

7. Since that date a material change in circumstances has occurred.
8. Prior to and since the date of the Order the Mother has repeatedly denied the Father unimpeded visitation with the Child, including, but not limited to:
 - A. Placing the Child unnecessarily in daycare while the Father is unemployed and at the residence full time;
 - B. Contacting and instructing the Child's daycare and school that the Father is not allowed any contact with the Child;
 - C. Stating several times and taking actions to enforce a mandate that the Father is only allowed supervised visitation with the Child;
 - D. Waking the Child up early in the morning and keeping the Child up late at night to avoid time with the Father;
 - E. Filing, in bad faith, a Motion for a Protective Order alleging the Father has abused the Mother and the Child with full knowledge that no such actions have occurred;
9. On the rare occasion the Mother is unable to prevent the Father from visiting the Child, the Mother engages in harassing and abusive contact with the Father and the Child, thereby disrupting the Father's time with the Child.
10. Prior to and since the date of the Order, the Mother has demonstrated a fundamental lack of understanding or appreciation as to what is in the child's best interest by:
 - A. Placing the Child in an illegal daycare which failed to adequately supervise the Child to a point where the Child was placed in danger of harm;
 - B. Failing to adequately address the Child's special needs as a downs syndrome Child;

