

[] EXPEDITE (if filed < 5 days of Hearing)
[] Hearing is Set (time sensitive emergency XP)
Date: Rm.
Time: ZOOM #: passcode
Commissioner/Calendar: / N/A

**Superior Court of Washington,
County of Kitsap**

FILED
MAR 04 2024
KITSAP COUNTY CLERK
DAVID T. LEWIS III

**In re the most recent petition filed by
Lenard Feulner for a parenting plan &
support of:**

**Adeline Marylynn Feulner (child)
DOB: 6-2-07**

Petitioner (party who started case 07-3-01713-1):

Heather Lynn Wood (mother)

And Respondent/s (other party/parties):

Lenard Ray Feulner (father)

No. 07-3-01713-1 ←(objection to case #)

**RESPONSE & additional Objections to
Lenard Feulner's Recent Petition De Novo
for a Parenting Plan**

**Responding Party: Heather Wood, mother
RE: Objection(s) to Lenard Feulner's
'Motion'/Declaration to join his new
action to a cause # associated w/a
Petition filed & dismissed/withdrawn by
the mother, Heather Wood, containing a
plethora of errors and facially defective
documents introduced into the record by
Lenard Feulner and the Court Clerk
[CR 40(e)].**

**Heather Wood has served Notice
disqualifying judge Adams from Lenard
Feulner's newly filed Petition
(Clerk's Action Required re: RCW 4.12.050)**

**TO: The Kitsap County Superior Court Clerk, 614 Division St #202, Port Orchard, WA, 98366,
(360) 337-7164, superiorcourt@kitsap.gov; exparte@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; (w/o
current standing in the instant new Petition) AND**

**Kerry Stevens, esq., Bar #15420, 11074 SE Glendale Ave Unit A, Port Orchard, WA 98366-9033,
(360) 269-2947; slo@wavecable.com (w/o standing in the instant new Petition) AND**

**Commissioner Matthew Clucas, esq. #22929, 614 Division St, Port Orchard, WA 98366-4683,
(360) 337-7140 (Presiding magistrate over the 8-15-23 Kangaroo Hearing w/o Due Process)**

**RESPONSE in re Lenard Feulner's De Novo Petition
for Parenting Plan; reminder of Disqualification of judge
Adams pursuant to RCW 4.12.050**

& OBJECTIONS

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**Heather L Wood, hrwoodo12@gmail.com
9129 James Rd, SW, Roch**

**07-3-01713-1
RSP 196
Response
16242086**



I Identity of the Parties & Jurisdiction

COMES now, Heather Wood, pro se of necessity, w/o counsel, under protest, indigent, in Forma Pauperis to make the RESPONSE & Objections noted herein, having served notice via declaration pursuant to RCW 4.12.050 disqualifying judge Adams as a nondiscretionary matter of right, as follows:

JURISDICTION & VENUE

While the case # captioned above would have been properly within Kitsap County's Family Court subject matter and in personum jurisdiction due to the minor child's birth and both litigants' 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, DEPRIVED jurisdiction and authority from this Court when it failed to meet even the most minimal procedural mandates required before luring the feckless parties back into the courtroom w/o notice in collusion with two non-participating attorneys (Williamson & Yelish) who observed a commotion/altercation between Heather Wood, mother, and Adeline, her child, OUTSIDE the COURTROOM & Courthouse in the hallway/lobby where it ensued--extrajudicially contacting Clucas and MODIFYING THE RECORD through UNSWORN statements without either parent's permission or participation. Thus, Heather Wood took exception to jurisdiction, and reserved the objection THROUGHOUT these *fruit of the poisoned tree* proceedings in protest despite her appearance. Similarly, Venue was improper in Kitsap because the child's domicile remained with the legal custodial parent, Heather Wood, who was and remains domiciled in Thurston County. Heather Wood NEVER abandoned Adeline. Adeline refused to leave the Lewis county (Providence) hospital w/her mother, & ran away w/her father who acted in concert w/his daughter to further alienate Adeline's affections from her mother while engaging in custodial interference, i.e. hiding/sheltering a runaway. It should be noted Lenard Feulner himself in his most recent Declaration admits he was not awarded CUSTODY, but residency, and hasn't even abided by that, parenting by phone instead of in person since he does not reside w/the child.

(1) OBJECTION 1: Commissioner Clucas was privately contacted by these two women w/o standing, local attorneys, Amanda Williams and Laura Yelish, who manipulated Clucas into unlawfully recalling the case w/o due process, notice, or 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 continues to take exception on the record to this outrage and lawless Kangaroo hearing.

Heather Wood, the complaining mother in this instance continues to take exception on an 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 forced into her Parenting Plan Petition she subsequently withdrew given the Kangaroo nature of the proceedings. Moreover, as a matter of law, the above captioned cause number, a Petition by the mother for a parenting plan was withdrawn and confirmed as withdrawn by judge Adams, after recognizing the mother had served notice on all parties she had withdrawn her petition effective immediately. I.e. Procedurally, there exists no Petition by the mother to be joined to Lenard Feulner's de novo Petition for a parenting plan, thus requiring either a new case # to distinguish it from the rubbish pile he created in the above captioned cause number, now defunct/dismissed. Ms. Wood objects to Lenard Feulner's attempt to further his trashing the record, ambiguation and abuse of process. If he chooses to file a de novo petition, he is required to strictly adhere to original procedural requirements. He has yet to do so.

Mr Feulner may file under the original cause number brought on by the State of Washington as the Petitioner in 2007 or file under a NEW cause # issued by the Kitsap County Clerk's office as a parenting case. Procedurally, he should file as the Petitioner in that new cause # for a parenting plan, allowing for discovery and the full exercise of Due Process by the parties instead of the court acting as a shadow litigant and knight errant for the at risk child, Adeline Feulner.

(2) OBJECTION 2: Heathet Wood Objects to the use of the same cause # for Lenard Feulner's Petition De Novo for the reason it continues and adds to intolerable confusion and ambiguity created by Lenard Feulner as well as the Court Clerk--Leaving a mountain of facially substantively defective documents in the cause #07-3-01713-1 record which remain. Lenard Feulner's Petition De Novo must be severed from the #0732-01713-1 case number in order for a clean record and proper jurisdiction to be established.

**RESPONSE to Lenard Feulner's Petition De Novo
(Re paragraph numbers in said Petition)**

1) ☒ admitted; ☐ denied; ☐ insufficient information

2) ☒ admitted; ☐ denied; ☐ insufficient information

3) ☒ admitted; ☐ denied; ☐ insufficient information

4) ☒ admitted; ☐ denied; ☐ insufficient information

Mr. Feulner's sworn statement here is infuriatingly contradictory to all of his prior misleading statements made in his sworn declarations and arguments heretofore. This and other deceptions should be a basis for impeaching his assertions/claims made before the Court. *Falsum in uno, Falsum omnibus.*

5) ☒ admitted; ☐ denied; ☐ insufficient information

The child, Adeline, does not, in fact, actually live w/Mr. Feulner.

6) ☐ admitted; ☒ denied; ☐ insufficient information

It is absolutely false to claim my child, Adeline, is living in Mr. Feulner's home. She lives in an RV parked on her grandmother's property. Mr. Feulner lives w/his girlfriend in a separate residence some distance away. He sleeps and eats there. Nor does Mr. Feulner have my consent for this arrangement. My daughter uses drugs (marijuana) as does Mr. Feulner over my objections. She tests positive for drug use as does Mr. Feulner. She has been filmed urging her 14yo girlfriend to snort a white powdery substance posted online, receiving Nazi tattoos from another child consisting of a penis and swastika, and complains her father discourages her eating—i.e. reduces her caloric intake. I would never agree to allow my underage daughter to live w/her father because he raped her when she was barely 6yo—french kissed her for his own sexual gratification and I learned of it in 2013 (filed a police report) when Adeline complained to me of the incident. Moreover, Mr. Feulner admitted the act to the Kitsap County Sheriff's detective who investigated the complaint. But he has denied it to the Court in his declarations and coached my daughter to follow suit. I intend to produce this detective as a witness to Lenard's admission regarding the incident to impeach him. He cannot be taken at his word and often contradicts himself because he can't keep his mendacity straight.

What is most harmful to Adeline is she is not being currently parented/supervised and Mr. Feulner admits he parents her by phone. Irrefutable evidence demonstrates she swam in Long lake in the nude on Halloween night, 2023—a school night. Nor does Mr. Feulner appear to prevent her from vaping or tattooing other children. Mr. Feulner meets the legal definition of an unfit parent. My daughter will be lucky to survive his so called 'parenting'—and is desperately in need of a structured environment.

Mr. Feulner repeats the lie he lists here in his pleading often. I did NOT have an 'outburst' either inside the court or outside of it or the Courthouse. It was my daughter who had the outburst as well as drove her father's car onto a public sidewalk, endangering herself and the public. I have audio tapes from the Court Clerk and a police report proving the same. Adeline, herself, admits 8-15-23 wasn't her best day. She can be heard disrupting a separate Court proceeding, Commissioner Clucas presiding, yet Mr. Feulner continues to repeat this falsehood to the Court. I need a meaningful continuance/setting of a trial date beyond 7-1-24 to exercise Discovery, interrogatories, and the subpoenaing of witnesses to expose Mr. Feulner's mendacity and unfitness as a parent. My child's criminal misconduct is clear evidence she is not being parented/supervised adequately. Nor is Mr. Feulner an expert or even adequately educated to opine on my fitness to educate my daughter, care for her emotional needs, and help her transition to a healthy law abiding adult. I have a 4-year degree from TESC and am currently struggling to complete a master's degree. Mr. Feulner does nothing to educate my daughter other than to enable her scofflaw behavior as he is a scofflaw himself, devoid of good judgment regarding appropriate boundaries for children and young girls as mentioned above.

7) ☒ admitted; ☐ denied; ☐ insufficient information

8) ☐ admitted; ☒ denied; ☐ insufficient information

My daughter does NOT live w/Mr. Feulner at all. She lives in an RV outside her 94yo grandmother's house. Mr. Feulner lives w/his girlfriend and does not supervise Adeline. She is a very at risk immature for her age youth. Mr. Feulner has a lasting brain injury making him prone to accidents and has been diagnosed with CNS neurological developmental disability. He also molested my daughter at 6yo.

9) ☐ admitted; ☒ denied; ☐ insufficient information

There has been no change in my ability to parent/accommodate my child's needs. Mr Feulner is incapable and unwilling to provide for our daughter, literally threatening me when I've previously asked him to assume more financial responsibility. Mr. Feulner has previously repeatedly hidden his income.

10) ☐ admitted; ☒ denied; ☐ insufficient information

Mr. Feulner's request is unreasonable because he cannot provide the care my daughter needs under the best of circumstances and is unfit to parent her, nor is he parenting her now, nor does she reside w/him.

11) ☒ admitted; ☐ denied; ☐ insufficient information

I do want a protection order for myself and my daughter, including from her associates who tattoo her and furnish drugs to her.

12)[x] admitted; [] denied; [] insufficient information

I do want a restraining order for myself and my daughter, including from her associates who tattoo her and furnish drugs to her.

13)[x] admitted; [] denied; [] insufficient information

14)[x] admitted; [] denied; [] insufficient information

My family is very interested in spending time w/my daughter and love her. Mr. Feulner has spent less than 1% of his time with my daughter during the past 16 years and continues to 'phone it in'. He even has my daughter paying for his ski trips. I have a receipt demonstrating this fact.

15)[] admitted; [x] denied; [] insufficient information

A partial truth—Mr. Feulner evades the fact the State of Washington had to sue him (case #07-9-03531-9 & 07-5-00352-8) in a parentage case to establish paternity in 2007 and obtain a child support order.

16)[x] admitted; [] denied; [] insufficient information

The mother is opposed to any such change for all the reasons cited above.

17)[] admitted; [x] denied; [] insufficient information

For all the reasons cited above, the mother is opposed to the relief Mr. Feulner requested and wishes to exercise her right to Due Process in full including Discovery, depositions, live testimony, witnesses and subpoenaed documents along w/interrogatories. The mother requests a trial be set after 7-1-23 to allow for the meaningful exercise of these rights.

Mr. Feulner's statements cannot be relied upon and many amount to perjury inasmuch as he contradicts himself under oath in the same proceedings where both statements cannot be true.

I declare under penalty of perjury of 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.

DATED this 4th day of March , 2024, in the County of Thurston, WA.



Heather Wood, pro se, mother

Respectfully submitted,

Heather Wood

Heather Wood, pro se, mother

DATED this 4th day of March, 2024, in the County of Thurston, WA.