

## DOCUMENTS ANALYZED:

1. Restraining Order (FL All Family 150)
  2. Mother's Proposed Parenting Plan
  3. Mother's Proposed WA Worksheet
  4. Proposed Order of Child Support
  5. Moyer Family Status Report (Keilin Report, September 2024)
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## FAMILY STRUCTURE:

- Parents: Christine Moyer and Robert Edward Moyer II
  - Children:
    - Robert Edward "Max" Moyer III (16)
    - Adrian Moyer (12)
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## FINANCIAL ORDERS:

1. Child Support:
  - Amount: \$1,775.48 monthly total (\$887.74 per child).
  - Imputed Income for Robert: \$62,500 gross/\$41,120 net monthly, despite current unemployment and the potential impact of the restraining order on his employability.
  - Christine's Income: \$18,833 gross/\$14,037 net monthly.
  - Concerns:
    - Unemployment: Robert is currently unemployed, and the imputed income may not accurately reflect his job-seeking challenges.
    - Impact of Restraining Order: The restraining order limits access to specific locations and restricts contact, which could impact Robert's ability to secure new employment, given its implications for his reputation.
    - Public Record: These orders, alongside the requirements for multiple treatment programs, may create additional barriers to employability.
2. Shared Expenses:
  - Private School: Split 50/50 between the parents.
  - Extracurricular Activities: Split proportionally to each parent's income.

- Health Insurance: Christine provides health insurance for the children, with Robert contributing a proportional share.
  - Spousal Support: No spousal support is addressed in the provided documents (Mother's Proposed WAWor...)(Proposed Order of Child...).
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#### RESTRAINING ORDER:

- Details:
    - A permanent restraining order against Robert, which includes:
      - A 100-foot stay-away provision from Christine's residence, workplace, vehicle, and other locations.
      - Restriction on any contact with Christine except through the Our Family Wizard app, limited solely to co-parenting communication.
      - A weapons surrender requirement.
      - A finding of domestic violence (DV), which may further complicate future employment prospects and restrict Robert's visitation rights (FL All Family 150 Restr...).
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#### PROPOSED PARENTING PLAN AND PHASED VISITATION:

1. Parenting Time and Phases:
  - Phase I (Minimum 120 Days):
    - Supervised Only: All contact with Adrian is supervised, with a maximum of up to 6 hours every other weekend.
    - Max's Contact: Max may have contact with Robert at his discretion, but he is not required to participate.
  - Phase II (Additional 120 Days):
    - Twice Weekly Unsupervised: If conditions are met, Adrian may have two unsupervised visits per week, including 6-hour visits on weekends and Wednesday afternoons/evenings.
  - Phase III (Additional 120 Days):
    - Overnight Visits: Adrian may stay for alternating weekends (Saturday noon to Sunday noon) and Wednesday evening visits after school.
  - Phase IV (Final Phase):

- Increased Time: Alternating weekends from Friday after school until Sunday at 6 p.m., with Wednesday evening visits after school until 7:30 p.m. This phase allows approximately 80/20 custody, which is the highest time allocation under the current plan(Mother's Proposed Paren...).

## 2. Sobriety and Testing Requirements:

- Soberlink Monitoring:
  - Required to test three times daily within specific time windows.
  - One missed test per quarter is permitted, but a second missed or failed test results in suspended visitation until further review.
- Hair Follicle Testing:
  - Required every 90 days with a comprehensive drug panel.
  - Missed or failed tests lead to suspended visitation, further limiting Robert's parenting time and impacting the progression through phases(Mother's Proposed Paren...).

## 3. Long-Term Limitations on Time with Adrian:

- Timeline to Maximum Time: Under the 120-day phase requirements, it would take at least a full year (or longer with any violations or concerns) to reach Phase IV's maximum time.
- Vacation Time: Robert's access to vacation time is restricted, with only one week permitted after Phase IV (no earlier than Summer 2026), contingent upon continued compliance and subject to approval from the parenting coordinator and Adrian's therapist.
- Max's Contact: Max's time remains entirely at his discretion, with no required time specified throughout the phases(Mother's Proposed Paren...).

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## KEILIN REPORT CONFLICTS:

### 1. Current Status (September 2024):

- Adrian: Only 6 hours of supervised visitation every other week.
- Max: No regular contact with Robert.
- Family System Described as "Chaotic": Keilin described the family dynamic as chaotic, with intermittent and escalating conflicts and noted concerns over both parents' boundaries (Robert's impulsivity and Christine's anxious responses).

### 2. Keilin's Recommendations:

- Increased Immediate Contact:

- Minimum Weekly Contact: Keilin recommends a minimum of 4-8 hours per week for Adrian, which is greater than the current 6 hours every other week. She identified the current limited contact as a “significant barrier to reunification.”
- Accelerated Timeline:
  - 60-90 Day Stability Period: Keilin suggests a 60-90 day period of stability instead of the parenting plan’s 120-day phases, allowing a faster progression with consistent monitoring.
  - Faster Progression: Keilin’s report emphasizes a preference for regular increases in time based on behavioral benchmarks and adjustments, contrasting with the parenting plan’s more drawn-out approach.
- Treatment Focus:
  - Team Therapy Approach: Keilin suggests a therapeutic team model with individual therapists plus a family therapist to address underlying dynamics and support family systems therapy when appropriate(Moyer Family Status Rep...).

### 3. Key Quote from Keilin:

- “Robert and Adrian's very limited time was a significant barrier to reunification services.”
- This statement supports the idea that the restrictive access provisions in the parenting plan might hinder rather than help the reunification process, and that a more consistent contact schedule with appropriate monitoring would be more effective in addressing the family’s needs(Moyer Family Status Rep...).

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### TIMELINE TO MAXIMUM PARENTING TIME:

- Phasing and Minimum Requirements:
  - Given the 120-day requirements per phase, it would take over a year to reach Phase IV’s maximum schedule (80/20 time split). Any missed test or non-compliance could further delay this progression.
- No Clear Path to 50/50 Custody: The current plan caps Robert’s residential time at an 80/20 split, with no indication of a path to 50/50 or greater custody, regardless of compliance or behavioral improvements(Mother's Proposed Paren...)(Moyer Family Status Rep...).

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### KEY DISCREPANCIES:

### 1. Restrictiveness of the Parenting Plan:

- Lower Contact Time: The parenting plan's initial phase allows for less contact than recommended by Keilin, who suggests a minimum of 4-8 hours per week as beneficial for reunification.
- Extended Phasing Timeline: Keilin's recommendation for a 60-90 day stability period contrasts with the plan's 120-day phase requirements, delaying the time needed to reach meaningful contact levels.
- Punitive Structure: The parenting plan appears more punitive than therapeutic, with strict conditions and prolonged testing requirements that could be counterproductive for family relationship repair.

### 2. Income Imputation and Financial Strain:

- Imputed Income Discrepancy: Robert's imputed income (\$41,120 net monthly) is significantly higher than his actual, current earnings. His unemployment and the potential impact of the restraining order on future employment create a realistic need for reassessment to align with current financial and employability challenges.

### 3. Lack of Clear 50/50 Custody Path:

- No Long-Term Progression to Equal Custody: The current structure allows for a maximum 80/20 split and provides no pathway to 50/50 custody, even if Robert complies fully with treatment and demonstrates sustained positive behavioral adjustments.

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## SUMMARY AND CONCLUSION:

**Documented Conflicts:** The proposed parenting plan, while highly structured, contains restrictions and phase requirements that significantly diverge from Jennifer Keilin's therapeutic recommendations, which favor more immediate contact with robust monitoring. The structured progression in the parenting plan, with a year-long timeline to reach only an 80/20 custody split, appears to work against the therapist's objective of consistent, behaviorally-based contact that supports reunification.

**Financial Implications:** The high imputed income used for child support calculations presents a burden in light of Robert's unemployment and potential employment challenges related to the restraining order and ongoing treatment requirements. These factors suggest a need for reassessment to reflect realistic income potential and avoid exacerbating financial strain.

**Advocacy for Therapeutic Alignment:** Given these discrepancies, there is a strong case for adjusting the parenting plan to align with the therapeutic recommendations outlined by Keilin. A modified plan that allows for more consistent contact, balanced with realistic financial obligations and