

IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

JOHN W. KNISELY AND : NO. AO6 89-61610-15
SHIRLEY KNISELY

V. :

STEVEN T. LEES AND : DOMESTIC RELATIONS
KATHY COOGAN-LEES : DIVISION

ORDER

AND NOW, TO WIT, THIS _____ DAY OF APRIL, 1990, UPON
CONSIDERATION OF THE EVIDENCE HEREIN IT IS HEREBY ORDERED AND
DECREED THAT: (1) GRANDPARENTS BE PERMITTED PARENTALLY-SUPERVISED
VISITS WITH GRANDDAUGHTER UPON REASONABLE, ADVANCE REQUEST THEREFOR
BY GRANDPARENTS TO PARENTS; (2) SAID VISITS SHALL OCCUR NO MORE
FREQUENTLY THAN ONCE EVERY TWO MONTHS AS WEEKEND, DAY VISITS FROM
APPROXIMATELY 10:00 A.M. TO 5 P.M., PREVAILING TIME; (3) DURING
PERIODS BETWEEN VISITS, GRANDPARENTS SHALL BE PERMITTED TO MAKE
ONE, PARENTALLY-SUPERVISED, JOINT TELEPHONE CALL TO GRANDCHILD PER
WEEK, PREFERABLY ON WEEKENDS OR WEEKDAY EVENINGS; (4) AS AN ONGOING
CONDITION TO GRANDPARENTS' VISITATION RIGHTS GRANDPARENTS SHALL
OBTAIN AND COUNSEL WITH A PROFESSIONALLY LICENSED PSYCHOLOGIST OR
PSYCHIATRIST WHO SHALL WORK IN CONCERT WITH PARENT AND GRANDCHILD'S
PSYCHOLOGISTS; (5) THIS COURT SHALL MAINTAIN ONGOING, SUPERVISORY
JURISDICTION; (6) THIS ORDER SHALL NOT BE SUBJECT TO REVIEW, EXCEPT
UPON MOTION OF ALL PARTIES HERETO, FOR A PERIOD OF TWO YEARS FROM
THE DATE HEREOF.

BY THE COURT:

J.



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: NO. AO6 89-61610-15

V.

:

STEVEN T. LEES AND
KATHY COOGAN-LEES

: DOMESTIC RELATIONS
DIVISION

PARENTS' PRE-TRIAL MEMORANDUM

I. PROCEDURAL HISTORY

IN MAY OF 1989, THE MATERNAL GRANDPARENTS OF PARENTS' CHILD, ABIGAIL SUSAN LEES, (hereinafter referred to as CHILD), BROUGHT SUIT AGAINST PARENT, STEVEN T. LEES, FOR PARTIAL CUSTODY OF SAID CHILD. BY ORDER OF THIS HONORABLE COURT, DATED JUNE 7, 1989, A CONFERENCE BEFORE RICHARD MOORE, ESQUIRE, DOMESTIC RELATIONS OFFICE, WAS SET FOR JUNE 20, 1989, AT WHICH TIME ALL OF THE PARTIES APPEARED, REPRESENTED BY COUNSEL, INCLUDING CHILD'S ADOPTIVE MOTHER, KATHY COOGAN-LEES, WHO HAD INADVERTENTLY NOT BEEN JOINED BY GRANDPARENTS' COUNSEL, AS A NECESSARY PARTY TO THE ACTION.

AT THE CONFERENCE IT WAS AGREED BY ALL PARTIES THAT: (1) A QUALIFIED, LICENSED PSYCHOLOGIST WOULD BE SELECTED BY MUTUAL AGREEMENT OF COUNSEL FOR THE PURPOSE OF MEETING WITH ALL OF THE

PARTIES, INCLUDING CHILD, AND ISSUING A REPORT AND RECOMMENDATION THEREON TO THE DOMESTIC RELATIONS OFFICE, WHICH REPORT, IF ACCEPTABLE TO ALL PARTIES, WOULD RESOLVE THE DISPUTE; (2) THE PSYCHOLOGIST'S REPORT AND RECOMMENDATION WOULD BE ADOPTED BY THE DOMESTIC RELATIONS OFFICE AS ITS RECOMMENDATION TO THIS HONORABLE COURT, IN ANY AND ALL EVENTS; AND (3) PENDING THE PSYCHOLOGIST'S INTERVIEWS AND ISSUANCE OF HIS REPORT AND RECOMMENDATION (estimated to take from 4 to 6 weeks), PARENTS AGREED TO ALLOW CHILD ONE FULLY-PARENT-SUPERVISED VISIT TO THE KNISELY RESIDENCE AT MECHANICSBURG AND GRANDPARENTS AGREED TO A SIMILAR VISIT AT CHILD'S HOME AT CHURCHVILLE, PENNSYLVANIA, THE FIRST VISIT TO OCCUR FORTHWITH AND THE LATTER VISIT WITHIN APPROXIMATELY EIGHT WEEKS AFTER THE FIRST VISIT. THESE VISITS TOOK PLACE AND ARE DETAILED IN PARENTS' SUMMARY OF POST JUNE 20, 1989 VISITS, WHICH IS ATTACHED HERETO AS EXHIBIT "A".

ANDREW R. VOGELSON, Ph.D., WAS SELECTED BY COUNSEL AND THE PARTIES AND COMMENCED MULTIPLE INTERVIEWS WITH GRANDPARENTS, PARENTS AND CHILD, THROUGH SEPTEMBER OF 1989. A COPY OF DOCTOR VOGELSON'S CURRICULUM VITAE IS ATTACHED HERETO AS EXHIBIT "B".

IN EARLY NOVEMBER OF 1989, DR. VOGELSON ISSUED HIS REPORT. A COPY OF HIS REPORT IS ATTACHED HERETO AS EXHIBIT "C". PARENTS HAVE AGREED TO THE RECOMMENDATIONS SET FORTH IN DOCTOR VOGELSON'S REPORT, AS INDICATED BY LETTER OF THEIR COUNSEL TO GRANDPARENTS' COUNSEL, DATED NOVEMBER 27, 1989, A COPY OF WHICH IS ATTACHED

HERETO AS EXHIBIT "D". AS NOTED FROM THE LETTER, IT IS IMPLICIT IN THE REPORT THAT GRANDPARENTS AGREE TO UNDERGO ONGOING COUNSELING CONCERNING CURRENT ISSUES ARISING FROM THE PROFOUND GRIEF WHICH THEY HAVE EXPERIENCED RELATING TO THE TRAGIC DEATHS OF FIRST THEIR DAUGHTER (PARENT STEVEN'S LATE WIFE) FROM ACUTE MYELOGENOUS LEUKEMIA, FOLLOWED BY THE DEATH OF THEIR ELDEST SON, ON A DATE NEAR THE ANNIVERSARY DATE OF THEIR DAUGHTER'S DEATH, IN A MOTOR VEHICLE ACCIDENT. PARENTS BELIEVE THAT DOCTOR VOGELSON WILL TESTIFY THAT ONGOING COUNSELING IS A CONDITION PRECEDENT TO THE PROPOSED TWO-YEAR PERIOD OF PARENT-SUPERVISED VISITATION.

GRANDPARENTS ARE NOT WILLING TO AGREE TO ANY FORM OF SUPERVISED VISITATION OR COUNSELING, AND THEREFORE HAVE NOT AGREED TO DOCTOR VOGELSON'S REPORT AND RECOMMENDATIONS. THE APRIL 17, 1990 HEARING BEFORE THIS HONORABLE COURT HAS BEEN SCHEDULED TO RESOLVE THE DISPUTE.

II. STATEMENT OF FACTS

CHILD WAS BORN, PREMATURELY, AT PENNSYLVANIA HOSPITAL, ON SEPTEMBER 25, 1983. IN FEBRUARY OF 1984, PARENT STEVEN'S WIFE, KATHY SUZANNE KNISELY, WAS DIAGNOSED AS HAVING ACUTE LEUKEMIA. ON OCTOBER 29, 1984, SHE DIED. ABIGAIL WAS 13 MONTHS OLD.

PARENT STEVEN MET PARENT KATHY COOGAN-LEES IN OCTOBER OF 1985. THEY WERE MARRIED SEPTEMBER 6, 1986. PRIOR TO THE MARRIAGE, BOTH

PARENTS MADE EXTRAORDINARY EFFORTS TO BE SYMPATHETIC AND UNDERSTANDING OF GRANDPARENTS' GRIEF, AND TO ACCOMMODATE THEIR NEED AND DESIRE TO BE WITH THEIR GRANDDAUGHTER.

SERIOUS PROBLEMS IN THE GRANDPARENT-PARENT RELATIONSHIP FIRST SURFACED AT OR ABOUT CHRISTMAS OF 1986. PARENTS HAD INVITED GRANDPARENTS TO STAY WITH PARENTS' IMMEDIATE FAMILY (consisting of STEVE, KATHY, ABIGAIL, and KATHY'S daughter, BECCA COOGAN) FOR CHRISTMAS DAY AND TO STAY OVERNIGHT. THE INTENT OF PARENTS WAS TO PROVIDE GRANDPARENTS AN OPPORTUNITY TO BEGIN TO GET TO KNOW ABIGAIL AND HER NEW, BLENDED FAMILY.

DUE TO THE EXISTING SPLIT-CUSTODY ARRANGEMENT BETWEEN PARENT KATHY AND HER EX-HUSBAND, DAUGHTER BECCA WAS TO SPEND CHRISTMAS EVE AT HER NATURAL FATHER'S RESIDENCE, AND PARENTS HEREIN WERE TO MEET BECCA AT A LOCATION HALF-WAY (literally) BETWEEN THE RESPECTIVE RESIDENCES, SO THAT SHE COULD SPEND CHRISTMAS DAY AND THAT NIGHT AT PARENTS' MILFORD SQUARE, PENNSYLVANIA, RESIDENCE.

PARENTS' UNDERSTANDING OF WHEN GRANDPARENTS WERE TO ARRIVE ON CHRISTMAS DAY WAS "SOMETIME AFTER DINNER".

ON CHRISTMAS DAY PARENTS AND ABIGAIL LEFT THEIR RESIDENCE, MID-AFTERNOON, TO PICK UP BECCA PER THE CUSTODY AGREEMENT. INASMUCH AS GRANDPARENTS HAD NOT YET THEN ARRIVED, A NOTE WAS PROMINENTLY PLACED ON THE RESIDENCE FRONT DOOR, BRIEFLY EXPLAINING

WHERE PARENTS AND ABIGAIL HAD GONE; TO MAKE THEMSELVES AT HOME; THAT PARENTS HOPED TO BE BACK BY 5:00 P.M. PARENTS AND ABIGAIL IN FACT ARRIVED BACK AT 5:20 P.M., WHEN THEY DISCOVERED PILES OF PRESENTS ON THE LIVING ROOM COUCH, THE NOTE FROM THE FRONT DOOR GONE, BUT NO SIGN OF THE KNISELYS.

AFTER THE CHRISTMAS DISASTER, PARENTS SOUGHT COUNSELING WITH THEIR MINISTER, THE REVEREND HARRY W. KEPPELY, JR., WHO WAS PARENT STEVE AND HIS LATE WIFE'S MINISTER, AS WELL AS CURRENT PARENTS' MINISTER AT THAT TIME, AND WAS WELL AWARE ON THE INTER-FAMILY DYNAMICS. DURING SIX HOURS OF COUNSELING, PARENT STEVE WAS SHOCKED TO LEARN FROM PASTOR KEPPELY THAT ON THE DAY HIS LATE WIFE DIED, GRANDPARENTS HAD TELEPHONED VARIOUS OF HIS PARISHIONERS, TRYING TO FIND SOMEONE WHO HAD ANY "DIRT" ON PARENT STEVE; THEY WERE LOOKING TO MAKE A CASE THAT HE WAS AN UNFIT PARENT SO THEY COULD ADOPT ABIGAIL. ALSO DURING THIS TIME FRAME, PARENT STEVEN WROTE A LETTER TO GRANDPARENT JOHN, IN AN EFFORT TO TRY TO EXPLAIN PARENTS' CONCERNS ABOUT ABIGAIL'S WELL-BEING, AND PARENTS' POSITION WITH REGARD THERETO. A COPY OF THIS LETTER, AND RELATED, CONTEMPORANEOUS CORRESPONDENCE, IS ATTACHED AS EXHIBIT "E".

THESE AND SUBSEQUENT INCIDENTS ARE COVERED IN CHRONOLOGICAL DETAIL IN PARENTS' CHRONOLOGY OF EVENTS, WHICH IS ATTACHED HERETO AS EXHIBIT "F". PARENTS HAVE TAKEN THIS HONORABLE COURT'S TIME IN SPECIFICALLY DESCRIBING THE INITIAL, PROBLEM INCIDENT SET FORTH IMMEDIATELY ABOVE BECAUSE IT SETS THE TONE IN DEALING WITH WHAT

PARENTS BELIEVE TO BE THE KEY QUESTION PRESENTED HEREIN: ARE GRANDPARENTS, PARENTS AND CHILD ALL INNOCENT VICTIMS OF GRANDPARENTS' INABILITY TO GET BEYOND THE "DENIAL" STAGE IN DEALING WITH THE TRAGIC, MULTIPLE DEATHS OF TWO OF THEIR THREE CHILDREN, AND, IF SO, ARE PARENTS ENTITLED TO PROTECT THEIR CHILD AND THE INTEGRITY OF THEIR IMMEDIATE FAMILY UNTIL SUCH TIME AS GRANDPARENTS ARE ABLE TO MAINTAIN AN AUTONOMOUS, UNSUPERVISED RELATIONSHIP WITH CHILD?

III. QUESTION PRESENTED

ARE GRANDPARENTS, PARENTS AND CHILD ALL INNOCENT VICTIMS OF GRANDPARENTS' INABILITY TO GET BEYOND THE "DENIAL" STAGE IN DEALING WITH THE TRAGIC, MULTIPLE DEATHS OF TWO OF THEIR THREE CHILDREN, AND, IF SO, ARE PARENTS ENTITLED TO PROTECT THEIR CHILD AND THE INTEGRITY OF THEIR IMMEDIATE FAMILY UNTIL SUCH TIME AS GRANDPARENTS ARE ABLE TO MAINTAIN AN AUTONOMOUS, UNSUPERVISED RELATIONSHIP WITH CHILD?

IV. DISCUSSION

AS THE ABOVE STATEMENT OF FACTS INDICATES, PROBLEMS EXISTED BETWEEN GRANDPARENTS AND PARENTS WELL BEFORE FEBRUARY OF 1988. RATHER THAN RECITE SPECIFIC INCIDENTS AT LENGTH, REFERENCE IS MADE TO EXHIBIT "F". WITH RESPECT TO EVENTS FROM FEBRUARY 1988 TO DATE REFERENCE IS MADE TO THE TELEPHONE CALL LOG, AND GENERAL COMMENTS,

WHICH ARE ATTACHED AS EXHIBITS "G" AND "H", RESPECTIVELY. THE TELEPHONE LOG IS BASED UPON CONTEMPORANEOUS HANDWRITTEN NOTES TAKEN BY PARENTS AT THE TIME OF EACH CALL. AS LONG AS ABIGAIL HAS BEEN TALKING ON THE TELEPHONE TO ANY OF HER SIX GRANDPARENTS THE CALLS HAVE BEEN FAMILY, CONFERENCE CALLS. THUS GRANDPARENTS HEREIN WERE AWARE WHAT THEY SAID WAS BEING HEARD BY BOTH ABIGAIL AND HER PARENTS. THE GENERAL COMMENTS CONSIST OF INFORMATION RECEIVED BY PARENTS FROM ABIGAIL AND INTERESTED THIRD PARTIES, BUT WERE NOT NECESSARILY CONTEMPORANEOUS TO THE PRECIPITATING EVENT. IN EACH CASE, HOWEVER, THE STATEMENTS WERE NOT SOLICITED BUT RATHER VOLUNTEERED.

THE COMMON THREAD TO THE HISTORY OF THIS CASE IS THAT GRANDPARENTS TRULY DO NOT UNDERSTAND THERE IS A PROBLEM. THIS IS NOT A CASE OF DELIBERATE, PREMEDITATED WRONGDOING BY ANY PARTY. PARENTS HAVE NEVER WANTED THIS TO BE AN ADVERSARIAL MATTER; A CASE OF "US" AGAINST "THEM". PARENT STEVEN HAS, SINCE THE DATE OF HIS LATE WIFE'S DEATH ON NUMEROUS OCCASIONS SUGGESTED TO GRANDPARENTS, IN A KIND AND LOVING WAY, THAT PROFESSIONAL COUNSELING TO HELP GRANDPARENTS WORK THROUGH THEIR GRIEF WAS THE ONLY WAY FOR THEM TO BEGIN TO UNDERSTAND WHY THEIR BEING "STUCK" IN THE GRIEVING PROCESS IS DANGEROUS TO ABIGAIL'S MENTAL HEALTH AND THE ABILITY OF PARENTS OF A NEW, BLENDED FAMILY TO BOND WITH THEIR CHILDREN. ON THESE OCCASIONS, PARENT STEVE WOULD FURTHER ADD THAT HE AND PARENT KATHY AND ABIGAIL WERE CURRENTLY IN COUNSELING AND WOULD DO EVERYTHING REASONABLY POSSIBLE TO COOPERATE WITH ANY COUNSELING EFFORTS ON

THEIR PART. GRANDPARENTS' CONSISTENT RESPONSE TO THESE OVERTURES WAS WORDS TO THE EFFECT THAT MENTAL ILLNESS RAN IN PARENT STEVE'S FAMILY, NOT THEIRS.

EACH AND EVERY ONE OF PARENT STEVEN'S CONCERNS, AS INITIALLY EXPRESSED IN EXHIBIT "E" AND THEREAFTER HAS BEEN ACKNOWLEDGED AS VALID BY DOCTOR VOGELSON IN HIS REPORT AND RECOMMENDATIONS. PARENTS BELIEVE THE ONLY HOPE FOR ABIGAIL TO HAVE A HEALTHY, HAPPY RELATIONSHIP WITH GRANDPARENTS IS FOR GRANDPARENTS TO PURSUE COUNSELING WITH AN OPEN MIND AND FOR PARENTS TO HAVE THE ABILITY IN THE INTERIM TO MONITOR GRANDPARENTS' INTERACTION WITH ABIGAIL UNTIL SUCH TIME AS THE PARTIES' MENTAL HEALTH COUNSELORS REASONABLY AGREE THAT SUCH SUPERVISED VISITATIONS ARE NO LONGER NEEDED.

PARENTS ARE SINCERE IN THEIR DESIRE TO DO WHATEVER IS NECESSARY TO ENSURE THE STABILITY AND MENTAL HEALTH OF THEIR FAMILY, AS IS EVIDENCED BY SCHEDULE "A" TO THEIR 1989 FORM 1040, A COPY OF WHICH IS ATTACHED AS EXHIBIT "I". PARENTS HAVE INCURRED IN EXCESS OF \$8,000 IN UNREIMBURSED MEDICAL EXPENSES IN 1989, FOR FAMILY COUNSELING FOR PARENTS AND A CHILD PSYCHOLOGIST FOR ABIGAIL. PARENTS' EARNEST DESIRE IS THAT GRANDPARENTS WILL PROSPECTIVELY DEVOTE THEIR INCOME TO MENTAL HEALTH, INSTEAD OF ADVERSARIAL, LEGAL COUNSELING.

V. CONCLUSION

PERMITTING PARTIAL CUSTODY OF CHILD TO GRANDPARENTS WILL INTERFERE IN THE PARENT-CHILD RELATIONSHIP AND IS NOT IN THE BEST INTEREST OF THE CHILD. REQUIRING QUALIFIED COUNSELING BY A LICENSED PSYCHOLOGIST OR PSYCHIATRIST FOR GRANDPARENTS WILL COMPLIMENT PARENTS ONGOING EFFORTS AND BE IN THE BEST INTEREST OF ALL OF THE PARTIES HERETO, BUT OF PARAMOUNT IMPORTANCE, WILL BE IN THE BEST INTEREST OF THE INNOCENT, SIX YEAR OLD CHILD WHO IS THE SUBJECT OF THIS CASE. WHEREFORE PARENTS RESPECTFULLY REQUEST THIS HONORABLE COURT ENTER THE ATTACHED, SUGGESTED FORM OF ORDER.

RESPECTFULLY SUBMITTED,

ALBERT MOMJIAN, ESQUIRE

I.D. NO.

COMMONWEALTH OF PENNSYLVANIA:

:SS.

COUNTY OF BUCKS

:

STEVEN T. LEES AND KATHY COOGAN-LEES, BEING DULY SWORN
ACCORDING TO LAW, DO HEREBY DEPOSE AND SAY THAT ALL OF THE FACTS
SET FORTH IN THE FOREGOING MEMORANDUM AND EXHIBITS THERETO ARE TRUE
AND CORRECT, TO THE BEST OF THEIR KNOWLEDGE, INFORMATION AND
BELIEF.

STEVEN T. LEES

KATHY COOGAN-LEES

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 11th DAY
OF APRIL, 1990.

NOTARY PUBLIC

VISITS WITH JOHN, SHIRLEY AND JEFF POST 6/20/89 HEARING

6/25/89

MECHANICSBURG VISIT:

Abby confused about Uncle Jeffrey being a grown-up; he is in his 30's, yet Shirley still speaks of him as being a "bad boy" or a "good boy", in a very juvenile, mocking tone of voice; she also refers to Pap Pap the same way.

Shirley relates to Abby as her peer, treating the men as children; in Kathy's words, Grandma has "Parentified" Abby; during the visit on at least 5 occasions she asked Abby if "Pap Pap is being Good" or if "Uncle Jeffrey is being good". Power was given to Abby, in that if she answered "no", then the boys would have to be punished, with Grandma asking Abby what should be done; worse yet Abby's suggestions are usually carried out or deferred to!

On those occasions when Shirley was following what we had expressed to them were our "house rules" (e.g. Abby must clean her plate of food before having bread or dinner rolls), she would say to Abby in a very parent-child-peerish and sweetly sarcastic way that these were mommy and daddy's rules, and she certainly wouldn't want to do anything wrong that could get her into trouble!

We tried our best to be within earshot of Abby at all times, but to otherwise allow the Kniselys freedom to associate with her, so long as their behavior wasn't harmful to Abby; as the day drew on Abby became more fresh and bossy; the old physical and psychological environment had got her cooking and the pot was about to boil over; this culminated in a temper tantrum about going to the "potty" before the 2½ hour trip home; Abby actually physically pushed Steve away when he directed her to go to the potty; this was the resurrection of misbehavior which we had rarely if ever seen during the past four months; it was just the sort to take-charge, defiant and controlling behavior which we and our therapists had been working so hard on to curtail; other control issues occurring that afternoon dealt with Abby's trying to direct whether doors should be open or closed, whether the water should be turned on or off, who was permitted to open, close, turn on, turn off, etc.

Death & Loss Issues:

Shirley made a big point of telling Abby about Uncle Jeffie's latest puppy that died (Abby had never even seen the puppy and didn't need to know about this loss; particularly in view of her obvious sensitivity to tragic, untimely deaths); Shirley, nonetheless, and in full view of the consternation which must have been apparent on our faces, even went to the extent of showing Abby pictures of the dog, saying "wasn't he cute? Isn't it sad he died?" We got the sense the taunting was deliberate.

Prior to leaving, Abby let it be known there were some toys that had been there which she wanted to take with her; She took one but the Kniselys wouldn't let her take the other. One got the sense of a post divorce, split household situation, where one parent was trying to assert "territorial" rights against another at the ex-

EXHIBIT A

pense of the child!

-1-

Abby commented on the 'phone to grandma the next week that she had had bad dreams and it was easier if they visited her at her home, 'cause being there made her think of her old mommy and uncle Rick (who died in a tragic rear-ending of a tractor trailer, which had definite over-tones of suicide) and it made her sad. This was in no way prompted by her parents; we have always let Abby speak her mind on the 'phone and have never rehearsed her about what to say when she calls, nor have we attempted to affect what she says during a conversation.

Abby told Steve that when we were there on Sunday, Grandma & Pap Pap had whispered in her ears that they were not going to come visit at her house; that she was going to have to get her parents to bring her out there.

8/27/89

CHURCHVILLE VISIT

For first hour the Kniselys (John, Shirley and Jeff) sat on the back porch, declining to come inside; during this time there was absolutely no eye contact by them toward us; the clear implicit message was "We are here only because Rich Moore said we had to come, and we are certainly not going to give you the satisfaction of enjoying the visit!" When Kathy and I tried to engage them in conversation, or make small talk or comments, they acted as if we were not there. All of us were sitting around an umbrella table at the time, with the exception of John, who sat off by himself in a chair, puffing on his pipe and looking generally miserable.

It did not take Shirley long to start baiting Abby, encouraging her to correct and criticize grown-ups; e.g., when Kathy asked Abby if she wanted ice cream on her pie, Shirley told Abby to say "That's a dumb question!"

Abby sat tall in her chair, squared her shoulders and parroted the foregoing in a fresh tone; almost immediately, however, she looked a little scared as she knew this behavior toward grown-ups was not permitted at her house.

What conversation there was was directed by Shirley to a discussion, or more accurately a monologue about Abby's good traits, and who she got them from: e.g., she has Uncle Jeffie's good memory, John's good coloring, she loves to shop like her grandma; at least 6 to 8 specific items were mentioned, all of them alleged Knisely traits; any comments made by Kathy or me consisted mostly of the two of us biting the insides of our respective cheeks; it was like we were invisible voyeurs at a Knisely reunion, or perhaps more accurately a bitch-session! Kathy and I looked at each other in amazement and instinctively agreed not to say anything, as anything said by them would be taken as argumentative and inflammatory.

Although the understanding as of 6/20/89 was that each visit would include a dinner; and notwithstanding the fact we had gone to great efforts to fix a "soup-to-nuts" good-china-and-silver affair, when supper was first mentioned John said they would not stay; finally, after we explain the waiting meal, they relented; it was sort of

like the Mad-Hatter's tea party, with everybody jovial and buddy, buddy, as if there were no problems.

-2-

After the visit, even though, to the best of our knowledge her late mother was never mentioned, Abby spoke of her for days after the visit; the association between the Kniselys and their desire to impress a memory of Abby's late mother upon her have had their effect. Just seeing them rev's her jets on the dead mommy/abandonment and need-for-control issues.

-3-

ANDREW R. VOGELSON
187 East Evergreen Avenue
Philadelphia, Pennsylvania 19118
(215) 247-7400

EDUCATION

Ph.D. Counseling Psychology, Temple University, 1973
M.A. Psychology, Temple University, 1968
A.B. Psychology, Columbia University, 1967

Post-Doctoral Training

Psychological Assessment: Irving Schwartz Institute for Children and Youth, and Philadelphia Psychiatric Center, 1975-1976.

Marriage Counseling and Sex Therapy: Marriage Council of Philadelphia, Division of Family Study, Department of Psychiatry, The University of Pennsylvania School of Medicine, 1976-1977.

Academic Honors

Regents Scholarship, New York State Department of Education, 1964-1967.
Pre-doctoral Research Fellowship, U.S. Department of Health, Education and Welfare, 1969-1971.

PROFESSIONAL CREDENTIALS

Qualified as a Clinical Psychologist and Counseling Psychologist under the specialty guidelines of the American Psychological Association.
Licensed Psychologist in the Commonwealth of Pennsylvania, PS 002059-L.
Listed in the National Register of Health Service Providers in Psychology.
Listed as an approved Divorce Counselor in Philadelphia, Bucks, and Montgomery Counties, Commonwealth of Pennsylvania.

ADVISORY BOARDS, ETC.

Advisory Committee on Quality Assurance, Philadelphia Office of Mental Health/Mental Retardation, 1982-1985.
Committee on Clinical Services for Adults, Philadelphia Forum of Mental Health/Mental Retardation Centers, 1980-1981.

EXHIBIT B

Steering Committee on Professional Continuing Education,
Marriage Council of Philadelphia, 1976-1977.
One of the founders and author of initial and follow-up
funding grants for Toddlers, Twos, Threes and Fours
Child Care Center, 1975.

CLINICAL EXPERIENCE

Private practice of psychological assessment, psychother-
apy, marriage and divorce counseling, child custody
evaluation and mediation, 1973-present.
Director, The Evergreen Group and Evergreen Psychological
Associates, 1983-present.
Consultant, Children of Divorce Counseling Program, J.S.
Jenks School, Philadelphia, 1987-present.
Deputy Director for Clinical Services, and Director of
Families of Divorce Program, Northeast Community
Center for Mental Health/Mental Retardation,
Philadelphia, 1981-1985.
Consultant, Psychiatric Care Associates (formerly North-
west Psychiatric Associates), 1983-present.
Participating Clinical Psychologist, HMO of Pennsylvania,
1978-present.
Consultant, Family Life Bureau, Archdiocese of Philadel-
phia, 1983-present.
Consultant, Program for Employed Persons, Eagleville Hos-
pital, 1983-present.
Director, Adult Outpatient Service (Coping Clinic) of
Philadelphia Psychiatric Center's Community Mental
Health Program, 1980-1981; Associate Director 1978-
1980; Senior Psychologist 1975-1980.
Consultant, Disability Determination Division, Social
Security Administration, 1976-present.
Consultant, Marriage and Divorce Committee, National
Organization for Women, Philadelphia Chapter, 1974-
1975.
Consultant, Boys Home of Delaware, 1973-1974.
Senior Therapist, Group Counseling Program, Philadelphia
Family Court, 1972-1974.
Consultant, St. Joseph Hall for Girls, 1970.
Research Associate, Associates for Research in Behavior,
Inc., 1969-1974.
Research Assistant, Head Start Research Center, Temple
University, 1968.

HOSPITAL AFFILIATION

Northwestern Institute of Psychiatry, Fort Washington,
Pennsylvania, Adjunct Staff Member, 1981-present.

TEACHING EXPERIENCE

- Practicum Supervisor of psychiatry residents, medical students, doctoral and master's level psychology students, and graduate psychiatric nursing students from Temple University, The University of Pennsylvania, Antioch University, the California School of Professional Psychology, and Villanova University, 1975-1985.
- Adjunct Professor, Department of Psychology, Chestnut Hill College, 1985-1986 (Abnormal Psychology, Practicum in Abnormal Psychology, Consultant for workshops on divorce, child custody, and counseling children of divorce).
- Instructor, Department of Psychiatry, The University of Pennsylvania School of Medicine, 1981-1983 (Orientation to Psychiatry).
- Adjunct Faculty, Institute of Human Development, Hahnemann Medical College, 1975 (Child Psychology, Abnormal Psychology).
- Professional Associate, Moore College of Art, 1974-1975 (Educational Psychology, General Psychology, Abnormal Psychology, Human Liberation, Foundations of Education).
- Assistant Teacher, Head Start, New York City, 1966.

PAST AND PRESENT PROFESSIONAL AFFILIATIONS

American Psychological Association
Philadelphia Society of Clinical Psychologists
Pennsylvania Psychological Association
American Personnel and Guidance Association
Eastern Psychological Association
Family Mediation Association of the Delaware Valley

PUBLICATIONS, PRESENTATIONS, FILMS, WORKSHOPS

A comparison of physically and psychiatrically handicapped rehabilitation workshop clients with respect to their perception of the impact of disability.
Master's Thesis, Temple University, 1968.

Perception of the impact of disability: A comparison of the physically and psychiatrically handicapped.
Rehabilitation Counseling Bulletin, 1969, 13 (1), 64-65.

Steering Committee on Professional Continuing Education,
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Director, The Evergreen Group and Evergreen Psychological
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Consultant, Children of Divorce Counseling Program, J.S.
Jenks School, Philadelphia, 1987-present.
Deputy Director for Clinical Services, and Director of
Families of Divorce Program, Northeast Community
Center for Mental Health/Mental Retardation,
Philadelphia, 1981-1985.
Consultant, Psychiatric Care Associates (formerly North-
west Psychiatric Associates), 1983-present.
Participating Clinical Psychologist, HMO of Pennsylvania,
1978-present.
Consultant, Family Life Bureau, Archdiocese of Philadel-
phia, 1983-present.
Consultant, Program for Employed Persons, Eagleville Hos-
pital, 1983-present.
Director, Adult Outpatient Service (Coping Clinic) of
Philadelphia Psychiatric Center's Community Mental
Health Program, 1980-1981; Associate Director 1978-
1980; Senior Psychologist 1975-1980.
Consultant, Disability Determination Division, Social
Security Administration, 1976-present.
Consultant, Marriage and Divorce Committee, National
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1975.
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Senior Therapist, Group Counseling Program, Philadelphia
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Research Associate, Associates for Research in Behavior,
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- Practicum Supervisor of psychiatry residents, medical students, doctoral and master's level psychology students, and graduate psychiatric nursing students from Temple University, The University of Pennsylvania, Antioch University, the California School of Professional Psychology, and Villanova University, 1975-1985.
- Adjunct Professor, Department of Psychology, Chestnut Hill College, 1985-1986 (Abnormal Psychology, Practicum in Abnormal Psychology, Consultant for workshops on divorce, child custody, and counseling children of divorce).
- Instructor, Department of Psychiatry, The University of Pennsylvania School of Medicine, 1981-1983 (Orientation to Psychiatry).
- Adjunct Faculty, Institute of Human Development, Hahnemann Medical College, 1975 (Child Psychology, Abnormal Psychology).
- Professional Associate, Moore College of Art, 1974-1975 (Educational Psychology, General Psychology, Abnormal Psychology, Human Liberation, Foundations of Education).
- Assistant Teacher, Head Start, New York City, 1966.

PAST AND PRESENT PROFESSIONAL AFFILIATIONS

American Psychological Association
Philadelphia Society of Clinical Psychologists
Pennsylvania Psychological Association
American Personnel and Guidance Association
Eastern Psychological Association
Family Mediation Association of the Delaware Valley

PUBLICATIONS, PRESENTATIONS, FILMS, WORKSHOPS

A comparison of physically and psychiatrically handicapped rehabilitation workshop clients with respect to their perception of the impact of disability.
Master's Thesis, Temple University, 1968.

Perception of the impact of disability: A comparison of the physically and psychiatrically handicapped.
Rehabilitation Counseling Bulletin, 1969, 13 (1), 64-65.

PREPARED TESTIMONY

STEVEN T. LEES

HOUSE JUDICIARY COMMITTEE

WE APPEAR BEFORE YOU TODAY AS VICTIMS OF THE PROVISIONS OF THE CURRENT GRANDPARENT VISITATION ACT. THE "WE" BEFORE YOU TODAY INCLUDES NOT ONLY MY WIFE AND MYSELF, BUT ALSO OUR TWO DAUGHTERS, BECCA AND ABIGAIL.

OUR DAUGHTER, ABIGAIL, THE "SUBJECT" GRANDCHILD IN THIS CASE, WILL BE EIGHT YEARS OLD EIGHT DAYS FROM TODAY. KATHY AND I HAVE BEEN MARRIED FOR A LITTLE OVER FIVE OF THOSE EIGHT YEARS. DURING THAT TIME IT ONLY DURING THOSE FEW MONTHS WHEN I TOOK A STAND WITH THE MATERNAL GRANDPARENTS, REFUSING TO PERMIT UNSUPERVISED, OVERNIGHT VISITS AT THEIR HOME, THAT WE WERE ABLE TO MAKE ANY PROGRESS IN BONDING AS A NUCLEAR FAMILY. THIS STANCE PRECIPITATED THE LITIGATION, (PRIMARILY BECAUSE GRANDPARENTS REFUSED TO ACCEPT OUR OFFER OF ONGOING VISITATION) WHICH HAS HAD US ON AN EMOTIONAL ROLLER COASTER EVER SINCE.

ALTHOUGH WE HAVE FINALLY FREED OUR FAMILY FROM THE CHOKE LOCK OF THE GVA-SANCTIONED COURT INTRUSION INTO OUR LIVES, WE HAVE NOT DONE SO BECAUSE THE STATUTE IS EITHER WELL DRAFTED OR WELL ADMINISTERED. WE ARE INSTEAD OUT OF COURT AT THE WHIM OF THE GRANDPARENTS.

IN THE CONTEXT OF THE DECEASED PARENT'S FAMILY, HOWEVER, THE IMPACT UPON THE NUCLEAR FAMILY IS CLEAR: ONE-HALF OF THE PARENT-PART OF THE FAMILY HAS BEEN OBLITERATED; THE FAMILY FUNCTIONS AT A REACTIVE, SUBSISTANCE LEVEL, SEEKING STABILITY AND CONSTRUCTIVE COMMUNITY SUPPORT.

WHEN THE SURVIVING PARENT IN A FAMILY SITUATION SUCH AS THIS ULTIMATELY MEETS AND FALLS IN LOVE WITH ANOTHER PARENT, PERHAPS THE BIGGEST CHALLENGE KNOWN TO MANKIND FACES THEM: BLENDING FAMILIES.

THE PROPOSED AMENDMENTS BEFORE YOU TODAY RECOGNIZE THAT WHERE A SURVIVING SPOUSE WITH A CHILD REMARRIES, AND THE "NEW" SPOUSE ADOPTS THE CHILD AS HIS OR HER OWN, THEN THE LAW SHOULD THROW NO IMPEDIMENTS IN FRONT OF OR BETWEEN THE SPOUSES AND THEIR CHILD OR CHILDREN, TO IMPEDE OR IMPAIR THAT LIMITED AMOUNT OF TIME AVAILABLE FOR "NEW" PARENT/CHILD BONDING.

WE HAVE NEVER SAID NOR ARE WE NOW SAYING THAT GRANDPARENTS WHOSE CHILD IS DECEASED SHOULD HAVE NO RIGHTS TO SEE THEIR GRANDCHILD, WE ARE SIMPLY SAYING THEY SHOULD HAVE NO GREATER RIGHTS THAN THE GRANDCHILD'S OTHER GRANDPARENTS, BOTH NATURAL AND ADOPTIVE.

AS EACH OF YOU CAN SEE FROM THE PACKET IN FRONT OF YOU, MY WIFE AND I HAVE ASSEMBLED DOCUMENTARY INFORMATION WHICH SETS

A MOTHER SEPARATE FROM MY MARRIAGE TO HER DAD.

I AM NOT UNIQUE; MANY MEN AND WOMEN IN MY SITUATION HAVE DONE THIS. THEY HAVE BEEN WILLING TO ASSUME PHYSICAL, SPIRITUAL AND EMOTIONAL RESPONSIBILITY FOR A CHILD WHO THEY DID NOT BRING INTO THIS WORLD BUT LOVE AND AS A RESULT ARE WILLING TO TAKE ON THE AWESOME RESPONSIBILITY OF PARENTING.

WHEN YOU ADOPT A CHILD, THE BIRTH CERTIFICATE IS REISSUED WITH YOUR NAME AS THE PARENT ON THE CERTIFICATE. IF THE CHILD HAS PROBLEMS IN SCHOOL YOU ARE CALLED IN AND HELD ACCOUNTABLE FOR THE CHILD'S BEHAVIOR. WHEN THE CHILD IS SICK YOU ARE THE ONE WHO HAS THE RESPONSIBILITY TO PROVIDE MEDICAL CARE, SIT UP NIGHTS, ETC. IN MY CASE BECAUSE OF THE EMOTIONAL PROBLEMS ABBY HAS HAD, I GAVE UP MY FULL TIME PROFESSION AS A CLINICAL SOCIAL WORKER AND HAVE ONLY TAKEN ON PROFESSIONAL RESPONSIBILITIES THAT ALLOW ME TO BE HOME MOST DAYS BEFORE AND AFTER SCHOOL TO GIVE ABBY ALL THE STABILITY AND CONTINUITY THAT I CAN.

WHY HAVE I DONE ALL OF THIS? BECAUSE I TAKE VERY SERIOUSLY MY RESPONSIBILITY AS ABBY'S MOTHER. STEVE AND I ARE ONLY ASKING TO BE ALLOWED TO PARENT OUR CHILD IN THE TRADITIONS AND VALUES THAT THE SOCIETY WE HAVE BEEN RAISED IN HAS TAUGHT US. WE HAVE A SPIRITUAL DIRECTION IN OUR SOCIETY THAT SAYS "...FOR THIS REASON A MAN SHALL LEAVE HIS FATHER AND MOTHER AND BE JOINED TO HIS WIFE AND THE TWO SHALL BECOME ONE FLESH..." GOD HAS ORDERED THE COVENANT OF

STEVE AND I ARE ONLY ASKING THAT WE BE ALLOWED TO HAVE THIS RIGHT FOR OUR CHILD. CHILDREN ARE VERY VULNERABLE, THEY LOOK TO THE ADULTS AROUND THEM AS GODS. WHEN THEY ARE LITTLE ALL THEY KNOW IS WHAT THE ADULTS IN THEIR LIFE TELL THEM, AND WHAT THEY EXPERIENCE THEMSELVES. THEY CAN'T READ BOOKS ON TRUST TO LEARN HOW TO TRUST, THEY MUST EXPERIENCE IT.

WHEN THERE IS CONFLICT BETWEEN PARENTS AND GRANDPARENTS IT IS VERY UNSETTLING TO A CHILD. IF ONE PARENT HAS DIED THE CHILD IS ALREADY FEARFUL OF THE WORLD AND NOT TRUSTING THAT ADULTS KNOW WHAT THEY ARE DOING, AFTER ALL, THEY COULDN'T KEEP MOM OR DAD FROM DYING. IF GRANDPARENTS ARE SUING FOR CUSTODIAL RIGHTS, CONFLICT ALREADY EXISTS, OR THE PARENTS AND GRANDPARENTS WOULD HAVE WORKED THEIR PROBLEMS OUT THEMSELVES. CHILDREN SENSE THIS CONFLICT AND IN MANY CASES, AS IN OUR OWN, THE CHILD HAS BEEN TOLD POINT BLANK, NEGATIVE THINGS ABOUT THEIR PARENTS. IN OUR CASE ABBY HAS BEEN TOLD 'THAT I'M NOT HER REALLY REAL MOM' AND THAT 'DADDY GAVE MY OLD MOMMY A DISEASE THAT KILLED HER.' LEUKEMIA IS NOT CONTAGIOUS. THESE COMMENTS ARE VERY POWERFUL. THE ADOPTIVE PARENT HAS NOT KNOWN THE CHILD AS LONG AS THE GRANDPARENTS HAVE, WHO DO YOU THINK THEY'LL BELIEVE? THERE IS OFTEN NATURAL RESENTMENT THAT MOM OR DAD NOW PAYS ATTENTION TO THE NEW PARTNER. AND SO FOR YOUNG CHILDREN IT IS EASIER TO BELIEVE THE NEGATIVE COMMENTS OF THE GRANDPARENTS.

WE HAVE BEEN VICTIMS OF THIS SEE SAW FOR FIVE YEARS NOW. WHEN ABBY FEELS CLOSE TO ME SHE TELLS PEOPLE THAT 'HER OLD MOMMY BEAT

CHILDREN THE CHANCE FOR SOME HEALING, FOR SOME SECURITY AND
INNOCENCE BEFORE IT'S TOO LATE.

Dear Dr. Klust,

Enclosed are papers and Tapes that will fill you in on some of the trauma Abby has been experiencing in her relationship with her grandparents. Below I will try to fill in the blanks.

1) Abby was born premature at 28 weeks gestation, 2lb 4oz at Penn. Hospital 9-25-83

2) Abby spent 82 days in the ICN.

3) Abby was home approx, 2 months when her mother was diagnosed with leukemia. She died 10-21-84. ∴ most of Abby's first 13 mo. were spent with other care givers and her father.

4) When I started dating Steve, Abby was 2½. She was very verbal and precocious. Her mother's memory had been kept so strongly alive that on a few occasions when I told her we were going to go somewhere she would ask, "Is my dead mommy coming?" When we passed the cemetery where her mother was buried Abby would wave and yell out "Hi mommy, how's my good old mommy."

Steve & I married 9-6-86
I adopted Abby in Feb. 87

5) We had a great deal of difficulty in est. boundaries, Abby had been given a lot of power. Two months after my marriage to Steve, Abby told me, "Some grown-ups are short, I'm just a short grown-up."

6) Abby had very strong abandonment issues. In her play she would refuse to be the mommy. She told my daughter Becca, who was 15 then, that "mommies just go away and leave you."

7) Abby would often cry at nap time and say, "you can never be happy when your mommy dies"

8) See App. B bottom and A-4

9) Grandparents refused to visit Abby from Feb. 1989 till June 1989 when Court ordered Steve + I to take Abby to Mechanicsburg for a visit. There was also a court ordered visit at our home (8-89) See D-1, 2, 3. Although invited after that grandparent did not see Abby till Court 5-24-90 (D1-2-3)

10) Grandparents did not visit but see phone log @ 11th 5. Grandparents said many inappropriate thing to Abby. She often got off the phone telling Steve and I "you have to take me there or I won't get my Toy etc."

11) From 8-89 till 5-24-90, the time Abby did not see her grandparents significant progress was made. We used a behavior chart with rewards to help her learn appropriate behavior. Abby mastered all tasks, she had far fewer Temper Tantrums and was beginning to bond with me.

12) We stopped the chart in Spring 1990 and within weeks all her mastered skills were gone i.e.: putting clothes in hamper, flushing the toilet and washing hands, not arguing with grown ups.

Her therapist feels that perhaps ① since this was around the time the court gave her grandparents visitation rights and she was again exposed to constant comments that made her feel torn loyalties between her parents and grandparents, perhaps her anxiety level was so high she could not focus on tasks, or ② perhaps she had an attention deficit disorder and the daily reminder of expected behavior and the rewards helped her keep focused.

13) In the hearing the psychologist who evaluated all parties, Dr. Andrew Vogelson (E) recommended that all visits for at least 2 yrs be supervised in parent home. The judge ordered this but did give the grandparents 2 weekend visits each year, unsupervised in grandparents home, (F)

14) The grandparents came to our home twice for supervised visits. During the second visit the grandparents were very angry when I would not let Abby go alone with them to a restaurant. The grandfather told Abby not to start at the car when I had it. . . .

(14 cont) The grandfather then came up behind me with his fist raised to hit me. The grand mother stopped him. Abby saw this as did my partner in my therapy practice, Linda Cooley M.S.W.

(15) Grand parents then requested unsupervised visits. And the Judge obviously did not review the case or his prior decision and said he wanted the grand parent to have "normal" visits, take Abby out alone etc.

16) The first unsupervised visit was in Sept. Each month thereafter they took Abby / SAT. a month from 10 to 5

17) Nightmares which she had often had before resurfaced. The theme was always someone or a monster coming to take her away from the family. Sometimes the family was killed, other times just left in the house.

18) Abby's Teacher reports that around Oct. Abby became more quiet and withdrawn in class. She is doing well academically and is even in a gifted program but both teachers report that Abby does not talk to others in class at all, on the playground she does but in class, even during the time children are free to talk and play she doesn't

* 19) In Sept. of 1989, I reported to Dr. Ziffer (Abby's Psychologist) that I was concerned by remarks the grandfather had made i.e: "I think of you every night when I'm in bed," also when ABBY was 3 she wouldn't let anyone wash or dry her vagina, Dr. Ziffer asked me to give ABBY a good touch, bad touch talk and see how she responded. There was no immediate response but a few hours later she told me that her grandmother had put her finger in her butt. She said she was not at the time and it never happened again. I asked Abby about bath, thermometers etc. but Abby said no to all of these. When I told Dr. Ziffer about this he said it was consistent with art work she had done for him. Abby has been consistent with this story ever since. She told Dr. Vogelson also. Neither professional reported this as Abuse. Dr. Vogelson felt the primary therapist Dr. Ziffer should report. Dr. Ziffer felt that since she wasn't alone with them now she was safe. My husband and I argued the point but could not get Dr. Ziffer to report. Our lawyer did raise this issue in the Judge chambers during our hearing but the Judge said he would not entertain this in his court now.

20) Last visit unsupervised with grandparents on Feb. 7, 1990. No ... +/val h

Abby Talking about her fears of being
Kidnapped And upsetting comments her grandparent
made.

2) We petitioned the court to make visits supervised
until re-evaluations could be done. A letter from
Dr Ziffer accompanied this report (I). The
Court ordered re-evaluations of all parties
and the grand parents refused to be re-evaluated.
As of Today 5-13-91 our lawyer has informed
us that the grand parents have failed to have
the case dropped. They are not going to pursue
their right to visitation - they do have the right
at anytime to re-institute their claim.

* In June 1990 Abby's father STEVEN Leec was hospitalized
at LANKANOU Hospital and diagnosed MANIC/depressive.
He is doing fine now on Lithium.

Hopefully all this information will be helpful. Behaving
Abby often has difficulty following even 1 step direction.
She space out, doesn't remember what was asked, even having
her look at us when we speak and repeat. It doesn't always
help. Teacher has not noted these problems at school. Abby
will put clothes on over other clothes and not notice, she
once put 2 pairs of corduroy pants on and didn't know it.
She often forgets what she is doing. She has a lot of
difficulty organizing her toys, desk at school etc. An auditor

Process. evaluation showed no problem in Spring of 1988.

The inconsistency is very hard to deal with. In relationships especially with me her moods change often and rapidly I never know when I enter a room if she'll be warm and accepting or have Temper Tantrum. She can be screaming and having Temper Tantrum and less than 5 min. later ^{be} the model child. Complete with hugs and kisses. She can be happy and excited because you're taking her to the movie and then S.T. in the car looking depressed and not talking the whole way to the theater. She sincerely has a blank look at times when she's being corrected.

ADBY constantly picks at her skin, in the fall we had to have her sleep with mittens on because her mosquito bites were getting infected. She also has fingers in her mouth all the time. One finger right now has the skin rubbed raw.

She is not usually an affectionate child but has been even less so lately. She anxiously has to be the center of attention all the time. She has a poor sense of boundaries with strangers i.e. she has waved at someone on a street corner and talked about how much she loves this stranger. When we point out that we probably won't see them again she cries and gets upset. She has very little trust in adults. When crossing the street she has from the youngest age until including now pulls the adults hand to control the direction you're going in.

Ritalin has helped her hyperactivity. She takes 15mg 3 times a day. Her therapist notes more focus in her conversations however at home it

Change has not been very consistent or noteworthy
this is why we felt an evaluation by you would be
helpful. I'm looking forward to meeting you on
June 3rd. Please call me at 364-7017 if you need
further information or clarification.

Sincerely,
Kathy Coogan - Devo
15 Daffodil Dr.
Charlottesville, PA- 18766
364-7017