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JAN 23 2024

**KITSAP COUNTY CLERK
DAVID T. LEWIS III**

Superior Family Court of Washington, County of Kitsap

In Re:

Petitioner:

Heather Wood, mother
&

Respondent:

Lenard Feulner, father

No. 07-3-01713-1

Response by Heather Wood (mother) to
Mr. Feulner's Declaration in re Motion for
Contempt (Parenting Plan case)

**TO: The Kitsap County Superior Court Clerk, 614 Division St #202, Port Orchard, WA, 98366,
(360) 337-716, superiorcourt@kitsap.gov; AND**

**Lenard Feulner, Respondent, 333 Lippert Dr, W, #C129, (360) 228-6079,
Lenardfeulner@gmail.com; AND**

**Adeline Feulner, 4101 Anderson Hill Rd SW, Port Orchard, WA, 98367, (564) 220-8922,
Adelinewolfpaw@gmail.com ; AND**

**Nancy Tarbell, esq., #26686, PO Box 840, Manchester, WA 98353-0840, (360)871-2794; AND
Kerry Stevens, esq., Bar #15420, 11074 SE Glendale Ave Unit A, Port Orchard, WA 98366-9033,
(360) 269-2947; AND**

**Commissioner Matthew Clucas, esq. #22929, 614 Division St, Port Orchard, WA 98366-4683,
(360) 337-7140** I Identity of the Parties & Jurisdiction' COMES now, Heather Wood, pro se of necessity, without counsel, indigent, in Forma Pauperis to make the Objections noted here and seek the following relief: Defective JURISDICTION & VENUE While the instant case would be properly within Kitsap County's Family Court subject matter' and in personam jurisdiction due to the minor child's birth and both litigant's residency in Washington State, the Kangaroo unlawfully held impromptu hearing on 8-15-23 before Commissioner Clucas, without a scintilla of due process after the regularly scheduled MTSC hearing was disposed of and - Lenard Feulner's motion dismissed, it had no jurisdiction nor authority when it subsequently lured the parents back into the courtroom with no notice in collusion with two non-participating attorneys who observed a commotion/altercation between Heather Wood, mother, and Adeline, her child OUTSIDE the courtroom in the hallway/lobby where it ensued. Thus, Heather Wood takes exception to jurisdiction, and reserves the same throughout these fruit of the poisoned tree proceedings in protest despite her appearance. This Court is the improper forum for the filed Petition for Emancipation for the following reasons: 1. Heather Wood, the child's mother, was never properly served, thus this Court lacks in personam jurisdiction over her. Nor does Heather Wood consent to jurisdiction, but objects to the lack of it. Heather Wood NEVER received or was properly served a Summons for this cause. Nor was an RTS filed at all. Thus this Court is presently barred from continuing w/this case. The 14h Amendment serves as a basis for Strict Scrutiny and Due Process-currently lacking in this forum. 2. Heather Wood's domicile remains in Thurston County where she works and lives as a school bus driver, a vital necessity for her very survival. She is indigent and cannot afford to commute to Port Orchard. Inasmuch as the child (Adeline) was unlawfully removed from Heather's physical/legal custody, the girl's domicile remains with her lawful guardians/custodian, i.e. the mother, Heather Wood, who resides and is domiciled n Thurston County. Thus venue in Kitsap County is improper under Washington State law properly interpreted. Ergo, this Court has neither proper Jurisdiction nor proper venue for this cause #. If

Strict Scrutiny had been applied ab initio, we would not be HERE today. We are here because when a parent has a child, Family Court has a hostage. (1) OBJECTION 1: Commissioner Clucas was subsequently privately contracted by these two women, local attorneys, Amanda Williams and Laura Yelish, who manipulated the court into unlawfully recalling the case w/o due process, notice, an opportunity to confront the litigants' accusers, and taking statements from the two attorneys on the record w/o swearing them in: i.e. with NO testimony as a basis, and an illegally held hearing at that. Heather Wood takes exception on the record to this outrage and lawless Kangaroo hearing. Heather Wood, the complaining mother in this instance takes exception on a continuing ongoing basis, reserving her protest/objection to the same to this violation of her civil rights and the kidnapping of her child under the pretext of the Court's authority without even the color of State law, thus lack of proper jurisdiction. II RELIEF SOUGHT (both cause #'s, 23-2-01534-18 & 07-3-01713-1, are linked for purposes of Due Process Violations)

[OBJECTION: The Petitioner objects to the Respondent expanding the scope of his responses instead of narrowing them. His document I am objecting to is a declaration on its face requiring sufficient notice, which it does not, resulting in my having insufficient time to respond. The Court requires 2 weeks notice for Declarations I have not been given—untimely and exceeding scope.]

My name is Lenard Feulner, I am the Respondent in this action. ***[Agreed. After months of distorting the record, Lenard Feulner finally concedes he is the respondent.]*** I am providing this response to the Petitioner's Motion for Contempt. Petitioner has withdrawn her Motion for Summary Judgment because it was not timely noted. . ***[I amended the Motion for Summary Judgement in the record, I did not, per se, 'withdraw' the motion, but in the record, I amended it.]***

I would add that she has failed to use the form for the Motion for Summary Judgment in a Parentage case and as such is seeking relief which is not available to her under that statute.

[Mr. Feulner's argument here is maliciously misleading—again! The instant case is a parenting case seeking a parenting plan. No motion for summary judgment has been filed in THIS cause, 07-3-01713-1. Petitioner Heather Wood has filed an amended conditional motion for a summary judgment in her daughter's Emancipation Petition case. Mr. Feulner has the bad habit of repeatedly erroneously conflating separate issues and cause numbers—further introducing ambiguity and confusion in an already deeply flawed record amounting to his effort to damage it further. Mr. Feulner's assertions, unsurprisingly, are false.]

[This is not a parentage case – the parentage case was disposed of on 12/24/07. Commissioner Clucas ordered the Juvenile department to provide services to Adeline

Feulner on 9/1/2023. This is a Parenting case, not a Parentage case. The distinctions are important and substantive. Respondent's objections to what services are available from the Juvenile department for a minor in the instant case, are issues between him and the Court which the Petitioner need not address.

Lenard Feulner has ignored Proper Venue and Jurisdiction, the fundamental basis of Law and Remedies. Mr. Feulner has entered Defective on their Face records from the beginning. Lenard Feulner's arguments should be discounted because he is unable to make them. The rules of Court Require more notice for a Declaration such as this. Declarations require All of the notice local Court Rules mandate. The caption, as indicated, requires more proper notice than what Mr. Feulner has provided here. The Devil's in the Details. By definition this Document is not timely because the respondent did not provide me sufficient notice for the Declaration as per local court rules. Thus, this must not be considered at this time.]

The court has preassigned this case to Judge Adams; ***[The Court assigned this case to ADAMS.]*** the Petitioner's complaints about the commissioner are unsubstantiated. ***[The mother's complaints regarding Commissioner Clucas have been substantiated, in the record, and the Court will determine whether they have been adequately substantiated. Not the respondent who continues to submit facially defective documents into the record.]***

The court does not lack jurisdiction. . ***[Obviously, the respondent is not qualified to make this argument. Feckless opinion is not fact. Lenard Feulner's opinion, in this regard, should be given no weight.]***

The original parenting plan action was filed in Kitsap County and Adeline and I live in Kitsap County. ***[Yes, but separately. Lenard Feulner concedes this is a Parenting Plan, a fact, even Commissioner Clucas has yet to concede, a documented fact. On this basis, among others, I have properly challenged Jurisdiction for the reason of the panoply of errors introduced into these proceedings by Lenard Feulner and Commissioner Clucas.]***

I do not contest that Adeline lived with her mother and that they primarily lived in Thurston County - however that is no longer the case. ***[Adeline's domicile remains in Thurston County because her absence is temporary. Lenard Feulner was not granted custody by this Court. Lenard Feulner is confused about the legal ramifications of domicile.]***

These orders designated the mother as the custodial parent of our infant daughter and reserves my right to obtain a parenting plan. *[Its some kind of hutzpah when the man who raped my 6 year old daughter invokes her innocence to argue to this Court. The Parentage case did not preserve Mr. Lenard's right to a parenting plan. Mr. Feulner's right to Petition for a Parenting Plan is intrinsic. However, The Parentage Case ordered Residence and Custody of Adeline Feulner was to be exclusively with the mother. After All, the State of Washington had to sue Lenard Feulner to determine parentage.]*

I have considered through the years pursuing a parenting plan, but frankly wasn't up to the battle I knew I would have with the Petitioner. ***[No. The reason Mr. Feulner did not file for a parenting plan, is he knew it would invite the exposure of his rape of my 6 year old daughter. His crime has been documented in the Kitsap County Sheriff's police report filed in 2013. Lenard Feulner admitted to the Kitsap County Sheriff's detective that he had penetrated his 6 year old daughter's mouth with his tongue. Rape by definition according to the US supreme court: Rape is penetration, no matter how slight. Lenard got into a battle with the mother because he knew he had unclean hands. Despite all of Mr. Feulner's protestations throughout this case, he does not deny that he raped his daughter. He argues the allegations are very damaging to him but he does not deny them. He protests the mother's allegations but does not deny them. Criminals are not entitled to hide the truth of their misconduct. This is the man Commissioner Clucas sent my daughter to temporarily reside with. Wow.]***

Petitioner makes claims some of which could be very damaging (including claims of sexual misconduct) which I was worried would further alienate me from our daughter. . **[As it should.]**

When Adeline contacted me about the issues she was having with her mother, I knew that I could no longer stand-by and allow the Petitioner to control our daughter's life in the same way she had controlled mine. .

[Child support responsibility, in no way amounts to controlling the obligor's life. But one could easily agree raping a 6 year old child does. Raping his daughter is tantamount to controlling her life. Lenard Feulner's violation of his 6 y/o daughter's innocence prematurely sexualized my daughter, reportedly pregnant as we speak. Mr. Feulner argues to this Court that I raised Hell in his life. I did not. I protected my daughter, and Lenard Feulner thought it was hell. Lenard Feulner now comes before this Court seeking equity in this action. It is a well established principle a suppliant seeking equity before a Court in equity, must have clean hands. Lenard Feulner does not.]

No one coached Adeline to flee the courthouse

[It wasn't the mother's car Adeline drove onto the sidewalk, endangering both herself and the public. It wasn't the mother who disrupted a proceeding underway, to beg Commissioner Clucas not to make her go home with her mother. The mother was neither disruptive, nor inappropriate, nor did she put her child or the public at risk. Once again, the respondent is Gaslighting this Court. What's inappropriate is the use of the Family Court to promote parental alienation.]

We didn't know that the Petitioner would act so inappropriately in a public space. The Petitioner implies that we knew she would attack Adeline after the initial hearing. **[I don't imply anything. I mean what I say and say what I mean and I say it under oath. Mr. Feulner, once again, engages in conjecture calling for speculation. The record speaks for itself.]**

In hindsight, if I had known that the Petitioner was going to be so inappropriate I would have encouraged Adeline to not attend the hearing.

[Inter alia, the respondent wouldn't have drug a 16 year old girl into open court to maliciously denounce her mother under oath, and penalty of perjury if he had known the mother was going to defend herself. Lenard Feulner provided Judge Houser the match, Houser provided the gasoline. Clearly, the respondent is bristling being exposed, thus he regrets bringing Adeline into Court because Adeline is now witnessing that exposure. The respondent is blaming the Petitioner for his own flaws. It was inappropriate to include the child in an adversarial forum to witness the conflict between her parents.]

The Petitioner makes wild allegations which are difficult to respond to other than saying they are not true.

[The respondent does not provide sufficient specificity for me to respond to his wild allegations about wild alegations.]

I will go through each of these as best I can. The Petitioner claims that I broke the order from July 20, 2023 - there are no orders of that date.

[Yes, there was no court order 7/20/23. That is the date he harbored my runaway child, a violation of the Parentage Order – The parentage case was disposed of on 12/24/2007, granting me exclusive custody and residency of my child. The date cited may have been a typo or taken out of context. Mr. Feulner's declarations are full of references taken out of context. Custodial Interference is a crime in Washington State. Lenard seeks to be rewarded for his misconduct. Temporary residency is not legal custody.]

This action was initial by myself on August 4, 2023. There was no ruling that required reconciliation.

[The hearing I take exception to was on 8/4/2023.]

[Similarly, the respondent is insufficiently specific as to where in my pleadings I mentioned a court order for 7/20/23. If such a typo exists, which I doubt, I don't recollect it. The court proceeding I consistently complained of among others is the one Houser conducted on 8/4/23 when he accepted sworn testimony from a feckless 16 year old girl denouncing her mother without conducting a colloquy or inquiry as to her age/competency.]

[The record reflects Mr. Feulner stated in open court, he was bringing this action on behalf of his daughter.]

– there was no ruling that required reconciliation. **[What in the heck is Mr. Feulner talking about?]**

The custody investigator recommended FFT, but after contacting him we discovered that FFT is available in juvenile court and is not available to the public. **[Commissioner Clucas ordered the juvenile department to provide services to Adeline Feulner, a 16 y/o child.]**

Adeline has since started her own counseling and if/when the counselor sees fit may include the Petitioner. ***[Mr. Feulner does not cite the counselors' credentials or identity or certification. His statement lacks particularity and is too nonspecific for a response. Adeline is free to communicate with whomever she wishes.]***

The Petitioner has taken no initiative to begin this process. **[I was under the misapprehension that contact with my daughter was restricted, fed by the false narrative initiated by Mr.**

I reside at my mother's home and spend time with my girlfriend, often spending the evening over at her house. **[Lenard has declared under penalty of perjury in these proceedings he is homeless. His instant declaratory statement is under penalty of perjury. The two positions are contradictory and can not be reconciled. Falsum in uno, falsum omnibus.]**

While our daughter was in her mother's care, she may have ordered the things she claims, this was not while Adeline was in my care. ***[Adeline states in her own declaration, under penalty of perjury, Mr. Feulner spends the night with his partner. The child confuses family membership with household membership. Lenard's testimony, since Adeline has been in his care, states that he is either homeless, or living in a tent outside a motorhome that Adeline temporarily resides in. Adeline was Ordered to reside with Mr. Feulner where he sleeps at night. The child is unsupervised each evening with vehicles at her disposal. A 93 year old Grandmother is not adequate to supervise a 16 year old girl.]***

Talking to her friend about boys is something teenagers do; the Petitioner exaggerates the situation. ***[The Petitioner has exaggerated nothing. The Petitioner presented evidence, and sworn declarations into the record. It is what it is.]***

We left as soon as the Petitioner arrived, Adeline and I never spoke to the Petitioner. . **[Yes, looks were exchanged.]**

Petitioner would like to characterize our statements as slander only because she has no insight into her own actions. ***[Conjecture calling for speculation, and I object to the statement on that basis. The respondent is improperly using a declaration to argue, conjecture, and speculate – I object to it on that basis also.]***

Ms. Wood's Response to _____ of 13 pages Heather Wood (360)999-8493
Mr. Feulner's Declaration; 9129 James Rd, SW, Rochester, WA 98529 hthrwood012@gmail.com

hidden actual income from the eyes of this court, and continues to do so even now. When he did pay child support it was erratic and unpredictable, not on schedule as ordered.]

The Division of Child Support has started collections actions against the Petitioner which I believe has precipitated a great deal of the Petitioner's current animosity. ***[Lenard Feulner is a skafra of long standing. He has attempted an end run around this Courts child support orders by inserting the Administrative Agencies involvement, hoping to circumvent this Court's legal authority over the child support issue, contrary to law. A valid Court of Law Order exists currently. It has never been rescinded. Lenard Feulner is in violation of that court order. Lenard Feulner effectively admits this in his own declaration. Any animosity by the mother is motivated by the theft of her child under color of state law and the father's sexual molestation/rape of my 6 year old girl.]***

The Petitioner Believes that she can seek support from me from July to current despite the fact that Adeline lives with me. . ***[That is Correct. The Child Support Order remains in effect until the Court modifies the order, which it has not. The Order remains in effect, as a matter of law. The Court defined Adeline's residency as temporary. Mr. Feulner, as is his habit, modified the Court Order as a law unto himself and attempted an end run around this court's authority via an administrative agency.]***

The Petitioner could have sought unpaid (or underpaid) expenses from Support Enforcement, she failed to do so and is only now seeking reimbursement of these expenses. . ***[Once again, the respondents misapprehensions show. The ten year statute of limitations for collecting child support arrearages has not lapsed. Mr. Feulner faults the petitioner for litigating these issues, and in the same breath faults her for not doing so.]***

I argue that I have paid any and all support that has been ordered.

[The Respondent admits he unilaterally canceled his child support obligation w/o Court permission/authority, attempting to circumvent it by involving an administrative agency w/no authority to overrule this Court and its orders.]

The Petitioner provides a list of items that she claims are "facts". In order to make this

response easier to read I am going to list them under the same numbers that the Petitioner put in her motion.

1. Agree
2. Parentage was filed in WA under 07-5-00352-8, that action was converted to this instant action. I do not resent being ordered to pay child support.

[The current Court has ruled on this issue—the mother, Heather Wood is and has always been the Petitioner since she brought this cause of action by filing a petition for a parenting plan and summons—both of which were properly served on Mr. Feulner. The Petitioner notes parentage case records are sealed and the second field containing a '5' signals as much. Parentage is not an issue in the instant case as that was adjudicated and disposed of on 12-24-07 under the cause number Mr. Feulner references. This case (07-3-01713-1) is a parenting case because it sought a proposed parenting plan pursuant to the Petitioner's filing and properly serving original process. There was never any Committed Intimate Relationship between Ms. Wood and Mr. Feulner, nor did she ever live w/him. Ms. Wood was given exclusive residency and custody of Adeline Feulner along with a child support order Mr. Feulner is in contempt of. His temporary order does not change that, yet another order he is in contempt of as Adeline does NOT reside w/him, a condition of that order.]

3. The Parentage Order granted the Petitioner the custodial designation and placed the child into her care. The Petitioner distorts the facts regarding the child "residing with the mother at all times". The child has resided with her mother, this language does not limit my ability to visit with our daughter. Furthermore, when it was clear that our daughter no longer wanted to live with her mother I sought a court order that placed her with me (which was granted by the court on August 15, 2023).

[Actually, Commissioner Clucas denied Mr. Feulner's emergency ex parte motion on 8-15-23, and disposed of the case until the child, Adeline, (after disrupting a hearing in progress by the Commissioner) recklessly drove her father's car onto a sidewalk, endangering herself and the public until the police were called. Commissioner Clucas held an impromptu Kangaroo hearing on the spot w/no notice, not a shred of Due

Process, no sworn testimony, and not a word of participation from either litigant, rendering the Commissioner's legal authority null and his orders void ab initio along w/all subsequent orders/settings that flowed from that Kangaroo court setting—all fruits of a poisoned tree. The culmination of Commissioner's massive violation of his oath of office and the code of judicial conduct resulted in his ordering Adeline reside w/her rapist. Mr. Feulner has claimed, before the Court, to be homeless—a dodge to lower child support payments while receiving income under the table. The father threatened the mother if she sought an increase in child support. His claims of not resenting the payments are disingenuous.]

4. To my knowledge I was never been contacted by CPS for my parenting. I think I was contacted by CPS once because the Petitioner was under investigation. I have never neglected either of my daughters. ***[Raping a 6yo girl amounts to more than neglect. Adeline complained of her father (when she was barely 6yo) rubbing her front and back privates, then sticking his tongue in the child's mouth. Rape is penetration no matter how slight according to the U.S. Supreme Court regardless of which bodily orifice was violated and the object/body part used to do it, e.g. Mr. Feulner's tongue. Moreover, Mr. Feulner admitted this to the Kitsap Sheriff's detective who investigated the complaint and wrote a police report. It is anticipated Adeline and her father will be placed on the witness stand along with the referenced detective.]***

5. I am unsure what the Petitioner is trying to say here.

6. I have always paid my support to the best of my ability. At times payments were delayed, but I did pay. I currently do not owe any arrears. ***[Mr. Feulner is 6 months in arrears as he canceled payments on his own after interfering w/the mother's***

custody by harboring a runaway child.]

7. The Petitioner should have sought reimbursement for expenses through the Division of Child Support. Petitioner is often overly wordy, and it can be difficult for me to hold her statements at face value. If there was evidence that these expenses were valid, and I had agreed to pay such expenses *before* they were acquired then I would have paid them. ***[The office of child support enforcement doesn't defray expenses for impoverished mothers. It chases deadbeat dads who won't pay, something Mr. Feulner argues the mother should have relied on instead of him.]***
8. The Petitioner seeks reimbursement from me for things that should be paid for with child support. Again, if the Petitioner had sought my approval for these expenses before she acquired them, I would have been willing to pay them. ***[Child support, medical expenses and other extraordinary costs do not require the approval of the obligor.]***
9. I do not owe any child support arrears at this time. ***[The parentage case order for child support remains in effect and in arrears 6 months.]***
10. This is hearsay, I cannot speak to a conversation the Petitioner may have had with my mother.

This is the Petitioner's opinion - not fact. I do not deny that the Petitioner took our daughter to the hospital to obtain a drug test. ***[Which yielded a positive, confirming the Petitioner's suspicions.]***

11. This is the Petitioner's opinion - not fact.
12. This is the Petitioner's opinion - not fact.
13. This is the Petitioner's opinion - not fact.
14. This is the Petitioner's opinion - not fact.
15. This is the Petitioner's opinion - not fact. I was not present at the hospital so I cannot

16. Adeline refused to leave with her enraged mother (the Petitioner) and sought support from the hospital staff. ***[Then why does the respondent support the child's false narrative that she was abandoned by her mother?]***

18. The Petitioner lacks insight into the rights of our daughter. Petitioner incorrectly believes that she can force her will on our daughter (and the hospital staff). ***[It is the duty of a custodial parent to protect and correct a child until they reach their majority. The respondent does not parent this at risk child.]***

32. This is the Petitioner's opinion - not fact.

33. The Petitioner never contacted me to obtain "verification". The only contact I received was from Adeline.

34. The Petitioner chose to take no action and instead attempts to shift the blame to me.

35. This is the Petitioner's opinion - not fact. As previously stated, the Petitioner is in this mess because of her own actions in a courthouse. *[The mother did absolutely nothing wrong or inappropriate on 8-15-23 outside or inside the Kitsap Courthouse. The child was disrupting inside and outside the courtroom. The mother did her best to manage an incorrigible truculent at risk child. Commissioner Clucas and Mr. Feulner attacked the mother in this forum for her trouble. This mother was faced w/a virtually impossible challenge then summarily stripped of her parental rights without an iota of Due Process or jurisdiction. Kitsap county's Court and clerk system have aided and abetted this travesty.]*

36. The court has authority to enter an order ex parte, the Petitioner was allowed her "day in court" and used that time to act foolishly and aggressively in a public forum.

[Emergency ex parte hearings require a genuine emergency/eminent true threat. Mr. Feulner had none of this, nor did Commissioner Clucas who denied Mr. Feeulner's motion upon review two weeks after 8-4-23.]

37. The court may conduct their hearings in any way that best serves the rights of the parties (including the minor child) and upholds the rules of the state and court.

[Unfortunately, for the child and her mother, Commissioner Clucas' impromptu Kangaroo hearing convened w/no any authority or Due Process whatsoever, violated the child and mother's human rights, the most fundamental being the

right for a fit mother to parent her child w/o interference from the state and its minions substituting their judgment for the parent's. (Troxel v. Granville, is a Supreme Court decision roundly castigating Washington State Courts for their interpretation of 'the best interest of the child' which the high Court found to be "breathtaking in scope".]

38. I renew my statements from above. The Petitioner lacks insight into her own behavior and that such behavior has recourse. ***["Dr.' Feulner's self serving psychoanalysis of Ms. Wood is offensive given the parties never lived together and the rapist rendering this opinion has no basis and little to offer regarding insight. The pot is calling the kettle black—again.]***

39. The orders entered in this case have all been properly obtained. *[Contrary to Mr. Feulner's feckless opinion, all proceedings in the instant case flowing from the Poisoned kangaroo Court hearing conducted by Commissioner Clucas, and its fruits, are void ab initio.]*

40. I renew my statements from above regarding jurisdiction.

41. I agree that the order places our daughter with me temporarily. I do not agree that there was "unlawful testimony. ***[There was no 'testimony' at all because the two attorneys, who should have known better, were not sworn in while making their comments on the record, thus they have no immunity from lawsuits because the qualified immunity extends to witnesses properly sworn in by definition. Mr. Feulner's misapprehensions are legion.]***

42. Our child was never abandoned by me. I renew my statements from above regarding

our living situation. ***[Mr. Feulner was an absentee drunk stoned father who did not provide for his young child or her mother. I stand 4-square with the statements I made and the harm it visited upon me and my child.]***

43. I renew my statements from above regarding our living situation. ***[Mr. Feulner has told this Court, more than once, he is homeless.]***

44. Adeline has missed some school, primarily due to illness. I find it ironic that the Petitioner is concerned about Adeline's school attendance when she was against sending her to public school to begin with (see declaration of Adeline Feulner filed in response to these motions). ***[Indicating how little the father knows of his own child's education history, Mr. Feulner is woefully ignorant of the fact my daughter enjoyed multiple public, private, and homeschooling venues. Her academic progress was excellent as the records I have documenting the same attest. Adeline Feulner has done well under her mother's tutelage.]***

45. Unfortunately, Adeline was in an accident in Thurston County, this is not uncommon for teens drivers. The case was dismissed today when the court could not determine fault (Adeline believes it was the fault of the other driver moving into her lane while going through a roundabout). ***[Adeline was never cited for driving her father's car onto the sidewalk outside the Kitsap Courthouse, nor was her father for inciting/encouraging her.]***

46. Adeline has been to the hospital for strep throat, an ovarian cyst and when she fell at work and hit her head. I was most certainly not responsible for any of these medical issues. ***[Who is caring for Adeline while her father is sleeping at his girlfriend's***

home?]

47. This is the Petitioner's opinion - not fact.

48. I renew my statements from above. Teenage girls talking about boys (and sex) is common and is not an attempt at "sex trafficking" despite the Petitioner's attempt to delude the other child's mother. ***[Mrs. Robb's Declaration(s) ring true and she, in every case, approached me with the information I reported to this Court. Mr. Feulner's lack of due diligence speaks volumes as to his lack of fitness as a parent. This is hardly surprising for a man who would stick his tongue in his 6yo child's mouth.]***

49. Adeline is doing okay in school, she is slowly figuring it out. The public school experience_ has been a challenge. I have stayed on top of her schooling and have called Adeline out on some of her excuses - like claiming she couldn't use her Chromebook to do her homework. I told her that I was going to meet with the school counselor to discuss these limitations. Before I could have that meeting Adeline met with her and "figured" out how to access her homework. ***[According to the GAL, Mr. Feulner wasn't even aware Adeline had missed 10 days of school. Were she residing w/him, he would have. Mr. Feulner feigned ignorance of e-mail protocols when Judge Adams directed him to accept secondary process by this method.]***

50. I renew my statements from above regarding Thanksgiving. I have not ever neglected our daughter. ***[Mr. Feulner has consistently neglected the best interests of the child throughout her entire life.]***

I am unsure why the Petitioner pursue this line of argument when there have been several

witnesses that testified that her behavior towards our daughter after the hearing was inappropriate. ***[My behavior in attempting to get my runaway teenage daughter to come home was very appropriate. Lenard's tongue was inappropriate. NO witnesses have 'testified'. Unsworn statements were recorded in a kangaroo court.]***

In conclusion, I ask the court to deny contempt. I have not acted in bad faith. ***[The Petitioner witnessed Mr. Feulner acting in bad faith on 8-15-23 when he encouraged Adeline to run from her mother and take his car. Additionally, during the initial hearing on 8-15-23, Clucas advised Mr. Feulner to assist the mother in seeking Thurston County ARY services for the child after denying his petition. Instead, Mr. Feulner encouraged his daughter's defiance toward her mother. It boggles the mind hearing a child's rapist pontificate about how he acts in good faith. Perhaps he was so busy acting in good faith, it serves as an explanation for why he failed to notice her 10 days of absence from school.]***

I live at my mother's home, as does Adeline. ***[This is a perjured declaration according to Adeline who belies Mr. Feulner's story. Mr; Feulner does not live w/Adeline or his mother. He lives and sleeps w/his girlfriend @ 333 Lippert Dr, W, #C129, Port Orchard, WA. If Mr. Feulner lived w/Adeline, she would know it.]***

Adeline regularly spends here evenings in the RV, but uses facilities in the home. I have a girlfriend, but I have not been staying with her recently. My mother has not been doing all that well lately and I have been staying with my mom to make sure I can help out. I suggested that Adeline sleep in my mom's house (grandma's house) and I sleep in the RV, but she prefers her privacy which is understandable given that my mother's home is very small.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct. Signed at Bremerton, WA on January 16, 2024

Lenard Feulner/ Respondet

[I declare under penalty of perjury under the laws of the State of Washington and pursuant to General Court Rule 13 and RCW 9A.72.085 that the foregoing is true and correct to the best of my belief and knowledge.]

Dated this 21st day of January, 2024 in the County of Kitsap:

A handwritten signature in black ink that reads "Heather Wood". The signature is written in a cursive, flowing style.

Heather Wood, pro se mother

Superior Court of Washington, County of Kitsap

In re: Care of Adeline Feulner

Petitioner/s (person/s who started this case):

Heather Wood (Mother)

And Respondent/s (other party/parties):

Lenard Feulner (Father)

No. 07-3-01713-1

Proof of Mailing or Hand Delivery
(for documents after Summons and Petition)
(AFSR)

**Proof of Mailing or Hand Delivery
(for documents after Summons and Petition)**

Warning! Do **not** use this form to prove you mailed or delivered a Summons, Petition, Order to Go to Court, or any kind of Restraining Order. For those documents, use Proof of Personal Service (FL All Family 101), or if you have court permission to serve by mail, use Proof of Service by Mail (FL All Family 107).

I declare:

1. I am (check one): ☒ the Petitioner ☐ the Respondent ☐ (name):

and am competent to be a witness in this case.

2. On (date): 1/21/2024, I served copies of the documents listed in **3** below to
(name of party or lawyer served): Lenard Feulner, Nancy Tarbell, Kerry Stevens by:

☐ mail (check all that apply): ☐ first class ☐ certified ☐ other _____

mailing address city state zip

X email to (address): lenardfeulner@gmail.com, nancy@tarbelllaw.com
SLO@wavecable.com

(only if allowed by agreement, order, or your county's Local Court Rule)

3. List all documents you served (check all that apply):

(The most common documents are listed below. Check only those documents that were served. Use the "Other" boxes to write in the title of each document you served that is not already listed.)

<input type="checkbox"/> Notice of Hearing _____	<input type="checkbox"/> Notice Re Military Dependent
<input type="checkbox"/> Motion for Temporary Family Law Order <input type="checkbox"/> and Restraining Order	<input type="checkbox"/> Sealed Financial Documents
<input type="checkbox"/> Proposed Temporary Family Law Order	<input type="checkbox"/> Financial Declaration
<input type="checkbox"/> Proposed Parenting Plan	X Response of: Heather Wood to Lenards Decl. Response to motion for Contempt., labeled only "Declaration" in caption.
<input type="checkbox"/> Proposed Child Support Order	X Response of Heather Wood to Lenards Decl. Response to Heather's Motion to Terminate Restraints: _____ labeled only "Declaration" in caption.
<input type="checkbox"/> Proposed Child Support Worksheets	X This Return of Service, <u>1/21/2024</u>
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____

4. Other: _____

I declare under penalty of perjury under the laws of the state of Washington that the statements on this form are true.

Signed at (city and state): Thurston County, Washington, Date: 1/21/2024



Signature

of server Heather Wood