

Superior Court of Washington, County of Kitsap

In re: The Emancipation of

Adeline Marylynn Feulner

DOB: 6-2-07

No. 23-2-01534-18

Counter-Declaration & Objections of
Heather Wood to Adeline Feulner's
Declaration(s) Filed 8-30-23

(PTE)

Counter-Declaration & Objection(s)

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

Adeline Feulner, Respondent, 4101 Anderson Hill Rd. SW, Port Orchard, WA 98367,
adelinewolfpaw@gmail.com (360)206-3209, (415)300-6801, (360)206-3209.

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:

JURISDICTION & VENUE

This Cause is properly within Kitsap County's Family Court subject matter and in personum **jurisdiction** due to the minor child's birth and both litigant's residency in Washington State, However, the **venue** is improper and belongs in Thurston. County because the child's (Adeline's) Domicile is in Thurston County which is the mother's Domicile by law and by virtue of the fact she remains the person w/sole lawful custody of Adeline pursuant to an order entered in Case # 07-5-00352-8, a Kitsap Superior Family Court parentage action, in re: Parentage: State of Washington, Petitioner, vs. Lenard Ray Feulner and Heather L. Wood, signed 11-15-07. That binding Court order designating the mother (Heather Wood) as the exclusive custodian of her only child, Adeline remained undisturbed until an lawless impromptu Kangaroo Court was convened by Court Commissioner Clucas on 8-15-23 AFTER the Commissioner had denied Lenard Feulner's MTSC and disposed of the matter, dismissing the litigants, Wood and Feulner,

leaving, at that point, Ms. Wood's lawful sole custody of Adeline, the child petitioner in this instant case, undisturbed and intact—UNTIL Commissioner Clucas, sua sponte, w/o any notice or consent, colluded w/two local attorneys well known to him, to punish Ms. Wood for the altercation outside his courtroom caused by the uncontrollable child's, Adeline, refusal to abide by the Court's ruling and her mother's directive to return home w/her immediately, Adeline having been w/her father since 7-20-13 w/o the mother's consent. Because the Kangaroo Hearing on 8-15-23 was convened and conducted by Commissioner Clucas w/o a scintilla of Due Process or even the color of State law, it was w/o proper jurisdiction and Void Ab Initio along w/every putative order, setting, finding, or any respect ordinarily required by law. Thus, proper jurisdiction and venue remains in Thurston County, the Domicile of the child now improperly before this Court in this Venue.

- (1) **OBJECTION 1:** The Child Petitioner (Adeline) uses most of her time denigrating her mother—a mature act, to be sure, for the proper purpose of an Emancipation Petition. She also illustrated, in her Declaration(s), her maturity and ability to support herself by outlining her plans to have an assortment of friends and relatives take responsibility for her living expenses by allowing her to couch surf in their abodes. “I’ve always depended on the kindness of strangers.” -Blanche DuBois in *Streetcar Named Desire*—Nor is the text of Adeline's Petition/Declaration(s) in her own handwriting or words.—another surefire indication of maturity, ability, and judgment.

AS A PRELIMINARY MATTER, it is required to resolve the challenge to proper jurisdiction/venue in this cause before it can proceed further. It is also a fact the mother, Heather Wood, never received or was served a Summons. There is, in fact, as of this date, no Return of Original Service on Heather Wood at all. The mother, Heather L. Wood, notes and takes particular exception to seeing Commissioner Clucas listed as presiding as the Emancipation. Hearing Judicial Officer scheduled for 10-6-23 @ 1:30pm when he was the very same Commissioner who convened the impromptu lawless Kanagaroo hearing in this Courthouse on 8-15-23 re Cause #07-3-01713-1, Kitsap Superior Family Court. Clucas cannot be an unbiased fair Court Official presiding in the 10-6-23 setting when he was the very person who unlawfully w/o proper jurisdiction, interfered w/my custody of Adeline and summarily stripped me w/o authority or jurisdiction of my parental rights—a tort and criminal act done in collusion w/two local attorneys well known to him, Amanda Williamson, esq. and Laura Yelish, esq.—neither having any standing or connection to that (07-3-01713-1) or this case.

In the Child Petitioner's PTE Pleading on page 1, #1.5, she alludes to having a WSECU bank account as though it was a sin qua non of adulthood. It is not. While it entails a need to act responsibly and w/good judgment, Adeline can be seen to have been coached in her pleadings and Declaration(s) w/handwriting known not to be hers except for her signature. The discrepancy is known to me, her mother, as I taught her cursive, not the public schools. It is also obvious to the untrained eye.

My only child (Adeline) didn't have the wit or good advice (presumed to be her Aunt Debbie's, Lenard Feulner's sister) to take proper steps to avoid having her birth certificate published to the world on Odessey. As an aside, I would ask the Court, sua sponte, to order

Adeline's birth certificate to be sealed from public view in the record by the Court Clerk—a matter illustrating the child's lack of maturity, judgement, and experience to protect herself. My discovery of my daughter's recreational use of drugs also illustrates she is an At Risk Youth vulnerable to others whether they be fools or knaves, peers or predators such as her father who raped her when she was barely 6yo as reported to the Kitsap Co. Sheriff on 6-8-13, report #K13-005713, request for the same pending as of 8-22-23. Ironically, Adeline remains fond of her father, Lenard Feulner, who can be seen in a photo taken by me when Adeline was ~8yo (See attachment(s) '1', et ux).

In the Child Petitioner's PTE Pleading on page 2, #1.6, Adeline references plans to complete her education at New Market High School which is in Tumwater. She offers no explanation of how she plans to support herself or get there other than to rely on the kindness of friends/relatives/strangers ala Blanche Dubois. As her mother, I know for a fact, she is not prepared academically, financially, emotionally, or psychologically for the responsibilities and duties of an adult, nor to support, care for, and protect herself. A child who lies to her mother, and uses drugs recreationally, as Adeline has done, does not have the discipline, maturity, or habits needed to be emancipated. Adeline cannot even be counted on to brush her teeth before setting out in the morning for her day. She has serious health problems such as asthma and dental problems. Adeline has been vaping and fainted on the stairs at Great Wolf Lodge (where she was employed) before she could struggle to the top. This puts others at risk as well, e.g. when she is driving, or serving as a life guard.

Adeline has serious dental problems, but refuses to go to the dentist. The child is currently incapable and disinclined to properly care for herself.

In the Child Petitioner's PTE Pleading on page 2, #1.7, Adeline references getting her driver's license as though doing so made her an adult somehow. Many responsible adults have no driver's license. Adeline is not one of them. Besides unlawfully consuming drugs recreationally as a child, as recently as 8-15-23, Adeline created a disturbance in the Kitsap Courthouse, disrupted a hearing in progress, ran to her father's car w/o an adult (as required while driving w/a learner's permit), started it and began to drive with a person sitting on the fender before driving up onto the sidewalk opposite the Courthouse before being forced to stop after the car's forward movement was arrested by a signpost on the sidewalk. This, and because she had been creating a disturbance honking the car's horn repeatedly caused the police to arrive and order her to step outside the vehicle. She was ordered by the first officer to arrive on the scene to stop the car 3 times, then complied. My child is truculent and incorrigible. Commissioner Clucas has lawlessly and gratuitously rewarded that behavior under aegis of the Kitsap Superior Family Court.

In the Child Petitioner's Declaration filed 8-30-23, on page 1, 1st paragraph, Adeline refers to difficulties w/her mother, omitting they were largely of her own making and mendacity. Adeline claims to recognize the responsibilities of an emancipated adult, but offers no evidence of how she will manage to meet them or even genuine inclination to do so,

suggesting she will depend on the kindness of friends, relatives, or strangers in other portions of her Declaration(s). Her maturity regarding operating a motor vehicle has been comment on above (Supra).

In the Child Petitioner's Declaration filed 8-30-23, on page 1, 2nd paragraph, Adeline refers To moving around a lot w/her mom. While this isn't something most children in military families welcome, my daughter's moves were often at her behest/preference. On other occasions, it was based on my best judgment and my finances. I seldom had a regular job because I was self employed, had two companies and sometimes employees/volunteers or interns which then provided me w/sufficient income to indulge my only daughter, spend thousands of dollars on her violin lessons, her automotive mechanic training, apiary tutoring, art, music, ballet, and piano lessons. I am known in my community as a very protective mother who doted on her daughter. Years went by wherein I set aside my personal social life to focus on my daughter's needs and our relationship. I breast fed this girl until she was ~5yo. I was committed to my daughter almost exclusively to a fault. She was my pride and joy. I love her still.

Adeline continues to denigrate my income and lifestyle as she continues on page 2 of her Declaration filed on 8-30-23. Whether we had to use the fitness center bathroom or had a pot to pee in is immaterial and irrelevant in this action. I am not on trial here or compelled to answer an inquisition into my habits, lifestyle, finances, successes or failures. The ONLY thing to be properly considered by this court is my daughter's maturity and ability in all respects to fully function as an emancipated adult including all of the rights, privileges, and responsibilities that entails. As an expert with respect to my own daughter's development, I assure this court for a myriad of reasons, she is not. It is unnecessary for purposes of this action for me to debate my daughter using this forum as a platform to 2nd guess my decisions as to what we could afford and could not. I note my daughter presumes to depend on others as an emancipated adult. When asked to contribute to our household, Adeline was never financially or functionally independent. Nor is she presently. I have good reason to believe, and in my expert opinion knowing my daughter as well as I do, she did not prepare the paperwork on her own submitted to this court in her name and the words chosen were not her own, nor in her handwriting. The girl expresses resentment for contributing to any of our household expenses. Adeline will very soon discover, if granted emancipated adult status, there are no free lunches in the real world. Nor is it true Adeline was the only one working. Never having had a child, Adeline is woefully unaware being a single mother is a full time job in itself. I engaged in a daily work search mandated by the TANF assistance program which didn't provide quite enough income for our survival, hence my requesting Adeline to help somewhat in the endeavor. Her help was de minimis. I admit I indulged my daughter so much, I regret it now as having ultimately been ultimately counter productive.

Adeline dissembles in characterizing my Uncle Jack Watkins as allowing "us to occasionally stay in a room in his house so we could use the bathroom." This is a patently false misleading statement. The truth is My uncle Jack and his sons (Casey, Luke, and Tristan) moved my daughter, I and all our possessions, my kiln, including our piano and car on a flatbed trailer all the way to Port Orchard where they furnished Adeline and myself w/2 bedrooms and 2 bathrooms—not

“occasionally”, but full time quarters w/home cooked meals replete w/prayers. I gladly paid my uncle rent to help out until he developed 4th stage cancer and a plumbing failure destroyed much of their floors and walls requiring us to remove all of our belongings a year later so the insurance company’s contractor could repair the extensive damage. The point is not my uncle’s generosity, but Adeline’s juvenile mendacity and ingratitude in mischaracterizing the extent of my uncle’s generosity, may he RIP. He taught Adeline how to use a bow, rifle, taught her how to fish, track game, took her out on his fishing boat many times, taught her to read the Bible and to have faith in God. In short, he mentored her in the twilight of his life, but Adeline refers to him as though she and her mother were treated like disfavored strangers which is so far from the truth as to call into question her respect for the truth or the maturity to have it. An adult does not carelessly slander their benefactor. I maintained section 8 housing for over 10 years.

“This has been the way we lived for as long as I can remember.” -Adeline Feulner in her Declaration- Adeline may need a clinical evaluation for neural damage, possibly due to her marijuana use if her memory is that bad. It isn’t true. I recommend d the Court order Adeline to submit to a hair analysis for long term drug use evaluation considering her sworn statement in her Declaration. Should it reveal long term drug use, the Court must consider it’s impact on an analysis of Adeline’s suitability for an Order granting emancipation .

I did revoke my permission for Adeline’s underage employment at Great Wolf Lodge because I knew as her mother it was not in her best interest to continue working there due to the trouble she was getting into using drugs. (Troxel v. Granville)

In the Child Petitioner’s Declaration filed 8-30-23, on page 2, 1st paragraph, Adeline refers to her dad’s presence/visitation as being restricted by her mother. Adeline has been eerily fond of her father for many years. When she was barely 6yo, she returned after a visit w/her father to our home, and was uncharacteristically scowling/glaring at me from our kitchen table. I asked what was wrong. Adeline told me her father said my gods were evil and I was going to Hell. He described where Hell was and drew a map to illustrate its location for her. The next day, she described a game her father, Mr. Feulner, played w/her he called ‘kitty-kat’ and how he would lick her face all over until he unexpectedly kissed her full on the lips and stuck his tongue down her mouth. I reported this incident to the Kitsap County Sheriff’s office in report K13-005713 on 6-18-13, copy request pending. This penetration of my daughter’s oral cavity w/Mr. Feulner’s tongue meets the legal definition of child rape for which there is no current statute of limitations in WA. State. I believe as an exper observer of my daughter’s development, she fails to recognize/appreciate the significance/ramifications of Mr. Feulner’s act. Will she assume this is normal behavior any young daughter’s she might have should tolerate/accept? I believe even now her father is grooming her.

In the Child Petitioner’s Declaration filed 8-30-23, on page 2, 2nd paragraph, Adeline refers To her father living on his mother’s property where she and her maternal grandmother reside at 4101 Anderson Hill Rd, SW, Port Orchard, WA 98367. This is not true and Adeeline is well aware her father spends his nights sleeping at his girlfriend’s section 8 apartment as he has done for 30 years. He uses his mother’s address as a legal fiction to evade process and collect public benefits. This is the environment Adeline has chosen over

mine after a lifetime together. Mr. Feulner has never voluntarily supported Adeline on his own and consistently resisted/delayed Court ordered child support, yet has succeeded with the support of his family in alienating my daughter's affections from me aided and abetted by Commissioner Clucas' unlawful actions in his impromptu Kangaroo Court on 8-15-23 prompted by Adeline's public disturbance outside his courtroom which he blames me for.

In the Child Petitioner's Declaration filed 8-30-23, on page 2, last paragraph, Adeline refers to her mother in a consistently negative light and emphasizes their differences/arguments and excited utterances. Absolutely none of that is material/relevant to an analysis of Adeline's suitability for an order of emancipation from this Court, which must assess her maturity, means of support, rectitude, willingness to be responsible for her actions, truthfulness, and compliance with the law. Adeline fails to meet most, if not all, of these parameters and the paragraph is relevant only to the extent much of it is inaccurate or fraught with material omissions. If I erred in a tentative agreement to approve of Adeline's bid for emancipation, it was prior to my discovery she had been deceiving me and was putting herself at risk physically and chemically. I now recognize my misjudging her maturity as it was a fraud and posturing. My daughter cannot be trusted at her current stage of development.

In the Child Petitioner's Declaration filed 8-30-23, on page 3, 1st paragraph, Adeline refers to bickering and arguing w/her mother. As our disagreements have no relevance to a determination of Adeline's maturity as cited above (Supra) or lack thereof, I need not respond to her assertions at all given their immateriality except to note her admission/fear the uranalysis from the hospital where I took her on 7-20-23 would return a positive test result for exposure to marijuana, which it did, in fact. I furnished a copy to Adeline's employer, the Great Wolf Lodge where she was responsible for children's safety in its swimming pool and water slides, a duty she could not reliably perform under the influence of drugs. Moreover, I revoked my permission for her to work there given she was using drugs recreationally and unlawfully. It remains unlawful for minors to engage in recreational drug use in WA. State. Adeline admits the hospital drug test was positive. What she appears to fail to understand in her feckless and false defense is CBD (a pain relieving component of marijuana) does not return false positives. Were Adeline better educated or further along in her academic achievements, she'd have been better equipped to mislead this Court. As it is, she falls short of that goal, revealing her immaturity and mendacity in the ill conceived bargain. Nor is this a divorce court or replevin action more appropriately forums suited for property disputes. Such property disputes are not properly before this court or being adjudicated in this forum. They are immaterial for that purpose here and should not be considered, nor to the speak to the child Petitioner's maturity or other factors properly used in a calculus of the child's maturity, ability, and willingness to accept all her rights, privileges, and responsibilities of an emancipated adult. Adeline refused to return home with her mother after being exposed in the drug test her mother subjected her to. In this instance, the child had no legally proper expectation of privacy from her mother's discovery of Adeline's pattern of illicit drug use. Shocked excited utterances prompted by wounded emotions and feelings of betrayal attributed to the

mother are irrelevant for Emancipation Petition purposes, but regretted in retrospect by Ms. Wood w/20:20 hindsight.

In the Child Petitioner's Declaration filed 8-30-23, on page 4, 1st paragraph, Adeline refers To more property claims/disputes between her and her mother. Those claims/disputes are not properly before this court and have no bearing on a proper analysis of the parameters determining the child's suitability/eligibility for an order of emancipation replete with all its perils for the young and unwary. Ms. Wood is not required, in that lught, to respond to the, and given their irrelevance and immateriality to the issue properly before this court, chooses not, to do so. She does, however continue to **object to the presence or presiding over any proceeding connected to herself or her daughter by Commissioner Clucas** who unlawfully has acted as her inquisitor, persecutor, punisher, and enemy in a Kangaroo Court he summarily convened w/o warning or a scintilla of duje process, let alone color of State law.

In the Child Petitioner's Declaration filed 8-30-23, on page 4, last paragraph, Adeline refers to and admits much of what Heather Wood has already declared above (Supra) in this document, including e.g. Adeline's father filed for an emergency ex parte MTSC restraining order scheduled and heard before Commissioner Clucas on the morning of 8-15-23 [Room 206]. Adeline admits that order was denied and she was told to return to her mother, Ms. Wood. Adeline also admits she was w/her father since 7-20-23 and had not spoken to her mother in all that time despite the mother's several attempts to contact/speak w/her child, Adeline. i.e. NO Emergency existed justifying the emergency ex parte motion and emergency ex parte order issued by judge Houser on 8-4-23 in case #07-3-01713-1 w/never any notice given to Ms. Wood until the day prior, 8-14-23 who arrived feckless, w/o counsel or preparation on the morning of 8-15-23. All of the Respondent's submissions from and including 8-4-23 through today have been facially defective and inadmissible in that cause. Nothing Adeline cites in the post heaing Courthouse altercation was even distantly an abuse of Heaher Wood's parental authority over her child, unlike Commissioner Clucas' abuse of his position in the ensuing impromptu lawless Kangaroo hearing he held later that same morning w/o notice or any leal authority or consent to/from the parties as escribed in Heather Woods motion to recuse denied by Commissioner Clucas on 9-1-23 and now proposed by this Court to preside over Adeline's Emancipation Petition Hearing.

The child Petitioner in this cause also admits violating her learner's permit by driving her father's car up onto the sidewalk w/o an adult in the vehicle. Adeline also admits she was present or given knowledge of the proceedings in which Commissioner Clucas excoriated her mother as the proximate cause of the commotion outside the courtroom even though the child admits in her declaration on numerous dates and on 8-15-23 she defied her mother's authority including refusing to return home with her mother after her recreational use of illicit drugs was exposed through the hospital drug testing her mom orchestrated.

In the Child Petitioner's Declaration filed 8-30-23, on page 5, 1st paragraph, Adeline refers to being a passenger in an auto accident resulting in an injury to her, a settlement w/the responsible party's insurance company pending. Adeline expresses relief in her declaration upon learning from the attorney representing her interests in that case her mother would be blocked from any settlement funds reached through stipulation between the parties. Thus, no facts contained within the paragraph have any value or relevance to the issue before this court, the Emancipation requested by the child Petitioner. Any discussion referenced her as a private matter between the child Petitioner's mother and her child. They should be redacted and stricken from the record posing the risk they do for attracting predators to the child and defrauding her of any settlement funds that may reach her...especially were she to be emancipated when her judgment and maturity are impaired,

In the Child Petitioner's Declaration filed 8-30-23, on page 5, 2nd paragraph, Adeline refers to her mother's actions as "the kind of cruel and manipulative behavior that I grew up with." While untrue, this statement flies in the face of overwhelming declaratory, documentary, and photographic evidence submitted to the contrary. Adeline then proposes she can depend on the kindness/charity of relatives/friends to sustain herself as an emancipated adult. She provides no evidence of her actually supporting herself in the 2 years she cites, only bare assertions. Adeline's own declaratory admissions and contradictions speak for themselves in undermining her claim to be mature enough to fend for herself as an emancipated adult rather than depend on the kindness/charity of others and public funds to do so. The girl didn't have the wit in this action to protect her own birth certificate from public view, even while being coached. This Court would be doing this feckless defiant incorrigible child no favors were it to grant her an Order of Emancipation. The Court should order the child to provide a hair sample for drug analysis immediately to make its determination and analysis of Adeline's eligibility for Emancipation, a condition she is developmentally ill prepared for.

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.

Signed at (city and state): Rochester, WA.

Date: 9-10-23



Signature

Heather L. Wood
Print or type Name

Attachments '1', et ux below of photos of Adeline, her father, and her mother:









Counter Declaration of
Heather Wood, Mother

Counter-Declaration & Objections Heather Wood, (360)999-8493
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