

STATE OF VERMONT
RUTLAND COUNTY, SS.

RUTLAND FAMILY COURT
DOCKET NO. 454-11-03 Rddm

LISA MILLER-JENKINS,)
Individually,)
)
 Plaintiff,)
 v.)
)
JANET MILLER-JENKINS,)
Individually,)
)
 Defendant.)

AFFIDAVIT OF SYLVIA HAYDASH, LCSW, DAPA, BCD

I, Sylvia Andersen Haydash, LCSW, DAPA, BCD, am over the age of 18 and otherwise competent to testify regarding the matters set forth in this Affidavit and make the following statements based upon my own personal knowledge:

1. I testified truthfully regarding my background and expert qualifications on March 30, 2007, in deposition proceedings to preserve my testimony for trial in this matter.
2. Lisa Miller made arrangements to meet me at my office and drop off some materials on the morning of Saturday, May 26, 2007. She arrived with Isabella, and informed me that they were meeting with Janet after leaving my office.
3. On previous occasions, Isabella has always been very open, engaging and verbal. She demonstrated the ability to separate from Lisa both to engage in independent play and to engage in conversation with me.
4. I witnessed very different behavior from Isabella on May 26.

5. Initially, I noted a lack of independence as Isabella was very clingy and physically attached herself to Lisa's legs and body. She appeared to be trying to make herself small by backing herself into Lisa, and trying to "hide" in her body.
6. When I see children in my practice, I use a therapeutic playroom that has a plethora of play therapy toys such as: puppets, doll houses, animals, art supplies, books and other engaging child friendly items. As a result, I can usually talk with parents quietly in the same room while the child explores independently. Previously, this had been no problem for Isabella. On May 26, however, Isabella showed signs of major separation anxiety, if Lisa was not around. She also clung to Lisa for the first ten minutes and hid her head in Lisa's armpit.
7. Additionally, I identified hyper-vigilant behavior in Isabella. This behavior manifests itself with an extremely heightened sense of alertness in a child. When a doorbell in my office chimed, Isabella reacted with a startle effect that was dramatic and out of proportion to the tone and volume of the bell stimulus.
8. Lastly, I identified Isabella exhibiting regressive talking skills. She spoke in soft baby-talk that was inconsistent with her previous exhibitions of being gifted and advanced verbally. Though Lisa encouraged her to step up her level of speech, Isabella persisted in communicating a level lower than her capabilities. She spoke at about a level that I would expect of a two to two and half year old, both in context and cadence. She showed little animation in her speech and her affect was blunted.

9. Lisa and Isabella stayed about an hour and, by the end, Isabella seemed to emerge from her shell, went to the bathroom on her own and gave me an unsolicited goodbye hug.
10. At the time, I did not consider this weekend drop-in visit to be a formal observation or evaluation for the Court, as it was a time Lisa and I had prearranged for her to return some previously borrowed materials. If this were a formal evaluation, I would have taken notes, asked Isabella more questions and engaged in some play therapy. Nevertheless, based on my history with Isabella, observations, experience and training, I did form certain opinions and conclusions that I shared with Lisa. Because I have now been asked to share those with the Court, I am providing this Affidavit.
11. It is clear from what I observed of Isabella that her behavior demonstrates that she is going through some stressful and traumatic events and that she would benefit from ongoing regular play therapy.
12. It is common in my profession, when evaluating child behavior, to take into account parental reporting of information regarding their observed behavior of their children.
13. My opinions and conclusions are reinforced by information provided by Lisa regarding recent changes in Isabella's behavior outside of my presence. I understand from Lisa that Isabella is intermittently enuretic after having been potty-trained since age two. Lisa also notes that Isabella has returned to whining and crying, and has demonstrated oppositional behavior that manifests itself with aggressive defiance followed by withdrawal. Lisa also confirmed that the clingy behavior, lack of independence, hyper-vigilance and baby-talk that I observed were not isolated to the

day of our visit (May 26) but began around the time of the April visitation with Janet Jenkins. Lisa also notes that Isabella now refuses to sleep in her own bed, and needs constant reassurance that Lisa is still there. When a child feels safe and secure, he/she is able to separate from the primary caregiver(s), having achieved the cognitive developmental milestone of object permanence. Isabella is displaying extremely regressive behaviors that can be interpreted as indicators of larger problems with Isabella and her lack of feeling safe and trusting of her environment.

14. I advised Lisa of the significance of these behaviors and advised her to keep a daily journal of Isabella's behaviors, both positive and regressive.
15. I suggested that Lisa locate a therapist for Isabella closer to her home and offered some recommendations as to how to locate a good play therapist.
16. Reunifications are difficult and it would be in the best interest of Isabella for any visits with Janet to take place at a pace and in a manner that does not traumatize Isabella, together with ongoing evaluations of Isabella's level of attachment to Janet.
17. At this point, after only two supervised two-hour visits, and the resulting regressive behaviors, it is my clinical opinion that leaving Isabella unsupervised with Janet for visitations would needlessly exacerbate Isabella's trauma. I further believe that unsupervised visits would be detrimental to Isabella at this time and could cause permanent damage to normal development.
18. I am not offering any opinion at this time as to whether Janet and Isabella should have continued contact or visitations. I only offer my observations, opinions and conclusions that Isabella appears to have been traumatized by the limited visitation


this far, a serious consequence, taking Isabella in a negative direction as compared to Isabella's condition before the recent visitations where she was a child that was well-adjusted, flourishing, above-the-curve developmentally, verbally gifted, and readily able to separate from Lisa and meet with other people.

Further Affiant sayeth not.


Sylvia Andersen Haydash, LCSW, DAPA, BCD

COMMONWEALTH OF VIRGINIA;
COUNTY OF PRINCE WILLIAM:

The forgoing was subscribed and sworn before me this 8th day of June, 2007, by Sylvia Andersen Haydash.


Notary Public
My commission expires: 6/31/08

AFFIDAVIT OF GWEN CORLEY, LCSW

Gwen Corley, LCSW, having been duly sworn, states under oath:

1. I am over the age of 18, and make this affidavit on my personal knowledge of the facts.
2. I am a licensed clinical social worker, and have seen Isabella Miller in my professional capacity.
3. I have been advised that Isabella is being required to periodically travel to and from Vermont for visitation during the school year.
4. Isabella suffers from sleep disturbance and nightmares, having difficulty sleeping through the night.
5. Isabella also talks about death, and has expressed fear that if her mother, Lisa, dies she will be at risk. Without prompting, Isabella has said she is afraid that Janet Jenkins may take her away from Lisa.
6. Based upon these factors, as well as others, in my professional opinion it would be detrimental to Isabella's emotional well being for her to travel back and forth to Vermont during the school year.
7. The distance from Virginia to Vermont, and the time it takes to travel back and forth, coupled with these emotional concerns, are simply too great to require a five year old child to make the trip during the school year.
8. The parent, not the child, should be the one to travel during the school year.

9. In my professional opinion, the best interests of the child necessitate that out of state visitation be limited to extended holidays and the summer time, and not be required during the normal school year.

FUTHER AFFIANT SAYETH NOT.


GWEN CORLEY, LCSW

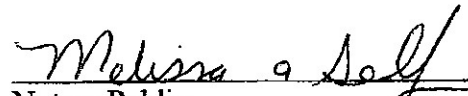
CERTIFICATE OF NOTARY

COMMONWEALTH OF VIRGINIA :

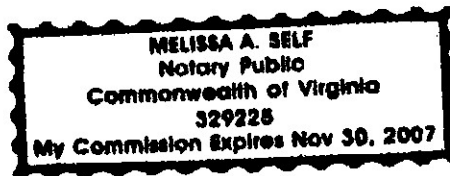
CITY OF WINCHESTER :

The foregoing affidavit was subscribed and sworn before me this

19th day of September, 2007.


Notary Public

My commission expires: 11/30/07



STATE OF VERMONT
RUTLAND COUNTY, SS.

RUTLAND FAMILY COURT
DOCKET NO. 454-11-03 Rddm

LISA MILLER-JENKINS,
Individually,

Plaintiff,

v.

JANET MILLER-JENKINS,
Individually,

Defendant.

**AFFIDAVIT OF TAMMARA CANFIELD IN SUPPORT OF SUPPLEMENTAL
MOTION TO ANNUL OR TEMPORARILY CEASE VISITATION**

I, Tammara Canfield, am over the age of 18 and otherwise competent to testify regarding the matters set forth in this affidavit and make the following statements based upon my own personal knowledge:

1. I know Lisa Miller and the child known as IMJ, and attend church with them. IMJ and my youngest daughter are friends. In addition, I often provide child care for IMJ when Lisa is not available.
2. I saw IMJ on Sunday, November 4, 2007, and during the week following as well. IMJ's behavior during this time has been unusual, and it has caused me great concern. I have seen IMJ acting out recently when she is normally a well-behaved child.
3. Normally IMJ runs and plays with the other children, laughing and coming to me for a big hug. On Sunday, November 4, 2007, however, IMJ was withdrawn, appeared very unhappy, and stood by herself off to the side. I therefore called her

over to me, sat her on my lap, and talked to her. At one point she buried her head

in my shoulder as if she was going to cry.

4. Sunday morning and evening she wanted to sit with me rather than her mother which is unusual. She did not want to go home with her mom, either, and this was after morning church service, after she was picked up from her visit.
5. On Monday, November 5, I watched IMJ because she had no school that day but Lisa had to work. At one point she said something to the effect that Janet wanted to be sure she (Janet) saw Janet's sister, Linda, when she came to Virginia. We had been discussing "good touch" and "bad touch." When I explained that if anyone ever touched her inappropriately that she should tell someone, such as a police officer or a neighbor, IMJ said that maybe if Linda became a Christian she would not have to go to jail. I interpreted this entire conversation as indicating that IMJ may have suffered some inappropriate contact during her last visit with Janet.
6. I have also seen some of IMJ's pictures, which cause me concern.
7. IMJ has told me that she does not like to talk about her visits with Janet because it makes her cry.

FURTHER AFFIANT SAYETH NOT.

Tammara Canfield
Tammara Canfield

COMMONWEALTH OF VIRGINIA:
CITY OF WINCHESTER:

The forgoing was subscribed and sworn before me this 20 day of November,

2007, by Tammara Canfield.

Wayne Capozzi # 7140123
Notary Public

My commission expires: August 31 2011