

25-2-00060-05
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Complaint
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NIKKI BOTNEN

SUPERIOR COURT OF WASHINGTON FOR CLALLAM COUNTY

GINA BLOOM, an individual,

Plaintiff,

v.

BRIAN J. PARKER, an individual, and
PORT GARDNER LAW GROUP, Inc., P.S., is a
Limited Liability Company, and
DAMON H. CANFIELD, an individual, and
CANFIELD MADOW LAW GROUP, a
Professional Limited Liability Company,

Defendants.

Case No. 25 2' 00060 05

COMPLAINT FOR DAMAGES

I. INTRODUCTORY STATEMENT

1.1 Plaintiff Gina Bloom suffered needless injuries and emotional distress as a direct result of Defendants Brian Parker and Damon Canfield's collusion to commit fraud and misrepresentation in Plaintiff Bloom's Snohomish County family court marital dissolution and custodial matter.

1.2 At all times relevant to this complaint, both Defendant Mr. Brian Parker and Defendant Mr. Damon Canfield were working for and with the direct support, oversight,



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1 management and promotion, of their respective law firms, Port Gardner Law Group and Canfield
2 Madow Law Group, for whom they both worked as family law attorneys.

3 **II. PARTIES**

4 2.1 Plaintiff, Ms. Gina Bloom was at all times relevant to this complaint a citizen of
5 Washington State, living in western Washington, in either King or Snohomish
6 Counties. Clallam County is also located in western Washington, near and
7 adjacent to Island and Skagit Counties.

8 2.2 Defendant Brian Parker, acting as a Washington State Bar Association (WSBA)
9 licensed attorney, No. 41015, and always under the banner of Port Gardner Law
10 Group, located in Everett Washington, also served as a Guardian ad Litem and
11 Commissioner in the same county, Snohomish, as the misconduct alleged herein.
12 At all times relevant to this complaint, GAL Mr. Parker was domiciled and
13 working in Washington State and is currently working in Clallam County located
14 in western Washington.

15 2.3 Defendant Canfield, acting as a WSBA licensed attorney, No. 28426, and always
16 under the banner of Canfield Madow Law Group located in Everett Washington,
17 was at all times relevant to this complaint domiciled and working in Washington
18 State. Canfield Madow advertises legal services to residents of Snohomish,
19 Skagit, King, Whatcom and Island Counties. Island and Skagit County are near
20 adjacent to Clallam County.

21 2.4 Defendant Port Gardner Law Group, Inc. P.S. (Port Gardner) is a Washington
22 State Limited Liability Company located in Everett Washington, providing
23 family law legal services in Washington State. GAL Mr. Parker at all times
24 relevant to this complaint used Port Gardner name and resources in conducting all

1 GAL duties. Port Gardner was on notice as GAL Mr. Parker held himself out as a
2 Port Gardner attorney while providing GAL services for the State of Washington.
3 Defendant Port Gardner is liable for GAL Mr. Parkers actions under the doctrine
4 of Respondeat Superior, as Defendant GAL Mr. Parker was clearly working as a
5 law firm employee, not an independent third party.

6 2.5 Defendant Mr. Canfield was during all times relevant to this complaint employed
7 by and working through his law offices, Defendant Canfield Madow Law Group,
8 a Professional Limited Liability Company (Canfield Madow), located in Everett
9 Washington. Mr. Canfield is a founding partner in the law firm. At all times
10 relevant to this Complaint, Mr. Canfield used the Canfield Madow name and
11 resources in conducting all attorney functions. Defendant Canfield Madow is
12 liable for Mr. Canfield's actions under the doctrine of Respondeat Superior.

13 **III. RELEVANT FACTUAL BACKGROUND**

14 3.1 August 29, 2008, Plaintiff Ms. Bloom, then a 22-year-old Romanian exchange
15 student working as an au-pair in Sammamish, Washington and attending Bellevue
16 College, married 29-year-old Brian C. Yorks, who was living and working in Western
17 Washington, employed in the Information Technology Industry.¹

18 3.2 Plaintiff Ms. Bloom and Mr. Yorks share two biological children, M.J.Y.(DOB
19 [REDACTED]) and B.G.Y.([REDACTED]).

20 3.3 Following a considerable history of domestic violence against Ms. Bloom, by Mr.
21 Yorks, on March 25, 2020, and again in April, Ms. Bloom and the two minor children
22

23 ¹ An Au Pair is typically a young person who lives with a host family in a country other than their own, and supports
24 the family and their childcare in return for full board, lodging and per diem. They take an active
part in the family life, as a member of the family www.aupair.com, <https://www.aupair.com/en/p-au-pair-meaning.php>.

1 were granted a Domestic Violence Protection Order (DVPO) for their protection
2 against Mr. Yorks by Snohomish County Superior Court (Case No. 20-2-01235-31).

3 3.4 In response to the criminal allegations, Mr. Yorks contemporaneously filed for
4 divorce from Ms. Bloom (Sno Co No. 20-3-00465-31).

5 3.5 For approximately the year following, Ms. Bloom's attempts to work with Mr. Yorks
6 to resolve the dissolution, including Mr. York's failure to attend court ordered
7 supervised visitation with their children, were met by Mr. Yorks' absence from the
8 State.

9 3.6 Upon returning from his travels and reengaging in the divorce case, Mr. Yorks
10 requested a Guardian ad Litem (GAL) be appointed to the case. Specifically, Mr.
11 Canfield requested that GAL Mr. Parker be appointed as the GAL.

12 3.7 The basis of the request to appoint a GAL was Mr. Yorks allegations that Ms.
13 Bloom's historical and credible allegations of abuse were actually acts of parental
14 alienation and further served as evidence of her mental instability.

15 3.8 On January 4, 2021, Mr. Canfield, under the banner of Canfield Madow Law Group
16 and on behalf of his client, Mr. Yorks, specifically requested GAL Mr. Brian Parker
17 be assigned to the divorce case. GAL Mr. Parker was known to Canfield Madow and
18 Mr. Canfield due to their prior and ongoing use of his services as a GAL in divorce
19 matters.

20 3.9 Mr. Brian Parker first began working as a family law attorney in Snohomish County
21 in the end of 2019. Since becoming qualified as a GAL in 2020 and prior to being
22 removed from all appointed positions with Snohomish County in 2024, Mr. Parker
23 was assigned a total of twelve (12) cases as GAL. Of those, Eight (8), or 2/3 of his
24

1 assigned GAL cases were at the request of the divorce attorneys working at Canfield
2 Madow.

3 3.10 On January 11, 2021, over Ms. Bloom objection, the court appointed Mr. Brian
4 Parker of Port Gardner Law Group, as GAL over the case.

5 3.11 On January 31, 2021, both Ms. Bloom and Mr. Yorks completed GAL mandated
6 intake forms, each providing their personal medical information including
7 prescription history, provider physicians and mental health counselors.

8 3.12 On February 11, 2021, GAL Mr. Parker conducted his one and only in person
9 interview of Mr. Yorks. Mr. Yorks and GAL Mr. Parker met at Mr. Parker's law
10 office, at Port Gardner located in Everett, Washington. No one else was present.

11 3.13 Out of the interview with Mr. Yorks on February 11th, GAL Mr. Parker noted the
12 following allegations against Ms. Bloom including but not limited to, Ms. Bloom
13 being prone to "rages," suffering from "Munchausen Syndrome" and being "overly
14 harsh" but also "too lenient" claiming she abuses prescription medicines, and that Ms.
15 Bloom is patently "unfit to handle the children" alleging that one day she would
16 "disown them."

17 3.14 Ms. Bloom's first interview with GAL Mr. Parker took place on February 19,
18 2021, at Port Gardner. Ms. Bloom was not advised of her rights nor made aware that
19 the interview, including her statements, could and would, be used against her in a
20 court of law, and specifically in the removal of her children from her care, custody
21 and control.

22 3.15 In GAL Mr. Parker's notes from his interview with Ms. Bloom he mocked Ms.
23 Bloom for the challenges she faces with English as a second language, saying in his
24 notes, she "dithered" at him and that she was "a mess."

1 3.16 At the time of these interviews, Ms. Bloom had sole decision-making power over
2 their two children and Mr. Yorks was supposed to be participating in supervised
3 visitation. There was a DVPO in place for the protection of Ms. Bloom and the two
4 minor children, then only five (5) and (7) years old (Sno Co. 20-2-02025-31).

5 3.17 Thereafter GAL Mr. Parker then required Ms. Bloom to bring both children to his
6 Port Gardner law office so he could interview them

7 3.18 At the time, Ms. Bloom's children were very young. The older child, still only
8 seven (7) was receiving regular medical treatment for ADHD, ODD and Anxiety
9 Disorder flowing from the domestic violence in the home.

10 3.19 Accordingly, on April 27, 2021, Ms. Bloom emailed GAL Mr. Parker asking that
11 the interview be held at the marital home where she and the children lived, and where
12 the children would be the most comfortable.

13 3.20 Later that same day, April 27, 2021, rather than returning her email, GAL Mr.
14 Parker called Ms. Bloom and told her, if she didn't bring the children to him at Port
15 Gardner, he would get a court order for Mr. Yorks to take them from her and bring
16 them to him.

17 3.21 Contemporaneously, on May 3, 2021, Ms. Bloom filed for and was granted a
18 second domestic violence protection order (DVPO) against Mr. Yorks.

19 3.22 The DVPO was granted based upon ongoing threats by Mr. Yorks to Ms. Bloom,
20 including stalking and keeping Ms. Bloom under video and audio surveillance in the
21 marital home post separation (No. 21-2-02025-31).

22 3.23 Further, Mr. Yorks' was attempting to retrieve his firearm from law enforcement,
23 after it was confiscated following his Rape DV 2 [STRONGARM] arrest from
24

1 February 20, 2020. Mr. Yorks threatened Ms. Bloom stating that he could walk into
2 any store and buy any gun he wished.

3 3.24 As required by GAL Mr. Parker, on May 6th, 2021, late afternoon, Ms. Bloom
4 brought the children to Port Gardner where GAL Mr. Parker planned to interview
5 them.

6 3.25 At the Port Gardner meeting with the children, the children were fidgety and
7 unsettled, clearly uncomfortable with Mr. Parker and the law offices. The meeting felt
8 hectic.

9 3.26 Although the children asked to stay with their mother Ms. Bloom during the
10 interview, GAL Mr. Parker refused and mandated Ms. Bloom to hold the door of his
11 office shut from outside so the children could not escape while he was addressing
12 them. Both Ms. Bloom and her children were emotionally unsettled by this and
13 extremely uncomfortable.

14 3.27 Given their ages and having never dealt with a GAL before, in preparation for the
15 interview, Ms. Bloom explained to her boys that the law offices would be “like” a
16 library where you use soft ‘library voices,’ and that they could talk to the GAL Mr.
17 Parker “like” a teacher, in such that could trust him and tell him anything you want.

18 3.28 Ms. Bloom believed that the GAL was going to adhere to the best interest of her
19 children.

20 3.29 At no point did GAL Mr. Parker, or anyone else, advise Ms. Bloom that
21 everything she said and did while at Port Gardner, to her children’s court appointed
22 GAL, and everything that her five- and seven-year-old children said and did while at
23 Port Gardner with their GAL, could and would be used against Ms. Bloom in a court
24 of law.

1 3.30 Then, although there had been no court activity in the divorce matter (Sno Co No.
 2 20-3-00465-31) since January, on Friday May 7, 2021, Mr. Canfield, as partner for
 3 Canfield Madow Law Group, and acting as Mr. Yorks divorce attorney, emailed GAL
 4 Mr. Parker to formally introduce himself into the Yorks case, advising specifically
 5 that the case was as real problem and that “he was going to have to set a hearing....”
 6 referencing alleged bad behavior by Ms. Bloom.

7 3.31 GAL Mr. Parker confirmed by email that he would meet Mr. Canfield to review
 8 his concerns regarding the case Monday May 10, 2021, at 11:30 AM by phone
 9 appointment. Billing records are clear that GAL Mr. Parker never accounted for this
 10 call with Mr. Canfield.

11 3.32 Specifically, GAL Mr. Parker in collusion with Damon Canfield, were developing
 12 an alternative narrative, wherein Ms. Bloom would be painted as mentally ill and a
 13 danger to her children in order to reverse the parties roles in the divorce proceedings.

14 3.33 June 10, 2021, Ms. Bloom emailed GAL Mr. Parker, subject “Anne Tuttle”
 15 wherein she provided a report from Dr. Anne Tuttle, her primary doctor since 2008,
 16 outlining Ms. Bloom relevant medical history intending to exonerate her from any
 17 impairment in her ability to parent.

18 3.34 Dr. Tuttle’s March 4, 2020, letter was also filed under seal in the family law case
 19 20-3-00465-31. Ms. Bloom had been Dr. Tuttle’s patient since 2008.

20 3.35 June 10, 2021, Ms. Bloom provided an email subject “Sprout Birth Center
 21 Medical Records” which included a clinical summary of Ms. Bloom’s medical
 22 records from the birthing and pediatric care center “Sprout Birth Center & Natural
 23 Health.
 24

1 3.36 Again, the report was also filed under seal in the family law case (20-3-00465-
2 31). Again, the report showed no infirmity to Ms. Bloom's ability to parent her
3 children.

4 3.37 On June 11, 2021, Ms. Bloom emailed GAL Mr. Parker again, subject "Med
5 Records" with all her medical records, including everything that had been filed with
6 the court to date. The email contained medical records from Dr. Bridgette Jeffries at
7 Restoration Mental Health Services, spanning from July 18, 2020, to February 22,
8 2021.

9 3.38 Everything collectively indicated that Ms. Bloom was the victim of domestic
10 violence and that she had no mental or physical infirmities that impaired her ability to
11 parent and in fact should be the custodial parent.

12 3.39 That same day, on June 11, 2021, GAL Mr. Parker provided his first report to the
13 court. That report, fundamentally contradicted every piece of evidence related to the
14 care and wellbeing of the children previously before the court and a part of the record.

15 3.40 GAL Mr. Parker's report specifically pointed to the unruly behavior of the
16 children at his office and opined that it was a reflection of Ms. Bloom's poor
17 parenting skills.

18 3.41 The report specifically recommended that the court amend the temporary
19 parenting plan, to move to joint decision making, discontinue the requirement of
20 supervised visitation for Mr. Yorks and, in important part, Ms. Bloom was required to
21 get a psychological evaluation.

22 3.42 The apparent basis of the requirement for Ms. Bloom to get a mental health
23 evaluation was her historically consistent allegations of domestic violence against Mr.
24

1 Yorks and Mr. Yorks' personal allegations against Ms. Bloom claiming her to be
2 mentally ill.

3 3.43 There was no acknowledgement of the, then, three (3) mental health reports, by
4 GAL Mr. Parker or the court, including the content of the June 10th email to Mr.
5 Parker, that had already been provided to the court as well as all participants in the
6 divorce case.

7 3.44 Each of these reports serves to exonerate Ms. Bloom of any infirmity that would
8 affect her ability to parent the parties' children.

9 3.45 Despite each Defendant having received the then same three (3) expert opinions
10 that Ms. Bloom was physically and emotionally fit to be a parent, and those same
11 reports being provided approximately 6 (six) more times over the course of pretrial
12 work, to both GAL Mr. Parker and Mr. Canfield, and filed with the court under seal,
13 both Defendant Mr. Canfield and Defendant GAL Mr. Parker, subsequently and
14 repeatedly represented to the court that Ms. Bloom was mentally ill and a danger to
15 her children.

16 3.46 On June 18, 2021, Mr. Canfield filed a motion with the court to adopt GAL Mr.
17 Parker's recommendations from the June 11th, 2021, GAL report. Ms. Bloom
18 objected.

19 3.47 GAL Mr. Parker's recommendation directly contradicted all meretricious
20 evidence in the record and would place the two minor children with Mr. Yorks,
21 without supervision.

22 3.48 On June 21, 2021, Ms. Bloom's temporary DVPO was made permanent for a six
23 (6) month period (21-2-02025-31).

24

1 3.49 July 7, 2021, Ms. Bloom filed her formal objection to the adoption of GAL's
2 recommendations, in which she again included her three (3) exonerating medical
3 evaluations, each an expert opinion, summarily, that Ms. Bloom was a great mother
4 and should maintain custody of her children.

5 3.50 Ms. Bloom also at the time filed five (5) separate third party witness declarations
6 with the court each celebrating her parenting skills and recounting abusive behavior
7 by Mr. Yorks against his family.

8 3.51 Nevertheless, on July 15, 2021, despite the significant contradictory evidence
9 filed by Ms. Bloom, a hearing was held, and GAL Mr. Parker maintained his
10 recommendation to the court, unchanged, and incongruent with all the other reliable
11 evidence before the court, reemphasizing the need to have Ms. Bloom evaluated for
12 her mental health, as though she had not already completed the same. In important
13 part, GAL Mr. Parker recharacterized Ms. Bloom in the court's eyes by alleging she
14 was a bad mother, as evidenced by the children's hectic behavior while at Port
15 Gardner.

16 3.52 Further GAL Mr. Parker alleged that Ms. Bloom was nefarious and purposefully
17 lied to her children, to sour the interview process, when using the library and teachers
18 as examples to explain behavioral expectations.

19 3.53 The statements of comparison citing the library and a teacher were
20 mischaracterized and then used by Mr. Parker as evidence of Ms. Bloom's
21 unwillingness to work with him and her resistance to participating in the GAL child
22 interviews.

23 3.54 The court followed GAL Mr. Parker's recommendation to the detail, without
24 question or any indication of a review of Ms. Bloom's filed pleadings and evidence.

1 3.55 Based on court order and the adoption of the GAL report the children were
2 transitioned to their father, Mr. Yorks that same day, July 15th, for their first
3 unsupervised visit with him since April of 2021 when for a few hours he had them at
4 their baseball events.

5 3.56 On July 18, 2021, the children returned home from the long weekend with Mr.
6 Yorks. The older child, M.J.Y. displayed new evidence of physical abuse including
7 bruises and marks on his back, legs, and buttocks.

8 3.57 Upon his return home M.J.Y. disclosed to Ms. Bloom that "daddy played tickle
9 games, and he tickled my private parts, and it made me uncomfortable." This is the
10 first time Ms. Bloom was aware of the sexual abuse being directed at one of the
11 children.

12 3.58 Upon the advice of the children's pediatrician, Dr. St. Claire, Ms. Bloom took
13 M.J.Y. to Seattle Children's Hospital on July 20, 2021. Ms. Bloom then took M.J.Y.
14 to his pediatrician to whom he disclosed the sexual molestation. The disclosure was
15 then also reported to Child Protective Services (CPS).

16 3.59 The children's next scheduled visit with Mr. Yorks was July 28, 2021. Upon
17 arrival at the exchange location, Frontier Village in Lake Stevens, Washington, Ms.
18 Bloom was unable to get the children to exit the car in order to deliver them to Mr.
19 Yorks.

20 3.60 When Ms. Bloom tried to physically remove him from her vehicle to provide him
21 to Mr. Yorks, the older child that had disclosed the sexual abuse, M.J.Y. began crying
22 uncontrollably and then vomited.

23 3.61 The Lake Stevens Police Department (LSPD) were called to assist. They advised
24 Mr. Yorks and Ms. Bloom that they would not assist with the removal of the children

1 from her car, and that they would not assist in enforcing the civil order between Ms.
2 Bloom and Mr. Yorks, i.e. enforcing the father's visitation.

3 3.62 August 3, 2021, Ms. Bloom filed a motion for temporary orders and a motion to
4 show cause seeking limitations on Mr. Yorks as well as a renewed order of protection
5 for the children in the family law case 20-3-00465-31.

6 3.63 In her filings, Ms. Bloom included medical evidence of M.J.Y's bruising and the
7 new evidence of sexual molestation including the sealed medical records from M.J.Y
8 medical evaluation at Seattle Children's and at his primary care pediatrician.

9 3.64 Of important note, M.J.Y.'s pediatrician stated in her report that was provided to
10 the court: "The last two visits with his biological father, he has returned with marks
11 on his bottom and hip. He is also very obsessed with bottoms after this, asking people
12 to take off pants, including his 5-yr old brother." This report was also included in Ms.
13 Bloom's pleadings.

14 3.65 That day, Aug. 3rd, Leslie Hohorst, Ms. Bloom's new attorney, Mr. Davies'
15 paralegal, served Mr. Canfield and GAL Mr. Parker, by way of email. Included in the
16 email were Mr. Davies, as well as GAL Mr. Parker, Mr. Canfield, and Amy Ferrier,
17 Mr. Canfield's senior paralegal at Canfield Madow.

18 3.66 Then at 2:48, four (4) minutes after Ms. Bloom's attorney provided service, Mr.
19 Canfield forwarded the email notice, clearly intended for GAL Mr. Parker, but
20 inadvertently sent to Mr. Yorks²

21 3.67 The email stated, with reference to Ms. Bloom's emergency hearing to address the
22 alleged sexual abuse against the older child, "Mr. Parker, you can't possibly condone
23

24 _____
² common first names Brian Yorks, Brian Parker

1 this kind of parental alienation? This is outrageous.”, recharacterizing Ms. Bloom’s
2 safety concerns related to her children, and especially her seeking support from the
3 court, as evidence of parental alienation and abuse of process.

4 3.68 Mr. Canfield included his paralegal Ms. Ferrier in the email to GAL Mr. Parker,
5 regarding the alleged parental alienation by Ms. Bloom.

6 3.69 Shortly after, at 3:04 pm Ms. Ferrier forwarded the email to GAL Mr. Parker,
7 explaining it was intended for him. Mr. Canfield was included in the forwarded
8 message.

9 3.70 In response, GAL Mr. Parker almost immediately started drafting his First
10 Supplemental Report. His billing statement shows 2.5 hours dedicated to the Yorks
11 redrafted report that afternoon.

12 3.71 The next day, on August 4th and approximately five (5) minutes prior to Ms.
13 Bloom’s hearing for an immediate restraining order against Mr. Yorks for the
14 protection of her children, GAL Mr. Parker appeared in court on behalf of Mr. Yorks
15 and provided all the parties with his First Supplemental Report.

16 3.72 Despite GAL Mr. Parker’s knowledge of the now four (4) exculpatory mental
17 health evaluations of Ms. Bloom, his August 4th report emulated the language from
18 Mr. Canfield’s emails just five (5) days prior, where Mr. Canfield refers to Ms.
19 Bloom as “her own organic mental health disorder”, having a “clear mental health
20 disorder” and stated that once “she gets herself under control and gets the help she
21 needs” [...].

22 3.73 The report was not filed and had not been provided prior to the hearing. The
23 report included new and specific allegations that Ms. Bloom suffers from a
24 personality disorder.

1 3.74 GAL Mr. Parker was and is the only person that ever identified Ms. Bloom as
 2 having a personality disorder, or any kind of mental infirmity that would impair her
 3 ability to parent. GAL Mr. Parker diagnosed her personally and in direct contradiction
 4 of the then four (4) evaluations in the record.

5 3.75 GAL Mr. Parker testified at the hearing: "With the important caveat that I am not
 6 a mental health professional and have no training on diagnosing mental health
 7 disorders or mental illnesses, Mother's behavior leads to strong concerns she has
 8 a personality disorder or other mental illness."

9 3.76 Specifically, a year later, in May 2022 as a part of the Yorks family court trial,
 10 GAL Mr. Parker testified for Mr. Yorks, stating in reference to his personal diagnosis
 11 of Ms. Bloom as having personality disorder:

12 "took that language, actually -- and I don't think I have a citation in
 13 front of me -- from my readings from a psychology book or text.
 14 So these are actually --they may --I would have to double-check
 15 my reading. They may have been lifted from the DSM-V for
 16 common symptoms of -- and again, I got them directly. I was reading
 a text or psychological treatise, but they were actually listed from
 the symptoms for various personality disorders, which raised my
 concern and led me to recommend a psychological evaluation."

17 3.76 For clarity, all expert reports, now four (4) that Ms. Bloom had provided to all
 18 participants to the case, and that had all been filed with the court, plainly informed the
 19 court that Ms. Bloom did not suffer from any mental or physical limitation that would
 20 affect her ability to parent, and in fact the parties should *not* share custody of the
 21 children, as it is *not* in the children's best interests (*emphasis added*).

22 3.77 For one specific example, Laura Montavon, MS LMFT of Snohomish County
 23 Psychology Associates, PLLC, on July 30, 2021 (Bloom's fourth report), in important
 24 part stated: "Gina has at all times had the best interest of her children at the center of her

1 attention. Please know that shared custody of these boys will not be in their best interests
2 at time.”

3 3.78 However, in contradiction with all third party neutral medical documentation provided
4 to the parties and the court, the August 4, GAL supplemental report, generated in direct
5 response to Mr. Canfield’s email, for the first time included the allegation of “parental
6 alienation” to describe Ms. Bloom’s cries for help.

7 3.79 GAL Mr. Parker’s first supplemental report went on at length about Ms. Bloom’s
8 dishonesty. Specifically, he highlighted Ms. Bloom’s alleged lie about requesting a home
9 visit for the child interview and, specifically, claiming that she did not make the request
10 until after Mr. Parker released his first report, as an attempt to undermine the GAL’s
11 criticism of her parenting skills.

12 3.80 This is not true, as it’s easily demonstrated upon a review of the record, that Ms.
13 Bloom made the request before the first child interviews took place and well before GAL
14 Mr. Parker’s first report.

15 3.81 Later in May 2022 at the family court trial, GAL Mr. Parker will testify under oath
16 that he previously had no recollection of Ms. Bloom ever asking for the interview to take
17 place at home.

18 3.82 Despite the email requesting the visit be at home being cited by GAL Mr. Parker for
19 billing purposes on April 27th, 2021, and becoming a dispositive aspect of the
20 degradation of Ms. Bloom’s character at trial, GAL Mr. Parker claimed he had no
21 memory of the email.

22 3.83 The August 4th hearing was continued upon Mr. Canfield’s request and over Ms.
23 Bloom’s objection, to have time to respond to the ‘new allegations’ against his client
24 Mr. Yorks. The matter was continued until August 18, 2021.

1 3.84 Thursday August 5, 2021, by court order, Mr. Yorks picked up the children from
2 YMCA in Monroe for his court ordered summer vacation. Mr. Yorks had not seen the
3 children since M.J.Y.'s disclosure and appointment at Seattle Children's Hospital.

4 3.85 The children were released to Mr. Yorks. However, YMCA representative Jennifer
5 Farlow thereafter contacted CPS very concerned for the well-being of the children,
6 stating "I've never seen a child so afraid to go with a father" specially referencing
7 M.J.Y.

8 3.86 On August 6, 2021, Brian Yorks emailed GAL Mr. Parker complaining about how
9 hard it was to retrieve the children and that the older child was threatening to stab
10 himself if he was required to stay with the father Mr. Yorks.

11 3.87 On that same day, August 6, 2021, Mr. Yorks filed a contempt motion against Ms.
12 Bloom based on her inability to remove the children and place them in Mr. Yorks'
13 custody on July 28, 2021, the event wherein they had called for police support in the
14 transition.

15 3.88 Monday August 9, 2021, in clear violation of the DVPO in place (case number 21-2-
16 02025-31) Mr. Yorks took his new girlfriend (then 5 months pregnant) and both
17 children to Florida to go to Disneyworld.

18 3.89 The older child, the one who had disclosed sexual molestation by Mr. Yorks, had
19 been scheduled for a forensic interview at Dawson Advocacy Place the same day,
20 August 9, 2021. The interview never took place.

21 3.90 Mr. Canfield, authorized by GAL Mr. Parker, advised Mr. Yorks to travel outside the
22 state against court order. Ms. Bloom was not advised of their decision or how they
23 administered the court order in favor of Mr. Canfield's client Mr. Yorks. She did not
24 know the children had been removed from the state.

1 3.91 August 18, 2021, the court heard cross motions on all open matters. The allegation of
2 contempt against Ms. Bloom was reserved, based on GAL Mr. Parker's allegation of her
3 mental health infirmity and the requirement that she get a psychological evaluation.

4 3.92 There was no reference made to the four (4) exonerating expert opinions regarding
5 Ms. Bloom's mental health already in place. None of the medical records or other
6 evidence provided by Ms. Bloom was ever considered, seemingly never viewed by the
7 court.

8 3.93 Ms. Bloom's motion for an immediate restraining order was not addressed, having
9 disappeared into the myriads of new allegations leveled against Ms. Bloom by Mr.
10 Canfield and GAL Mr. Parker and was, in the end, summarily denied.

11 3.94 At the hearing, Mr. Canfield recommended that Ms. Bloom be evaluated by their
12 preferred forensic clinical psychologist Dr. Monique Brown. Mr. Canfield had hired Dr.
13 Brown in past cases for the benefit of Canfield Madow clients and had been happy with
14 her work.

15 3.95 The court ordered Ms. Bloom to acquiesce to a mental health evaluation by Mr.
16 Yorks' preferred evaluator, Dr. Brown. Further, the court allowed Mr. Yorks to solely
17 be responsible for the payment of her services

18 3.96 Additionally, it was ordered that Mr. Yorks would have the first contact with Dr.
19 Brown, by way of a phone call to determine the scope of services and costs.

20 3.97 At the time the court ordered the evaluation of Ms. Bloom by Dr. Brown, Ms. Bloom
21 had already been evaluated by two (2) medical doctors, her psychiatrist and a mental
22 health psychologist. All these reports, four (4) in total, irrefutably establish that Ms.
23 Bloom was not suffering from a mental health condition, let alone one that would affect
24 her ability to parent.

1 3.98 August 18, 2021, after the hearing, Ms. Bloom filed an administrative complaint
2 against GAL Mr. Parker with both Washington State Bar Association (WSBA) and
3 Snohomish County GAL Committee, for the proffered fraud and perjury in his August
4 4, 2021, report, and for colluding with Mr. Canfield to allow Mr. Yorks to leave the
5 state with their two young children in violation of court order and without her
6 knowledge, thus causing M.J.Y. to miss his forensic interview.

7 3.99 September 23rd Ms. Bloom filed for extension of the DVPO (21-2-02025-31) The
8 hearing was set for October 7, 2021.

9 3.100 In response, on Friday October 1, 2021, GAL Mr. Parker drafted another new
10 report, the second supplementary GAL Report, which he then filed with the court on the
11 4th of October under the appropriate case number, Sno Co. No. 20-3-00465-31.

12 3.101 Despite GAL Mr. Parker not being a party to the DVPO matter, Mr. Canfield filed
13 the newest GAL report into Mr. Yorks' DVPO response October 6, 2021 (Sno Co. No.
14 21-2-02025-31).

15 3.102 October 7, 2021, at the DVPO hearing, to ensure that the report from the other
16 cause number made its way into the hearing, GAL Mr. Parker appeared for Mr. Yorks to
17 testify against Ms. Bloom.

18 3.103 After GAL Mr. Parker's testimony degrading Ms. Bloom veracity for the truth
19 and her mental health, Ms. Bloom, prose was no longer permitted to address the court,
20 the court then, absent any motion on the record, dismissed Ms. Bloom's DVPO.

21 3.104 At the DVPO case no. 21-2-02025-31 hearing held on October 7, 2021, both Mr.
22 Canfield and GAL Mr. Parker were aware that GAL Mr. Parker's diagnosis of
23 Personality Disorder which was presented to the court by GAL Mr. Parker and Mr.
24 Canfield, was directly and completely contradictory to the four (4) expert medical

1 evaluations filed with the court and previously provided to all parties involved with the
2 family law matter.

3 3.105 Between Aug. 18, 2021, and November 19, 2021, Ms. Bloom scheduled her
4 evaluation with Dr. Brown four (4) separate times. On each occasion Dr. Brown had to
5 cancel and reschedule.

6 3.106 Oct. 14, 2021, Matthew Jankovic, a law clerk for Port Gardner Law Group,
7 emailed GAL Mr. Parkder to relay information from the phone call he received from
8 Mr. Canfield, while GAL Mr. Parker was in mediation. Mr. Canfield was seeking GAL
9 Mr. Parker's approval of another trial continuance, and coordinating the next set of
10 motions against Ms. Bloom.

11 3.107 Mr. Jankovic included accolades for Mr. Parker, and as a contrast to Ms. Bloom's
12 then pending administrative complaints regarding GAL Mr. Parker's dishonesty. Mr.
13 Jankovic wrote, specifically, Mr. Canfield thinks you're a "really good guy" who
14 "always tells the truth."

15 3.108 October 15, 2021, Ms. Bloom filed a motion with the court, objecting to the
16 otherwise "agreed" trial continuance by Mr. Yorks, and included evidence of ongoing
17 domestic violence, evidence of GAL misconduct, and, in important part, sealed mental
18 and physical health evaluations from the four (4) experts, each concluding or supporting
19 Ms. Bloom as the primary parent, the caregiver parent, suffering from no mental health
20 related parental limiting factors and the professional assessment that she should be the
21 primary caregiver of the parties' children.

22 3.109 On October 14, 2021, GAL Mr. Parker emailed CPS regarding the Yorks matter.
23 GAL Mr. Parker contacted CPS just to let them know that Ms. Bloom's mental health
24

1 was in question, implying that she could not be trusted and her reports to CPS were
 2 likely contrived.

3 3.110 In important note, based on a review of Mr. Parker's October 14, 2021, billing
 4 records, GAL Mr. Parker first received a call from Mr. Canfield, thereafter he made the
 5 call to CPS. After that he emailed his GAL reports to CPS. Then GAL Mr. Parker
 6 placed a call back to Mr. Canfield. Each of these events were billed for that day October
 7 14, 2021.

8 3.111 Oct. 23, 2021, GAL Mr. Parker received an email from Dr. Brown indicating that
 9 it was she that had to cancel all the prior appointments with Ms. Bloom, specifically
 10 stating that it was in no way Ms. Bloom's fault that the appointment had been delayed.

11 3.112 Oct. 26, 2021, three (3) days after receiving the email from Dr. Brown concerning
 12 Ms. Bloom's scheduled evaluation, GAL Mr. Parker reasserted his previous allegation
 13 that Ms. Bloom was noncooperative and refused to coordinate with Dr. Brown for her
 14 evaluation as ordered by the court. He included this in his report to the court and
 15 directed Porter Gardner law clerk Mr. Jankovic to file the same.

16 3.113 Before filing the inaccurate reports for GAL Mr. Parker, Mr. Jankovic questioned
 17 whether GAL Mr. Parker still meant to file the report, uncorrected. GAL Mr Parker
 18 affirmed and Jankovic filed the false report. That same false report, was then the primary
 19 piece of evidence presented at the October 29, 2021 Exparte Emergency Hearing where
 20 all custodial, and protection status was flipped from Ms. Bloom to Mr. Yorks.

21 3.114 On Oct 29, 2021, at 8:50 am, Ms. Bloom, prose, received an email from Mr.
 22 Canfield's legal assistant, Hannah Bartow, entitled "Yorks Ex Parte Hearing 10/29/2021
 23 2:00 p.m." advising her that Mr. Canfield would be appearing that afternoon, at 2:00
 24

1 p.m. in the exparte department of the Snohomish Superior Court to request an
2 Immediate Restraining Order.

3 3.115 The email on its face made no specific mention that Ms. Bloom was the party
4 being restrained, only that the hearing was set and that the attachments included the
5 relevant pleadings. Ms. Bloom was prose.

6 3.116 The email included the sender, Hannah Bartow, the recipient, Ms. Bloom, and on
7 Cc.: GAL Mr. Brian Parker, his Port Gardner law clerk Mathew Jankovic, Mr. Yorks's
8 attorney Mr. Canfield and his senior paralegal Amy Ferrier, an employee of Canfield
9 Madow.³

10 3.117 That morning at 10:45 a.m., Ms. Bloom, after being contacted by the children's
11 school nurse regarding her children's health and Covid-19 exposure, sent an email
12 addressed to everyone on the notice thread, which included Mr. Yorks, GAL, Mr.
13 Parker, Mr. Canfield and Mr. Matthew Jankovic, advising them all that she would be
14 seeking medical care for their younger child B.G.Y. that morning at Seattle Children's.

15 3.118 It was evident based on a plain reading of the message why she would be unable
16 to attend the "emergency hearing" scheduled a few hours later.

17 3.119 That morning, Mr. Yorks was physically present at the Evergreen District Court
18 in Monroe where he was pursuing a patently frivolous lawsuit against their older child,
19 M.J.Y.'s, Godmother (and Ms. Bloom's best friend), Siobhan Owen Ryseff (DOB
20 07/16/1985), based on a 935-dollar phone bill.

21 3.120 Mr. Yorks lawsuit was dismissed with prejudice for failure to state a claim in
22 November of 2021.

23

24

³ Ms. Bloom was then using email address: ginayorks24@gmail.com.

1 3.121 Mr. Canfield knew his client Mr. Yorks was attending the other court matter that
2 day when his office set the emergency hearing earlier that morning. He also knew that,
3 but for some other event, Ms. Bloom would be otherwise engaged at that hearing as a
4 witness for Siobhan.

5 3.122 Although already implicit in the email chain of communication, at 1:23 p.m. Ms.
6 Bloom wrote: "We are at Seattle Children's Hospital ER" with reference to herself and
7 B.G.Y., the younger child who subsequently tested positive for Covid-19.

8 3.123 At 1:45 p.m. Mr. Yorks replied to the email chain of communication, again
9 including the original recipient list: Ms. Bloom, GAL Mr. Parker, Mr. Canfield and Mr.
10 Jankovic.

11 3.124 That afternoon, October 29, 2021, starting at 2:07 PM, Protem Commissioner
12 Jacalyn Brudvik of Snohomish County Superior Court, heard the exparte emergency
13 hearing for Immediate Order of Restraint against Ms. Bloom in favor of Mr. Yorks.

14 3.125 Ms. Bloom, prose at the time, was not present at the hearing on the afternoon of
15 Oct. 29, 2021, and did not become privy to the record until she received the audio
16 recording of the hearing on November 11, 2023.

17 3.126 Present at the emergency motion were Mr. Canfield on behalf of Mr. Yorks, who
18 was not present, and the GAL Mr. Brian Parker who appeared on behalf of Mr. Canfield
19 and his client Mr. Yorks.

20 3.127 The motion pleadings consisted of Mr. Yorks' declaratory allegations against Ms.
21 Bloom and the newest version of the GAL report filed three days earlier, October 26,
22 2021 (third supplementary report).

23 3.128 Despite knowledge of all of Ms. Bloom's exculpatory medical evaluations, and
24 the email from Dr. Brown only three (3) days earlier on October 23, the GAL report led

1 the court to believe that Ms. Bloom would not cooperate with him as the GAL or Dr.
 2 Brown in the coordination of a mental health evaluation. GAL Mr. Parker continued to
 3 assert that Ms. Bloom was dishonest, non-cooperative and mentally ill.

4 3.129 Both GAL Mr. Parker and Mr. Canfield, were aware of the four (4) medical
 5 reports exonerating Ms. Bloom of any mental health impairment and that GAL Mr.
 6 Parker’s diagnosis of Ms. Bloom, as well as the allegations he had waged, did not match
 7 the facts or the record.

8 3.130 Further, despite knowledge of Ms. Bloom’s exculpatory expert evaluations, Mr.
 9 Canfield aggressively encouraged the court to believe that GAL Mr. Parker was telling
 10 the truth and that his personal diagnosis of Ms. Bloom was correct, purposely
 11 promulgating the allegations that 1) Ms. Bloom suffers from a *Personality Disorder* 2)
 12 Ms. Bloom is a danger to her children and 3) Ms. Bloom will not cooperate with getting
 13 a mental health evaluation.

14 3.131 Despite Ms. Bloom’s email notice that she was at Seattle Children’s Hospital, Mr.
 15 Canfield represented to the Court that he was unaware of Ms. Bloom’s whereabouts and
 16 implied that she was missing with her younger child. He purposely excluded any
 17 evidence of the call Ms. Bloom had received, and was discussed in the relevant email
 18 chain, from the children’s school relaying their covid exposure.

19 3.132 Both Mr. Canfield and GAL Mr. Parker represented to the court that Ms. Bloom
 20 was mentally impaired and a danger to her children.

21 3.133 Following Mr. Canfield’s in court narrative describing Ms. Bloom’s alleged
 22 erratic and alienating behavior, he added: “*And ironically, Ms. Yorks isn’t here today, as*
 23 *if to double down on the chaos.*” [...] and then added “we don’t know if she ever went
 24

1 to Children’s Hospital. We don’t know where she is with (the child) at this point in time,
 2 but we don’t know... [...]” (*emphasis added*).

3 3.134 The GAL Mr. Parkre also testified against Ms. Bloom, encouraging the court to
 4 believe they were not aware of Ms. Bloom’s whereabouts.

5 3.135 In an effort to nail down Ms. Bloom’s alleged poor behavior, GAL Mr. Parker
 6 testified: “I’ve repeatedly held that the parents need to cooperatively parent, quit
 7 fighting, the kids need to see them cooperate, and Ms. Yorks has rejected that.⁴ So, I am
 8 recommending a change of custody at this point.”

9 3.136 Following the GAL recommendations and the representations of Mr. Canfield,
 10 alone, Commissioner Brudvik removed Ms. Yorks’s custodial rights, flipping residency
 11 and sole decision making to Mr. Yorks.

12 3.137 Based on GAL recommendations, the court placed a restraining order against Ms.
 13 Bloom for the protection of Mr. Yorks and their children.

14 3.138 Based on GAL recommendations, the court also specifically ordered Ms. Bloom
 15 to remove all social media based fundraising efforts to hire an attorney.

16 3.139 There is no indication or evidence in the record that Commissioner Brudvik
 17 reviewed the Judicial Information System, (JIS) or the Odyssey docket, or any other
 18 docket records, on October 29th, 2021.

19 3.140 Because of GAL Mr. Parker and Mr. Canfield’s representations the Commissioner
 20 followed GAL Mr. Parker’s recommendations to remove the children from Ms. Bloom,
 21 remove her custodial decision making and immediately place the children with Mr.
 22 Yorks.

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⁴ Referring to Ms. Bloom as Ms. Yorks.

1 3.141 Commissioner Brudvik's decision had to be guided by the testimony GAL Mr.
2 Parker and Mr. Canfield, because there is no other evidence in the record, save Mr.
3 Yorks declaratory allegations throughout the family court case, that could be cited to
4 corroborate the court's decision.

5 3.142 Specifically, in that hearing, the court failed to learn of Mr. Yorks' substantial
6 history of domestic violence-related arrests, and specifically the then-pending charge for
7 Rape Domestic Violence, Second Degree, *Strongarm*, against Ms. Bloom, which was
8 under review by the Snohomish County Prosecuting Attorney's Office.

9 3.143 The considerable history of credible domestic violence Dr. allegations, and the
10 pending charge of Rape was certainly known to Mr. Parker, as was confirmed by the
11 disclosure of Yorks JIS records which was recovered from Mr. Parker's case file.

12 3.144 GAL Mr. Parker had solicited York's JIS in April of that year, asking Mr.
13 Jankovic of Port Gardner to check it, and provide him a copy.

14 3.145 At the time of the emergency ex parte hearing, Ms. Bloom had no criminal history,
15 no infraction history and no history of domestic violence or restraining orders against
16 her. All evidence before the court, other than what was provided by GAL Mr. Parker,
17 categorically confirmed that Ms. Bloom was able to parent without issue, bearing no
18 mental or physical infirmity whatsoever.

19 3.146 The commissioner made no findings to support the emergency ex parte hearing.
20 Ms. Bloom was not present, they did not attempt to contact her, despite Mr. Canfield
21 and Mr. Parker knowing where she was, and that she did not have any kind of
22 representation at the hearing.

23 3.147 From this point going forward, the script had been flipped, and Ms. Bloom was
24 irrevocably labeled as an abuser and mentally unstable.

1 3.148 The court ordered additional mental health restrictions based on the GAL Mr.
 2 Parker's allegations and recommendation.

3 3.149 Nov. 1, 2021, Ms. Bloom filed a motion for GAL Mr. Parker to be removed from
 4 the case. In her administrative complaint, Ms. Bloom cited GAL Mr. Parker for
 5 purposely misinforming the court in that she had nefariously missed appointments with
 6 Brown.

7 3.150 Ms. Bloom included evidence of GAL Mr. Parker's perjury at the Exparte
 8 Hearing, along with the fraudulent filing of his October 26th report, the perjury within
 9 his August 4th report as well as GAL Mr. Parker's approval of the Florida DVPO
 10 Violation, and later confirmed by Everett Police Department investigation.

11 3.151 Then, on November 3, 2021, CPS received an anonymous report targeting Ms.
 12 Bloom. The report alleged that someone heard the children talking about their mother
 13 Ms. Bloom talking badly about Mr. Yorks by way of text messages on her phone that
 14 she allegedly allowed her children to read.

15 3.152 Later, in Dr. Brown's January 24, 2022 extremely thorough fifty-five (55) page,
 16 mental health evaluation of Ms. Bloom, Dr. Brown does note the anonymous call to
 17 CPS, its timing and its direction, 'was highly suspicious.'

18 3.153 On November 18th, 2021, during Ms. Bloom's motion hearing to dismiss GAL
 19 Mr. Parker from her family law case, Commissioner Tracy Waggoner, a member of the
 20 Snohomish GAL Committee, denied Ms. Bloom's motion.

21 3.154 Commissioner Waggoner then awarded Mr. Parker \$20,000 from the parties'
 22 marital fund, specifically Yorks' 401k, taken as a loan against the family assets, for use
 23 paying Mr. Parker, payment to be redistributed at trial.
 24

1 3.155 Ms. Bloom requested a loan from the same account to hire an attorney, however
2 her request was denied.

3 3.156 On January 24, 2022, Dr. Brown completed her evaluation of Ms. Bloom. Now,
4 by a fifth expert, it was concluded, and clearly stated in the report, that Ms. Bloom has
5 strong parenting skills and no infirmity that would affect her parenting.

6 3.157 Dr. Brown confirmed Ms. Bloom's PTSD diagnosis was caused by Mr. Yorks'
7 abuse, and at minimum, the consequence of the intimidation and controlling behaviors.

8 3.158 Although Mr. Canfield hand selected Dr. Brown for Plaintiff Ms. Bloom's
9 psychological evaluation, Mr. Yorks was unsatisfied with Dr. Brown's conclusions, so
10 much so that Mr. Yorks emailed the doctor personally, requesting she arrive at a
11 different conclusion regarding Ms. Bloom's mental health.

12 3.159 Then on May 10, 2022, after multiple continuances by Mr. Yorks and over Ms.
13 Bloom's continued objection, trial commenced.

14 3.160 The matter was assigned to Judge Paul Thompson, a Snohomish County Superior
15 Court Judge, for trial.

16 3.161 Ms. Bloom, now represented by Mr. Davies, included Dr. Monique Brown as one
17 of her trial witnesses.

18 3.162 By the time of the family court trial in May of 2022, Ms. Bloom's position in the
19 case had been successfully switched to that of Mr. Yorks. Rather than commencing trial
20 as the custodial parent, protected from her abuser, Mr. Canfield with the support of
21 GAL Mr. Parker misled the court into believing that Ms. Bloom was mentally impaired
22 and the abuser in the marital relationship.

23 3.163 Going into trial, Mr. Yorks was now the custodial parent, protected from Ms.
24 Bloom, and as such, positioned properly as Mr. Canfield had hoped.

1 3.164 They successfully recharacterized Mr. Yorks history of domestic violence and
2 Ms. Bloom's concerns for her children's wellbeing into evidence of her mental infirmity
3 and parental alienation.

4 3.165 They further alleged that Ms. Bloom's attempts to seek redress from the court for
5 both her and children's protection was also evidence of her mental instability and abuse
6 of process. They argued Ms. Bloom would have to be crazy to think that anyone
7 associated with the court would work to conspire against her.

8 3.166 Prior to commencing trial, Judge Thompson advised the parties that he was the
9 judge that reviewed and dismissed Plaintiff Ms. Bloom's original GAL grievance filed
10 against the GAL Mr. Parker in August of 2021.

11 3.167 Judge Thompson stated on the record that he found no wrongdoing on the part of
12 the GAL Mr. Parker and thereafter conducted the trial, taking determinative testimony
13 from GAL Mr. Parker.

14 3.168 For one example, on May 11, 2022, the second day of the trial, GAL Mr. Parker
15 testified that Ms. Bloom purposely manipulated and sabotaged their one (1) in a person
16 meeting with the children that was conducted at this private law firm's offices.

17 3.169 However, Ms. Bloom had ardently requested the meeting be at their home where
18 her young children would be more comfortable. GAL Mr. Parker refused and then
19 vilified Ms. Bloom for her children's unruly behavior at his office.

20 3.170 Specifically, GAL Mr. Parker told the Court that Ms. Bloom lied in claiming to
21 have asked for a home with GAL Mr. Parker and her children. He offered this and other
22 testimony to show Ms. Bloom as noncooperative.

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1 3.171 GAL Mr. Parker then offered his own written conclusion, that Ms. Bloom was
2 mentally unstable, a personality disorder and should have limited, supervised, visitation
3 with their children.

4 3.172 At trial, while under oath, GAL Mr. Parker testified for Mr. Canfeild, that, in his
5 understanding, parental alienation constitutes a basis for restrictions under RCW
6 26.09.191. Specifically, Mr. Parker stated: "Right. You can also—unless I'm
7 misremembering—parental alienation is mentioned in .191. Am I wrong?" In response,
8 counsel Jennifer Bitner of Canfield Madow, on behalf of Mr. Canfield, clarified: "I
9 believe they replaced it with abusive use of conflict."

10 3.173 GAL Mr. Parker's statements, other than his opinions, were all categorically false
11 as easily shown upon a complete review of the record and Dr. Brown's mental health
12 evaluation of Plaintiff Ms. Bloom. At trial, Ms. Bitner, an attorney that works for Mr.
13 Canfield's law firm, Canfield Madow, objected to Dr. Brown testifying in the trial. Ms.
14 Bitner argued that her testimony would be 'cumulative' and unnecessary in addition to
15 the report she provided the court. Over Ms. Bloom's objection the court followed Ms.
16 Bitner and did not allow Dr. Brown to testify.

17 3.174 Then, despite the actual conclusion in Dr. Brown's report, GAL Mr. Parker
18 simply misrepresented Dr. Brown's findings claiming that the report verified everyone's
19 concerns about Ms. Bloom, her mental health and her ability to parent.

20 3.175 At the conclusion of trial, relying entirely on GAL Mr. Parker's testimony, rather
21 than the exhibits or medical findings in the record, Judge Thompson, on June 28, 2022,
22 found, with specific reference to Dr. Brown's psychological evaluation of Plaintiff
23 Bloom:

24 I am finding there is an emotional or physical problem. It is a
long-term emotional and/or physical problem that gets in the way

1 of her ability to parent. There are long-term emotional issues that
2 are present. They absolutely interfere with her ability to parent these
3 children. That is evidenced by the mental health evaluation that I
4 did receive and reviewed. It appears that there are just many untreated
5 mental health concerns. I'm just using that issue generally. As I stated,
6 I went through that report in detail.

7 3.176 Judge Thompson went so far as to say, in reference to Dr. Brown's report: "[...]
8 mental health evaluation of Ms. Yorks⁵. I read the evaluation at least twice. I say that
9 because I went through sections of it multiple times."

10 3.176 Dr. Brown's exhaustive, expert evaluation of Ms. Bloom made no comments,
11 observation or conclusion that could be reasonably construed to support any of Judge
12 Thompson's findings related to Plaintiff Ms. Bloom's mental or physical health or her
13 ability and aptitude to parent her children.

14 3.177 Dr. Brown concluded that Ms. Bloom was not impaired and should be the primary
15 caregiver of the children, stating specifically Ms. Bloom "has strong parenting skills."

16 3.178 The basis of all court action was the adoption of GAL Mr. Parker's
17 recommendations which directly supported Mr. Yorks position(s) and directly contradict
18 the now five (5) independent expert opinions that ALL supported Ms. Bloom as the
19 children's primary care giver and *not* suffering from any kind of infirmity and should
20 not therefor be subject to any parental restrictions.

21 3.179 The family court trial was completed on June 28, 2022. Judge Thompson made
22 his oral rulings from trial including a formal finding that Mr. Yorks committed acts of
23 Domestic Violence in the marriage. Such a finding carries mandatory RCW 26.09.191
24 parenting restrictions.

⁵ Referring to Ms. Bloom's marital name, Yorks.

1 3.180 On July 14, 2022, during the presentation of final orders, over objection, Judge
 2 Thompson ordered no such mandatory RCW 26.09.191 parenting restrictions against
 3 Mr. Yorks as per the statute.

4 3.181 Instead, based on GAL Mr. Parker's misrepresentation of Bloom's mental health
 5 evaluation, corroborated by Mr. Canfield, and Ms. Bitner at trial, she was denied any
 6 custodial status of her children and further sanctioned financially by the trial court. Ms.
 7 Bloom, indigent, was ordered to provide child support to Mr. Yorks and pay for
 8 supervised visits with her children.

9 3.182 Ms. Bloom timely appealed the trial Court determination. In part, Plaintiff Ms.
 10 Bloom argued that Judge Thompson's actions at trial infringed upon Ms. Bloom's First
 11 Amendment rights, constituting an impermissible violation of free speech. January 19,
 12 2023, after receiving the verbatim report of proceedings from her bench trial, Bloom
 13 filed a second grievance against GAL Mr. Parker based on his perjury presented at trial.

14 3.183 January 24, 2023, her trial court judge, Judge Thompson, as Chair of the
 15 Snohomish Superior Court GAL Committee, heard and dismissed without any due
 16 process, Bloom's grievance against Defendant Mr. Parker for a second time.

17 3.184 On October 16, 2023, the Everett Police Department (PD) released their
 18 investigation of the GAL Mr. Parker, finding that Parker had committed first-degree
 19 perjury in Judge Thompson's courtroom on May 11, 2022, vis-a-vis the Bloom Yorks
 20 trial.

21 3.185 Accordingly, Ms. Bloom notified Snohomish County Superior Court
 22 Administration on November 1, 2023, advising Snohomish County of the first-degree
 23 perjury referral from Everett PD.
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1 3.186 Ms. Bloom outlined the apparent conflict of interest between Judge Thompson
2 and GAL Mr. Parker, and that Judge Thompson had ignored previous meritorious
3 allegations against GAL Mr. Parker.

4 3.187 November 3, 2023, Hanna Ivanovich, Judge Thompson's law clerk, advised
5 Bloom and Yorks' counsel, by email, that Judge Thompson had recused himself and
6 would not be hearing any further matters regarding their case.

7 3.188 Ms. Bloom moved for clarification of the recusal as the matter was pending on
8 appeal. But no such clarification was provided.

9 3.189 November 15, 2023, the Snohomish Superior Court administration notified
10 Plaintiff Ms. Bloom that GAL Mr. Parker had been suspended from the Protem bench in
11 Snohomish Superior Court.

12 3.190 From here, Ms. Bloom came to learn that Mr. Parker was no longer listed as a
13 Guardian ad Litem in either Snohomish or Skagit County GAL registries, the two (2)
14 counties where he had previously served.

15 3.191 February 26, 2024, the Court of Appeals Division I released its opinion, striking
16 down the trial court ruling, in part, as an unconstitutional gag on Bloom's speech (case
17 no. 84480-6-1). Further, the court of appeals found that Judge Thompson abused his
18 discretion and made numerous errors regarding the application of RCW 26.09.191.

19 3.192 The mandate was filed with the Snohomish Superior Court on May 15, 2024.

20 3.193 Judge Thompson assigned the mandate to known friend and colleague Judge
21 Jennifer Langbehn of Snohomish County Superior Court. Judge Langbehn determined,
22 two days after the conclusion of the ninety (90) days response requirement, that even
23 though the Appellate court determined there were *no* findings on the record, that she
24 could nevertheless deduce them from a review of the same record (RCW 2.08.240).

1 3.194 As such Judge Langbehn was able to deny Ms. Bloom’s motion for a new trial.

2 3.195 On December 31, 2021, Ms. Bloom filed into the Federal District Court for relief
3 from the unconstitutional procedures employed by the Snohomish County Family Court
4 in the course of Ms. Bloom’s family law case.

5 3.196 GAL Mr. Parker and Mr. Canfield, with the support of their colleagues, and
6 specifically Ms. Bitner as the trial attorney, each worked to mislead the court and
7 misrepresent Ms. Bloom. They were both aware of the five (5) exonerating reports, but
8 nevertheless acted as though the first four didn’t exist.

9 3.197 Defendants fraudulently forced Ms. Bloom to get the fifth evaluation with Dr.
10 Brown, and then they purposely kept Dr. Brown from testifying at trial when they didn’t
11 like the results. Rather than sharing the truth, they doubled down, and each one of them,
12 including Mr. Canfield’s colleague Ms. Jennifer Bitner, and in furtherance of the success
13 of Canfield Madow, and Mr. Canfield’s client, Mr. Yorks, purposely offered testimony
14 and commentary intentionally misrepresenting Dr. Brown’s report.

15 3.198 Sadly, the court either never reviewed the record, or chose to ignore it, and relied
16 solely on GAL Mr. Parker and Mr. Canfield’s false statements and mischaracterization
17 of Ms. Bloom.

18 3.199 Exemplifying the mistreatment of Ms. Bloom’s case, Dr. Brown stated in her
19 report, including but not limited to:

20 3.199.1 Gina’s test scores were not consistent with personality disorder. (Plaintiff’s Ex.

21 A. Dr. Brown’s Report, Pg. 27)

22 3.199.2 There is no evidence ... that Gina has struggled with any substance abuse (*Id.* at
23 pg. 29) accused of engaging in parental alienation. It appears these allegations
24 are primarily the result of the children saying, reportedly unprompted, to the

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GAL they wanted to stay with their mother and the children saying that would stab themselves if they had to stay with their father (Plaintiff's Ex. A pg. 35).

3.199.3 It also does appear that most of the GAL's attention has been focused on Gina's actions and behaviors, leading to sanctions while the father has not had to have the same consequences in a similar way, despite concerns with such things as unilateral decision making, refusing to engage in professionally supervised visitation, neglectful parenting, and credible IPV reports. An example of the perceived unfairness is Gina being accused of dwelling on violent outcomes (referring to fear for children while in Yorks care) despite the father also emailing the GAL stating Gina might kill him (*Id* at pg. 36)

3.199.4 There was no evidence provided for this evaluation that suggested that Gina, on her own, has limitations that should prevent her from performing parenting functions as defined in RCW 26.09.004 (*Id* pg. 36)

3.199.5 It is clear that Gina has strong parenting skills. These skills would be supported if there were *fairness and equity* moving forward in the custody and co-parenting process. Research has shown that fairness and equity reduce parental conflict (*emphasis added*) (*Id.* at pg. 37)).

IV. CAUSES OF ACTION

First Cause of Action: Fraudulent Misrepresentation as to all Defendants as Co-Conspirators.

Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth herein.

4.1 Under Washington State law, a claim for fraud requires a plaintiff to establish nine essential elements by clear, cogent, and convincing evidence: (1) a representation of an existing fact; (2)

1 the materiality of that fact; (3) the falsity of the representation; (4) knowledge of the falsity by
2 the party making it; (5) intent that the plaintiff act upon the representation; (6) the plaintiff's
3 ignorance of its falsity; (7) the plaintiff's reliance on the truth of the representation; (8) the
4 plaintiff's right to rely upon it; and (9) resulting damages. *Stiley v. Block*, 130 Wn.2d 486, 505,
5 925 P.2d 194, 204 (1996).

6 4.2 Plaintiff asserts that Defendants' actions and representations satisfy these elements as set
7 forth below. Each element of fraud must be established by "clear, cogent and convincing
8 evidence." *Sigman v. Stevens-Norton, Inc.*, 70 Wash.2d 915, 920, 425 P.2d 891 (1967).

9 4.3 1) Representation of an Existing Fact: Defendant GAL Mr. Brian Parker, knowingly and
10 falsely represented to the Snohomish County Superior Court that Plaintiff Gina Bloom suffered
11 from a mental health disorder, including but not limited to a personality disorder, rendering her
12 unfit to parent her children. This representation was made alongside other representations,
13 including, but not limited to: allegations that Plaintiff refused to participate in court processes;
14 refused to respond to inquiries from the GAL or the opposing party; acted in a manner contrary
15 to court directives, recommendations, and/or orders, and had absconded with the children to an
16 unknown location. These representations were not based on the best interests of the children or
17 on any neutral evaluation but were instead crafted to advance the litigation and financial
18 objectives of Defendant Canfield Madow Law Group and its client, Mr. Yorks.

19 4.4 (2) Material Fact: A fact is material if a reasonable person would attach importance to it in
20 determining their course of action. *See Guarino v. Interactive Objects, Inc.*, 122 Wn. App. 95,
21 114, 86 P.3d 1175 (2004). The misrepresentations by Defendant Parker were material because
22 they directly impacted the judicial decisions that stripped Plaintiff of her custodial rights,
23 imposed unwarranted psychological evaluations, and disrupted her livelihood, familial stability
24 and the well-being of her children. These representations were not merely incidental but went to

1 the heart of the court's determinations, significantly altering the "total mix" of information
2 available to the court. Moreover, Defendant Parker's actions, which were improperly motivated
3 by the financial and litigation objectives of Canfield Madow Law Group and its client, ensured
4 these material misrepresentations influenced the court's decisions to Plaintiff's severe detriment.

5 4.5 (3) Falsity: To establish fraud under Washington law, a plaintiff must demonstrate that the
6 defendant's representations were false. See *Guarino v. Interactive Objects, Inc.*, 122 Wn. App.
7 95, 114, 86 P.3d 1175 (2004). Defendant Parker knowingly made false representations to the
8 court by alleging that Plaintiff Gina Bloom suffered from a mental health disorder, including but
9 not limited to a personality disorder, rendering her unfit to parent. These claims were explicitly
10 contradicted by multiple psychological evaluations in Parker's possession, including Dr.
11 Brown's exonerating report dated January 24, 2022 which concluded that Plaintiff exhibited no
12 mental health conditions that would impair her parenting abilities. However, instead of relying
13 on these credible assessments, GAL Mr. Parker disregarded them entirely and fabricated
14 allegations to serve the litigation and financial interests of Canfield Madow Law Group and its
15 client, rather than fulfilling his statutory duty as an impartial GAL under RCW 26.12. Parker's
16 knowing presentation of false information was instrumental in misleading the court and causing
17 harm to Plaintiff.

18 4.6 (4) Knowledge of the Falsity: Under Washington law, a plaintiff must demonstrate that the
19 defendant knew their representations were false at the time they were made. See *Guarino v.*
20 *Interactive Objects, Inc.*, 122 Wn. App. 95, 114, 86 P.3d 1175 (2004). Defendant Parker acted
21 with actual knowledge of the falsity of his representations. Parker had access to and reviewed
22 multiple psychological evaluations, including reports which unequivocally stated that Plaintiff
23 Gina Bloom exhibited no mental health conditions that would impair her parenting. Despite this,
24 Parker deliberately ignored this evidence and fabricated claims of mental illness to support his

1 allegations. Additionally, Parker's conduct demonstrated his intent to mislead. Rather than
2 adhering to his statutory duty to act impartially as a GAL, Parker acted to further the business
3 interests of Canfield Madow Law Group by ensuring a favorable trial outcome for its client. By
4 knowingly presenting false information to the court, Parker leveraged his GAL authority to
5 manipulate judicial decisions and outcomes, thereby advancing the financial and litigation
6 success of Canfield Madow Law Group and its client at Plaintiff's expense.

7 4. 7 (5): Intent to Cause Reliance: Under Washington law, fraud requires proof that the defendant
8 intended their false representations to be acted upon, resulting in harm to the plaintiff. *See*
9 *Stieneke v. Russi*, 145 Wn. App. 544, 564–65, 190 P.3d 60 (2008). Defendant Parker knowingly
10 and deliberately made false representations, intending that both the court and Plaintiff Gina
11 Bloom would act in reliance upon them. Parker's assertions that Plaintiff suffered from
12 debilitating mental health disorders were specifically calculated to mislead the court into issuing
13 adverse rulings, including, but not limited to, unwarranted psychological evaluations, removal of
14 Plaintiff's custody rights, restrictions on her right to free speech and to seek redress, elimination
15 of critical domestic violence victim protections, and the imposition of unreasonable restrictions
16 on her ability to parent. Plaintiff Gina Bloom justifiably relied on Parker's representations
17 because of his statutory role as the court-appointed GAL under RCW 26.12. As the GAL, Parker
18 was duty-bound to act in the best interests of the children and to provide impartial, accurate
19 information to the court. Plaintiff had every right to expect that Parker's representations were
20 made in good faith and in accordance with his statutory obligations. Instead, Parker misused his
21 GAL authority to serve the business interests of his firm, Port Gardner, Canfield Madow Law
22 Group and its client, thereby betraying the trust placed in him by both the court and Plaintiff.
23 This breach of trust, coupled with Parker's calculated intent to manipulate judicial reliance,
24 directly resulted in the Plaintiff's significant harm and satisfies the element of intent.

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2 4.8 (6): Ignorance: Under Washington law, a claim for fraud requires proof that the plaintiff was
3 unaware of the falsity of the defendant's material misrepresentations, at least in the specific
4 context of their true intent or purpose. *See Stieneke v. Russi*, 145 Wn. App. 544, 564–65, 190
5 P.3d 60 (2008). While Plaintiff Gina Bloom understood that Parker's statements regarding her
6 mental health and parental fitness were false and unsupported by credible evidence, she did not
7 know that Parker was working in concert with Canfield Madow Law Group to advance the
8 litigation and financial interests of their client. Plaintiff relied on Parker's statutory role as a
9 court-appointed GAL under RCW 26.12 and reasonably believed that his representations were
10 made in furtherance of the children's best interests, as his role legally required. Plaintiff was
11 unaware that Parker had violated his duty of neutrality and impartiality to further the improper
12 business interests of the opposing party. Likewise, the court, acting as a third party, had no
13 knowledge that Parker's misrepresentations were false or that he was collaborating with Canfield
14 Madow Law Group. The court relied on Parker's GAL status and presumed neutrality in issuing
15 adverse rulings based on Parker's false statements. Parker intentionally leveraged this reliance to
16 achieve his improper goals, knowing the court would act on his representations without
17 knowledge of his ulterior motives.

18 4.9 (7): Actual Reliance. Under Washington law, fraud requires proof that the plaintiff relied on
19 the truth of the defendant's misrepresentations. *See Stieneke v. Russi*, 145 Wn. App. 544, 564–
20 65, 190 P.3d 60 (2008). While Plaintiff Gina Bloom refuted the substantive claims made by
21 Defendant Parker regarding her mental health and parenting capabilities during the litigation, as
22 a litigant, she disagreed with his conclusions and challenged his recommendations in good faith,
23 believing that his actions—though flawed—were motivated by a good-faith assessment of the
24 children's best interests, as required by his statutory role as a GAL under RCW 26.12. However,

1 Plaintiff was unaware that Defendant Parker's omissions of exonerating psychological reports
2 and fabricated claims were not errors or misjudgments but were instead motivated by his
3 improper collaboration with Canfield Madow Law Group to advance their business and litigation
4 interests on behalf of their client, Mr. Yorks. Plaintiff relied on the presumption that Parker, as a
5 court-appointed GAL, was fulfilling his statutory duty to act impartially and in the children's
6 best interests. Her reliance on the integrity of Parker's role was both reasonable and foreseeable,
7 given his position as a trusted officer of the court. As such, Plaintiff Bloom, willingly and to her
8 financial detriment, complied with all court-ordered psychological evaluations, therapy sessions,
9 and related conditions that were imposed as a direct result of Parker's misrepresentations.
10 Likewise, the court relied on Parker's misrepresentations and omissions in issuing rulings
11 adverse to Plaintiff, including, but not limited to, ordering unwarranted psychological
12 evaluations, removing her custody rights, and eliminating her domestic violence protections.
13 4.10 (8) Right to Rely: *See* RCW 26.12. As a court-appointed GAL, Defendant Parker was
14 statutorily obligated to act with impartiality and to prioritize the best interests of the children.
15 Plaintiff Gina Bloom had the right to rely on Defendant Parker's representations because they
16 were made under the authority of his GAL appointment. Plaintiff relied on the presumption that
17 his actions, though objectionable within the scope of the litigation, were undertaken in
18 fulfillment of his statutory role. Plaintiff could not have reasonably known that Parker had
19 deliberately omitted exonerating evidence and made false representations to further the financial
20 and litigation interests of Canfield Madow Law Group. Similarly, the court had a right to rely on
21 Parker's representations as the foundation for its rulings, given his role as a neutral and
22 statutorily empowered officer of the court. Parker's recommendations were presumed to be
23 unbiased, evidence-based, and in the best interests of the children. However, Parker knowingly
24 and willfully breached his statutory obligations, betraying the trust of both Plaintiff and the court.

1 His intentional misconduct subverted the court's decision-making process and resulted in
2 significant harm to Plaintiff, including the loss of custody, financial hardship, and emotional
3 distress.

4 4.11 (9): Resulting Damage as a Result of Reliance: Under Washington law, a claim for fraud
5 requires proof that the plaintiff suffered damages as a direct and proximate result of the
6 defendant's fraudulent misrepresentations. *See Guarino v. Interactive Objects, Inc.*, 122 Wash.
7 App. 95, 126, 86 P.3d 1175, 1191 (2004), as amended on denial of reconsideration (June 30,
8 2004). Plaintiff Gina Bloom suffered extensive and quantifiable harm as a direct consequence of
9 Defendant Parker's fraudulent actions and misrepresentations. Parker's false allegations and
10 omissions led the court to issue rulings that removed Plaintiff's custody rights, subjected her to
11 unwarranted psychological evaluations, and eliminated vital domestic violence protections.
12 These rulings caused Plaintiff significant emotional distress, including, but not limited to, the
13 loss of her relationship with her children, loss of employment, loss of housing, and the erosion of
14 legal safeguards meant to protect her as a victim of domestic violence. Plaintiff incurred
15 substantial expenses, including, but not limited to, the cost of psychological evaluations, therapy,
16 legal fees, and other litigation-related and non-litigation related expenses, all of which are
17 directly attributable to Defendant Parker's fraudulent conduct. Additionally, Plaintiff
18 experienced reputational damage, as Parker's false claims painted her as mentally unfit and have
19 caused damage to her credibility in the community and within the court system. These damages
20 are not speculative but were foreseeable and proximately caused by Parker's deliberate actions to
21 advance the interests of Canfield Madow Law Group and its client. Defendant Parker's betrayal
22 of his statutory duties as GAL and his misuse of his position to manipulate judicial outcomes
23 inflicted enduring harm upon Plaintiff, harm she continues to suffer, warranting full
24 compensation. (See Complaint, ¶¶ 84-85, 135-138, 147-150, 203-205, 220-224.)

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Second Cause of Action: Abuse of Process as to all Defendants as Co-Conspirators.

Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth herein.

4.12 Under Washington law, abuse of process occurs when a party employs legal proceedings for an ulterior purpose not contemplated by the law. *Sea-Pac Co. v. United Food & Com. Workers Loc. Union 44*, 103 Wash. 2d 800, 806, 699 P.2d 217, 220 (1985); *See* Restatement (Second) of Torts § 682, at 474 (1977).

4.13 The essential elements that establish abuse of process are: (1) an ulterior purpose beyond the proper scope of the process; and (2) an act in the use of the process not proper in the regular prosecution of the proceedings, and (3) harm to the litigant. Defendant Brian Parker, as a court-appointed Guardian ad Litem (GAL), and Defendant Damon Canfield, as counsel to Mr. Yorks, misused the judicial system's GAL processes to discredit Plaintiff Gina Bloom, deprive her of parental rights, and further their improper litigation goals.

4.14 Use of Legal Process for an Improper Purpose Defendants Parker and Canfield utilized Plaintiff's dissolution and custody proceedings as a vehicle to further Defendant Parker, Defendant Port Gardner, Defendant Canfield, and Defendant Canfield Madow's business interests, including, but not limited to, securing favorable custody outcomes for Defendant Canfield's client, Mr. Yorks. This included, but was not limited to, Defendant GAL Mr. Parker's fabrication of allegations of mental instability and personality disorder against Plaintiff, which were not based on credible evidence but were aimed at advancing Defendant Canfield's litigation strategy; coordinating with Defendant Mr. Canfield, as well as the support and resources of

1 Defendants Port Gardner and Canfield Madow, to omit and suppress exculpatory evidence in
2 GAL reports, and in presentation of testimony evidence, including expert evaluations supporting
3 Plaintiff's parental fitness; and orchestrating procedural maneuvers, including filing misleading
4 GAL reports on June 11, 2021, and August 4, 2021, to achieve adverse outcomes for Plaintiff.

5 4.16 Defendant Parker misused his appointment as GAL, employing the legal process for an
6 ulterior purpose outside the proper scope of his role. Rather than acting in the best interests of the
7 children, he used the authority of his appointment, conferred upon him by the court, to discredit
8 Plaintiff, portraying her as an unfit parent to further Defendant Canfield's business interests, the
9 reputation of Port Gardner and secure favorable litigation outcomes for Defendant Canfield's
10 client, Mr. Yorks.

11 4.17 Acts in Furtherance of the Improper Purpose. In furtherance of their improper purposes,
12 Defendants took the following actions, among others:

13 Defendant GAL Mr. Parker collaborated with Defendant Mr. Canfield through private
14 communications, as evidenced by the emails exchanged on May 7, 2021, and August 3, 2021,
15 wherein they coordinated efforts to undermine Plaintiff; knowingly submitted GAL reports that
16 misrepresented Plaintiff's fitness to parent, disregarded exculpatory evidence, and falsely
17 diagnosed Plaintiff with a personality disorder; manipulated the judicial process to remove her
18 protections as a victim of domestic violence and portray Plaintiff's legitimate safety concerns for
19 her children as evidence of parental alienation, thereby depriving her of her custodial rights; and
20 knowingly relied on Defendant GAL Mr. Parker's improper GAL reports to advocate for custody
21 changes that were unsupported by credible evidence.

22 4.18 Ulterior Purpose. Defendants' actions were driven by an ulterior purpose that exceeded the
23 proper statutory scope of the GAL process and proper legal advocacy. Specifically, Defendants,
24 each named, sought to use the GAL process and the authority conferred to Defendant GAL Mr.

1 Parker under the statute as a means to discredit Plaintiff and secure favorable custody outcomes
2 for Defendant Yorks, thereby furthering both Port Gardner and GAL Mr. Parker's reputational
3 success and Defendant Canfield's business interests and litigation success. This misuse of
4 process included, but is not limited to, removing Plaintiff's status as a victim of domestic
5 violence, stripping her of custodial and decision-making authority over her children, and
6 portraying her as mentally unstable, suffering from a personality disorder, and manipulative—
7 each actions designed not to advance the children's best interests or legitimate legal goals but to
8 achieve objectives outside the proper scope of the judicial process. Defendant Parker's conduct
9 violated his statutory duty under RCW 26.12.175 to act impartially and represent the best
10 interests of the children, instead misusing his appointment as GAL to further his professional
11 position, the reputation of his law office, Port Gardner and Defendant Canfield's improper
12 litigation strategy and advance purposes entirely unrelated to his court-appointed role.

13 4.19 Damages Resulting from Defendants Abuse of Process. As a direct and proximate result of
14 Defendants' abuse of process, Plaintiff suffered significant harm, including, but not limited to,
15 the loss of custody and decision-making authority over her children; restraints on her right to free
16 speech and seek redress; vital domestic violence victim protections; emotional distress, including
17 anxiety, embarrassment, humiliation, grief, and trauma; financial harm resulting from increased
18 litigation expenses, unnecessary evaluations, and supervised visitation fees; and reputational
19 damage caused by false and defamatory statements regarding Plaintiff's mental health and
20 parenting abilities.

21 4.20 These harms continue to impact Plaintiff's ability to advocate for her children, including,
22 but not limited to, the ability to participate meaningfully in court processes and engage in her
23 children's lives and community. The resulting loss of a relationship with her children has
24 deteriorated Plaintiff's quality of life and diminished her enjoyment of everyday activities.

Third Cause of Action: Intentional Infliction of Emotional Distress as to all Defendants as Co-Conspirators.

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Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth herein.

4.21 Defendants' illegal conduct, which continued through 2023 and throughout the years preceding, was extreme and outrageous. Their conduct went far beyond occasional acts of inconsiderateness or professional negligence. Defendants' actions were intentional, consistent, and persistent, and they engaged in behavior that would have been outrageous and caused emotional harm to any reasonable person. Their conduct involved the deliberate misuse of the GAL authority and process, as well as legal proceedings, to portray Plaintiff as an unfit parent, discredit her credibility, and strip her of custodial and decision-making authority over her children.

4.22 Plaintiff was particularly susceptible to Defendants' extreme and outrageous conduct due to the prolonged emotional and financial harm she had already suffered in connection with prior legal proceedings and her role as a victim of domestic violence. Defendants knew or should have known of Plaintiff's susceptibility, as their actions exploited her status as a victim and targeted her vulnerabilities to achieve improper litigation objectives.

4.23 Defendants intentionally and recklessly inflicted extreme emotional distress upon Plaintiff and knew or should have known that their conduct would do so. Defendants' coordinated efforts to fabricate allegations, omit critical evidence, and portray Plaintiff as mentally unstable were calculated to cause emotional harm and did so in a manner beyond the bonds of acceptable professional conduct.

1 4.24 As a direct and proximate result of Defendants' actions, Plaintiff has experienced and
2 continues to experience severe emotional distress, including fear, grief, shame, humiliation,
3 embarrassment, anxiety, panic attacks, night terrors, and trouble sleeping. These ongoing harms
4 have significantly impaired Plaintiff's ability to advocate for her children, participate in their
5 lives, and maintain her quality of life.

6 4.25 Defendants' intentional acts caused Plaintiff's severe emotional distress, and they intended
7 or recklessly disregarded the likelihood that their actions would result in such harm.

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9 **Fourth Cause of Action: Breach of Statutory Duty as to Defendant GAL Mr. Parker**

10 Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth
11 herein.

12 4.26 Under Washington law, a Guardian ad Litem (GAL) appointed under RCW 26.12.175 owes
13 statutory duties to act impartially, conduct independent investigations, report factual findings to
14 the court, and represent the best interests of the children. Defendant GAL Mr. Brian Parker, as a
15 court-appointed GAL, owed these statutory duties to Plaintiff Gina Bloom and her children. By
16 accepting his appointment, Defendant GAL Mr. Parker was obligated to perform these duties
17 faithfully, without bias, undue influence, or ulterior motives.

18 4.27 Defendant GAL Mr. Parker willfully, wantonly, and intentionally breached these statutory
19 duties by using his position as GAL not to fulfill his statutory mandate to represent the children's
20 best interests but to secure a favorable outcome for Mr. Yorks, a client of Defendant Canfield
21 Madow Law Group and perpetuate the business relationship between Defendant Port Gardner
22 and Defendant Canfield Madow.

23 4.28 Defendant GAL Mr. Parker's conduct was designed to further the litigation objectives of
24 Defendant Canfield and advance the business interests of Defendant Canfield Madow Law

1 Group, rather than serve the impartial and child-centered role required of him. These breaches
2 included, but are not limited to:

- 3 1. Fabricating allegations against Plaintiff, including unfounded claims of parental
4 alienation, mental instability, and unfitness to parent, which were unsupported by
5 credible evidence;
- 6 2. Suppressing exculpatory evidence, including psychological evaluations and
7 documentation that demonstrated Plaintiff's fitness as a parent;
- 8 3. Colluding with Defendant Canfield to manipulate the GAL process to harm Plaintiff's
9 reputation, credibility, and parental rights, as evidenced by private communications and
10 coordinated strategies; and
- 11 4. Submitting false and misleading reports to the court, omitting material facts, and
12 knowingly presenting a biased narrative to achieve an outcome favorable to Defendant
13 Yorks and his legal counsel.

14 4.29 Defendant Parker's actions exceeded the scope of his statutory authority under RCW
15 26.12.175. Defendant Parker used his GAL appointment and the authority conferred to him by
16 the court to further the litigation and business interests of Defendant Canfield Madow Law
17 Group, acting outside the scope of his judicially conferred authority.

18 4.30 Damages. As a direct and proximate result of Defendant Parker's breaches of his statutory
19 duties, Plaintiff Gina Bloom has suffered, and continues to suffer, significant harm, including,
20 but not limited to: emotional trauma, ongoing disruption to her family relationships, the loss of
21 her relationship with her children, PTSD, humiliation, embarrassment, anxiety, grief, and a
22 diminished ability to enjoy life, family interactions, and basic daily activities. Plaintiff has lost
23 vital domestic violence victim protections, incurred unwarranted costs for psychological
24 evaluations, supervised visitation fees, and extensive legal expenses, and suffered reputational

1 damage within her community and the court system. These harms are severe, ongoing, and
2 continue to impact her ability to advocate for her children, protect her parental rights, and rebuild
3 her life.

4
5 **Fifth Cause of Action: Gross Negligence as to all Defendants as Co-Conspirators.**

6 Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth
7 herein.

8 4.31 Under Washington law, gross negligence involves a substantial and appreciable departure
9 from the standard of care and constitutes a failure to exercise even slight care or reckless
10 disregard for the rights of others. *Swank v. Valley Christian Sch.*, 188 Wash. 2d 663, 685, 398
11 P.3d 1108, 1120 (2017).

12 4.32 Defendant Brian Parker, as a court-appointed Guardian ad Litem (GAL), owed Plaintiff
13 Gina Bloom and her children a duty, including but not limited to, acting impartially, conducting
14 independent and neutral investigations, providing truthful and evidence-based recommendations
15 to the court, and prioritizing the best interests of the children.

16 4.33 Defendant Parker breached this duty by misusing his appointment as GAL to secure
17 favorable outcomes for the client(s) of Defendant Canfield, to further the litigation and financial
18 interests of Defendant Canfield and Canfield Madow Law Group. This misconduct constitutes a
19 substantial and appreciable departure from the standard of care required of a GAL and
20 demonstrates reckless disregard for his statutory duties and the authority conferred upon him by
21 the court.

22 4.34 As a direct and proximate result of Defendant Parker's grossly negligent misconduct,
23 Plaintiff suffered and continues to suffer significant harms that are ongoing and that continue to
24 inflict profound damage on Plaintiff's and her children's quality of life. Defendant Parker's
grossly negligent misconduct, characterized by reckless disregard for his statutory duties, entitles

1 Plaintiff to recover damages. Plaintiff seeks all damages recoverable under Washington law,
2 including compensatory damages, emotional distress damages, punitive damages where
3 applicable, attorney's fees, and any other relief the court deems just and equitable.

4 **Sixth Cause of Action: Civil Conspiracy as to all Defendants as Co-Conspirators.**

5 Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth
6 herein.

7 4.35 Civil conspiracy exists when two or more persons combine to accomplish an unlawful
8 purpose or a lawful purpose by unlawful means. *Corbit v. J.I. Case Co.*, 70 Wn.2d 522, 528, 424
9 P.2d 290 (1967).

10 4.36 Defendants Brian Parker and Damon Canfield knowingly and willfully conspired to harm
11 Plaintiff Gina Bloom by combining their efforts to misuse Parker's court-appointed role GAL to
12 achieve unlawful purposes. Defendants entered into an agreement to abuse the GAL process to
13 secure favorable litigation outcomes for the clients of Defendant Canfield and Canfield Madow
14 Law Group, including Mr. Yorks, and to advance the financial and professional interests of
15 Defendant Parker and his firm, Port Gardner Law Group.

16 4.37 Defendants' overt acts in furtherance of their conspiracy include, but are not limited to,
17 fabricating baseless allegations of Plaintiff's mental health and fitness as a parent, suppressing
18 exculpatory evidence, coordinating the submission of false and biased reports to the court, and
19 abusing legal processes for improper purposes. These acts were not isolated but part of a
20 calculated effort to build an overwhelming and insurmountable record against Plaintiff, which
21 culminated in adverse rulings that stripped her of custody and critical domestic violence
22 protections.

23 4.38 By conspiring to exploit the Guardian ad Litem (GAL) process as a mechanism for personal
24 gain and professional advancement, Defendants devised and executed a coordinated scheme to
construct a false and prejudicial narrative regarding Plaintiff. This conspiracy induced the court

1 to rely on fabricated, misleading, and biased evidence to Plaintiff's detriment. But for
2 Defendants' conspiracy and their deliberate overt acts Plaintiff Gina Bloom would not have been
3 wrongly characterized as mentally unfit or falsely diagnosed with personality disorders.
4 4.39 Defendants' calculated misconduct resulted in adverse judicial determinations that unjustly
5 stripped Plaintiff of custody and decision-making authority over her children, deprived her of
6 critical domestic violence victim protections, and caused her to suffer profound emotional
7 distress, irreparable harm to her reputation, substantial financial losses, and a devastating loss of
8 her relationship with her children. Moreover, Defendants' actions inflicted long-term damage to
9 Plaintiff's credibility within the legal system and her community, significantly impairing her
10 ability to advocate for her children, protect her parental rights, and maintain her quality of life.

11

12 **Seventh Cause of Action: Defamation as to all Defendants as Co-Conspirators.**

13 Plaintiff realleges and incorporates by reference all paragraphs above as though fully set forth
14 herein.

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15 4.40 A defamation claim has four essential elements: (1) a false communication (2) that was
16 unprivileged, (3) for which the defendant is at fault, and (4) that caused the plaintiff damages.

16

17 *Mark v. Seattle Times*, 96 Wn.2d 473, 486, 635 P.2d 1081 (1981)

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18 4.41 False Communication: Defendant Brian Parker, acting in his capacity as a court-appointed
19 Guardian ad Litem (GAL), made numerous false statements concerning Plaintiff Gina
20 Bloom that were fabricated without evidentiary support, contradicted by credible
21 exculpatory documentation that Defendants intentionally withheld, and were designed to
22 discredit Plaintiff and irreparably harm her reputation.

22

23 4.42 Unprivileged Communication: Defendant Parker's defamatory statements exceeded the
24 scope of his statutory duties under RCW 26.12 and 26.09 and were made in furtherance of
the coordinated effort with Defendant Canfield to damage Plaintiff's reputation for the

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1 improper and unlawful purposes of furthering his business relationship with Damon Canfield
2 and the business interests of Defendants, and Defendants Canfield Madow Law Group and
3 Port Gardner Law Group.

4 4.43 Fault: Defendant Parker acted with fault by knowingly fabricating false allegations against
5 Plaintiff and publishing these defamatory statements with reckless disregard for the truth.
6 Defendant deliberately ignored exculpatory evidence and presented falsehoods to the court
7 with the intent to harm Plaintiff's reputation, mislead the court, and further his and
8 Defendant Canfield's improper objectives. Defendant's conduct was grossly negligent at a
9 minimum, and intentional and malicious at its worst.

10 4.44 Damages: As a direct and proximate result of Defendant Parker's defamatory statements,
11 Plaintiff suffered substantial harm, including irreparable damage to her reputation, and
12 economic and non-economic damages, including, but not limited to, lost wages, emotional
13 distress, medical bills, pain and suffering, mental anguish, loss of enjoyment of life, anxiety,
14 PTSD, embarrassment, fear, and humiliation.

15 **V. DAMAGES TO MS. BLOOM**

16 Plaintiff realleges and incorporates herein as if set forth in full all paragraphs as outlined above.

17 4.45 GAL Mr. Parker's support of Mr. Canfield and consequently, his client Mr. Brian Yorks,
18 caused extensive cost and litigation while Ms. Bloom tried desperately to overcome the barrier
19 his misrepresentation placed between her and her children.

20 4.45 Ms. Bloom was never able to overcome Mr. Parker's immense power as granted by the state
21 and herein provided for the benefit of Mr. Yorks, not the children.

22 4.46 As a result of GAL Mr. Parker's misrepresentations to the court, Ms. Bloom suffered a
23 phenomenal amount of stress, anxiety, and extreme concern for the well-being of her
24 children.

1 4.47 As a result of GAL Mr. Parker's misrepresentations, also known to be false but nevertheless
2 promoted to the court by Mr. Canfield, Ms. Bloom and her children suffered irreparable
3 harm, including the ongoing sexual abuse of the older child, who had disclosed domestic
4 violence by Mr. Yorks to a myriad of adults and trusted authority figures by the time trial
5 commenced.

6 **As to all Defendants as Co-Conspirators.**

7 Plaintiff realleges and incorporates herein as if set forth in full below all paragraphs outlined
8 above.

9 4.48 What other allegations that may naturally arise out of discovery and the course of
10 proceedings.

11 **XII. REQUESTED RELIEF**

12 As a result of the foregoing, Plaintiff requests the following relief.

13 4.49 **Compensatory Damages.** For an award of money damages in an amount to be proven at
14 trial.

15 4.50 **Prejudgment Interest.** For an award of prejudgment interest on all liquidated amounts.

16 4.51 **Attorney's Fees and Costs.** For Plaintiff's attorneys fees and costs as allowed by law.

17 4.52 **Other Relief.** For such further relief as the Court deems just and equitable.

18 Respectfully submitted,

19
20 DATED this 21 2025.

21 Attorney for the Plaintiff:

22 

23 Shannon M. Draughon WSBA #35424
24 Attorney for Plaintiff Ms. Bloom