

Petition for Order of Protection and Order for Hearing

Case # (the clerk fills this in):

19.CB.27095(P)

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 §36-3-802)

ERIKA

JEAN

SCHANZENBACH

first

middle

FILED 1-16-20 at 3:05 a.m./p.m.

Katherine Priestor, Clerk & Master

Check if Applicable:

By: Kate Cross

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):

ROWAN

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. XXXXXXXXXXXXXXXXXXXXX |
| | <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:

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 Rowan Skeen is one of those activists.

Rowan has stalked me on the public right of way outside the Bristol Regional Women's Center in Bristol, TN.

On December 23, 2019, Rowan joined with her sister Alethea and confronted me and crowded into my personal space while holding a large, open umbrella on the east side of Slaughter Street. She did so while blaring music from small speakers hanging from her neck. She followed me at very close range well within my personal space as I walked up and down the street. She pressed herself up against my body. She told her sister Alethea to keep dancing suggestively up against my body when she saw it was upsetting me. Notably, she then grabbed leaflets from my front jacket pocket and threw them onto the ground. She refused to back off out of my personal space and stop touching me despite my repeated requests that she do so.

On October 2, 2019, as I started to counsel a person outside the clinic from the east side of Slaughter Street, Rowan crossed the street, confronted me, and pressed her body into the sign I was holding. She stood against me holding her large, open umbrella alongside her sister Alethea and refused to back off despite my repeated requests that she do so. She blew with her mouth directly into my face. She followed me at very close range as I walked up and down the road. She stood directly in front me while holding her open umbrella, blocking the public from seeing my sign and blocking me from communicating my message.

The only reason there are fewer incidents between Rowan and myself is that she often doesn't arrive out there until I'm leaving, or she's not there at all on the same days as me. But when my time out there overlaps with hers, these incidents are just as likely to occur with her as they are between me and Alethea.

Rowan's conduct is entirely illegitimate and prevents my legitimate and legal efforts at counseling women in need. Inasmuch as my counseling will continue, Rowan'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 video evidence of much of the above conduct available for the court.

Where and when did this happen?

These incidents have taken place on Slaughter Street 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 10-2-2019.

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.

10

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

Erika Johnson

Date: 1/16/2020

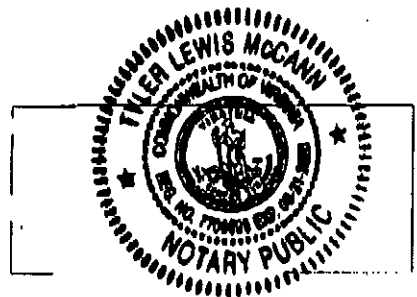
Notary fills out below (TCA §36-3-602) -

I declare that the Petitioner has read this Petition, and swears it 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

[Handwritten Signature]

Date _____

Judicial Officer's signature

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.