

**14-3-00778-8**

(	<b>Annette M Roth</b>	)	
(	petitioner	)	
(	v.	)	<b>Declaration</b>
(		)	<b>of Stephen Hicks</b>
(	<b>Stephen K Hicks</b>	)	in support of
(	restorer	)	<b>Proposed Parenting Plan</b>

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**STEPHEN K. HICKS’  
DECLARATION**

I, **STEPHEN HICKS**, being first duly sworn, depose, say, and declare by my signature that the following facts are true, and not meant to mislead to the best of knowledge and belief.

I was married to Ms. Annette M. Roth, a very abusive alcoholic, for over 17 years. We have a son, Lucas M. Hicks, now 10 years old. I have always considered being a Father to my son the most important, most spiritual relationship of my life.

The conditions imposed by the current parenting plan and [DVPO] have compromised my son Lucas’ relationship with me, and have exacerbated the concerns I have about his mother, Ms. Annette Roth.

Some of the subject matter has been difficult for me to discuss openly. In the past, Ms. Roth often becomes highly volatile when these issues are spoken of. I am deeply concerned about collateral damage to our son Lucas resulting from Ms. Roth’s reactions to my statements.

Ms. Roth has made attempts on my life via strangulation, punching and hitting, and has been severely psychologically abusive over the years. My personal inquiries into her past have triggered violent reactions, assaultive and coercive behaviors. Her abusive use of conflict was often perpetrated in front of our son, which was the most frightening factor for me. She has used coercive tactics under threat of her leaving and taking our son away. Our DV case has been an extension of her abusive strategy, estranging me from our son and wrongly painting me as a violent drug addict and the cause of our conflict.

Ms. Roth is an extremely high conflict individual. Her use of conflict and her ongoing abusive litigation has seriously compromised my relationship with my son.

I care deeply about my son. Lucas and I were bonded before the PPO was put in place. Unfortunately, Ms. Roth has shown every indication of her intent to permanently estrange me from our child:

#### FACTS

- Mr. Hicks has no prior history of violence and has no criminal record.
- Mr. Hicks has passed several drug evaluations revealing the frivolous nature of Ms Roth's allegations.
- Mr. Hicks provides an evaluation by Gary Kolb, Psychiatrist, PhD. whose professional recommendation was for anger management rather than DV treatment.
- Mr. Hicks completed 12 weeks of anger management treatment under Mr. Phillip Griffin LMHC, and filed Mr. Griffin's determination in support of Mr. Hicks' reunification with his son under a new parenting plan.
- Mr. Hicks has submitted himself voluntarily to more psychological evaluations with another PhD, and will provide those reports upon completion, to further satisfy the courts requirements and in support of a prudent reunification process under his submitted proposal for a new parenting plan.

- Ms. Roth has brought a total of four(4) erroneous and frivolous criminal charges against Mr. Hicks over the past 3 years. As of March, 2019, The Thurston County District Court has dismissed all four(4) counts, with prejudice.
- Ms. Roth has used abusive litigation tactics, has falsified documents and has submitted those and other perjured documents to the court in a collusive effort to deprive Mr. Hicks of his relationship with his son, and to gain an advantage in their divorce case and subsequent parenting plan.

Ms Roth continues to claim fear as her very best offer to the court. However the court must consider her fears of me are misdirected and unwarranted. Ms. Roth is extremely abusive herself. Ms. Roth grew up in a very abusive household, and suffered at the hands of an abusive alcoholic father and her sexually deviant brother, Robert. Her fears may be real, but they extend from issues involving her family, not me. Ms. Roth's fears are the most significant factor threatening the psychological outcome of Lucas' short and long term health. Ms. Roth's fears are perpetuating Lucas' estrangement from his father.

It appears likely Ms. Roth's abusive use of conflict will continue. There is also a threat it may increase as I gain more time with our son Lucas. Therefore the court needs more information regarding Ms. Roth's mental health and her issues regarding violence and alcohol use. A Psychiatric evaluation concerning possible personality disorders stemming from the violence in her household growing up is prudent. This evaluation should be done by a PhD who specializes in these specific issues. This must be done by an independent third party, chosen from a list which I have provided.

Also, a 2 week random UA testing for alcohol, barbiturates and opioids is requested, as it can provide the court with more contextually relevant information. Weekly meetings with AA are strongly urged and can only help mitigate some of the possible conflict towards Stephen in the future.

Additionally, I find it unconscionable that Ms Roth's attorney has also behaved abusively towards me. Ms. Hall has overtly threatened me in the hallway of the courthouse, used abusive

and threatening language in emails, and submitted falsified documents into the court record, in attempts to deceive the court. Her undue influence in these circumstances, professional influence over staff within the administrative clerk's offices, and her malicious tactics are completely unprofessional and unacceptable. Since I have not been able to afford my own attorney throughout this case, I feel that there has been an extremely biased review of the facts and I have not received a fair trial. I believe Ms. Redford-Hall has been a serious detrimental influence in this case. She has knowingly entered falsified and perjured documents into the court record and behaved provocatively towards me on many occasions, presumably to try and incite a negative reaction from me. Her over-reaching and broad influence has been entirely unfair to me, and has been a major factor in compromising my relationship with my son. Ms Roth's attorney has also attempted to create a bias with my private health care provider by sending Mr. Phil Griffin LMHC copies of our case files without my consent. This is my health care and the health care of my son and his mother. I consider these malicious tactics. These are attempts to create an unfair bias in the minds of independent third parties and are more threats to me and my son. Collateral contact with Ms Roth's attorney must be strictly prohibited. Any attempts to create an element of unfair bias within either my evaluators, or Ms Roth's evaluators - or both, must be mitigated by the court.

It may be prudent to no longer allow Ms. Redford-Hall to represent Ms. Roth, and sufficient time should be given to Ms. Roth to find another attorney of her own choosing. I truly feel threatened by both Ms. Roth's and Ms. Hall's behavior. The unethical and illegal tactics of Ms. Hall, along with Ms Roth's abusive use of conflict have maliciously prejudiced me to this court and severely hindered the process of justice and peace for Lucas. The bogus criminal charges filed by Ms. Roth - now dismissed, with prejudice, have hurt me and my relationship with our son Lucas, dragging this case out for what is now over four (4) years, which should never have been allowed to happen. I have suffered far too much loss, which unfortunately carries over to Lucas.

One of the most valuable things we can give to our children is TIME. The most important factor in a child's maturation process is the development of self-esteem and reduction of risky behaviors. The most significant contribution to these factors is **parental constancy: TIME**. Time

with those who love and care for Lucas – his parents. BOTH of his parents. We should never do anything to rob him of these bonds.

I have always fully supported Ms. Roth's time with Lucas. I have never, and would never do anything to compromise their relationship. I just want a fair and unbiased approach to these issues. What I ask the court to do for me is fair and prudent. Ms Roth needs to have a review of her behavior, and my request for evaluations is the very least this court can do. I want the very best for Lucas, from both of us. Appropriate evaluations for Ms. Roth will only help the court acquire the relevant information it needs to make an accurate and proper decision for our son.

In my proposed parenting plan I have outlined a sensible, phased-in approach to reconnecting with Lucas, which includes supervised visitation and reunification therapy. This makes sense, as progressively increasing my time with him along with the appropriate therapy will give him the very best we can provide.

In conclusion, I want to convey my regrets for not pursuing this course sooner. Dealing with erroneous criminal charges, false allegations of violence and recovering from the abuse I endured at the hands of Ms. Roth over the last 20 years has been the most challenging time of my life. To be clear, I know I could have handled this situation so much better. I was devastated by the sudden loss of my relationship with my son. I allowed my anger and frustration over Ms Roth's behavior to overwhelm my sense of better judgment. I reacted in anger at times and said things I will forever regret. I want the court to know I was very much afraid and concerned for my family and my son at the time. There were times my reaction to her aggression was unhealthy and only made things worse. We said some very nasty things to one another and I never wanted our issues to compromise our family. I have only ever acted out of love for my son, his mother, and in my own self defense. I have never been a threat to Lucas or Ms. Roth. I am truly sorry it ever appeared otherwise.

This is the truth as I have lived it. I wish I knew then what I know now about redirecting conflict in a healthy way. For this I am truly sorry. I hope one day she sees things for what they



## **APPENDIX A**

### **List of approved providers and evaluators**

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