

INDIANA COURT OF APPEALS

Kasey Parsons v. Ryan Brock

25A-JP-2771 · No. 25A-JP-2771 · Decided March 27, 2026

SUMMARY

The Indiana Court of Appeals considered whether the trial court properly reinstated a father's parenting time after previously finding him a clear and present danger to the children and their mother. The court held that the trial court improperly focused on the mother's reconciliation with the father rather than requiring evidence that resuming parenting time served the children's best interests and that the father no longer posed a danger. The judgment was reversed and remanded.

CASE DETAILS

COURT	Indiana Court of Appeals
WRITING FOR THE COURT	Judge DeBoer; Judge Brown; Judge Altice
JURISDICTION	Indiana Court of Appeals
DECIDED	March 27, 2026
DOCKET	25A-JP-2771
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Mother appealed the trial court's order reinstating Father's parenting time after previously restricting it because Father had been found to pose a clear and present danger to the children and Mother.
STANDARD OF REVIEW	A parenting-time determination is reviewed for abuse of discretion. Findings and conclusions entered sua sponte are reviewed under Indiana Trial Rule 52(A), and will not be set aside unless clearly erroneous, with due regard for the trial court's opportunity to judge witness credibility. Because Father did not file an appellee's brief, the court reviewed Mother's arguments for prima facie error.
PRECEDENTIAL VALUE	published
PARTIES	Kasey Parsons v. Ryan Brock

TOPICS

- visitation
- paternity
- standard of review
- appellate procedure
- statutory interpretation

PRACTICE AREAS

family law

paternity

parenting time

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by removing restrictions on Father's parenting time based principally on the parents' reconciliation and Mother's failure to comply with the prior order, rather than evidence that Father no longer endangered the children and that renewed parenting time served their best interests.
2. What burden and statutory standard apply when a parent seeks to modify an order restricting parenting time.

HOLDINGS

1. A restriction on parenting time is intended to protect the children and cannot be waived by the custodial parent's conduct. When a parent seeks to remove an existing restriction, the requesting parent must present evidence that the concerns underlying the restriction have been remedied and that restarting parenting time is in the children's best interests.
2. The parent seeking to modify an existing restriction on parenting time bears the burden of proving that the existing arrangement should be altered and that modification serves the children's best interests.

KEY QUOTATIONS

"Rather, it was intended to protect the children, and Father was required to prove he no longer endangered them and that restarting his parenting time was in their best interests." (15)

"Under these circumstances, the court abused its discretion by restarting Father's parenting time without adequate evidence and proper consideration of whether doing so was in the children's best interests." (15-16)

FACTUAL BACKGROUND

Kasey Parsons and Ryan Brock are the unmarried parents of two children. In March 2022, the trial court found Father to be a clear and present danger based on harassment, threats, abusive communications, conduct involving the children, and behavior that caused the children to fear him; the court therefore prohibited parenting time until counseling supported renewed contact. Despite that order, the parties later reconciled and Father lived with or saw the children for a period, but the relationship ended after Father punched a porch light during an argument and he was later convicted of invasion-of-privacy offenses. In 2025, the trial court reinstated Father's parenting time based principally on Mother's failure to follow the earlier order, without finding that renewed parenting time served the children's best interests.

PROCEDURAL HISTORY

The parties entered an agreed paternity and custody arrangement in 2021. In March 2022, after an emergency hearing, the trial court restricted Father's parenting time and prohibited contact until counseling supported renewed contact. After a 2025 hearing concerning Father's request to restart parenting time, the trial court

ordered supervised visits for one month followed by parenting time under the Indiana Parenting Time Guidelines. Mother appealed, and Father did not file an appellee's brief.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings consistent with the opinion, including reconsideration of Father's request to restart parenting time based on adequate evidence and the children's best interests.

CASES CITED

- Coronado v. Coronado, 243 N.E.3d 1121, 1124 (Ind. Ct. App. 2024)
- Jenkins v. Jenkins, 17 N.E.3d 350, 352 (Ind. Ct. App. 2014)
- In re Paternity of C.H., 936 N.E.2d 1270, 1273 (Ind. Ct. App. 2010)
- Neal v. Neal, 268 N.E.3d 757, 762 (Ind. Ct. App. 2025)
- Duncan v. Duncan, 843 N.E.2d 966, 969 (Ind. Ct. App. 2006), trans. denied
- S.M. v. A.A., 136 N.E.3d 227, 230 (Ind. Ct. App. 2019)
- In re Paternity of W.C., 952 N.E.2d 810, 816 (Ind. Ct. App. 2011)
- In re Paternity of K.J.L., 725 N.E.2d 155, 157 (Ind. Ct. App. 2000)
- In re Paternity of Snyder, 26 N.E.3d 996, 998 n.1 (Ind. Ct. App. 2015)
- Best v. Best, 941 N.E.2d 499, 502 (Ind. 2011)
- T.R. v. E.R., 134 N.E.3d 409, 415 (Ind. Ct. App. 2019)