

Petition for Order of Protection and Order for Hearing

Case # (the clerk fills this in):
19-CB-270910(c)

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

FILED 1-16, 20 20 @ 3:15 a.m./p.m.
Katherine Priester, Clerk & Master

By: Kate Cron

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):

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

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

- 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: _____

Warning!

- Weapon involved
- Has or owns a weapon



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 Denise Skeen is one of those activists.

Denise Skeen stalks me along W. State and Slaughter Streets outside the Bristol Regional Women's Center in Bristol, TN.

On December 23, 2019, Denise followed directly behind and against me as I gathered my pro-life group standing on W. State Street and walked eastward across Slaughter Street. Denise walked directly into me as I reached the street crossing despite my request that she get away from me.

On November 20, 2019, Denise approached me and **shouted repeated noises through a bullhorn pointed directly in my face** as I stood on the east side of Slaughter Street and attempted to use a small hand-held amplification device to communicate to patients in the clinic parking lot. I have only used the amplification device since being drowned out by a bullhorn in my face, shouting, or loud amplified noise from speakers deployed by the clinic's escorts. Denise **followed me and continued shouting through her bullhorn directly in my face even when I tried to move away from her.** She also held a sign up in front of my device in a further effort to cut off my communication.

On September 18, 2019, Denise confronted me on W. State Street and **stood directly in my face** outside of the abortion facility **despite my requests for her to back off.** She held a sign in my face and prevented me from communicating with patients in the clinic parking lot. She **followed me up and down the sidewalk as I tried to move away from her.** **She also stepped on my feet.**

On September 4, 2019, Denise **followed me** from the west to the east side of Slaughter Street, where she **encroached into my personal space and repeatedly touched me and my sign despite my requests that she not touch me.** Denise **intimidated me by saying she "[doesn't] want [me] at this clinic, so go**

away." She was soon joined by her daughter Alethea, who joined her mother in crowding against me while holding her large, open rainbow umbrella. Denise then started acting very sexual, asking me in a suggestive tone, "Daddy still butt fucking you?" She also made lots of sexual tongue gestures in furtherance of her stated intent to demonstrate oral sex techniques.

On June 19, 2019, Denise deliberately kicked my sign into the street. Then Denise, along with her daughter Alethea and husband James, approached and confronted my group on the east side of Slaughter Street and shouted in our ears repeatedly over a span of multiple minutes as we attempted to pray.

In general, Denise also routinely confronts me with extremely sexual comments while I stand on the public right of way, including: (a) repeated accusations of me committing incest with my father; (b) descriptions of oral sex acts; (c) descriptions of sodomy; and (d) descriptions of masturbation. She also accuses me of getting sexual enjoyment out of her daughters, Alethea and Rowan, pressing themselves up against me. She makes sexually suggestive and/or derogatory comments about my body and how I dress, etc.

Denise's conduct is entirely illegitimate and prevents my legitimate and legal efforts at counseling women in need. Inasmuch as my counseling will continue, Denise's conduct will continue.

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 evidence available for the court.

Where and when did this happen?

These incidents occurred on Slaughter and W. State Streets outside the Bristol Regional Women's Center at 2901 W. State St., Bristol, TN 37620. The first incident occurred on 12-23-2019. The second described incident occurred on 11-20-2019. The third described incident occurred on 09-18-2019. The fourth described incident occurred on 09-4-2019. The fifth described incident occurred on 06-19-2019.

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.

If the parties share a residence, please allow the Respondent to obtain his/her clothing and personal effects such as medicine and other things he/she may need.

14 **Counseling/Substance Abuse Programs**

Please order the Respondent to go to a certified batterers' intervention program if one available in the area or a counseling program.

15 **No Firearms**

Please order the Respondent not to have, possess, transport, buy, receive, use or in any other way get any firearm.

List all firearms that you believe the Respondent owns, controls, or has access to:

Type of Firearm (Pistol, Rifle, etc.)	Location

16 **Animals / Pets**

Please give me custody and control of any animal owned, possessed, leased, kept or held by me, the Respondent, or the children listed above.

17 **Costs, fees, and litigation taxes**

Please order the Respondent to pay all court costs, lawyer fees, and taxes for this case.

18 **Transfer the billing responsibility for and rights to wireless telephone number(s)**

Please issue an order directing _____, a wireless telephone service provider, to transfer the billing responsibility for and rights to the wireless telephone number or numbers of petitioner since petitioner is not the account holder.

Current account holder (name): _____

Billing telephone number: _____

New account holder (name): _____

All telephone numbers to transfer to new account holder:

Telephone number (include area code): _____

Telephone number (include area code): _____

Telephone number (include area code): _____

Telephone number (include area code): _____

Check box to include attachment with additional telephone number(s).

If the judge makes this order, you will be financially responsible for the transferred wireless telephone number or numbers, including the monthly service costs and costs of any mobile device associated with the wireless telephone number or numbers. You may be responsible for other fees. You must contact the wireless service provider to find out what fees you will be responsible for and whether you are eligible for an account.

19 **Other Orders: (General Relief) I request all other relief that is appropriate under the circumstances, including that Denise 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:

Edna Johnson

Date: 1/16/2020

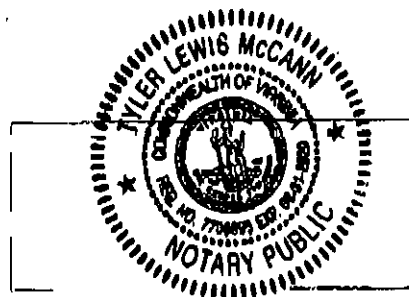
Notary fills out below (TCA §36-3-602) --

I declare that the Petitioner has read this Petition, and swears it to be true to the best of her/his knowledge.

Sworn and subscribed before me, the undersigned authority,

By (Print name of notary): TYLER LEWIS MCCANN

On this date: JANUARY 16, 2020



Tyler Lewis McCann 08-31-2020
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

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

Proof of Service of Petition, Notice of Hearing and Temporary Order of Protection:
 Respondent was served on (date): _____
 at (time): _____ by (check one):
 Personal service
 U.S. Mail per TCA §§ 20-2-215 and 20-2-216 (The Respondent does not live in Tennessee.)

 Server's signature

 Print Name

Petitioner was served on (date): _____
 at (time): _____ by (check one):
 Personal service

 Server's signature

 Print Name

If the Petitioner is under 18 (and Petitioner is a social worker filing on behalf of a minor) and service of these documents would not put him/her at risk, the Clerk will serve and fill out below. (TCA § 36-3-605(c))

I served the child's parents of copies of the Petition, Notice of Hearing, and Temporary Order of Protection by personal delivery or U.S. Mail on: (date): _____ at (address): _____

 Clerk's signature:

Notice to the Respondent about Firearms

If the court grants the Petitioner's request for a Protective Order:

- You will not be able to have a firearm while this or any later protective order is in effect. You will have to transfer all firearms in your possession within 48 hours to any person who is legally allowed to have them. 18 U.S.C. §922(g)(8), TCA §36-3-606(f), TCA §36-3-625.
- You will not be allowed to buy a firearm until the court says otherwise.