

Superior Court of Washington, County of Chelan

FILED
MAR 23 2022
Kim Morrison
Chelan County Clerk

In re:

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

ADRIANNE D. YOUNG

And Respondent/s (other party/parties):

ERIK B. CANNELLA

No. _____

22-3 00107-04

Information for Temporary Parenting Plan
(DCLSPP)

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: ADRIANNE D. YOUNG.
- 2. The information on this form is about:

Child's name	Age	Child's name	Age
1. ADELAIDE V. YOUNG	5	4.	
2.		5.	
3.		6.	

- 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?
ADRIANNE D. YOUNG	CHELAN, WASHINGTON	5 YEARS

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

		Yes	No
a.	I have a loving and stable relationship with the children.	X	
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.	X	
c.	I attend to the children’s education, including any necessary remedial or other education.	X	
d.	I help the children to develop age-appropriate social relationships.	X	
e.	I use good judgment to protect the children’s well-being.	X	
f.	I provide financial support for the children, such as housing, food, clothes, child care, health insurance, and other basic needs.	X	

Explain and give examples for each answer above:

A. Every morning, I wake Adelaide up and cuddle with her and set her expectations for the day. We talk about crafts, breakfast, after school plans. I help Adelaide get dressed and, if she is sleepy, I help her brush her teeth and hair. On days or weeks that Adelaide is home, we ebb and flow between together tasks like reading or coloring and independent activities that she can work on and create freely. Presently, we are creating little dinosaur houses out of cardboard boxes. Adelaide feels free to tell me when she is frustrated and scared. She says she loves me as she's climbing over furniture, boulders, and logs. She calls for me at night when the cats are acting like poltergeists. I help Adelaide navigate her school social issues and answer her many questions about "what would happen if" and "why is it that." Adelaide rarely has a meltdown, is rarely angry, and is game to make the moment better with a few deep breathes. She demands that I tickle her at least once a day and we wrestle just as often. Lots of our time is spent talking about cats and how to care for animals with integrity. Sometimes, we are quiet and we cuddle on the couch. Sometimes we just run and scream around the house. We sing and dance daily. We share a sense of humor.

B. Throughout the COVID Pandemic, I have been Adelaide's entertainment, educator, compassionate playmate, and caregiver. I have been Adelaide's sole caregiver and provider since 04/01/2019. I book and take her to all doctor's appointments. I take care of her when she is sick and reset her elbow when it is out of joint. I have signed Adelaide up for Leavenworth U6 Soccer and after school Spanish class. Because of COVID restrictions/closures/infection this school year, Adelaide's school attendance has averaged less than two weeks of school a month this school year. We meet up at the park with her school-age friends. Adelaide is up to date on all vaccinations, dental, and medical checkups.

C. Our daily schedule involves reading, video research, and early learning using Osmo and Duolingo ABCs. I help Adelaide practice her letters and spell words by sounding them out. I am in weekly direct contact with Adelaide's Pre-K teacher. We have started seeds for the garden and Adelaide loves learning from me about how things grow.

D. We have a special Wednesday morning before school breakfast and school drop off routine. In the summer, we have a standing Wednesday afternoon playdate at the river. We attend birthday and holiday parties with Adelaide's former Mountain Sprouts friends. When Adelaide is not sick or quarantined, we go to the park. I have been conscious about building a local community of friends, neighbors who are early childhood development professionals that will care for Adelaide if I am sick and advocate for Adelaide into her adulthood, and provide community as she grows and gets her first job.

E. I rarely socialize after dark and keep our social interactions limited to families with children or those who work in child education. Only close friends come to my house and I do not spend the night away from Adelaide unless she is in the care of a trusted family member that she has stated that she is comfortable with.

F. I work early morning hours and late evening hours as a freelance writer to pay for housing, food, educational materials, and books. I own a private dining company that is booked for the whole of July and some of September. I have access to ample financial support at the asking. I provide the chore money that Adelaide saves up for toys and we donate old toys in order to buy new ones. _____

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

Monday	Tuesday	Wed.	Thursday	Friday	Saturday	Sunday
4AM - 6AM 7:30AM-3:00 PM	4AM - 6AM 7:30AM-3:00 PM	4AM - 6AM 7:30AM-3:00 PM	4AM - 6AM 7:30AM-3:00 PM	4AM - 6AM 7:30AM-3:00 PM	9PM - 11PM	4AM - 6AM

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*): 11/1/20_ 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>): ERIK B CANNELLA_____		Yes	No
a.	Has a loving and stable relationship with the children.		X
b.	Takes 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.		X
c.	Attends to the children's education, including any necessary remedial or other education.		X
d.	Helps the children to develop age-appropriate social relationships.		X
e.	Uses good judgment to protect the children's well-being.		X
f.	Provides financial support for the children, such as housing, food, clothes, child care, health insurance, and other basic needs.		X

Explain and give examples for each answer above:

A. While at one time, Erik and Adelaide enjoyed a fun, dynamic, and loving relationship it has never been free from his consumption of alcohol. Since his last visit on 01/22/2022, Adelaide has not asked to see her father or chat with him on FaceTime. While visiting Adelaide in Leavenworth on 01/22/2022, Erik was intoxicated on alcohol to the point of failing to remember an extensive conversation we had earlier in the evening and then failing to recognize me – his mate of 14 years – at the end of the evening. Erik was negligent of Adelaide’s care, leaving her undressed and under-fed in favor of texting, calling and video chatting accusations that I “beat” and “raped” him.

Erik has stated on several occasions that he does not care what conversation Adelaide hears and that “She can handle it.”

Erik has stated that since Adelaide is a child of my act of “raping” him, he has a problem connecting with Adelaide.

Adelaide has stated that she does not want to be alone when she is talking to her father.

B. Erik is not involved in Adelaide’s daily life and by his own admission is unable to remember conversations and agreements we have made about her care or her future. Many of Erik’s text messages to me about his mental health and mental state reflect an inability to care for himself.

C. Erik is not involved in Adelaide’s school or education and has not taken an active role in purchasing educational games, books, or subscriptions since September 2020.

D. Erik is not involved in Adelaide’s social life and does not have contact with other parents.

E. On 01/22/2022 Erik was intoxicated on alcohol and drove with Adelaide in his vehicle from Dempsey Road in Leavenworth to Icicle Brewery in Leavenworth and then back again.

F. Erik has not provided meaningful financial support for Adelaide. Since August 2021 until January 2022, Erik has sent an average of \$200/month mostly to pay for shared expenses such as telephone, health or car insurance. He has contributed very little to Adelaide’s direct well being.

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

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

For the past 12 months or longer.

X 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
School Days: 6 AM up, breakfast, dressed 7:00 Bus 3:20 Bus 3:30 Home No School 7AM Up, breakfast, 9 AM Self play Outside/ Errands 11:30 Clean up 12-1 PB & J Lunch 1-2:30 Playtime 2:30-3:30 Clean up. 3:30: Snack 4:15: chores then iPad 5:30 Chicken Dinner 6:30: Movie/ Dancing/Art 8PM Books, Teeth & PJs, mediation. 9PM Asleep	School Days: 6 AM up, breakfast, dressed 7:00 Bus 3:20 Bus 3:30 Home No School 7AM Up, breakfast, 9 AM Self play 10 snack 10:30 Outside. 12-1 Lunch 1-2:30 Playtime 2:30-3:30 Clean up. 3:30: Snack 4:15:chores then iPad 5:30 Taco Dinner 6:30: Movie/ Dancing/Art 8PM Books, Teeth & PJs, mediation. 9PM Asleep	7-8:05 Up and Doughnut Breakfast Date. Drop off School: 8:05-2:25 Or 10AM Late Start Or 8:05 - 12:00 Playdate. 12-1 Lunch 1-2:30 Playtime 2:30-3:30 Clean up. 3:30: Snack Playdate. 6:PM Dinner and movie 8PM Books, Teeth & PJs, mediation. 9PM Asleep	School Days: 6 AM up, breakfast, dressed 7:00 Bus 3:20 Bus 3:30 Home No School Days: 7AM Up, breakfast, 9 AM Self play 10 - 11:30 Outside/ Errands 12-1 Taco Lunch 1-2:30 Playtime 2:30-3:30 Clean up. 3:30: Snack 4:15: chores then iPad 5:30 Sushi / fish Dinner 6:30: Movie/ Dancing/Art 8PM Books, Teeth & PJs, mediation. 9PM Asleep	6 AM up, breakfast, dressed 7:00 School Bus Home 3:30 Home Days: 7AM Up, breakfast, 9 AM Self play 10 snack 10:30 Outside. 12-1 Lunch 1-2:30 Playtime 2:30-3:30 Clean up. 3:30: Snack 4:15: chores then iPad 6:PM Dinner 6:30: Movie/ Dancing/Art 8PM Books, Teeth & PJs, mediation. 9PM Asleep	7-9:00 Up and Breakfast 9:00 Errands 10: Snack 11 - 1:30 Cook, bake, eat. or Playdate 1:30 - 3:00 Craft, bake, Play. 3:00-3:30 Clean up. 3:30: Snack 4:15: TV 5:30 Chili Dinner 6:30: Movie/ Dancing/Art 8PM Books, Teeth & PJs, mediation. 9PM Asleep	7-9:00 Up and Breakfast in the movie nest 9:00 Art Project, house project, birthday party or playdate. 10: Snack Playtime 11 - 1:30 Cook, bake, eat. 2:30-3:30 Clean up. 3:30: Snack 4:15: TV 5:30 Pizza Dinner 6:30: Movie/ Dancing/Art 8PM Books, Teeth & PJs, mediation. 9PM Asleep

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

RCW 26.09.194(1)
Mandatory Form (05/2016)

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:

A Adelaide does not want to be alone when she talks to her father on video chat. On 2/15/2022, the last time Adelaide spoke with Erik, he disparaged and accuse me of keeping Adelaide "away from her family" instead of talking and bonding with her.

B On 12/8/2021 Erik texted "I am moving in with my parents or killing myself 50/50"

On 12/9/2021 at 11:05 AM, Erik texted "Thank you It's this brain thing I am not blaming I don't care I am having a massive issue of staying above earth No one is to blame Unfortunately you are my person " and "I am not long for this earth Thank you for the kind words Just lost my credit Cards Drivers license I am done"

On 01/11/2022 After many conversations about the matter, Erik asked about my 5-year plan for Adelaide. When I told him again that we were staying in Leavenworth, he texted, "Thanks for reminding g me My brain doesn't work the same way So it goes E"

C. During the last teacher's conference on 10/29/2021 Erik monopolized the meeting by repeating statements about my parenting.

E. On the afternoon of 09/23/2021, Adelaide was visiting Erik in Seattle when she exasperated her Nursemaid's elbow – an annular ligament displacement – which immobilized her left arm. Despite knowing that she was immobilizing pain, Erik did not provide or buy pain medication for Adelaide until the next day. He did not seek medical attention for her entire four-day visit and returned her to my care on 09/26/2021 untreated, in pain and unable to use her arm.

Erik's repeats accusations in front of Adelaide that I "raped" him, "beat" him, and that I "kill people".

On 01/25/2022 Erik unnecessarily put a stop service on the Chelan PUD account that provides power to Adelaide's residence and left a \$170.00 balance on the account that had to be paid in order to start a new account.

F. After sending money, Erik will repeatedly text with unfounded claims that I cannot care for Adelaide and threatens to "come after me" and "take" Adelaide.

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

Chelan County Sheriff Department Case Numbers related to Erik's extensive alcohol abuse

05/19/2019: 19C04383 WELFARE CHECK.186 Dempsey: While cooking a private event, Erik calls his brother Jean Cannella implying that he has to plans to commit suicide. Jean calls the Chelan County Sheriffs Department. By the time the police arrive at 186 Dempsey, Erik is passed out from alcohol consumption. He contradicts the statements he made to Jean and says he was "just blowing off steam".

02/01/2021: 21C01033 DOMESTIC DISTURBANCE Erik was intoxicated from profound alcohol consumption and becomes verbally abusive, calling me a "bitch" in front of our

daughter. When calmly asked to leave, he refuses. The deputies arrive and I take Adelaide to spend the night in an AirBnB.

01/22/2022: 22C00663: ASSAULT

Erik calls CCSD accusing my boyfriend Leland Holmes of assault. The sheriff's report noted alcohol on Erik's breath. They also noted that he made conflicting statements. Leland Holmes was not charged with assault as no assault took place.

Responding officer Deputy Biggar advised that Erik not be allowed to take Adelaide unless he was sober. Deputy Biggar provided me with information about protection orders.

Physical Threats of Violence and Violent Interactions

On 06/12/2019 at Icicle Center for the Arts, while holding Adelaide in his arms, Erik kicked my feet and ankles while I was carrying a large pot of boiling water. Erik elbowed me while I was using a kitchen knife. I could not leave the kitchen because I was prepping food for a major event called Chef Fest.

On 03/07/2019, at 186 Dempsey Leavenworth, Washington, Erik lunged at me while the I was holding Adelaide in my arms and said, "you don't know what I think about doing to you."

On August 15, 2015 Erik lunged at me and I felt forced to defend myself. I called the Chelan County Sheriff's Department. Erik took the phone and canceled the call. Erik did not seek medical attention. The following day, Erik worked with several other people at a winery event, his appearance was unremarkable.

Inconsistent Claims

Erik claims that I have inflicted physical and sexual violence on him. The details and dates of the assaults consistently change.

Erik wishes to take Adelaide to stay with his parents who, as recently as September 2021, he accused of child abuse and alluded to sexual abuse at a parent's hands.

Erik wishes to take Adelaide to visit his brother, who as recently as September 2021, he accused of being his abuser.

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*) ___ pages.

Signed at (*city and state*): Leavenworth, WA _____ Date: 3/22/22



Sign here

Adrienne D Young _____
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.