

RECEIVED

2021-07-21 PM 1:20

SUPERIOR COURT OF WA.  
CLERK OF COURT

BY BH31 DEPUTY

21-3-00272-23  
DCLSP 17  
Declaration in Supp of Parenting Plan  
11572027



**Superior Court of Washington, County of Mason**

In re:

No. 21-3-00272-23

Petitioner:

Information for Temporary Parenting Plan  
(DCLSP)

RACHEL A. FERRAND

And Respondent:

EDWARD SCOTT REED

**Information for Temporary Parenting Plan**

*The court needs the information below to order a temporary parenting plan. You may attach pages to this form if you need more space. You may fill out a separate form for each child if the information is different for each child.*

1. My name is: Edward Reed.
2. The information on this form is about:

Child's name	Age
1. Leon Jaymz Reed	7

3. List the people the children have lived with in the last 12 months:

Who the children lived with (names)	Where (county/state)?	For how long?
Edward Reed	Kitsap County, WA	11 Years
Rachel Ferrand	Mason County, WA	Birth

///

///

4. Describe **your** involvement with the children's daily needs:

		Yes	No
a.	I have a loving and stable relationship with the children.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	I take care of the children's daily needs, such as feeding, clothing, physical care and grooming, supervision, doctor/dentist visits, day care, and other activities for the children.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	I attend to the children's education, including any necessary remedial or other education.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	I help the children to develop age-appropriate social relationships.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	I use good judgment to protect the children's well-being.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f.	I provide financial support for the children, such as housing, food, clothes, childcare, health insurance, and other basic needs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Explain and give examples for each answer above:*

- a. I strive to foster a warm and loving relationship with our child.
- b. Though I am not the primary caregiver for our child, I facilitate his daily physical and emotional needs when in my care.
- c. Our child's positive development is nurtured and a priority in my home.
- d. I assist our child in developing healthy and age-appropriate relationships with friends and both immediate and extended family members.
- e. I always use good judgment regarding our child's wellbeing both physical and emotional.
- f. I assist in the providing for our child's financial needs.

5. List your **current** work schedule below, if any:

Monday	Tuesday	Wed.	Thursday	Friday	Saturday	Sunday
7:20 a.m.- 4:00 p.m.	7:20 a.m.- 4:00 p.m.	7:20 a.m.- 4:00 p.m.	7:20 a.m.- 4:00 p.m.	7:20 a.m.- 4:00 p.m.		

How long has this work schedule been in place? (*Check one*):

☒ For the past 12 months or longer.

☐ For **less** than 12 months, since (*date*): . Before then, I had the work schedule listed below:

Monday	Tuesday	Wed.	Thursday	Friday	Saturday	Sunday

6. Describe the **other parent's** involvement with the children's daily needs:

The other parent ( <i>name</i> ):		Yes	No
a.	Has a loving and stable relationship with our child.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Takes care of our child's daily needs, such as feeding, clothing, physical care and grooming, supervision, doctor/dentist visits, day care, and other activities for our child.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c.	Attends to our child's education, including any necessary remedial or other education.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	Helps our child to develop age-appropriate social relationships.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Uses good judgment to protect our child's well-being.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Provides financial support for our child, such as housing, food, clothes, childcare, health insurance, and other basic needs.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*Explain and give examples for each answer above:*

- a. Petitioner has a loving, though not stable, relationship with our child.
- b. Petitioner has extremely limited involvement with the day-to-day care of our child.
- c.
- d.
- e. Petitioner employs corporal punishment and has even called the police on our young son.
- f. Respondent has not maintained steady employment and/or has not been able to meet the financial needs of our child at times. I have contributed much and am more than happy to pay child support according to Washington law.

7. List the other parent's **current** work schedule below, if any: Unknown

Monday	Tuesday	Wed.	Thursday	Friday	Saturday	Sunday

How long has this work schedule been in place? (*Check one*):

☒ For the past 12 months or longer.

☐ For **less** than 12 months, since (*date*): . Before then, the other parent had the work schedule listed below:

Monday	Tuesday	Wed.	Thursday	Friday	Saturday	Sunday

8. List the **children's** schedule below, including school, childcare, and other activities:

Monday	Tuesday	Wed.	Thursday	Friday	Saturday	Sunday
7a.m-3p.m school	7a.m-3p.m school	7a.m-3p.m school	7a.m-3p.m school	7a.m-3p.m school		

9. Abandonment, abuse, domestic violence, sex offense, or other serious problems  
(RCW 26.09.191)

☒ Does not apply. There are no abandonment, abuse, domestic violence, sex offense, or other serious problems that affect the children in this case.

☐ (Check one): ☐ The other parent's ☐ My parenting time and decision-making should be limited for the reasons listed in my proposed *Parenting Plan*, section 3.a.

*Explain and give examples supporting those reasons for limitations:*

10. Any other information the court needs to make a decision about a temporary *Parenting Plan*:

See December 21, 2021 *Declaration of Edward Reed In Support of Terminating Temporary Order for Protection* (Cause No. 21-2-488-23) attached hereto and incorporated herein.

I declare under penalty of perjury under the laws of the state of Washington that the facts I have provided on this form (and any attachments) are true. ☒ I have attached (number) 26 pages.

Signed at (city and state): Bremerton Wa Date: 12/21/2021



ID 5CM4mVhDGBjz1TY3Faegjwdc

Sign here

Edward Reed  
Print name

**Warning!** Documents filed with the court are available for anyone to see unless they are sealed. Financial, medical, and confidential reports, as described in General Rule 22, **must** be sealed so they can only be seen by the court, the other party, and the lawyers in your case. Seal those documents by filing them separately, using a *Sealed* cover sheet (form FL All Family 011, 012, or 013). You may ask for an order to seal other documents

1  
2  
3  
4  
5  
6  
7 **Superior Court of Washington, County of Mason**

8 In re:

9 Petitioner:

10 RACHEL FERRAND

11 And Respondent:

12 EDWARD SCOTT REED

No. 21-2-488-23

Declaration of Edward Reed In Support  
of Terminating Temporary Order for  
Protection  
(DCLR)

13 **Declaration of Edward Reed In Support of Terminating**  
14 **Temporary Order for Protection**

15 1. I am 18 years of age or older and I am the Respondent.

16 2. I declare:

17 Following is a paragraph-by-paragraph response to Petitioner's November 5, 2021  
18 declaration.

19 **Paragraph 1**

20 Petitioner states that the only reason she is in court on this matter is to protect her son from  
21 possibly being abused. Yet, the three sentences that follow make no abuse allegations, but  
22 rather are completely off-topic, discussing the child's need for a "stable lifestyle" due to  
23 ADHD and special needs; Petitioner's belief that visitation with both parents is "confusing"  
24 due to different "parenting structures;" and that our child's behavior improves with extended  
25 time away from me. Petitioner's statements lead one to question whether possible abuse is  
really the issue, or are Petitioner's baseless allegations a way to cut me out of my son's life  
simply because she believes he would be better behaved, less confused and more stable.  
However, these proceedings should be about what is in the best interests of our child.  
Petitioner seemingly ignores the importance of having both parents in a child's life. I don't  
believe Petitioner has the qualifications to make such a complex judgment, based on her  
beliefs and questionable statements inferring causality without any supporting evidence  
whatsoever.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**Paragraph 2**

Petitioner states she filed this case because our son brought up touching by his father after watching a video in school back in November 2020, roughly a year ago. Yet, Petitioner seeks to mislead this Court by failing to mention that she already brought a case in Mason County Superior Court (No. 20-2-479-23) dealing with the very same alleged incident by filing a *Petition for Order of Protection* on November 12, 2020.

Ultimately, on April 8, 2020, CPS found that the allegations they received on or about November 9, 2020 either did not occur or that there was insufficient evidence to conclude that abuse or neglect occurred (see **Exhibit A**). Accordingly, following the CPS determination, and upon Petitioner agreeing to terminate the protective order (see **Exhibit B**), on May 28, 2021, the Court terminated the January 6, 2021 *Temporary Order for Protection*. Yet, here we have Petitioner taking a second bite at the apple, with no offer of new evidence, knowing full well that the allegations stemming from November 2020 were unfounded. Petitioner herself references CPS's involvement and even that a report was issued---disingenuously not mentioning the report's ultimate conclusion.

**Paragraph 3**

Here, Petitioner relies on a purported recording of dubious origin; yet, if this alleged recording were evidence of anything, why would CPS have issued the finding as it did? If the recording was not submitted to CPS, then this fact alone calls into question the existence or authenticity of this alleged recording. Either way, Petitioner relies on evidence she has not offered to the Court, which is highly questionable.

**Paragraph 4**

Here, Petitioner admits that I have been applying medicine to my son's penis, which was prescribed in June 2021, a wholly appropriate thing for a parent to do. Medicine she herself insists that I apply when my son is in my care (see **Exhibit C**). Again, Petitioner mis portrays the facts to this court, implying that I referred to the medication in my declaration prior to it being prescribed on or about June 28, 2021; however, the declaration she refers to is dated October 22, 2021, months after it was prescribed and about two (2) months after she herself insisted, via text message on August 25, 2021, I make sure to apply the medicine. Again, Petitioner cites the November 2020 allegation, failing to be forthright with the outcome of the investigation of the baseless allegation.

**Paragraph 5**

The allegations here mirror those claimed in paragraph one, again Petitioner's main concern appears to be devising a way to cut me out of my son's life simply because she believes he would be better behaved, less confused and more stable. Petitioner alleges that the counselor at Behavioral Health Services has referenced violence in conjunction with visits in my home, but this appears to be another baseless allegation as she has provided no source of documentation to this unfounded allegation.

**Paragraph 6**

Here, Petitioner again relies on an unfounded CPS claim made over a year ago as the basis for her allegations and again lacks any documentation or concrete findings to these accusations. She reports that the school's assistant principal allegedly alluded that Leon had been hurt or traumatized yet again there is no report made. If this incident had been

grounded in fact the assistant principal is legally obligated to report any signs of abuse or neglect. There is no such report.

#### **Paragraph 7**

Here, Petitioner references guardian ad litem as the solution as their views would be identical with that of the Petitioners. I do not believe this to be an accurate statement as Petitioner has failed to provide any documentation surrounding these baseless allegations and it appears her purpose here is to relitigate a situation that has already been decided and her claims are unfounded. Petitioner states that that our child's well-being is of great importance, his best interests and safety are her main priority. This is a contradictory statement based on the current situation as instead of focusing on how to have a healthy and positive transition between the two households, Petitioner's focus appears to be on crafting accusations that can only cause harm and further conflict for our child. Additionally, Petitioner has refused to allow me access to educational and medical providers. Based on that the alleged reports from counselors and school administration would be even less conclusive that the unfounded CPS report as without my involvement and the refusal to allow me to communicate with his providers creates further bias opinions towards me. I am heavily concerned about her use of false allegations as a means of creating distance and conflict between our son and myself.

Furthermore, I would like to point out that many of Petitioner's statements are contradicted by text communications between myself and Petitioner during 2020, leading up to Petitioner's outlandish actions in falsely making horrible allegations against me to both the Court and CPS (see Exhibit D). Following is an explanation of Exhibit D.

Page 1. Exhibit D shows that Petitioner supports corporal punishment while I am ambivalent as to whether I really think physical force is warranted against a child.

Page 2. This shows that way back in June 2020, Petitioner was having issues with our child's behavior; yet, she now represents to the Court that it is only when our child returns from my residence that he acts out.

Page 3. There is no evidence of Petitioner's contentions. Her only "evidence" against me is her own statements, which I believe come from a place within her, including feelings of self-loathing, which this text conversation illuminates.

Page 4. Petitioner admits to "struggling" and believing herself to be "useless."

Page 5. Here, only weeks before her smear campaign against me began, Petitioner rails on about how difficult her life is due to having to deal with the challenges our child can present. Petitioner was extremely distressed about the state of her existence. Curiously, Petitioner does not blame my son's visits with me for his behavior. This contention is a fiction that Petitioner came up with to try and make up for the absence of evidence supporting her claims.

Page 6. Here is evidence of my attempt to be supportive of Petitioner's frustrations and possible solutions due to my desire to coparent amiably with Petitioner.

Page 7. Here is an example of my eagerness to spend time with my son. Though I worked on the day she requested, I offered to watch Leon the very next time I was free.

Page 8. Again, Petitioner admits to her frustration with life and depressed state. I don't fault her for these feelings at all, but this was her state of mind just before she decided to take her frustrations out on me, which is unfortunately the outlet she has chosen.

Page 9. On October 30, 2020, only a couple of weeks before Petitioner lied to this Court in order to obtain the initial protective order in the first case, Petitioner clearly displays her anger and bitterness that our child makes statements in order to get under her skin. Notice that Petitioner's anger at our young child's contentions predate her new theory that visitation with me causes Leon to act out by over a year.

Page 10. Again, a mere six (6) days before obtaining a protective order without notice to me, Petitioner reveals that she is the one whose problems with Leon's behavior seemingly escalating under her care. I don't blame Petitioner for our son acting out, but Petitioner blames me for no other reason than it's a justification that she was able to fabricate, which Petitioner apparently thought would make sense to a court. However, there is no causal relationship, nor is Petitioner qualified to come to such a fanciful conclusion.

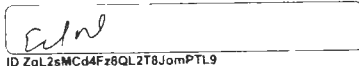
Page 11. Petitioner believes whipping our son's ass is funny, despite the fact that Leon is on the spectrum.

Page 12. These final texts speak for themselves. Petitioner is not the perfect parent she represents to be to this Court. Nobody is. However, Petitioner abuse of the court system must be stopped in my humble opinion.

(Number any pages you attach to this Declaration. Page limits may apply.)

I declare under penalty of perjury under the laws of the state of Washington that the facts I have provided on this form (and any attachments) are true. [X] I have attached (number): 22 pages.

Signed at (city and state): Bremerton, Wa Date: 12/20/2021

  
ID ZqL2sMCd4Fz6QL2T8JomPTL9

Sign here

Edward Reed  
Print name

**Warning!** Documents filed with the court are available for anyone to see unless they are sealed. Financial, medical, and confidential reports, as described in General Rule 22, **must** be sealed so they can only be seen by the court, the other party, and the lawyers in your case. Seal those documents by filing them separately, using a *Sealed* cover sheet (form FL All Family 011, 012, or 013). You may ask for an order to seal other documents

# EXHIBIT A

RECEIVED & FILED  
Mason County Clerk

MAY 28 2021

Superior Court of WA  
Sharon Fogo

20-2-00479-23  
RPT 13  
Report  
10390695



NO. 20-2-00479-23

Report

SUPERIOR COURT OF WASHINGTON FOR MASON COUNTY	
<u>Rachel Ferrand</u> Plaintiff/Petitioner	
VS	<u>Edward Reed</u> Defendant/Respondent

(13)

RESTRICTED



STATE OF WASHINGTON  
DEPARTMENT OF CHILDREN, YOUTH, AND FAMILIES  
2605 Olympic Hwy N., STE 440 P.O. Box 1127  
Shelton, WA 98584

04/08/2021

Edward Reed  
1916 Jackson Dr. NW  
Bremerton, WA 98312

RE: Intake Number: 4473980

Dear Edward Reed:

I am writing to inform you of the results of the Child Protection Services (CPS) investigation conducted by the Department of Children, Youth, and Families (DCYF) and your rights concerning the results of this investigation. On or about 11/09/2020, CPS received a report alleging that you abused or neglected your child or a child in your care. CPS investigated this report, which included a discussion of the allegations with you. CPS has completed the investigation and made a finding that abuse or neglect did not occur or that there was insufficient evidence to conclude that the abuse or neglect happened.

What type of child abuse or neglect did you allegedly commit?

The allegation(s) are:

- Sexual abuse

Child abuse and neglect are defined in state law. CPS is required to use these definitions when investigating allegations of abuse and neglect.

What did CPS find?

CPS investigated the allegations. The investigation determined that the allegations of abuse and neglect against you are Unfounded. When an allegation is 'Unfounded,' it means that CPS investigated the allegation and, based on the information available, has determined that it was more likely than not that the alleged abuse or neglect did not occur, or that there was insufficient evidence to determine whether the alleged child abuse did or did not occur.

**What happens to information about Unfounded CPS reports?**

1. The Department of Children, Youth, and Families (DCYF) keeps this information in its computer system. State law requires DCYF to destroy records about unfounded reports of child abuse or neglect after six years unless CPS makes a Founded report about you, your child or a sibling or half-sibling of your child.
2. DCYF cannot provide information about unfounded reports to anyone outside the department without your written permission.
3. An Unfounded report cannot be the reason for denying you a license or for disqualifying you from employment to care for children or vulnerable adults.
4. Prior to destruction of your records the information from this investigation can be used in:
  - Future CPS investigations; or
  - Legal actions related to child protection or child custody.

**What are your rights?**

1. You have a right to know the results of the CPS investigation. This letter is provided for this purpose.
2. You have the right to send CPS a written response about the allegation and finding. If you send a written response, it will be put in your CPS file. Send written responses to the address printed on top of this letter.
3. You have the right to see your CPS file. You may ask for access to your file in writing or by calling the number listed below.

**Where can you find more information about CPS findings and your rights?**

Washington Administrative Code (WAC) Chapter 110-30 and RCW 26.44.020 cover these issues. You can access it on line at <http://apps.leg.wa.gov/wac/default.aspx?cite=110> and <http://apps.leg.wa.gov/rcw/default.aspx?cite=26.44.020>.

Sincerely,

KAT SCHEIBNER

CPS Supervisor



(360) 432-2050

TELEPHONE NUMBER

# EXHIBIT B

Miso  
Xpnuu BHW

RECEIVED & FILED  
Mason County Clerk

JUN 15 2021

Superior Court of WA  
Sharon Fogo

BP 2

20-2-08479-23  
ORMTPO 17  
Order Modifying Terminating Terms of Protection  
10492489

**Court of Washington  
For Mason County**

Rachel Ferrand  
Petitioner DOB  
vs.  
Edward Reed  
Respondent DOB

**No. 20-2-479-23  
Order Modifying/Terminating  
Order for Protection**

☐ Petitioner  
☒ Respondent (Order Lasts Two Years or  
Less)  
(ORMTPO)  
(Clerk's action required)

The Moving Party (requester) is the:

☐ Petitioner.

☒ Respondent and the order identified below was granted for two years or less.  
(If the order lasts more than two years, do not use this order. Use form DV 7.080, Order on  
Respondent's Motion and Declaration to Modify/Terminate Order for Protection Effective More Than  
Two Years.)

The court considered the pleadings, relevant portions of the file, and testimony, if any.

☒ The court finds that this is the Respondent's only motion to modify or terminate filed during  
the current 12 month period following entry of the order.

The court orders that the:

☐ Temporary Order for Protection, filed on \_\_\_\_\_ (date).

☒ Order for Protection, filed on January 6<sup>th</sup>, 2021, (date).

☐ \_\_\_\_\_, filed on \_\_\_\_\_ (date).

Is:

☒ terminated.

☐ continued in effect but modified as follows:

Protected Party, Rachel Ferrand has agreed to terminate this protection order.

Order Terminating Order for Protection (ORMTPO) - Page 1 of 2

Soriano Law LLC  
PO Box 664  
Montesano, WA 98563  
P: (360) 249-6174  
F: (360) 249-6292

**EX PARTE**

#17

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- [ ] This order is a temporary modification. It will be effective until the hearing scheduled below.  
[ ] The parties are directed to appear for a hearing on \_\_\_\_\_ (date),  
at \_\_\_\_\_ a.m./p.m., at: \_\_\_\_\_ (location).

**Washington Crime Information Center (WACIC) Data Entry**

It is further ordered that the clerk of court shall forward a copy of this order on or before the next judicial day to:

☒ MASON County Sheriff's Office [ ] \_\_\_\_\_ Police Department where petitioner lives which shall enter it into WACIC.  
Service

[ ] The clerk of court shall also forward a copy of this order on or before the next judicial day to:  
[ ] \_\_\_\_\_ County Sheriff's Office [ ] \_\_\_\_\_ Police Department where the other party lives which shall personally serve \_\_\_\_\_ (name) with a copy of this order and shall promptly complete and return to this court proof of service.  
or ☒ The moving party (requester) shall make private arrangements for service of this order.  
or [ ] The other party appeared and was informed of the order by the court; further service is not required.

Dated: 6/15/21 ~~am~~ 3:55 pm

Judge/Court Commissioner

Daniel L. Goodell  
DANIEL L. GOODELL

I acknowledge receipt of a copy of this Order:

I acknowledge receipt of a copy of this Order:

[Signature] 6/11/21  
Moving Party (requester) Date

[Signature] 6/11/2021  
Non-moving party Date

# EXHIBIT C

4:14

🕒 LTE 77% 🔋

← Rachel Ferrand

+1 214 865 9802



1:41 PM

Leon told me you did not do the cream medication the whole time he was there. That is not okay and can mess up his healing. Please just do it and get it done. Thank you and have a good night.

8:15 PM

Leon told me you did not do the cream medication the whole time he was there. That is not okay and can mess up his healing. Please just do it and get it done. Thank you and have a good night.

8:16 PM

Wednesday, August 25, 2021

Enter message



# EXHIBIT D



My mom said he's saying the same shit I did when I was younger and developed an attitude. I did 3 big smacks to his bottom and he's apologizing for being rude and running away from me. He won't do it again. Omfg 🤔👊

I don't like smackkng him but goddamn it!

Whatever works. I've debated spanking but not sure about it yet. I am heavy handed

5/19/20, 3 13PM

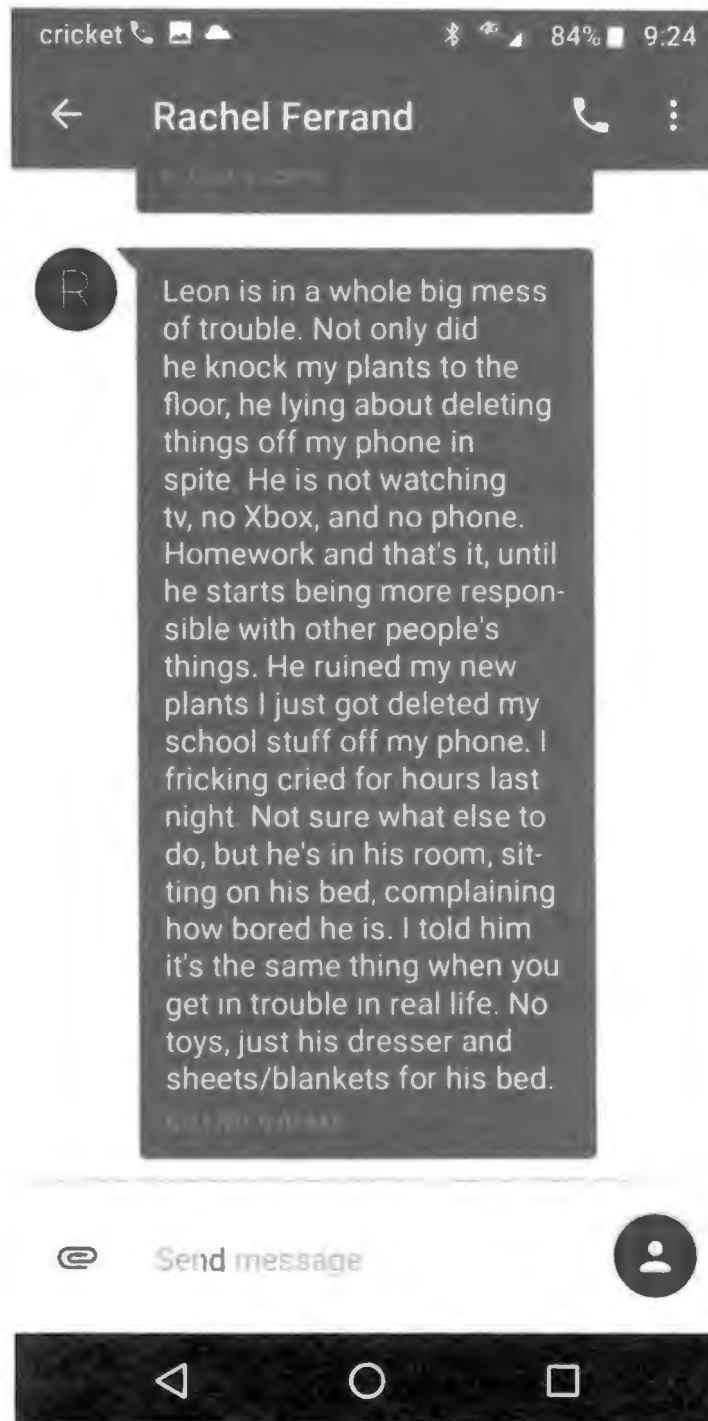


Just one smack for you Chewbacca

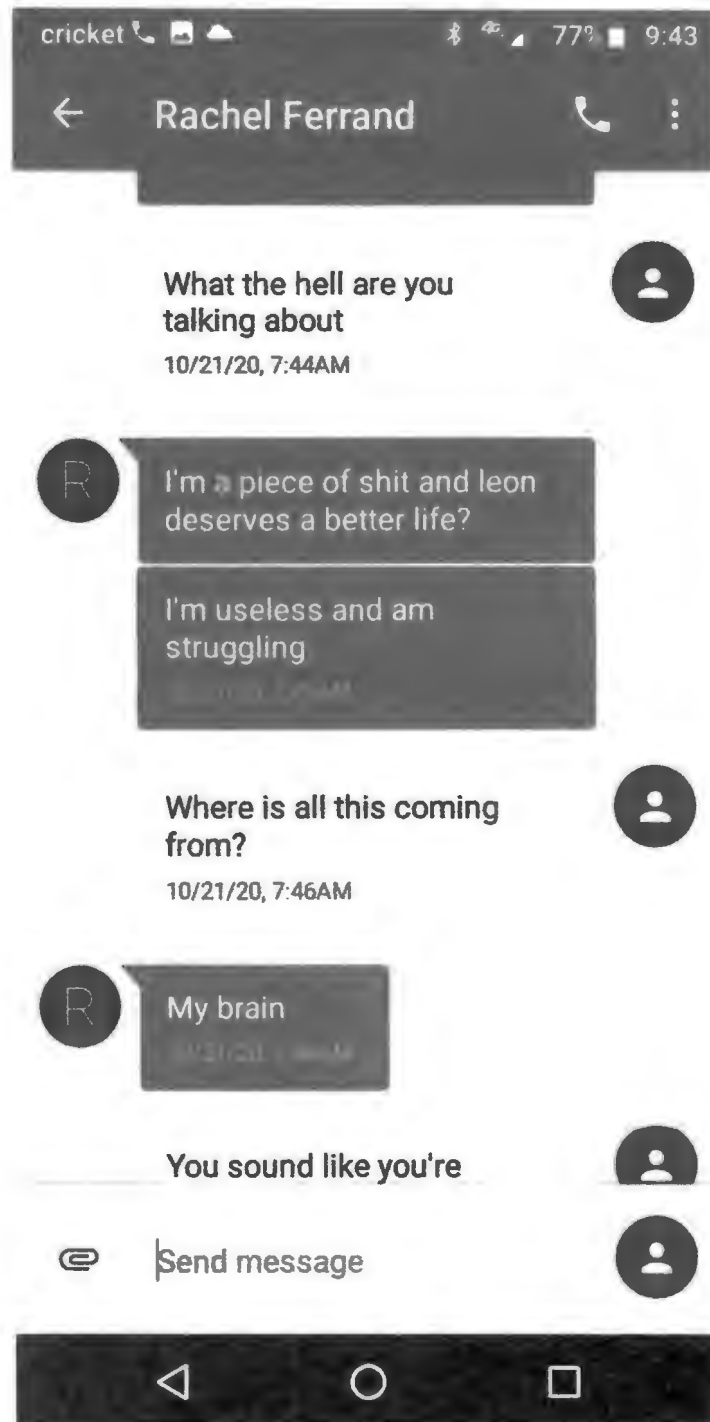


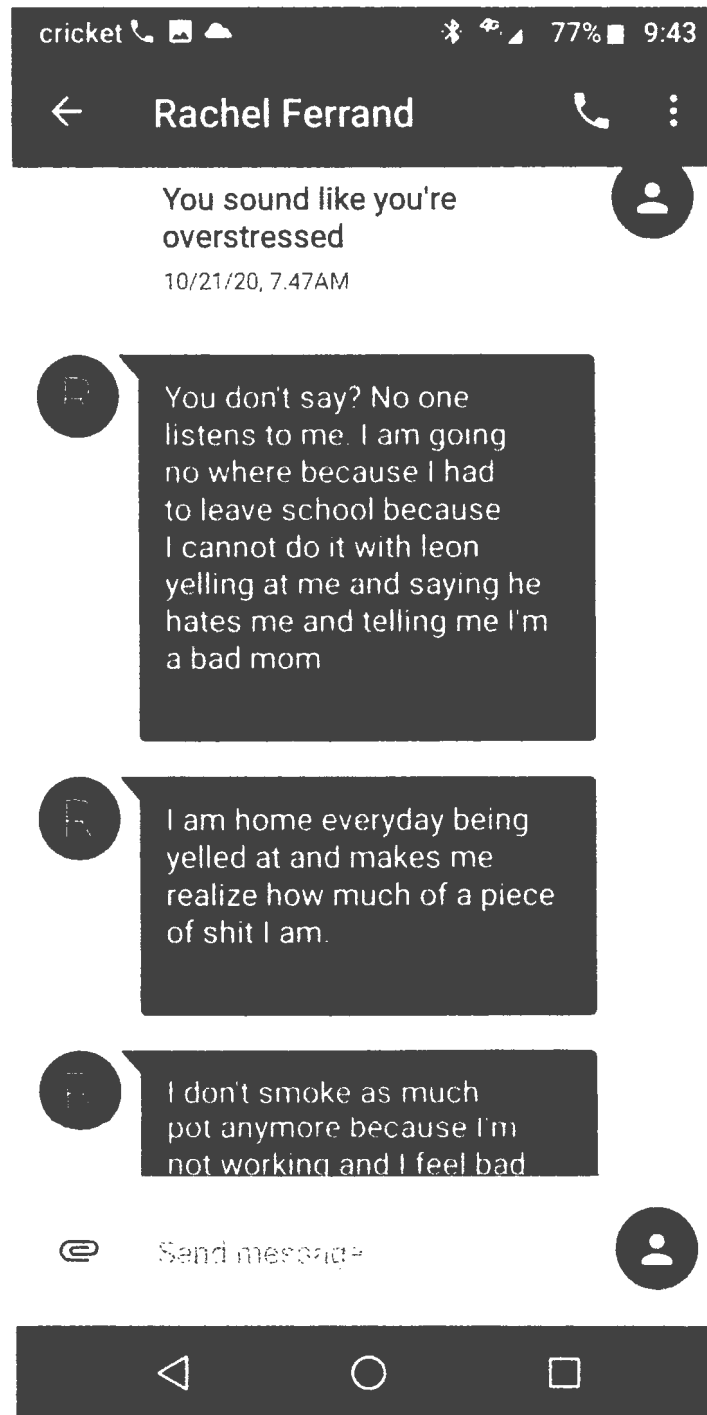
Send message

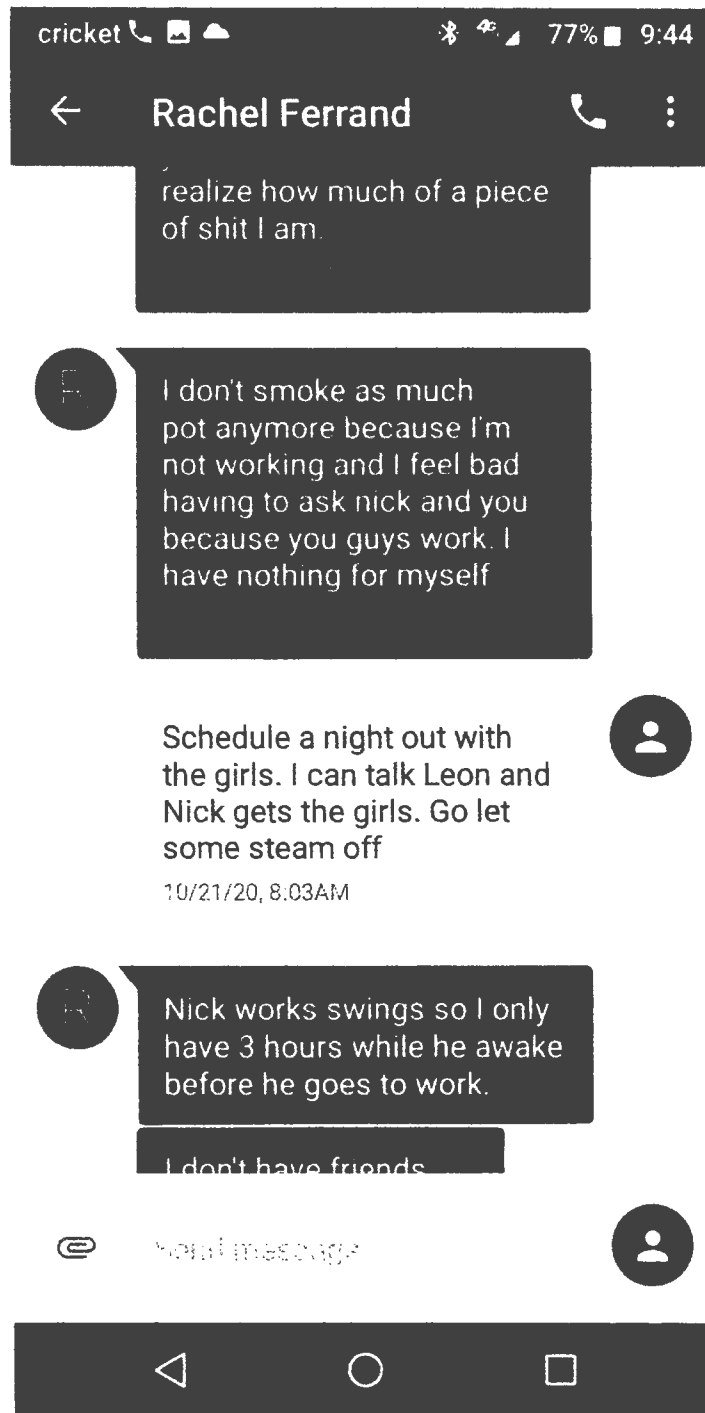


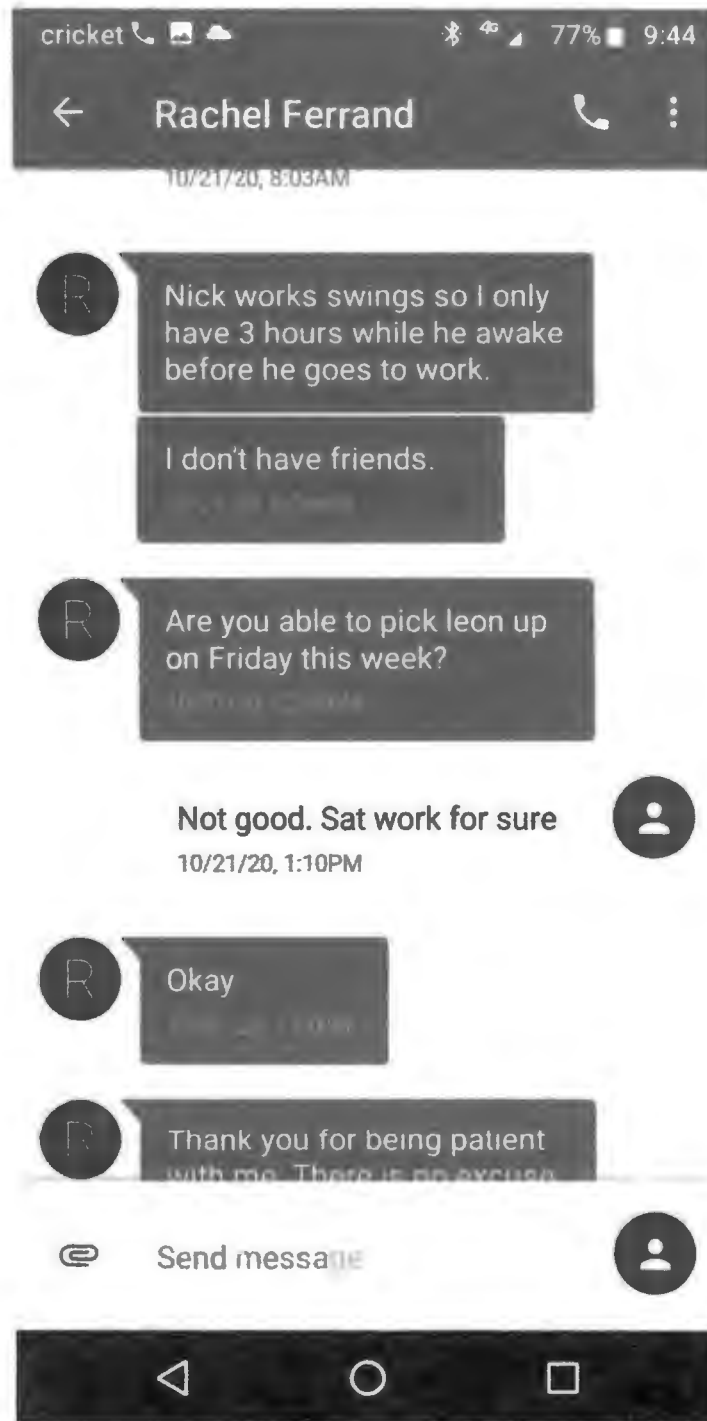


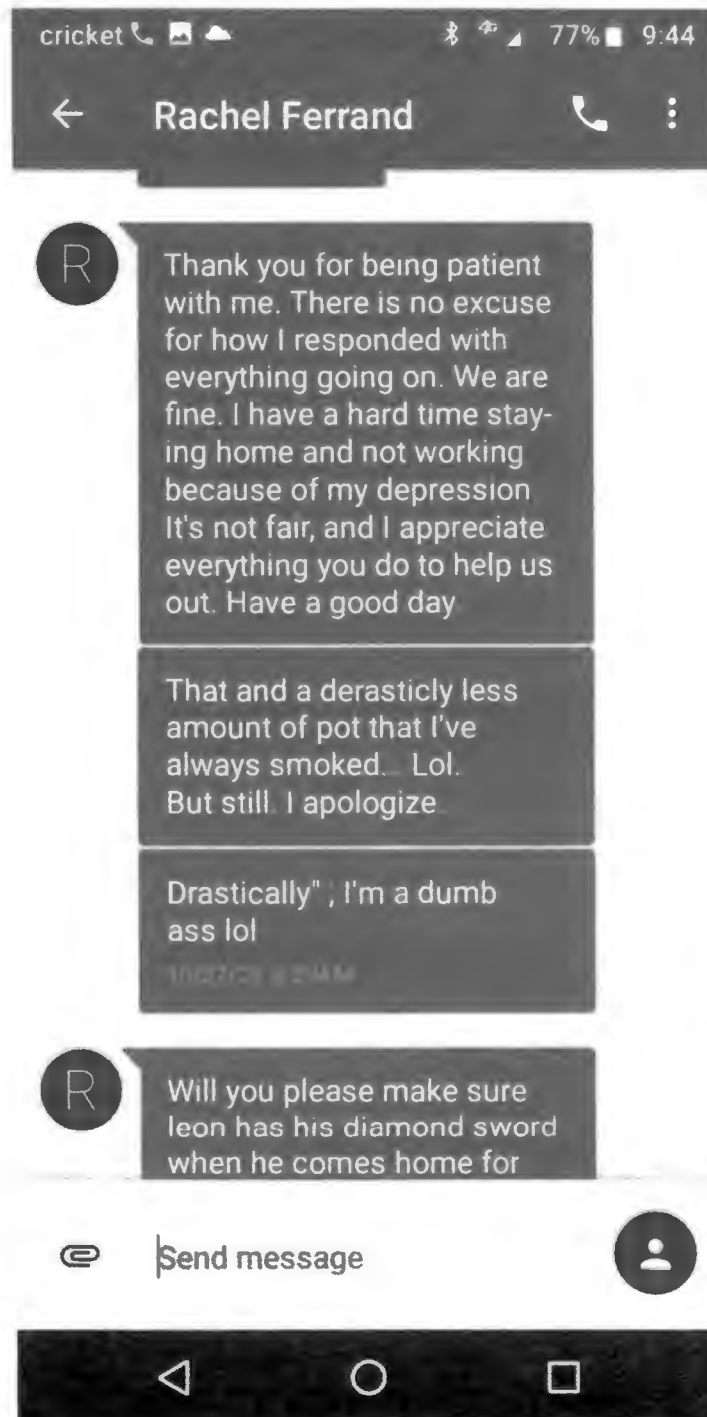


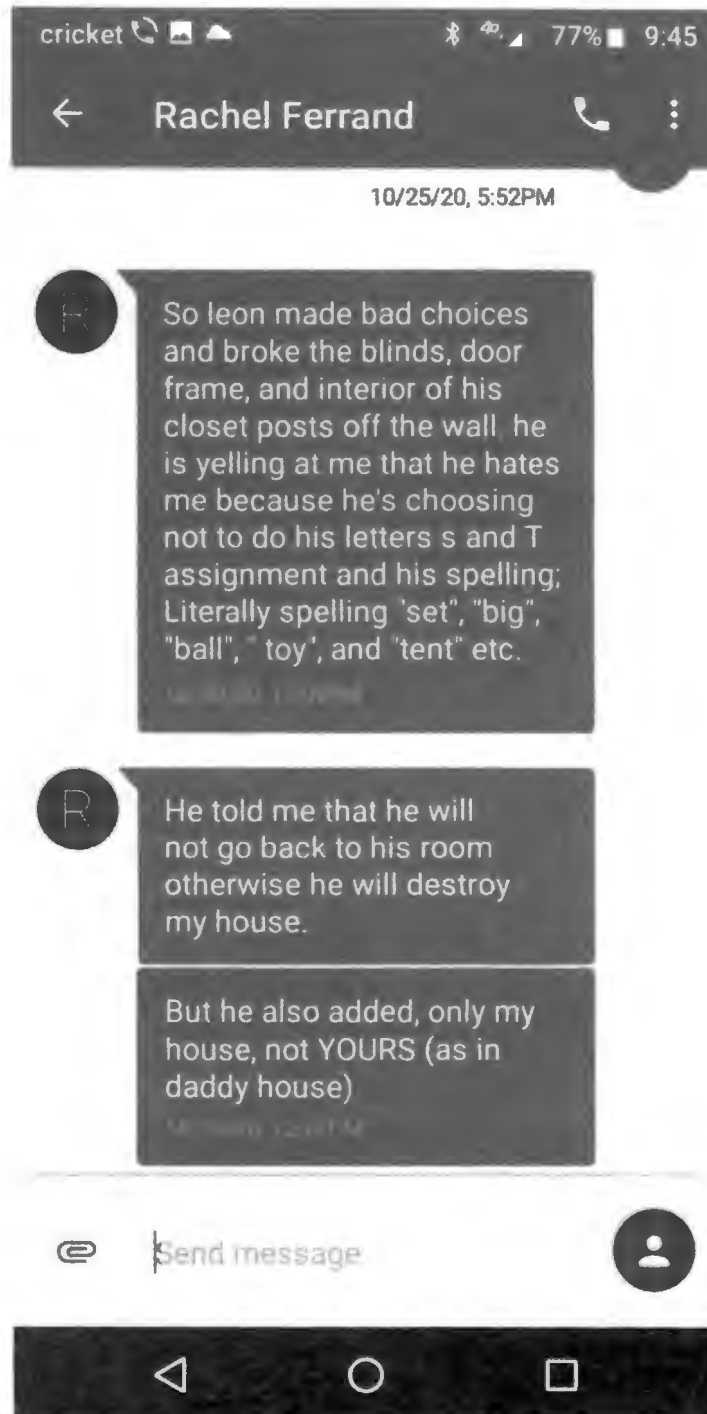


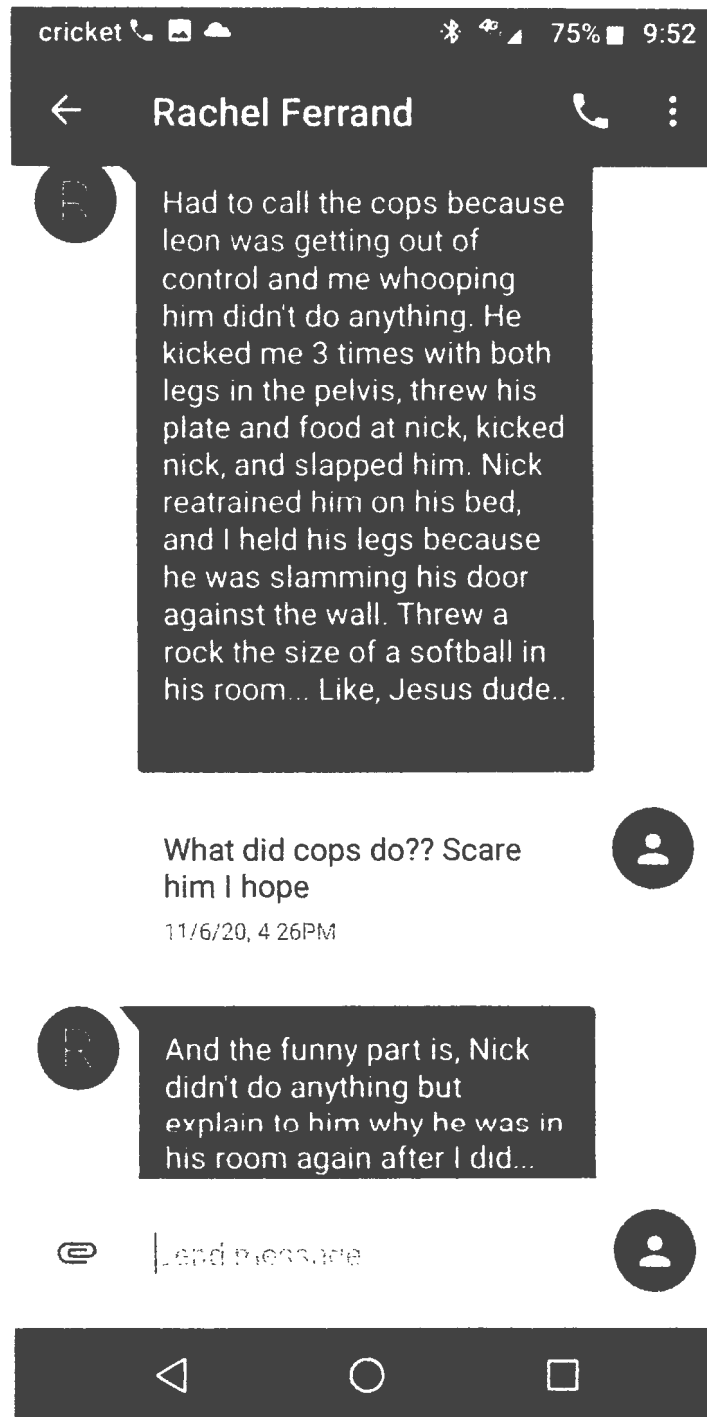


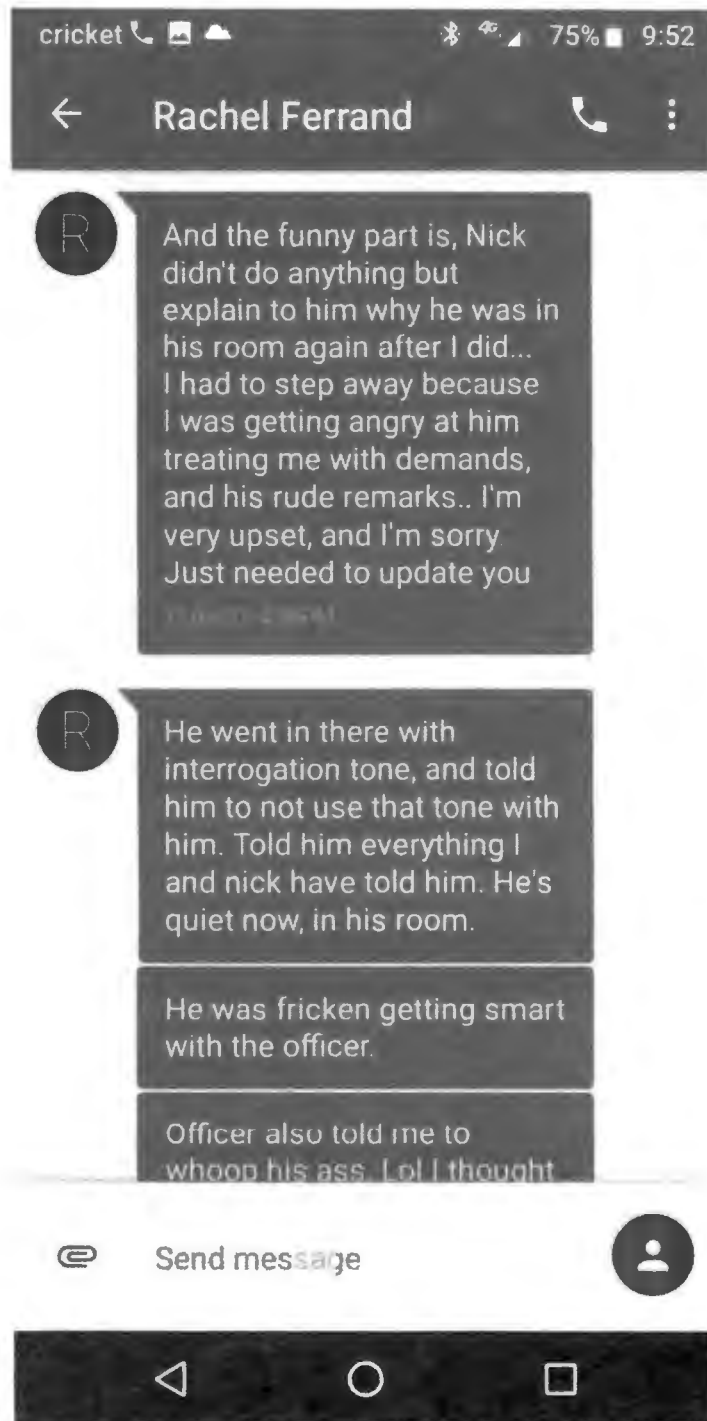


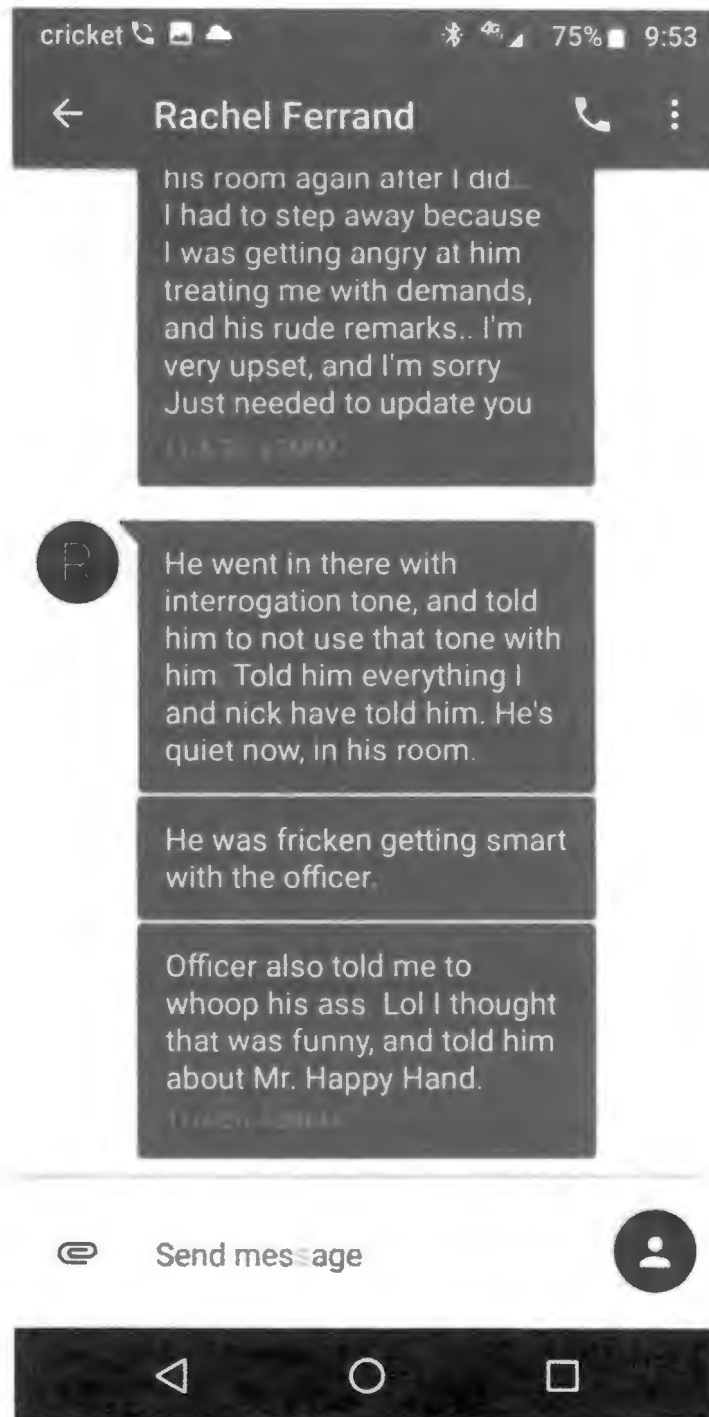












1  
2  
3  
4  
5  
6  
7  
8 **Superior Court of Washington, County of Mason**

9 In re:

No. 21-3-00272-23

10 Petitioner:

DECLARATION RE: SIGNATURE on  
ELECTRONIC DOCUMENT (NPF)

11 RACHEL A. FERRAND

12 And Respondent:

13 EDWARD SCOTT REED

14  
15 I, Ryan M. Pesicka, declare under penalty of perjury under the laws of the State of  
16 Washington, that the foregoing electronic document(s) attached to this declaration, which  
17 consist of 31 pages including this declaration page, is a complete and legible image that  
18 I have examined personally and that was received by me via email at the following  
19 address: ryan.pesicka@sorianolawllc.com

20  
21  
22  
23  
Dated

12/21/21

Declarant's Signature

