

Petition for Order of Protection and Order for Hearing

Case # (the clerk fills this in):
20-CB-27094 M

In the Chancery Court of Sullivan County, TN

Petitioner's name: (person needing protection)
 (List Child's name if filed on behalf of person under 18 years of age pursuant to TCA §36-3-602)

ERIKA JEAN SCHANZENBACH
first middle last

FILED 1-16, 2020 @ 3:05 a.m./p.m.
 Katherine Pricster, Clerk & Master
 By: Katie Brown

Check If Applicable:

Petitioner is under 18 and this Petition is being filed on behalf of an unemancipated person (someone under 18 years of age) pursuant to TCA §36-3-602. This request is being made by _____ who is child's parent or legal guardian or a caseworker.

This request is being made by a law enforcement officer pursuant to TCA §36-3-619.
 Person on whose behalf this Petition is filed consents in writing to the filing and signs here

➔ _____

****PETITIONER'S CHILDREN UNDER 18 THAT PETITIONER BELIEVES ARE IN NEED OF PROTECTION:**

Name	Age	Relationship to Respondent	Name	Age	Relationship to Respondent
1. _____			3. _____		
2. _____			4. _____		

Respondent's Information (person you want to be protected from):

ALETHEA SKEEN
first middle last date of birth (MM/DD/YYYY)
270 Wyatt Hollow Rd. Bristol TN 37620-1078
street address city state zip

Respondent's Employer: _____
Employer's name Employer's phone #

Describe Respondent:

Sex	Race	Hair	Eyes	Height - Weight - SSN - Other	
<input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	<input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Hispanic <input type="checkbox"/> Other: _____	<input type="checkbox"/> Black <input type="checkbox"/> Grey <input type="checkbox"/> Blond <input type="checkbox"/> Bald <input checked="" type="checkbox"/> Brown <input type="checkbox"/> Other: _____	<input type="checkbox"/> Brown <input type="checkbox"/> Hazel <input type="checkbox"/> Blue <input type="checkbox"/> Green <input type="checkbox"/> Gray <input type="checkbox"/> Other: _____	Height	
				Weight	
Social Sec. #		(Provided to Clerk's office if known) Do not list it here. XXXXXXXXXXXXXXXXXXXXXXXX			
Scars/Special Features					
Phone Number					

① Check all of the following that apply to the Petitioner:

Warning!

- Weapon Involved
- Has or owns a weapon



- a. We are married or used to be married.
- b. We live together or used to live together.
- c. We have a child together.
- d. We are dating, used to date, or have had sex.
- e. We are relatives, related by adoption, or are/were in-laws. (Specify): _____
- f. We are the children of a person whose relationship is described above (Specify): _____
- g. The Respondent has stalked me.
- h. The Respondent has sexually assaulted me.
- i. Other: The stalking includes physical assault.

② List all children under 18 that you have:

* Check here if listing addresses would put you or your child in danger. If so, leave any spaces for addresses blank.

Name of Child	Age	Is Respondent the parent of the child? (Write "yes" or "no")	Does the child need to be protected from the Respondent?	Child's address

③ Where else have the children (that you and Respondent have together) lived during the last 6 months?

Children's previous addresses

Who did they live with at this address?

_____	_____
_____	_____
_____	_____

④ Other Court Cases – Is there any court, other than this court, in which the respondent and petitioner are parties to an action? (including cases in which the parties have children in common)

Yes No If "Yes," fill out below:

County and State of other case: _____

Case Number (if you know it): _____

Kind of case (check all that apply): Divorce Domestic Violence Criminal Juvenile Child Support

Other (specify): _____

- ⑤ **Custody Rights** – Does anyone besides you or the Respondent claim to have custody or visitation rights to the children that you and Respondent have together? Yes No If "Yes," who?

Name

Address

⑥ **Describe Abuse – (use additional sheets of paper if necessary and attach to Petition)**

Describe abuse, stalking or assault (include, IF APPLICABLE, information about abuse or fear of abuse to your child(ren), personal property or animals)

I am a pro-life sidewalk counselor. When I am not at work, I sometimes stand peacefully on the public sidewalk at the abortion clinic on West State Street in Bristol, calling out to women with offers of information and assistance. I may hold a sign or hand out pamphlets. My activities are non-violent and legal.

Sidewalk counselors like me have been a beneficial presence at clinics throughout the country for many years, helping many women choose life for their children. We have generally had a functional co-existence with activists on the other side of the issue who likewise appear on the sidewalk.

In recent years, the pro-choice activists around the country have become more aggressive, and those at the Bristol clinic have become extremely so. They engage in brazenly illegal assaults and other offenses whose sole purpose is to disrupt our efforts and prevent women from hearing our message. Respondent Alethea Skeen is one of those activists.

Alethea habitually stalks me when I attempt to counsel people outside Bristol Regional Women's Center in Bristol, TN.

On December 23, 2019, Alethea approached me as I stood on the east side of Slaughter Street (the opposite side from the clinic), crowded into my personal space while holding a large, open umbrella, **told me to engage in a sexual act, high-fived my hand as I held it up in front of my face, and refused to back off and stop touching me despite my repeated requests that she do so.** She then **followed me well within my personal space** as I walked up and down the street, **stepping on my feet, grabbing me along my sides from behind, and dancing in a sexually suggestive manner right up against me despite my personal requests that she back off.** When her sister, Rowan, grabbed the leaflets out of my pocket and threw them on the ground, **Alethea picked them up and crumpled and destroyed them with her hands.** She **continued to crowd into my personal space and follow me wherever I walked despite my requests that she back off and stop touching me and my attempts to move away from her to a different area of the public right of way.** Eventually a police officer showed up and separated Alethea and Rowan from me and advised that I file a police report of the incident.

On November 13, 2019, despite my many requests that she stop doing so, Alethea repeatedly pushed her body up against mine as I attempted to counsel people on the west side of Slaughter Street. She crowded so close to me that she pushed me eastward out into the street. She also followed me at extremely close range as I walked up and down the public right of way outside the clinic. She did all this despite my repeated requests that she back off.

On October 2, 2019, with no sign of rain, Alethea and her sister Rowan crowded into my personal space on the east side of Slaughter Street while holding their open umbrellas. Alethea **licked my bare hand**

and forearm multiple times as I held it up to try to create some personal space, despite my protests for her to stop. She also positioned herself behind me multiple times and **grabbed/tickled my sides** by my waist, despite my repeated instructions to her to stop touching me. She also **pushed up against the sign I was holding** despite my requests that she back off and stop touching me. She also followed me at very close range as I walked up and down Slaughter Street despite my requests that she back off. **I tried many times to walk away from her to a different area of the public right of way, but she continued to follow me and refused to let me deescalate the situation.**

In two other incidents, on September 18 and August 14, 2019, respectively, Alethea **followed me as I walked back to my car a substantial distance from the clinic. Alethea physically encroached into my personal space despite me being nowhere close to the clinic and completely unable to communicate with patients** at the time. She did so despite my repeated requests that she stop following me.

On September 4, 2019, Alethea **pushed her body up against me** while holding her large, open umbrella as I attempted to counsel people on the west side of Slaughter Street, despite my repeated requests that she not touch me. When I crossed over to the east side of Slaughter Street to move away from her, Alethea soon also crossed the street and, joined now by her mother Denise, **continued encroaching into my personal space.** Alethea **shrieked at me to "suck it up, you little bitch."**

On September 3, 2019, Alethea posted on her on Facebook page about the fact that day she stood "in front of [me] to obscure [my] sight." She acknowledged that she "snuggled" against my sign and then wrote: **"if you don't want blocked stay home babydoll. you do not have a right to an audience. you know who I'm standing in front of tomorrow?? sweet old Erika."**

On July 3, 2019, as I tried to counsel people by speaking gently through my hand-held amplification device (which I began using because of Alethea's and others' efforts to disrupt and drown out my message) Alethea confronted me with a much louder bullhorn, directed toward me, on the west side of Slaughter Street. Alethea sang unintelligible noises into her bullhorn to prevent me from communicating with anyone. **As I tried to step away from her, she followed me and continued singing into her bullhorn pointed directly at me. She also repeatedly voiced police siren noises into her bullhorn. By this point she was joined by her father, James Skeen, who used his own bullhorn to play "feedback" noises from a handheld device and from his smart phone.** Together their conduct harassed me and forced me to walk away.

There have also been numerous other incidents in the past year of Alethea stalking me by resting her entire body and arm on my sign, pushing me, resting her armpit on my hand, etc., all despite my instructions to her to back off and stop touching me.

Alethea's conduct is entirely illegitimate and prevents my legitimate and legal efforts at counseling women in need. Inasmuch as my counseling will continue, Alethea's conduct will continue. She has assured me of that on several occasions, saying that if I don't like what she does, **"All you've got to do is go home,"** and **"shut the fuck up."** Alethea has taunted me for being afraid, and says **"You can expect this [inaudible] every week, Erika. This is what you have to look forward to every week."** She also states: **"Stop coming to the clinic and this all ends."**

All of these incidents have caused me significant mental suffering and distress, and have caused me to feel terrorized, frightened, intimidated, threatened, harassed, and molested.

I have much of the above conduct documented on video available to the court.

Where and when did this happen?
These incidents occurred on Slaughter Street or in the nearby vicinity outside the Bristol Regional Women's Center at 2901 W. State St., Bristol, TN 37620. The first incident described above occurred on 12-23-2019. The second described incident occurred on 11-13-2019. The third described incident occurred on 10-2-2019. The two incidents in which Alethea followed me back to my car occurred on 9-18-2019 and 8-14-2019, respectively. The next described incident outside the clinic occurred on 9-4-2019. The final described incident occurred on 7-3-2019.
Describe any weapons used.

I ask the court to make the following Orders after the hearing: (check all that apply)

- ⑦ **No Contact**
Please order the Respondent to not contact: me our children under 18, either directly or indirectly, by phone, email, messages, text messages, mail or any other type of communication or contact.
- ⑧ **Stay Away**
Please order the Respondent to stay away from my home my workplace or from coming about me for any purpose.
- ⑨ **Personal Conduct**
Please order the Respondent not to:
X Cause intentional damage to my property or interfere with the utilities at my home.
 Hurt or threaten to hurt any animals that I/we own or keep.
- ⑩ **Temporary Custody**
Please give me temporary custody of our children.
- ⑪ **Child Support**
Please order the Respondent to pay reasonable child support.
- ⑫ **Petitioner Support (if married)**
Please order the Respondent to pay reasonable spousal support.
- ⑬ **Move-out / Provide other housing**
Please order the Respondent to (check one): move out of our family home immediately or provide other suitable housing (if married)
- Check here if your home or lease is in the Respondent's name only.

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Other Orders: (General Relief) I request all other relief that is appropriate under the circumstances, including that Alethea not intentionally interfere with my efforts to assist women.

I also ask the court to:

1. Make an immediate Temporary Order of Protection. (*Ex-Parte Order of Protection*)
2. Notify law enforcement in this county of that Order.
3. Serve the Respondent a copy of that Order and Notice of Hearing to take place within 15 days of service.
4. Serve a copy of the Request, Notice of Hearing and Temporary Order on the parents of the Petitioner (if the Petitioner is under 18 years of age) unless the Court finds that this would create a serious threat of serious harm to the Petitioner. T.C.A. §36-3-605 (c)

Petitioner (parent/legal guardian/caseworker/law enforcement personnel) signs below in front of a notary public and swears that he/she believes the above information is true:

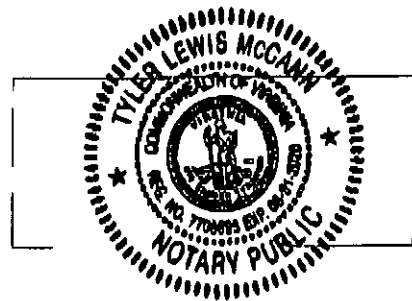
[Signature] Date: 1/16/2020

Notary fills out below (TCA §36-3-602) –

I declare that the Petitioner has read this Petition, and swears it be true to the best of her/his knowledge. Sworn and subscribed before me, the undersigned authority,

By (Print name of notary): Tyler Lewis McGarr

On this date: January 16, 2020



[Signature]

Notary or Court Clerk or Judicial Officer signs here Date notary's commission expires

- The court finds good cause and will issue a Temporary Order of Protection.
- The court does not find good cause and denies a Temporary Order of Protection - The court finds there is no immediate and present danger of abuse to the petitioner and denies the Petitioner's request for a Temporary Order of Protection. The court will set the matter for hearing.

ORDER FOR HEARING

The Petitioner and Respondent must go to court and explain to the judge why the judge should or should not issue an Order of Protection against the Respondent.

This hearing will take place on (date): 1-31-2020 at (time): 9:00 a.m. p.m.
at (location): 801 Anderson St. Bristol, TN 37620

[Signature] Date 1-16-20
Judicial Officer's signature

Proof of Service of Petition, Notice of Hearing If the Petitioner is under 18 (and Petitioner is a minor)