Coordinator, school breaks shall be
23 alternated as follows:

- 24 • Mid-Winter Break: The parties shall alternate mid-winter break with the father
having even years and the mother having odd years. Mid-winter break will
commence 10:00 a.m. on Saturday after school lets out and ends at 6:00 p.m. the
25 Sunday before school resumes.

- 1
- 2 ● Spring Break: The parties shall alternate spring break with the mother having even
 - 3 years and the father having odd years. Spring break will commence 10:00 a.m. on
 - 4 Saturday after school lets out and ends at 6:00 p.m. the Sunday before school
 - 5 resumes.
 - 6 ● Winter Break: The parties shall each have one-half of the winter break with the
 - 7 father having the first half in even years and the mother having the second half.
 - 8 The opposite shall occur in odd years. Winter break will commence 10:00 a.m. the
 - 9 day after school lets out and ends at 6:00 p.m. the day before school resumes. The
 - 10 exchange shall take place on noon on the day that is the mid-point of the break.
- 11

12 **Special Occasions:** Mother will have Adrian for her birthday and Mother's Day. Upon
13 commencement of **Phase III**, the father will have Adrian for his birthday and Father's Day,
14 and the parents will alternate Adrian's birthday with the mother having Adrian on his
15 birthday in even years, and the father having Adrian for his birthday in odd years. If a
16 special occasion falls on a school day, the special occasion shall be defined as beginning
17 after school until 7:30 p.m. If the special occasion falls on a weekend, the special occasion
18 shall be defined as beginning at 10:00 a.m. on the day of the special occasion and ending
19 at 6:00 p.m.

20

11. Conflicts in Scheduling

21 The Holiday Schedule must be observed over all other schedules. If there are conflicts within the
22 Holiday Schedule (*check all that apply*):

23 Named holidays shall be followed before school breaks.

24 Children's birthday/s shall be followed before named holidays and school breaks.

25 Other (*specify*):

26 Does not apply.

12. Transportation Arrangements

21 The children will be exchanged for parenting time (picked up and dropped off) at:

22 each parent's home.

23 school or daycare, when in session.

24 other location (*specify*):

1 Any transfers of the children to be at a public place within 2 miles of the halfway point between the
2 parents' homes, chosen by the mother.

3 Who is responsible for arranging transportation?

4 [] The **picking up** parent - The parent who is about to **start** parenting time with the children must
5 arrange to have the children picked up.

6 [] The **dropping off** parent - The parent whose parenting time is **ending** must arrange to have the
7 children dropped off.

8 Other details (if any):

9 Robert Moyer shall provide all transportation.

10 **13. Moving with the Child/ren (Relocation)**

11 Anyone with majority or substantially equal residential time (at least 45 percent) who wants to
12 move with the children **must notify** every other person who has court-ordered time with the
children.

13 **Move to a different school district**

14 If the move is to a different school district, the relocating person must complete the form *Notice of*
15 *Intent to Move with Children* (FL Relocate 701) and deliver it at least **60 days** before the intended
move.

16 *Exceptions:*

- 17 • If the relocating person could not reasonably have known enough information to complete
the form in time to give 60 days' notice, they must give notice within **5 days** after learning
the information.
- 18 • If the relocating person is relocating to a domestic violence shelter or moving to avoid a
clear, immediate, and unreasonable risk to health or safety, notice may be delayed **21 days**.
- 19 • If information is protected under a court order or the address confidentiality program, it
may be withheld from the notice.
- 20 • A relocating person who believes that giving notice would put themselves or a child at
unreasonable risk of harm, may ask the court for permission to leave things out of the
notice or to be allowed to move without giving notice. Use form *Motion to Limit Notice of*
Intent to Move with Children (Ex Parte) (FL Relocate 702).

24 The *Notice of Intent to Move with Children* can be delivered by having someone personally serve
25 the other party or by any form of mail that requires a return receipt.

26 If the relocating person wants to change the *Parenting Plan* because of the move, they must deliver
a proposed *Parenting Plan* together with the *Notice*.

1 ***Move within the same school district***

2 If the move is within the *same* school district, the relocating person still has to let the other parent
3 know. However, the notice does not have to be served personally or by mail with a return receipt.
4 Notice to the other party can be made in any reasonable way. No specific form is required.

5 ***Warning! If you do not notify...***

6 A relocating person who does not give the required notice may be found in contempt of court. If
7 that happens, the court can impose sanctions. Sanctions can include requiring the relocating person
8 to bring the children back if the move has already happened, and ordering the relocating person to
9 pay the other side's costs and lawyer's fees.

10 ***Right to object***

11 A person who has court-ordered time with the children can object to a move to a different school
12 district and/or to the relocating person's proposed *Parenting Plan*. If the move is within the same
13 school district, the other party doesn't have the right to object to the move, but they may ask to
14 change the *Parenting Plan* if there are adequate reasons under the modification law (RCW
15 26.09.260).

16 An objection is made by filing the *Objection about Moving with children and Petition about
17 Changing a Parenting/Custody Order (Relocation)* (form FL Relocate 721). File your Objection
18 with the court and serve a copy on the relocating person and anyone else who has court-ordered
19 time with the children. Service of the *Objection* must be by personal service or by mailing a copy
20 to each person by any form of mail that requires a return receipt. The *Objection* must be filed and
21 served no later than **30 days** after the *Notice of intent to Move with Children* was received.

22 ***Right to move***

23 During the 30 days after the *Notice* was served, the relocating person may not move to a different
24 school district with the children unless they have a court order allowing the move.

25 After the 30 days, if no *Objection* is filed, the relocating person may move with the children
26 without getting a court order allowing the move.

27 After the 30 days, if an *Objection* has been filed, the relocating person may move with the children
28 pending the final hearing on the *Objection unless:*

- 29 • The other party gets a court order saying the children cannot move, or
- 30 • The other party has scheduled a hearing to take place no more than 15 days after the date the
31 *Objection* was served on the relocating person. (However, the relocating person may ask the
32 court for an order allowing the move even though a hearing is pending if the relocating
33 person believes that they or a child is at unreasonable risk of harm.)
- 34 • The court may make a different decision about the move at a final hearing on the *Objection*.

35 ***Parenting Plan after move***

36 If the relocating person served a proposed *Parenting Plan* with the *Notice*, **and** if no *Objection* is

1 filed within 30 days after the *Notice* was served (or if the parties agree):

- 2
- 3
- 4
- 5
- Both parties may follow that proposed plan without being held in contempt of the *Parenting Plan* that was in place before the move. However, the proposed plan cannot be enforced by contempt unless it has been approved by a court.
 - Either party may ask the court to approve the proposed plan. Use form *Ex Parte Motion for Final Order Changing Parenting Plan – No Objection to Moving with Children* (FL Relocate 706).

6 **Forms**

7 You can find forms about moving with children at:

- 8
- The Washington State Courts' website: www.courts.wa.gov/forms,
 - Washington LawHelp: www.washingtonlawhelp.org, or
 - The Superior Court Clerk's office or county law library (for a fee).

9 (*This is a summary of the law. The complete law is in RCW 26.09.430 through 26.09.480.*)

10 **14. Other**

- 11 A. The father to enroll within four weeks and complete a state-certified domestic
12 violence treatment program (at the level recommended by the program). The father
13 to sign a release so the mother may receive copies of his progress reports and notice
of completion of the program directly from the provider.
- 14 B. The father to enroll in DV Dads when he has completed enough of the DV treatment
15 program to do so and complete the DV Dads program. The father to sign a release
16 so the mother may receive copies of his progress reports and completion of the
program directly from the provider.
- 17 C. A parent coordinator should be appointed for a period of two years from the date
18 of the final parenting plan. The role of the parent coordinator should include
19 assisting the parties in reaching a resolution of the matters involving the children's
20 residential schedule, recommending any other services for the parties and/or the
21 children including, but not limited to, parenting classes, further evaluation or
22 assessment, and individual psychotherapy for the parties and/or child or family
23 counseling or reunification counseling, establishing and enforcing communication
24 guidelines for the parents and/or the child pursuant to provisions of the Final
Parenting Plan, recommending to the parents non-substantive changes to the Final
Parenting Plan, and providing dispute resolution as specified in the Final Parenting
Plan. The parenting coordinator shall also assist the parties with decision making.
- 25 D. The father should continue treatment with Dr. Fannin to include regular Vivitrol
26 shots and medication management necessary for continued sobriety. Dr. Fannin

1 should issue a quarterly status report to be provided to the mother detailing the
2 father's compliance with treatment.

- 3
- 4 E. The father to continue in therapy with Luis Merced at least twice monthly or more
frequently as directed by Mr. Merced.
- 5 F. Adrian to continue in counseling with his current provider, meeting at least twice a
month, or for a longer time or more frequent sessions if recommended by the
therapist. The father should be included in Adrian's counseling at the direction of
the provider. Within the next sixty days, Adrian's therapy should include a focus
on skills and resources needed to accommodate future visits of additional time and
unsupervised contact.
- 6
- 7 G. The father should participate in hair follicle testing once every 90 days. The panel
8 for testing should include THC, Opiates, PCP, Cocaine, Amphetamines, and
Psilocybin. The father shall sign a release so that test results can be sent directly to
the mother.
- 9
- 10 H. The father to participate in Soberlink testing three times per day every day for at
11 least two years. The father should be enrolled in the text reminder program, must
12 maintain the necessary technical requirements to test (facial recognition
13 technology, charged testing device, and internet connectivity), and should test
14 within 30 minutes of the designated testing time. The father should provide
15 approval for weekly test results to be emailed to the mother and parenting
16 coordinator and for the mother to receive instantaneous test results via text message.
17 The father should be permitted a maximum of one missed test per quarter. A second
18 missed test or a failed test should result in suspension of the father's time with the
19 children pending further court orders.
- 20 I. All communication between the parties should be made through Our Family Wizard
unless in the case of an emergency requiring medical care or other life-threatening
circumstances.
- 21
- 22 J. A copy of the Parenting Plan Evaluation Report conducted by Connor Lenz, MSW
23 to be given to A&TA, DV Dads, Parenting Coordinator, Adrian's therapist, Mr.
24 Merced.
- 25 K. Both parents should notify each other promptly of a change in residence via OFW.
- 26 L. Both parents should be self-informed of the children's academic status and school

1 attendance.

- 2
- 3 M. The children will have unrestricted telephone/facetime/text messaging/social media
- 4 contact with the parents.
- 5 N. Each parent shall notify the other parent as soon as reasonably possible when there
- 6 is an issue related to the children's emergency medical care.
- 7 O. Neither parent shall advise the children of the status of child support payments or
- 8 other legal matters regarding the parents' relationship.
- 9 P. Neither parent, nor any other adult in their presence, shall make any disparaging
- 10 remarks about the other in the presence of the children.
- 11 Q. Father shall be able to attend Adrian's extracurricular activities even if they do
- 12 not occur during his residential time. The father shall not interact with the mother
- 13 at these events.
- 14 R. The mother shall participate in therapy to assist her in separating her issues with
- 15 the father from parenting.
- 16 S. The mother shall ensure the residential schedule is followed and that Adrian
- 17 participates in all recommended counseling, reunification therapy and any other
- 18 recommendations made by Kari Betts and/or the parenting coordinator.

15. Proposal

19 [] Does not apply. This is a court order.

20 [X] This is a **proposed** (requested) parenting plan. (*The parent/s requesting this plan must read*
and sign below.)

21 I declare under penalty of perjury under the laws of the State of Washington that this plan was
22 proposed in good faith and that the information in section 3. above is true.

23 Parent requesting plan signs here

Signed at (city and state)

25 Other parent requesting plan (if agreed) signs here

Signed at (city and state)

26 16. Court Order

1 [X] Does not apply. This is a proposal.
2

3 [] This is a court order (if signed by a judge or commissioner below).

4 **Findings of Fact** - Based on the pleadings and any other evidence considered:

5 The Court adopts the statements in section 3 (Reasons for putting limitations on a parent) as its
6 findings.

7 [] The Court makes additional findings which are:

8 [] Contained in an order or findings of fact entered at the same time as this *Parenting Plan*.
9

10 [] Attached as Exhibit A as part of this *Parenting Plan*.

11 [] Other:

12 **Conclusions of Law** - This *Parenting Plan* is in the best interest of the children.
13

14 [] Other:

16 **Order** - The parties must follow this *Parenting Plan*.
17

18 Date

Judge or Commissioner signs here

19 **Warning!** If you do not follow this *Parenting Plan*, the court may find you in contempt (RCW
20 26.09.160). You still have to follow this *Parenting Plan* even if the other parent doesn't.

21 Violation of **residential** provisions of this order with actual knowledge of its terms is punishable
22 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.

23 **If this is a court order, the parties and/or their lawyers (and any GAL) sign below.**
24

This order (check any that apply):

[X] Is an agreement of the parties.
[] Is presented by me.

This order (check any that apply):

[X] Is an agreement of the parties.
[X] Is presented by me.

1 [X] May be signed by the court without notice to me.
2
3

21047

Petitioner **or** lawyer signs here + WSBA #

Lisa A. Sharpe

Print Name

Date

24386

Respondent **or** lawyer signs here + WSBA #

Natalie de Maar

Print Name

Date

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26

Filing Status Single Married filing jointly Married filing separately (MFS) Head of household (HOH) Qualifying surviving spouse (QSS)
 Check only one box. If you checked the MFS box, enter the name of your spouse. If you checked the HOH or QSS box, enter the child's name if the qualifying person is a child but not your dependent:

Your first name and middle initial <u>Robert E</u>	Last name <u>Moyer, II</u>	Your social security number <u>226-17-6941</u>	
If joint return, spouse's first name and middle initial <u>Christine</u>	Last name <u>Moyer</u>	Spouse's social security number <u>626-11-4660</u>	
Home address (number and street). If you have a P.O. box, see instructions. <u>1210 Kirkland Ave</u>		Apt. no. <u></u>	Presidential Election Campaign Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. <input type="checkbox"/> You <input type="checkbox"/> Spouse
City, town, or post office. If you have a foreign address, also complete spaces below. <u>Kirkland</u>		State <u>WA</u>	ZIP code <u>98033</u>
Foreign country name <u></u>	Foreign province/state/county <u></u>	Foreign postal code <u></u>	

Digital Assets At any time during 2022, did you: (a) receive (as a reward, award, or payment for property or services); or (b) sell, exchange, gift, or otherwise dispose of a digital asset (or a financial interest in a digital asset)? (See instructions.) Yes No

Standard Deduction Someone can claim: You as a dependent Your spouse as a dependent
 Spouse itemizes on a separate return or you were a dual-status alien

Age/Blindness You: <input type="checkbox"/> Were born before January 2, 1958 <input type="checkbox"/> Are blind	Spouse: <input type="checkbox"/> Was born before January 2, 1958 <input type="checkbox"/> Is blind				
Dependents (see instructions):		(2) Social security number	(3) Relationship to you	(4) Check the box if qualifies for (see instructions):	
If more than four dependents, see instructions and check here . . . <input type="checkbox"/>	(1) First name <u>Robert E</u>	Last name <u>Moyer, III</u>	Son <input checked="" type="checkbox"/>	Child tax credit <input checked="" type="checkbox"/>	Credit for other dependents <input type="checkbox"/>
	(1) First name <u>Adrian R</u>	Last name <u>Moyer</u>	Son <input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>

Income	1a Total amount from Form(s) W-2, box 1 (see instructions)	1a <u>869,921.</u>
Attach Form(s) W-2 here. Also attach Forms W-2G and 1099-R if tax was withheld.	b Household employee wages not reported on Form(s) W-2	1b
If you did not get a Form W-2, see instructions.	c Tip income not reported on line 1a (see instructions)	1c
Attach Sch. B if required.	d Medicaid waiver payments not reported on Form(s) W-2 (see instructions)	1d
Standard Deduction for—	e Taxable dependent care benefits from Form 2441, line 26	1e
• Single or Married filing separately, \$12,950	f Employer-provided adoption benefits from Form 8839, line 29	1f
• Married filing jointly or Qualifying surviving spouse, \$25,900	g Wages from Form 8919, line 6	1g
• Head of household, \$19,400	h Other earned income (see instructions)	1h <u>0.</u>
• If you checked any box under Standard Deduction, see instructions.	i Nontaxable combat pay election (see instructions)	1i
	z Add lines 1a through 1h	1z <u>869,921.</u>
	2a Tax-exempt interest	2a
	3a Qualified dividends	3a <u>14,974.</u>
	4a IRA distributions	4a
	5a Pensions and annuities	5a
	6a Social security benefits	6a
	c If you elect to use the lump-sum election method, check here (see instructions)	<input type="checkbox"/>
	7 Capital gain or (loss). Attach Schedule D if required. If not required, check here	<input type="checkbox"/>
	8 Other income from Schedule 1, line 10	8 <u>0.</u>
	9 Add lines 1z, 2b, 3b, 4b, 5b, 6b, 7, and 8. This is your total income	9 <u>920,946.</u>
	10 Adjustments to income from Schedule 1, line 26	10
	11 Subtract line 10 from line 9. This is your adjusted gross income	11 <u>920,946.</u>
	12 Standard deduction or itemized deductions (from Schedule A)	12 <u>25,900.</u>
	13 Qualified business income deduction from Form 8995 or Form 8995-A	13 <u>26.</u>
	14 Add lines 12 and 13	14 <u>25,926.</u>
	15 Subtract line 14 from line 11. If zero or less, enter -0-. This is your taxable income	15 <u>895,020.</u>

Form 1040

Department of the Treasury—Internal Revenue Service
U.S. Individual Income Tax Return

2023

OMB No. 1545-0074

IRS Use Only—Do not write or staple in this space.

For the year Jan. 1-Dec. 31, 2023, or other tax year beginning _____		, 2023, ending _____	, 20_____	See separate instructions.
Your first name and middle initial Robert E	Last name Moyer, II			Your social security number 226 17 6941
If joint return, spouse's first name and middle initial Christine	Last name Moyer			Spouse's social security number 626 11 4660
Home address (number and street). If you have a P.O. box, see instructions. 1210 Kirkland Ave			Apt. no.	Presidential Election Campaign
City, town, or post office. If you have a foreign address, also complete spaces below. Kirkland		State WA	ZIP code 98033	Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.
Foreign country name		Foreign province/state/county	Foreign postal code	<input type="checkbox"/> You <input type="checkbox"/> Spouse

Filing Status	<input type="checkbox"/> Single	<input type="checkbox"/> Head of household (HOH)
Check only one box.	<input checked="" type="checkbox"/> Married filing jointly (even if only one had income)	<input type="checkbox"/> Qualifying surviving spouse (QSS)
	<input type="checkbox"/> Married filing separately (MFS)	
If you checked the MFS box, enter the name of your spouse. If you checked the HOH or QSS box, enter the child's name if the qualifying person is a child but not your dependent: _____		

Digital Assets	At any time during 2023, did you: (a) receive (as a reward, award, or payment for property or services); or (b) sell, exchange, or otherwise dispose of a digital asset (or a financial interest in a digital asset)? (See instructions.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
-----------------------	---	---

Standard Deduction	Someone can claim: <input type="checkbox"/> You as a dependent <input type="checkbox"/> Your spouse as a dependent
	<input type="checkbox"/> Spouse itemizes on a separate return or you were a dual-status alien

Age/Blindness You: <input type="checkbox"/> Were born before January 2, 1959 <input type="checkbox"/> Are blind Spouse: <input type="checkbox"/> Was born before January 2, 1959 <input type="checkbox"/> Is blind					
Dependents (see instructions):	(1) First name Robert E	Last name Moyer, III	(2) Social security number 539-63-1472	(3) Relationship to you Son	(4) Check the box if qualifies for (see instructions): <input checked="" type="checkbox"/> Child tax credit <input type="checkbox"/> Credit for other dependents
If more than four dependents, see instructions and check here . . . <input type="checkbox"/>	Adrian R	Moyer	126-77-8331	Son	<input checked="" type="checkbox"/> <input type="checkbox"/>
				<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
				<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

Income	1a Total amount from Form(s) W-2, box 1 (see instructions)	1a 735,921.
Attach Form(s) W-2 here. Also attach Forms W-2G and 1099-R if tax was withheld.	b Household employee wages not reported on Form(s) W-2	1b
If you did not get a Form W-2, see instructions.	c Tip income not reported on line 1a (see instructions)	1c
	d Medicaid waiver payments not reported on Form(s) W-2 (see instructions)	1d
	e Taxable dependent care benefits from Form 2441, line 26	1e
	f Employer-provided adoption benefits from Form 8839, line 29	1f
	g Wages from Form 8919, line 6	1g
	h Other earned income (see instructions)	1h 0.
	i Nontaxable combat pay election (see instructions)	1i
	z Add lines 1a through 1h	1z 735,921.
Attach Sch. B if required.	2a Tax-exempt interest	2b Taxable interest
	3a Qualified dividends	3b Ordinary dividends
	4a IRA distributions	4b Taxable amount
	5a Pensions and annuities	5b Taxable amount
Standard Deduction for—	6a Social security benefits	6b Taxable amount

c If you elect to use the lump-sum election method, check here (see instructions) <input type="checkbox"/>
7 Capital gain or (loss). Attach Schedule D if required. If not required, check here <input type="checkbox"/>
8 Additional income from Schedule 1, line 10
9 Add lines 1z, 2b, 3b, 4b, 5b, 6b, 7, and 8. This is your total income
10 Adjustments to income from Schedule 1, line 26
11 Subtract line 10 from line 9. This is your adjusted gross income
12 Standard deduction or itemized deductions (from Schedule A)
13 Qualified business income deduction from Form 8995 or Form 8995-A
14 Add lines 12 and 13
15 Subtract line 14 from line 11. If zero or less, enter -0-. This is your taxable income

For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions.

Form 1040 (2023)

2023 W-2 and EARNINGS SUMMARY

Employee	Reference	Copy
W-2	Wage and Tax Statement	2023 OMB No. 1545-0008
Copy C for employee's records.		

d Control number Dept. Corp. Employer use only
01481827 WFV WGJ0 230431

c Employer's name, address, and ZIP code
STARBUCKS COFFEE COMPANY
PO BOX 34442 MS S-TAX
SEATTLE, WA 98124

e/f Employee's name, address, and ZIP code
CHRISTINE MOYER
1210 KIRKLAND AVE
KIRKLAND, WA 98033

b Employer's FED ID number 91-1325671	a Employee's SSA number XXX-XX-4660
1 Wages, tips, other comp. 226778.46	2 Federal income tax withheld 69290.22
3 Social security wages 160200.00	4 Social security tax withheld 9932.40
5 Medicare wages and tips 246609.54	6 Medicare tax withheld 3995.32

7 Social security tips 8 Allocated tips

9 10 Dependent care benefits

11 Nonqualified plans	12a See instructions for box 12 C 1282.12
14 Other 16314.68 RSU GAIN 157.64 WA WRK CMP	12b D 18677.28
	12c W 1153.80
	12d AA 3822.72
	13 Stat emp Ret. plan 3rd party sick pay X

15 State Employer's state ID no. 16 State wages, tips, etc.

17 State income tax 18 Local wages, tips, etc.

19 Local income tax 20 Locality name

1 Wages, tips, other comp. 226778.46	2 Federal income tax withheld 69290.22
3 Social security wages 160200.00	4 Social security tax withheld 9932.40
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KIRKLAND, WA 98033

15 State Employer's state ID no.	16 State wages, tips, etc.
17 State income tax	18 Local wages, tips, etc.
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Federal Filing Copy
W-2 Wage and Tax Statement **2023**
OMB No. 1545-0008

Copy B to be filed with employee's Federal Income Tax Return.

. State Filing Copy
W-2 Wage and Tax Statement **2023**
OMB No. 1545-0008

Copy 2 to be filed with employee's State Income Tax Return.

Social Security Number: XXX-XX-4660

CHRISTINE MOYER
1210 KIRKLAND AVE
KIRKLAND, WA 98033

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PAGE 01 OF 02

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KIRKLAND, WA 98033

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19 Local income tax	20 Locality name

Federal Filing Copy
W-2 Wage and Tax Statement **2023**
OMB No. 1545-0008

Copy B to be filed with employee's Federal Income Tax Return.

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1210 KIRKLAND AVE
KIRKLAND, WA 98033

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17 State income tax	18 Local wages, tips, etc.
19 Local income tax	20 Locality name

City or Local Filing Copy
W-2 Wage and Tax Statement **2023**
OMB No. 1545-0008

Copy 2 to be filed with employee's City or Local Income Tax Return.



CO 000000-000000
 CU6
 US03: US Non Retail
 SE01: Exempt SEA
 Starbucks Corporation
 2401 Utah Ave South
 Seattle WA 98124-1067

Earnings Statement

Employee ID 001481827
 Page 001 of 002
 Period Beg/End: 09/09/2024 - 09/22/2024
 Advice Date: 09/27/2024
 Advice Number: 4818270641

CHRISTINE MOYER
 1210 KIRKLAND AVE
 KIRKLAND, WA 98033

For inquiries on this statement please call: 888-728-9411

Total Hours Worked: 80.00
 Basis of Pay: Salaried
 Pay Rate: 8,282.57

<u>Earnings</u>	<u>Rate</u>	<u>Hours/ Units</u>	<u>This Period</u>	<u>This Year-to-Date</u>
SPOT			5,000.00	
Digi Ptr Stp		11.54	230.80	
Regular	103.53	80.00	8,282.40	143,699.64
Holiday			5,797.68	
Personal			828.24	
Sick			1,242.36	
Vacation			14,080.08	
Imputed Income				
EE GTLI Taxable		48.46	969.20	
Gross Pay		8,293.94	170,878.80	

Tax Deductions

FED Withholding Tax	2,276.26	46,542.67
Social Security Tax	497.17	10,254.59
Medicare Tax	116.27	2,398.25
WA Worker Compensation	6.88	119.36
WA Family Leave Insur	21.39	599.49
WA Medical Leave Insur	10.41	291.70
WA WA Cares Fund LTC T	48.11	991.20
Tax Deduction Total	2,976.49	61,197.26

<u>Other Deductions</u>	<u>This Period</u>	<u>This Year-to-Date</u>
Post-Tax Deductions		
Dep Child Life	0.80	16.00
Aflac HOSP	12.69	253.80
Aflac SCI	3.68	73.60
Aflac PCI	3.65	73.00
Aflac ACCD	8.42	168.40
Spouse Life Ins	0.59	11.80
401K Roth	165.65	3,413.00
Total Post-Tax	195.48	4,009.60
Net Pay	3,860.68	80,016.14

Direct Deposit Summary

XXXXXXXXX1026 3,860.68

<u>Other Benefit Info</u>	<u>Earned</u>	<u>Taken Balance</u>
Paid Vacation Grant	200.00	136.00 64.00
Protected Sick Time	140.80	8.00 132.80
Extended Sick Time	440.00	0.00 440.00
Personal Day	1.00	0.00 1.00

BEN Hours 480.00

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Starbucks Corporation
 2401 Utah Ave South
 Seattle WA 98124-1067

Advice Number: 4818270641

Advice Date: 09/27/2024

Deposited to the account of
 CHRISTINE MOYER

Account Number XXXXXXXX1026 Transit ABA 125000024 Amount 3860.68

THIS IS NOT A CHECK



US03: US Non Retail
SE01: Exempt SEA
Starbucks Corporation
2401 Utah Ave South
Seattle WA 98124-1067

000000-000000

Earnings Statement

Page 002 of 002
Period Beg/End: 09/09/2024 - 09/22/2024
Advice Date: 09/27/2024
Advice Number: 4818270641

CHRISTINE MOYER
1210 KIRKLAND AVE
KIRKLAND, WA 98033

For inquiries on this statement please call: 888-728-9411

Total Hours Worked: 80.00
Basis of Pay: Salaried
Pay Rate: 8,282.57

<u>Earnings</u>	<u>Rate</u>	<u>Hours/ Units</u>	<u>This Period</u>	<u>This Year-to-Date</u>
Pre-Tax Deductions				
Parking		40.00	780.00	
AD&D		5.88	117.60	
Dental		65.16	1,303.20	
Life Ins		26.52	530.40	
Medical		172.65	3,453.00	
Vision		13.36	267.20	
401K		745.42	15,358.40	
HSA		192.30	3,846.00	
Total Pre-Tax		1,261.29	25,655.80	

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THIS IS NOT A CHECK

For Settlement Purposes Only
 Not to be Used in Litigation
 Pursuant to ER 408

Washington State Child Support Schedule Worksheets

[] Proposed by []
 Or, [] Signed by the Judicial/Reviewing Officer. (CSW)

[] State of WA (CSWP)

County KING

Case No. 23-3-05392-7 SEA

Child/ren and Age/s: Robert Moyer, 16; Adrian Moyer, 12

Parents' names: Robert Edward Moyer II
 (Column 1)

Christine Moyer
 (Column 2)

	Robert	Christine
Part I: Income (see Instructions, page 6)		
1. Gross Monthly Income		
a. Wages and Salaries Imputed for Robert	-	\$17945.58
b. Interest and Dividend Income	\$697.21	\$697.30
c. Business Income: Rental Income	-	\$414.83
d. Maintenance Received	-	-
e. Other Income: Robert – Deferred Compensation; Christine - Bonus	\$2,248.25	\$2,897.32
f. Imputed Income	\$17000.00	-
g. Total Gross Monthly Income (add lines 1a through 1f)	\$19945.46	\$21955.03
2. Monthly Deductions from Gross Income		
a. Income Taxes (Federal and State) Tax Year: 2024	\$4,022.07	\$4,060.54
b. FICA (Soc.Sec.+Medicare)/Self-Employment Taxes	\$1,120.60	\$1,199.52
c. State Industrial Insurance Deductions	-	\$13.76
d. WA Family Leave, WA Medical Leave, WA Cares Fund	\$159.82	\$159.82
e. Mandatory Pension Plan Payments	-	-
f. Voluntary Retirement Contributions	\$416.66	\$416.66
g. Maintenance Paid	-	-
h. Normal Business Expenses	-	\$840.00
i. Total Deductions from Gross Income (add lines 2a through 2h)	\$5,719.15	\$6,690.30
3. Monthly Net Income (line 1g minus 2i)	\$14,226.31	\$15,264.73
4. Combined Monthly Net Income (add both parents' monthly net incomes from line 3)	\$29,491.04	
5. Basic Child Support Obligation Number of children: 2 x \$1190.00 per child (enter total amount in box →)		\$2,380.00
6. Proportional Share of Income (divide line 3 by line 4 for each parent)	.482	.518

	Robert	Christine	
Part II: Basic Child Support Obligation (see Instructions, page 7)			
7. Each Parent's Basic Child Support Obligation without consideration of low income limitations (Each parent's Line 6 times Line 5.)	\$1,147.16	\$1,232.84	
8. Calculating low income limitations: Fill in only those that apply.			
Self-Support Reserve: (125% of the federal poverty guideline for a one-person family.)	\$1,569.00		
a. Is combined Net Income Less Than \$1,000? If yes, for each parent enter the presumptive \$50 per child.	-	-	
b. Is Monthly Net Income Less Than Self-Support Reserve? If yes, for that parent enter the presumptive \$50 per child.	-	-	
c. Is Monthly Net Income equal to or more than Self-Support Reserve? If yes, for each parent subtract the self-support reserve from line 3. If that amount is less than line 7, enter that amount or the presumptive \$50 per child, whichever is greater.	-	-	
9. Each parent's basic child support obligation after calculating applicable limitations. For each parent, enter the lowest amount from line 7, 8a - 8c, but not less than the presumptive \$50 per child.	\$1,147.16	\$1,232.84	
Part III: Health Care, Day Care, and Special Child Rearing Expenses (see Instructions, page 8)			
10. Health Care Expenses			
a. Monthly Health Insurance Premiums Paid for Child(ren)	-	-	
b. Uninsured Monthly Health Care Expenses Paid for Child(ren)	-	-	
c. Total Monthly Health Care Expenses (line 10a plus line 10b)	-	-	
d. Combined Monthly Health Care Expenses (add both parents' totals from line 10c)		-	
11. Day Care and Special Expenses			
a. Day Care Expenses	-	-	
b. Education Expenses	-	-	
c. Long Distance Transportation Expenses	-	-	
d. Other Special Expenses (describe)			
	-	-	
	-	-	
	-	-	
	-	-	
e. Total Day Care and Special Expenses (Add lines 11a through 11d)	-	-	
12. Combined Monthly Total Day Care and Special Expenses (add both parents' day care and special expenses from line 11e)		-	
13. Total Health Care, Day Care, and Special Expenses (line 10d plus line 12)		-	
14. Each Parent's Obligation for Health Care, Day Care, and Special Expenses (multiply each number on line 6 by line 13)	-	-	
Part IV: Gross Child Support Obligation			
15. Gross Child Support Obligation (line 9 plus line 14)	\$1,147.16	\$1,232.84	

	Robert	Christine
Part V: Child Support Credits (see Instructions, page 9)		
16. Child Support Credits		
a. Monthly Health Care Expenses Credit	-	-
b. Day Care and Special Expenses Credit	-	-
c. Other Ordinary Expenses Credit (describe)	- - -	- - -
d. Total Support Credits (add lines 16a through 16c)	-	-
Part VI: Standard Calculation/Presumptive Transfer Payment (see Instructions, page 9)		
17. Standard Calculation (line 15 minus line 16d or \$50 per child whichever is greater)	\$1,147.16	\$1,232.84
Part VII: Additional Informational Calculations		
18. 45% of each parent's net income from line 3 (.45 x amount from line 3 for each parent)	\$6,401.84	\$6,869.13
19. 25% of each parent's basic support obligation from line 9 (.25 x amount from line 9 for each parent)	\$286.79	\$308.21
Part VIII: Additional Factors for Consideration (see Instructions, page 9)		
20. Household Assets <i>(List the estimated present value of all major household assets.)</i>		
a. Real Estate	-	-
b. Investments		-
c. Vehicles and Boats	-	-
d. Bank Accounts and Cash	-	-
e. Retirement Accounts	-	-
f. Other: (describe)	-	-
	-	-
	-	-
	-	-
	-	-
21. Household Debt <i>(List liens against household assets, extraordinary debt.)</i>		
a.	-	-
b.	-	-
c.	-	-
d.	-	-
e.	-	-
f.	-	-
22. Other Household Income		
a. Income Of Current Spouse or Domestic Partner <i>(if not the other parent of this action)</i>		
Name	-	-
Name	-	-
b. Income Of Other Adults in Household		
Name	-	-
Name	-	-

	Robert	Christine
c. Gross Income from overtime or from second jobs the party is asking the court to exclude per Instructions, page 8	-	-
d. Income Of Child(ren) (if considered extraordinary)		
Name	-	-
Name	-	-
e. Income From Child Support		
Name	-	-
Name	-	-
f. Income From Assistance Programs		
Program	-	-
Program	-	-
g. Other Income (describe)		
	-	-
	-	-
23. Non-Recurring Income (describe)		
	-	-
	-	-
24. Monthly Child Support Ordered for Other Children		
Name/age: Paid <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	-	-
Name/age: Paid <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	-	-
Name/age: Paid <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	-	-
25. Other Child(ren) Living In Each Household (First name(s) and age(s))		
26. Other Factors For Consideration		
Basis for Interest and Dividend Income for Robert and Christine:		
50% of Interest (\$966) reported on 2023 tax return		
Interest: \$40.25/mo., \$483.00 Annually		
50% of Dividends (\$15,768) reported on 2023 tax return		
Dividend: \$656.96/mo., \$7,884 Annually		
Basis for Business Income for Christine Moyer: \$414.83/mo.:		
\$4,978.00 Annually reported on 2023 tax return with depreciation added back in.		

Other Factors For Consideration (continued) (attach additional pages as necessary)

Basis for Other Income for Christine Moyer, \$2,897.32:

\$34,767.80 annually comprised of:

- 2023 bonus \$24,537;
- \$5,000 SPOT reported on pay stub;
- Digi Ptr Stip \$230.80 reported on pay stub.

Signature and Dates

I declare, under penalty of perjury under the laws of the State of Washington, the information contained in these Worksheets is complete, true, and correct.

Parent's Signature (Column 1)

Parent's Signature (Column 2)

Date

City

Date

City

Judicial/Reviewing Officer

Date

**This Worksheet has been certified by the State of Washington Administrative Office of the Courts.
Photocopying of the worksheet is permitted.**

***For Settlement Purposes Only
Not to be Used in Litigation
Pursuant to ER 408***

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

In re the Marriage of:

CHRISTINE MOYER,

Petitioner,

and

ROBERT EDWARD MOYER II,

Respondent.

NO. 23-3-05392-7 SEA

CHILD SUPPORT ORDER FINAL (ORS)

**CLERK'S ACTION REQUIRED:
WSSR, 1**

Child Support Order

1. Money Judgment Summary

[X] No money judgment is ordered.

[] Summarize any money judgments from section 23 in the table below.

Judgment for	Debtor's name (person who must pay money)	Creditor's name (person who must be paid)	Amount	Interest
Past due child support from _____ to _____			\$	\$
Past due medical support from _____ to _____			\$	\$
Past due children's exp. from _____ to _____			\$	\$

Other amounts (<i>describe</i>):			\$	\$
Yearly Interest Rate for child support, medical support, and children's expenses: 12% . For other judgments: % (<i>12% unless otherwise listed</i>)				
Lawyer (name):	represents (<i>name</i>):			
Lawyer (name):	represents (<i>name</i>):			

Findings and Orders

2. The court orders child support as part of this family law case. This is a (*check one*):
 [] temporary order [X] final order.
3. The *Child Support Schedule Worksheets* attached or filed separately are approved by the court and made part of this order.

4. Parents' contact and employment information

Each parent must fill out and file with the court a *Confidential Information* form (FL All Family 001) including personal identifying information, mailing address, home address, and employer contact information.

Important! If you move or get a new job any time while support is still owed, you must:

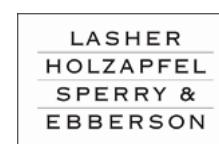
- Notify the Support Registry, and
- Fill out and file an updated *Confidential Information* form with the court.

Warning! Any notice of a child support action delivered to the last address you provided on the *Confidential Information* form will be considered adequate notice, if the party trying to serve you has shown diligent efforts to locate you.

5. Parents' Income

RCW 11.130.255; RCW 26.09.135, .320;
 RCW 26.26B.030
 Mandatory Form (07/2022)
 FL All Family 130

CHILD SUPPORT
 ORDER
 Page 2 of 27



ATTORNEYS AT LAW
 2600 Two Union Square
 601 UNION STREET
 SEATTLE WA 98101-4000
 TELEPHONE 206 624-1230
 Fax 206 340-2563

Parent: Robert Edward Moyer II	Parent: Christine Moyer
<p>Net monthly income \$ 14,226. <i>(line 3 of the Worksheets)</i> This income is <i>(check one):</i></p> <p>[X] imputed to this parent. <i>(Skip to 6.)</i> <input type="checkbox"/> this parent's actual income <i>(after any exclusions approved below).</i></p>	<p>Net monthly income \$ 15,265. <i>(line 3 of the Worksheets)</i> This income is <i>(check one):</i></p> <p>[] imputed to this parent. <i>(Skip to 6.)</i> <input checked="" type="checkbox"/> this parent's actual income <i>(after any exclusions approved below).</i></p>
<p>Does this parent have income from overtime or a second job?</p> <p>[X] No. <i>(Skip to 6.)</i> <input type="checkbox"/> Yes. <i>(Fill out below.)</i></p> <p>Should this income be excluded? <i>(check one):</i></p> <p>[] No. The court has included this income in this parent's gross monthly income on line 1 of the <i>Worksheets</i>. <input type="checkbox"/> Yes. This income should be excluded because: This parent worked over 40 hours per week averaged over 12 months, and That income was earned to pay for <input type="checkbox"/> current family needs [] debts from a past relationship [] child support debt, and This parent will stop earning this extra income after paying these debts. The court has excluded \$ from this parent's gross monthly income on line 1 of the <i>Worksheets</i>.</p> <p>[] Other findings:</p>	<p>Does this parent have income from overtime or a second job?</p> <p>[X] No. <i>(Skip to 6.)</i> <input type="checkbox"/> Yes. <i>(Fill out below.)</i></p> <p>Should this income be excluded? <i>(check one):</i></p> <p>[] No. The court has included this income in this parent's gross monthly income on line 1 of the <i>Worksheets</i>. <input type="checkbox"/> Yes. This income should be excluded because: This parent worked over 40 hours per week averaged over 12 months, and That income was earned to pay for <input type="checkbox"/> current family needs [] debts from a past relationship [] child support debt, and This parent will stop earning this extra income after paying these debts. The court has excluded \$ from this parent's gross monthly income on line 1 of the <i>Worksheets</i>.</p> <p>[] Other findings:</p>

6. Imputed Income

*To calculate child support, the court may **impute** income to a parent:*

RCW 11.130.255; RCW 26.09.135, .320;
RCW 26.26B.030
Mandatory Form (07/2022)
FL All Family 130

CHILD SUPPORT
ORDER
Page 3 of 27



ATTORNEYS AT LAW
2600 Two Union Square
601 UNION STREET
SEATTLE WA 98101-4000
TELEPHONE 206 624-1230
Fax 206 340-2563

- 1
- whose income is unknown, or
 - who the Court finds is unemployed or under-employed by choice.
- 2

3 *Imputed income is not actual income. It is an assigned amount the court finds a parent*

4 *could or should be earning. (RCW 26.19.071(6))*

5 Parent (name): Robert Moyer II	6 Parent (name): Christine Moyer
<p>6 [] Does not apply. This parent's actual 7 income is used. (<i>Skip to 7.</i>)</p> <p>7 [X] This parent's monthly net income is 8 imputed because (<i>check one</i>):</p> <p>9 [] this parent's income is unknown.</p> <p>10 [X] this parent is voluntarily 11 unemployed.</p> <p>12 [] this parent is voluntarily under- 13 employed.</p> <p>14 [] this parent works full-time but is 15 purposely under-employed to 16 reduce child support.</p> <p>17 [] this parent is currently enrolled in 18 high school full-time and is 19 voluntarily unemployed or under- 20 employed.</p> <p>21 The imputed amount is based on the 22 information below: (<i>Options are listed</i> 23 <i>in order of required priority. The court</i> 24 <i>used the first option possible based on</i> 25 <i>the information it had unless a</i> 26 <i>presumed option was rebutted.</i>)</p> <p>22 [] Pay for 20 hours per week at the 23 minimum wage where this parent 24 lives because this parent is enrolled 25 in high school full-time and is 26 voluntarily unemployed or under- employed.</p> <p>22 [] Full-time pay at current pay rate.</p>	<p>6 [X] Does not apply. This parent's actual 7 income is used. (<i>Skip to 7.</i>)</p> <p>7 [] This parent's monthly net income is 8 imputed because (<i>check one</i>):</p> <p>9 [] this parent's income is unknown.</p> <p>10 [] this parent is voluntarily 11 unemployed.</p> <p>12 [] this parent is voluntarily under- 13 employed.</p> <p>14 [] this parent works full-time but is 15 purposely under-employed to 16 reduce child support.</p> <p>17 [] this parent is currently enrolled in 18 high school full-time and is 19 voluntarily unemployed or under- 20 employed.</p> <p>21 The imputed amount is based on the 22 information below: (<i>Options are listed</i> 23 <i>in order of required priority. The court</i> 24 <i>used the first option possible based on</i> 25 <i>the information it had unless a</i> 26 <i>presumed option was rebutted.</i>)</p> <p>22 [] Pay for 20 hours per week at the 23 minimum wage where this parent 24 lives because this parent is enrolled 25 in high school full-time and is 26 voluntarily unemployed or under- employed.</p> <p>22 [] Full-time pay at current pay rate.</p>

Parent (name): Robert Moyer II	Parent (name): Christine Moyer
<p>[] Full-time pay based on reliable information about past earnings.</p> <p>[] Full-time pay based on incomplete or irregular information about past earnings.</p> <p>[] Pay for 32 hours per week at the minimum wage where this parent lives because this parent:</p> <ul style="list-style-type: none"> [] recently graduated from high school. [] is on TANF now, or recently came off TANF, public assistance, SSI, or disability. [] was recently incarcerated. <p>[] Full-time pay at the minimum wage where the parent lives because this parent (<i>check all that apply</i>):</p> <ul style="list-style-type: none"> [] recently worked at minimum wage jobs. [] has never been employed. [] does not have information about past earnings. <p>[] Table of Median Net Monthly Income.</p> <p>[X] Other (<i>specify</i>): Full-time based on Bureau of Labor Statistics.</p>	<p>[] Full-time pay based on reliable information about past earnings.</p> <p>[] Full-time pay based on incomplete or irregular information about past earnings.</p> <p>[] Pay for 32 hours per week at the minimum wage where this parent lives because this parent:</p> <ul style="list-style-type: none"> [] recently graduated from high school. [] is on TANF now, or recently came off TANF, public assistance, SSI, or disability. [] was recently incarcerated. <p>[] Full-time pay at the minimum wage where the parent lives because this parent (<i>check all that apply</i>):</p> <ul style="list-style-type: none"> [] recently worked at minimum wage jobs. [] has never been employed. [] does not have information about past earnings. <p>[] Table of Median Net Monthly Income.</p> <p>[] Other (<i>specify</i>):</p>

7. Limits affecting the monthly child support amount

[] Does not apply. The monthly amount was not affected by the upper or lower limits in RCW 26.19.065.

[X] The monthly amount has been affected by (*check all that apply*):

[] **Low-income limits.** The self-support reserve and presumptive minimum payment have been calculated in the *Worksheets*, lines 8.a. - c.

[] **The 45% net income limit.** The court finds that the paying parent's child support obligations for their biological and legal children are more than 45% of their net income (*Worksheets* line 18). Based on the children's best interests and the parents' circumstances, it is (*check one*): [] fair [] **not** fair to apply the 45% limit.
(*Describe both parents' situations*):

[X] **Combined Monthly Net Income over \$12,000.** Together, the parents earn more than \$12,000 per month (*Worksheets* line 4). The child support amount (*check one*):

[X] is the presumptive amount from the economic table.

[] is **more** than the presumptive amount from the economic table because (*specify*):

8. Standard Calculation

Parent Name	Standard calculation worksheets line 17
Robert Edward Moyer II	\$1,147
Christine Moyer	\$1,233

[] **Check here if there is a residential split** – (each parent has at least one of the children from this relationship living with them most of the time.)

These children (<i>names and ages</i>):	These children (<i>names and ages</i>):
Live with (<i>parent's name</i>):	Live with (<i>parent's name</i>):

The standard calculation for the parent paying support is \$. This is from (*check one*):

[] the *Attachment for Residential Split Adjustment (Arvey calculation)*, line G (form WSCSS - Attachment for RSA). This *Attachment* to the *Child Support Schedule Worksheets* is approved by the court and made part of this Order.

[] other calculation (*specify method and attach Worksheet/s*):

9. Deviation from standard calculation

Should the monthly child support amount be different from the standard calculation?

[X] **No** - The monthly child support amount ordered in section **10** is the **same** as the standard calculation listed in section **8** because (*check one*):

[X] no one asked for a deviation from the standard calculation. (*Skip to 10.*)

[] there is not a good reason to approve the deviation requested by (*name/s*):
. The facts supporting this decision are (*check all that apply*):

[] Detailed in the *Worksheets*, Part VIII, lines 20 through 26.

[] The parent asking for a deviation:

[] Has a new spouse or domestic partner with income of \$.

[] Lives in a household where other adults have income of \$.

[] Has income from overtime or a second job that was excluded in section **5** above.

[] other (*specify*):

[] **Yes** - The monthly child support amount ordered in section **10** is **different** from the standard calculation listed in section **8** because (*check all that apply*):

[] A parent or parents in this case has:

[] Children from other relationships.

- 1 [] Paid or received child support for children from other relationships.
- 2 [] Gifts, prizes, or other assets.
- 3 [] Income that is not regular (non-recurring income) such as bonuses, overtime,
4 etc.
- 5 [] Unusual unplanned debt (extraordinary debt not voluntarily incurred).
- 6 [] Tax planning considerations that will not reduce the economic benefit to the
7 children.
- 8 [] Very different living costs, which are beyond their control.

9

10 [] The children in this case:

- 11 [] Spend significant time with the parent who owes support. The non-standard
12 amount still gives the other parent's household enough money for the children's
13 basic needs. The children do not get public assistance (TANF).
- 14 [] Have extraordinary income.
- 15 [] Have special needs because of a disability.
- 16 [] Have special medical, educational, or psychological needs.
- 17 [] There are (or will be) costs for court-ordered reunification or a voluntary placement
18 agreement.
- 19 [] The parent who owes support has shown it is not fair to have to pay the \$50 per
20 child presumptive minimum payment.
- 21 [] The parent who is owed support has shown it is not fair to apply the self-support
22 reserve (calculated on lines 8.a. - c. of the *Worksheets*).

23 [] Other Reasons:

25 **The facts that support the reasons checked above are (check all that apply):**

[] Detailed in the *Worksheets*, Part VIII, lines 20 through 26.

[] The parent asking for a deviation:

[] Has a new spouse or domestic partner with income of \$.

[] Lives in a household where other adults have income of \$.

[] Has income from overtime or a second job that was excluded in section 5 above.

[] As follows:

10. Monthly child support amount (transfer payment)

After considering the standard calculation in section 8, and whether or not to apply a deviation in section 9, the court orders the following monthly child support amount (transfer payment).

[X] (*Name*): Robert Edward Moyer II must pay child support to (*name*): Christine Moyer each month as follows for the children listed below (*add lines for additional children if needed*):

Child's Name	Age	Amount
1. Robert Edward Moyer III ("Max")	16	\$573.50
2. Adrian Moyer	12	\$573.50
Total monthly child support amount:		\$ 1,147.00

[] **Residential Split** - Each parent has at least one of the children from this relationship living with them most of the time. (*Name*): must pay child support to (*name*): each month as follows:

Total monthly child support amount: [] \$

11. Starting date and payment schedule

1 The monthly child support amount must be paid starting (*month, year*): November 1, 2024
2 on the following payment schedule:

3 [X] In one payment each month by the 1st day of the month.

4 [] In two payments each month: 1/2 by the _____ and 1/2 by the _____ day of the month.

5 [] Other (*specify*):
6

7 **12. Step increase or decrease (for modifications or adjustments only)**

8 [X] Does not apply.

9 [] **Approved** - The court is changing a final child support order. The monthly child
10 support amount is increasing or decreasing by more than 30 percent from the last final
11 child support order. This causes significant financial hardship to the parent who owes
12 or receives support, so the increase will be applied in two equal steps:
13 On (*date*): _____, six months after the Starting Date in section **11**, the monthly
14 child support amount will be the full amount listed in section **10**.

15 For 6 months from the Starting Date in section **11** above, the monthly child support
16 amount will be an amount exactly half way between the old monthly amount and
17 the new monthly amount for a total of \$ _____ each month.

18 [] **Denied** - The court is changing a final child support order (*check one*):

19 [] but the monthly payment increased or decreased by less than 30%.

20 [] and the monthly payment increased by more than 30%, but this does not cause a
21 significant hardship to the parent who owes support.

22 [] and the monthly payment decreased by more than 30%, but this does not cause a
23 significant hardship to the parent who receives support.

24 **13. Periodic Adjustment**

25 [X] Child support may be changed according to state law. The Court is not ordering a
26 specific periodic adjustment schedule below.

[] Any party may ask the court to adjust child support periodically on the following schedule **without** showing a substantial change of circumstances:

The *Motion to Adjust Child Support Order* may be filed:

[] Every months.

[] On (date/s): .

[] Other (*describe condition or event*):

Important! A party must file a *Motion to Adjust Child Support Order* (form FL Modify 521), and the court must approve a new *Child Support Order* for any adjustment to take effect.

[] Deadlines, if any (*for example, deadline to exchange financial information, deadline to file the motion*):

14. Payment Method (*check either Registry or Direct Pay*)

[] **Registry** – Send payment to the Washington State Support Registry. The Division of Child Support (DCS) will forward payments to the person owed support and keep records of all payments.

Address for payment: Washington State Support Registry
PO Box 45868, Olympia, WA 98504

Phone number/s: 1 (800) 922-4306 or 1 (800) 442-5437

Important! If you are ordered to send your support payments to the Washington State Support Registry, and you pay some other person or organization, you will **not** get credit for your payment.

DCS Enforcement (*if Registry is checked above*):

[] DCS will **enforce** this order because (*check all that apply*):

- 1 [] This is a public assistance case.
- 2 [] One of the parties has already asked DCS for services.
- 3 [] One of the parties has asked for DCS services by signing the application
- 4 statement at the end of this order (above the *Warnings*).
- 5 [] DCS will **not** enforce this order unless one of the parties applies for DCS services
- 6 or the children go on public assistance.

7 [X] **Direct Pay** – Send payment to the other parent or non-parent custodian by:

8 [] Mail to:

9 _____
10 Street Address or PO Box City State Zip

11 or any new address the person owed support provides to the parent who owes
12 support. (*This does not have to be a home address.*)

13 [X] Other method:

14 Direct deposit into an account designated by Christine Moyer.

15. **Enforcement through income withholding (garnishment)**

16 DCS or the person owed support can collect the support owed from the income, earnings,
17 assets, or benefits of the parent who owes support, and can enforce liens against real or
18 personal property as allowed by any state's child support laws without notice to the parent
19 who owes the support.

20 *If this order is **not** being enforced by DCS and the person owed support wants to have
21 support paid directly from the employer, the person owed support must ask the court to
22 sign a separate income withholding order requiring the employer to withhold income and
23 make payments. (Chapter 26.18 RCW.)*

24 Income withholding may be delayed until a payment becomes past due if the court finds
25 good reason to delay.

26 [] Does not apply. There is no good reason to delay income withholding.

[] Income withholding will be **delayed** until a payment becomes past due because (*check one*):

[] the child support payments are enforced by DCS, and there are good reasons in the children's best interest **not** to withhold income at this time. If this is a case about changing child support, previously ordered child support has been paid on time.

List the good reasons here:

[X] the child support payments are **not** enforced by DCS and there are good reasons **not** to withhold income at this time.

List the good reasons here:

Agreement of the parties.

[X] the court has approved the parents' written agreement for a different payment arrangement.

16. Temporary reduction if incarcerated (abatement)

Important! *Read Support Abatement Warnings at the end of this order.*

If the person who owes support is incarcerated:

- The total monthly child support amount may be temporarily reduced to \$10 while the person who owes support is in jail, prison, or a correctional facility for at least six months (or serving a sentence of more than six months), and has no income or assets available to pay the support.
- If reduced, the support amount will be \$10 a month.
- Beginning the fourth month after the person who owes support is released, support will be 50% of the original amount, or \$50 per child, whichever is more.
- One year after release, support will return to the original amount in section 10.
- Reinstatement of the support amount at 50% does not automatically apply, if a *Petition to Modify Child Support Order* is filed during the period of abatement.

[] The person who owes support qualifies for abatement. Monthly child support is temporarily reduced (abated) to \$10 and will be reinstated as described above.

17. End date for support

Support must be paid for each child until the court signs a different order or (*check one*):

[X] the child turns 18 or is no longer enrolled in high school, whichever happens last, unless the court makes a different order in section **18**.

[] the child turns 18 or is emancipated, unless the court makes a different order in section 18.

[] after *(child's name)*: _____ turns 18. Based on information available to the court, it is expected that this child will be unable to support them self and will remain dependent past the age of 18. Support must be paid until *(check one)*:

[] this child is able to support themselves and is no longer dependent on the parents.

[] other:

[] other (*specify*):

18. Post-secondary educational support (for college or vocational school)

[] **Reserved** - A parent or non-parent custodian may ask the court for post-secondary educational support at a later date without showing a substantial change of circumstances by filing a *Petition to Modify Child Support Order* (form FL Modify 501). The *Petition* must be filed before child support ends as listed in section 17.

[X] **Granted** - The parents must pay for the children's post-secondary educational support. Post-secondary educational support may include support for the period after high school and before college or vocational school begins. The amount or percentage each person must pay (*check one*):

[] will be decided later. The parties may make a written agreement or ask the court to set the amount or percentage by filing a *Petition to Modify Child Support Order* (form FL Modify 501).

[X] is as follows (*specify*):

1 Max has a Vanguard UTMA Account x5817 and a Fidelity 529 account x6171 with
2 balances of \$10,967 and \$108,911, respectively, as of September 30, 2024. Adrian has a
3 Vanguard UTMA account x8951 and a Fidelity 529 account x3635 with balances of
4 \$11,291 and \$85,078, respectively as of September 30, 2024. These accounts shall be
5 used to fund each child's post secondary educational support. After these funds are
6 exhausted, both parents shall each pay 50% of a child's expenses to complete a regular
7 four-year course of study in a college, university or vocational school.

8 The obligation of a parent to contribute toward the post a high school expenses of Max
9 and Adrian shall be governed by the following guidelines:
10

- 11 A. The need for a contribution to each child shall take into account the ability of the
12 child to provide for his own education through working, scholarships or other sources
13 of funds.
14
- 15 B. The obligation shall provide for the equivalent of four years of education after
16 graduation from high school but shall not extend beyond a child's 23rd birthday.
17
- 18 C. The obligation shall include tuition, books, school fees, course supplies, rent, utilities
19 and fees, transportation, personal & miscellaneous expenses which includes health
20 care insurance, uninsured healthcare expenses, automobile insurance, automobile
21 maintenance and gas, cell phone, clothing, entertainment, travel to and from school
22 and other agreed upon personal expenses.
23
- 24 D. OPTIONAL LANGUAGE: The obligation shall include tuition, books, school fees,
25 course supplies, rent, utilities and fees, transportation, personal & miscellaneous
26 expenses which includes health care insurance, uninsured healthcare expenses,
automobile insurance, automobile maintenance and gas, cell phone, clothing,
entertainment, travel to and from school and other agreed upon personal expenses
capped at the University of Washington Resident Student Budget.
<https://www.washington.edu/financialaid/getting-started/student-budgets/>
27
- 28 E. All payments for post-secondary educational expenses shall be made directly to the
29 educational institution or service provide, if feasible.
30
- 31 F. The child must enroll in an accredited academic or vocational school, must be
32 actively pursuing a course of study commensurate with the child's vocational goals,
33 and must be in good academic standing as defined by the institution. The court
34 ordered post secondary educational support shall be automatically suspended during
35 the period or periods the child fails to comply with these conditions.
36

- 1
- 2 G. The child shall make available all academic records and grades to both parents as a
3 condition of receiving post secondary educational support. Each parent shall have
4 full and equal access to the post secondary education records.
- 5 H. The obligation is only an obligation between the parents and is not enforceable by any
6 of the children in their own name; provided, however, nothing shall preclude either
7 parent from enforcing this provision against the other parent as part of this order for
8 support of a child.
- 9 I. Any funds that remain in the children's education accounts upon completion of their
10 post secondary education shall be divided equally between the children.

11 The parties shall remain co-owners of the Vanguard UTMA accounts and shall have online
12 access to the accounts.

13 Christine Moyer is the custodian of the Fidelity 529 accounts. She shall provide statements to
14 the father on a quarterly basis (i.e. upon issuance of the January, March, June and September
15 statements). If the Robert Moyer requests interim statements, Christine Moyer shall provide
16 them to him.

17 These accounts shall not be used for anything other than post-secondary educational support
18 unless otherwise agreed by the parties in writing.

19 [] **Denied** The request for post-secondary educational support is denied.

20 [] Other (*specify*):

21 19. Tax Issues

22 ***Important!*** *Although personal tax exemptions are currently suspended under federal law
through tax year 2025, other tax benefits may flow from claiming a child as dependent.*

23 [] The parties will follow the law and IRS rules about claiming children on tax forms.

24 [X] The parties have the right to claim the children as their dependents for purposes of
25 personal tax exemptions and associated tax credits on their tax forms as follows (*check
one*):

26 RCW 11.130.255; RCW 26.09.135, .320;
RCW 26.26B.030
Mandatory Form (07/2022)
FL All Family 130

CHILD SUPPORT
ORDER
Page 16 of 27



ATTORNEYS AT LAW
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SEATTLE WA 98101-4000
TELEPHONE 206 624-1230
Fax 206 340-2563

1 [X] Every year - Christine Moyer has the right to claim Max Moyer; and Robert
2 Edward Moyer II has the right to claim Adrian Moyer.

3 [] Alternating - (name): has the right to claim the children for
4 (check one): [] even [] odd year and (name): has the right to
5 claim the children for the opposite years.

6 [X] Other (specify):

7 When only one child is left to claim as an exemption, the parties shall alternate years
8 with the Robert Edward Moyer II having even years and Christine Moyer having odd
9 years.

10 If a party will not benefit from the claiming a child as a dependent on their tax return,
11 he/she shall timely notify the other parent so the other parent may claim the child.

12 For tax years when a non-custodial parent has the right to claim the children, the
13 parents must cooperate to fill out and submit IRS Form 8332 in a timely manner.

14 20. Medical Support

15 **Important!** Read the Medical Support Warnings at the end of this order. Medical Support
16 includes health insurance (both public and private) and cash payments towards premiums
and uninsured medical expenses.

17 [] The court is not ordering how healthcare coverage must be provided for the children
18 because the court does not have enough information to determine the availability of
19 accessible healthcare coverage for the children (coverage that could be used for the
20 children's primary care). The law requires every parent to provide or pay for medical
support. DCS or any parent can enforce this requirement. (Skip to 21.)

21 [X] **Private health insurance ordered.** (Name): Christine Moyer must pay the
22 premium to provide health insurance coverage for the children. The court has
23 considered the needs of the children, the cost and extent of coverage, and the
24 accessibility of coverage.

25 [X] The other parent must pay 50% of the premium paid. Health insurance
26 premiums (check one):

[] are included on the *Worksheets* (line 14). No separate payment is needed.

[X] are **not** included on the *Worksheets*. Separate payment is needed. A parent or non-parent custodian may ask DCS or the court to enforce payment for the proportional share.

* *Proportional share is each parent's percentage share of the combined net income from line 6 of the Child Support Schedule Worksheets.*

[] The other parent is **not** ordered to pay for any part of the children's insurance because (*explain*):

A parent cannot be excused from providing health insurance coverage through an employer or union solely because the child receives public healthcare coverage.

[] A parent has been ordered to pay an amount that is more than 25% of their basic support obligation (*Worksheets*, line 19). The court finds this is in the children's best interest because:

*A parent cannot be ordered to pay an amount towards healthcare coverage premiums that is more than 25% of their basic support obligation (*Worksheets*, line 19) unless the court finds it is in the best interest of the children.*

[] **Public health care coverage.** (*Name*): _____ has enrolled the child in public health care coverage and does not have available at no cost, accessible health insurance coverage through an employer or union.

[] The other parent must enroll the child in accessible health insurance coverage through their employer or union up to 25% of their basic support obligation.

[] The other parent must pay their proportional share* of the premium for public health care coverage for the child. Public health care premiums (*check one*):

[] are included on the *Worksheets* (line 14). No separate payment is needed.

[] are **not** included on the *Worksheets*. Separate payment is needed. A parent or non-parent custodian may ask DCS or the court to enforce payment for the proportional share.

* *Proportional share is each parent's percentage share of the combined net income from line 6 of the Child Support Schedule Worksheets.*

[] The other parent is **not** ordered to pay for any part of the children's healthcare coverage because (*explain*):

A parent cannot be excused from providing health insurance coverage through an employer or union solely because the child receives public healthcare coverage.

[] A parent has been ordered to pay an amount that is more than 25% of their basic support obligation (*Worksheets*, line 19). The court finds this is in the children's best interest because:

[] Other (*specify*):

21. Healthcare coverage if circumstances change or court has not ordered

If the parties' circumstances change, or if the court is not ordering how healthcare coverage must be provided for the children in section 20:

- A parent, non-parent custodian, or DCS can enforce the medical support requirement.
- If a parent does not provide proof of accessible healthcare coverage (coverage that can be used for the children's primary care), that parent must:
 - Get (or keep) insurance through their work or union, unless the insurance costs more than 25% of their basic support obligation (line 19 of the *Worksheets*),
 - Pay their share of the other parent's monthly premium up to 25% of their basic support obligation (line 19 of the *Worksheets*), or
 - Pay their share of the monthly cost of any public healthcare coverage, such as Apple Health or Medicaid, which is assigned to the state.

1
2 **22. Children's expenses not included in the monthly child support amount**

3 **Uninsured medical expenses** - Each parent is responsible for a share of uninsured medical
4 expenses as ordered below. Uninsured medical expenses include premiums, co-pays,
5 deductibles, and other healthcare costs not paid by healthcare coverage.

6 7 Children's Expenses for:	Parent (<i>name</i>): Robert Moyer II pays monthly	Parent (<i>name</i>): Christine Moyer pays monthly	Make payments to:	
			8 9 Person who pays the expense	10 11 Service Provider
12 13 Uninsured medical expenses including agreed upon counseling.	14 15 50%**	16 17 50%**	[] See "Other" below	[] See "Other" below

18 ** Proportional Share is each parent's percentage share of the combined net income from
19 line 6 of the Child Support Schedule Worksheets.*

20 *** If any percentages ordered are different from the Proportional Share, explain why:*

21 Agreement of the parties.

22 **Other shared expenses (check one):**

23 Does not apply. The monthly amount covers all expenses, except healthcare expenses.

24 The parents will share the cost of the expenses listed below (*check all that apply*):

Children's Expenses for:	Parent (<i>name</i>): Robert Moyer II pays monthly	Parent (<i>name</i>): Christine Moyer pays monthly	Make payments to:	
			Person who pays the expense	Service Provider
Education: SAAS tuition, mandatory school related expenses; college applications; mandatory pre-college tests such as SATs. Tutoring by agreed upon tutors. Agreed upon school trips and other non-mandatory school related expenses.	[] Proportional Share* [] \$ [X] 50%**	[] Proportional Share* [] \$ [X] 50%**	[] See "Other" below	[] See "Other" below
[X] Cellular phones:	[] Proportional Share* [] \$ [X] 50%**	[] Proportional Share* [] \$ [X] 50%**	[] See "Other" below	[] See "Other" below

Children's Expenses for:	Parent (name): Robert Moyer II pays monthly	Parent (name): Christine Moyer pays monthly	Make payments to:	
			Person who pays the expense	Service Provider
[X] Other <i>(specify):</i> Agreed upon sports, sports equipment, summer and school break camps, ski passes and other extracurricular activities.	[] Proportional Share* [] \$ [X] 50%**	[] Proportional Share* [] \$ [X] 50%**	[] See "Other" below	[] See "Other" below

* *Proportional Share is each parent's percentage share of the combined net income from line 6 of the Child Support Schedule Worksheets.*

** *If any percentages ordered are different from the Proportional Share, explain why:*
Agreement of the parties.

[X] Other *(give more detail about covered expenses here, if needed):*

The parties shall pay for the children's expenses on the joint Bank of America debit card for the savings account ending in x8654. The account shall be funded in an agreed amount each month to cover the expenses and shall always have a minimum balance of \$10,000.

To the extent expenses are not paid using the joint Bank of America savings account x8654 debit card, the parent who has paid the expenses shall exchange expenses at the end of each month with supporting documentation (receipts, email verification). The parent who is asked to pay shall have 7 days to pay their 50% share of the expenses.

Christine Moyer shall manage the savings account. Christine Moyer and Robert Moyer shall have joint access to the account.

A person receiving support can ask DCS to collect:

- expenses owed directly to them.
- reimbursement for expenses the person providing support was ordered to pay.

- 1
2 • an order for a money judgment from the court.

3 **23. Past due child support, medical support and other expenses**

4 [] This order does not address any past due amounts or interest owed.

5 [X] As of (*date*): , no parent owes (*check all that apply*):

6 [X] Past due child support [X] Interest on past due child support
7 [X] Past due medical support [X] Interest on past due medical support
8 [X] Past due other expenses [X] Interest on past due other expenses

9 to (*check all that apply*):

10 [] The other parent or non-parent custodian.

11 [] The state.

12 [] The court orders the following **money judgments** (*summarized in section 1 above*):

Judgment for	Debtor's name (person who must pay money)	Creditor's name (person who must be paid)	Amount	Interest
[] Past due child support from to			\$	\$
[] Past due medical support (<i>health insurance & healthcare costs not covered by insurance</i>) from to			\$	\$

Judgment for	Debtor's name (person who must pay money)	Creditor's name (person who must be paid)	Amount	Interest
[] Past due expenses for: [] day care [] education [] long-distance transp. from _____ to _____			\$	\$
[] Other (describe):			\$	\$

The **interest rate** for child support judgments is 12%.

[] Other (*specify*):

24. Overpayment caused by change

[X] Does not apply.

[] The *Order* signed by the court today or on date: _____ caused an overpayment of \$ _____.

[] (*Name*): _____ shall repay this amount to (*Name*): _____
by (*date*): _____.

[] The overpayment shall be credited against the monthly support amount owed each month at the rate of \$ _____ each month until paid off.

[] Other (*specify*): _____

25. Other Orders

All of the *Warnings* below are required by law and are incorporated and made part of this order.

[] Other (*specify*):

Ordered.

Dated:

Judge or Commissioner

Petitioner and Respondent or their lawyers fill out below:

This document (*check any that apply*):

- [X] Is an agreement of the parties
[] Is presented by me
[X] May be signed by the court without notice
to me

This document (*check any that apply*):

- [X] Is an agreement of the parties
[X] Is presented by me
[] May be signed by the court without notice
to me

21047

24386

Petitioner signs here or lawyer signs here + WSBA No.

Respondent signs here or lawyer signs here +

WSBA No.

Lisa A. Sharpe

Print Name

Date

Natalie de Maar

Print Name

Date

All the warnings below are required by law and are part of the order. Do not remove.

Warnings!

If you don't follow this child support order...

- DOL or other licensing agencies may deny, suspend, or refuse to renew your licenses, including your driver's license and business or professional licenses, and
- Dept. of Fish and Wildlife may suspend or refuse to issue your fishing and hunting licenses and you may not be able to get permits. (*RCW 74.20A.320*)

If you receive child support...

You may have to:

- Document how that support and any cash received for the children's healthcare was spent.

RCW 11.130.255; RCW 26.09.135, .320;
RCW 26.26B.030
Mandatory Form (07/2022)
FL All Family 130

CHILD SUPPORT
ORDER
Page 25 of 27



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Fax 206 340-2563

- 1 • Repay the other parent for any daycare or special expenses included in the support if you didn't
2 actually have those expenses. (*RCW 26.19.080*)
-

3 ***Support Abatement Warnings!***

4 The Division of Child Support (DCS), the person required to pay support, the payee under this
5 order, or the person entitled to receive support **may ask the court or DCS to temporarily**
6 **reduce** child support to \$10 per month when the person required to pay support is in jail, prison,
7 or a correctional facility for at least six months, or serving a sentence of more than six months.

8 There is a rebuttable presumption that an incarcerated person cannot pay child support. DCS, the
9 payee under this order, or the person receiving the support may overcome the presumption by
showing that the person required to pay support has income or other assets available to pay
support.

10 When a request for abatement is made, DCS will review its records and other available
11 information, and decide if abatement is appropriate. DCS will send notice of the decision to the
12 person required to pay support, and to the payee under this order or the person entitled to receive
support. Any of those persons may object to DCS's decision.

13 If at any point during the period of incarceration, a person or DCS later learns of income or other
14 assets available to pay support, a request to terminate or reverse the abatement may be made
through DCS or the Office of Administrative Hearings.

16 ***Medical Support Warnings!***

17 The parents must keep the Support Registry informed about whether they have access to
18 healthcare coverage for the children at a reasonable cost and to provide the policy information for
any such coverage.

19 **If you are ordered to provide children's healthcare coverage...**

20 You have **20 days** from the date of this order to send:

- 21 • proof that the children are covered, or
- 22 • proof that healthcare coverage is not available as ordered.

23 Send your proof to the other parent or to the Support Registry (if your payments go there).

24 If you do **not** provide proof of healthcare coverage:

- 25 • The other parent or the support agency may contact your employer or union, without
notifying you, to ask for direct enforcement of this order (*RCW 26.18.170*), and
- 26 • The other parent may:
 - Ask the DCS for help,
 - Ask the court for a contempt order, or

- 1 • File a Petition in court.

2 **Don't** cancel your employer or union health insurance for your children unless the court
3 approves or your job ends, and you no longer qualify for insurance as ordered in section **20**.

4 If an insurer sends you payment for a medical provider's service:

- 5 • you must send it to the medical provider if the provider has not been paid; or
6 • you must send the payment to whoever paid the provider if someone else paid the provider; or
7 • you may keep the payment if you paid the provider.

8 If the children have public healthcare coverage, the state can make you pay for the cost of the
9 monthly premium.

10 **Always** inform the Support Registry and any parent if your access to healthcare coverage changes
11 or ends.

Starbucks RSUs to Christine Moyer

DOS 9/15/2023

Share price (9/30/24) \$97.49

Grant ID	Award Date	Vest Date	Shares		% Community	Community Shares	Community Value	Separate Shares	Separate Value
			Pre-tax	Post-tax					
05KE193RUR	11/13/2019	11/13/2023	39	29 Short (distributed)	96%	27.8	\$2,713.04	1.2	\$114.17
05KE225RUR	11/11/2020	11/13/2023	39	29 Short (distributed)	95%	27.4	\$2,675.15	1.6	\$152.06
	11/11/2020	11/14/2024	48	Post-Short	0%	0.0	\$0.00	48.0	\$4,679.52
05KE245RUR	11/10/2021	11/10/2023	40	30 Short (distributed)	92%	27.7	\$2,700.34	2.3	\$224.36
	11/10/2021		91	Post-Short	0%	0.0	\$0.00	91.0	\$8,871.59
05KE279RUR	11/18/2022	11/20/2023	39	29 Short (distributed)	82%	23.8	\$2,318.77	5.2	\$508.44
	11/18/2022		121	Post-Short	0%	0.0	\$0.00	121.0	\$11,796.29
05KE302RUR	11/14/2023		145	Post-Short	0%	0.0	\$0.00	145.0	\$14,136.05
05KE298RSU	9/18/2024		208	Post-Short	0%	0.0	\$0.00	208.0	\$20,277.92
								Community Value	Separate Value
								Fidelity x0939 - stock	\$10,407.31
								*does not include cash balance	

IN RE MARRIAGE OF MOYER

Spouse 1: Robert
Spouse 2: Christine

Date of Marriage: September 5, 1998

Date of Separation: September 15, 2023

	ASSET	VALUE	AMOUNT OWED	DATE OF VALUATION	SEPARATE ROBERT	SEPARATE CHRISTINE	NET COMMUNITY	COMMUNITY ROBERT	COMMUNITY CHRISTINE
REAL PROPERTY									
1	1210 Kirkland Ave. Reed Appraisal Report	\$2,700,000		10/07/24			\$2,700,000		\$2,700,000
2	First Tech Mortgage - Kirkland Residence		(\$183,733)	09/17/24			(\$183,733)		(\$183,733)
3	Kirkland Condominium	\$570,000					\$570,000		\$570,000
4	First Tech Mortgage Kirkland Condominium		(\$114,320)	09/17/24			(\$114,320)		(\$114,320)
5	First Tech HELOC (Secured by Kirkland residence)		(\$160,597)	09/11/24			(\$160,597)		(\$160,597)
Real Property Sub-Total		\$3,270,000	(\$458,650)				\$2,811,350		\$2,811,350
LIQUID ACCOUNTS									
6	BofA x8654 - Joint (Children's Expense Account)	\$1,790		09/07/24			\$1,790	\$895	\$895
7	First Tech x4021, x6463 - Joint (Kirkland Rental)	\$14,042		09/30/24			\$14,042		\$14,042
8	BofA x0432 - Robert	\$6,295		10/11/24	\$6,295				
9	Fidelity HSA x5316 - Robert	\$32,428		09/30/24			\$32,428	\$32,428	
10	BofA x1026 - Christine	\$3,600		10/08/24		\$3,600			
11	UMB HSA x6492 - Christine	\$4,960		09/30/24		1,154	\$3,806		\$3,806
Liquid Accounts Sub-Total		\$63,115			\$6,295	\$4,754	\$52,066	\$33,323	\$18,743
ILLIQUID ACCOUNTS									
12	Microsoft 401(k) - Robert	\$1,824,071		09/30/24			\$1,824,071	\$1,824,071	
13	Microsoft DCP - Robert	\$32,889		09/30/24			\$32,889	\$32,889	
14	Fidelity IRA x9280 - Robert	\$66,512		09/30/24			\$66,512	\$66,512	
15	Fidelity IRA x0520 - Christine	\$4,904		09/30/24			\$4,904		\$4,904
16	Starbucks 401(k) - Christine	\$1,098,190		09/30/24			\$1,098,190		\$1,098,190
Illiquid Accounts Sub-Total		\$3,026,566					\$3,026,566	\$1,923,472	\$1,103,094
STOCK									
17	Fidelity Joint x5828	\$10		09/30/24			\$10	\$5	\$5
18	Fidelity x2840 - Robert	\$1,553,333		09/30/24			\$1,553,333	\$776,666	\$776,667
19	Fidelity x1931 - Robert (September transfer from x582)	\$381,478		09/30/24			\$381,478	\$381,478	
20	H - MSFT stock	\$1,694,729					\$1,694,729	\$1,694,729	
21	H - MSFT stock options	\$139,590					\$139,590	\$139,590	
22	Fidelity x0939 - Christine (SP is Starbucks RSUs 1st to vest after separation)	\$12,185		09/30/24		\$999	\$11,186		\$11,186
23	Fidelity x2068 - Christine (August transfer from x5828)	\$386,008		09/30/24			\$386,008		\$386,008

	ASSET	VALUE	AMOUNT OWED	DATE OF VALUATION	SEPARATE ROBERT	SEPARATE CHRISTINE	NET COMMUNITY	COMMUNITY ROBERT	COMMUNITY CHRISTINE
24	Starbucks RSU Grant 05KE245RUR 91 Shares @ \$97.49 per share	\$8,872		09/30/24		\$8,872			
25	Starbucks RSU Grant 05KE225RUR 48 shares @ \$97.49 per share	\$4,680		09/30/24		\$4,680			
26	Starbucks RSU GranT 05KE302RUR 145 Shares @ \$97.49 per share	\$14,136		09/30/24		\$14,136			
27	Starbucks RSU Grant 05KE279RUR 121 Shares @ \$97.49 per share	\$11,796		09/30/24		\$11,796			
28	Starbucks RSU Grant 05KE298RSU 208 Shares @ \$97.49 per share	\$20,277		09/30/24		\$20,277			
Liquid Accounts Sub-Total		\$4,227,094				\$60,760	\$4,166,334	\$2,992,468	\$1,173,866
PERSONAL PROPERTY									
29	H - Personal property	X					X	X	
30	W - Personal property	X					X		X
31	Cabo Time Shares								
Personal Property Sub-Total									
OTHER ASSETS									
32	2017 Tesla Model S P100D - KBB Report	\$27,774		06/03/24			\$27,774	\$27,774	
33	Subaru - My Subaru Report	\$18,525		10/14/24			\$18,525		\$18,525
34									
Other Assets Sub-Total		\$46,299					\$46,299	\$27,774	\$18,525
Credit Cards									
35	American Express x1009, x3009 - Joint - Christine to be removed.				xx				
36	Bank of America Visa x2784 - Robert				xx				
37	American Express x1001				xx				
38	American Express x3000- Christine					xx			
39	Nordstrom x1037 - Christine					xx			
40	Bank of America Visa x3507 - Christine					xx			
41	Chase x4229 - Christine					xx			
Credit Cards Sub-Total									
OTHER LIABILITIES									
42									
43									
44									
Other Liabilities Sub-Total									
Sub Totals		\$10,633,074	(\$458,650)		\$6,295	\$65,514	\$10,102,615	\$4,977,037	\$5,125,578
Adjusting Entry							\$377,349	(\$377,349)	

	ASSET	VALUE	AMOUNT OWED	DATE OF VALUATION	SEPARATE ROBERT	SEPARATE CHRISTINE	NET COMMUNITY	COMMUNITY ROBERT	COMMUNITY CHRISTINE
Totals		\$10,633,074	(\$458,650)		\$6,295	\$65,514	\$10,102,615	\$5,354,386	\$4,748,229

Distribution Percentage	53.00%	
Percentage		53.00% 47.00%

	ASSET	VALUE	AMOUNT OWED	DATE OF VALUATION	SEPARATE ROBERT	SEPARATE CHRISTINE	NET COMMUNITY	COMMUNITY ROBERT	COMMUNITY CHRISTINE
Assets Held for Children									
Fidelity 529 x6171 - Max 9/30/2024		\$108,911							
Fidelity 529 x3635 - Adrian 9/30/2024		\$86,506							
Vanguard UTMA x5817 - Max 9/30/2024		\$10,967							
Vanguard UTMA x8941 - Adrian 9/30/2024		\$11,219							
BofA Svgs x7847 - Max 9/2024		\$5,421							
BofA Ckg x5205 - Max 9/2024		\$1,292							
BofA Svgs x2592 - Adrian 9/2024		\$6,462							
BofA Ckg x4918 Adrian 10/2024		\$482							