

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA

HALEY CROWE

Plaintiff,

v.

WAYLAND WILLIS,

Defendant.

CASE NUMBER: 2025EDR0053

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**MOTION TO CORRECT AND SUPPLEMENT THE RECORD  
WITH AFFIDAVITS AND CERTIFIED TESTING DOCUMENTATION**

COMES NOW **Defendant, Wayland Braxton Willis**, pro se, respectfully moves this Court to correct and supplement the record with limited sworn affidavits and certified documentation addressing factual representations relied upon in the current temporary posture of this case. This Motion is factual in nature and submitted solely to ensure the accuracy and completeness of the record. Defendant shows the Court as follows:

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**1. LIMITED PURPOSE OF THIS MOTION**

1. This Motion is filed for the limited purpose of supplementing the record with:
  - a. sworn affidavits from individuals with **first-hand knowledge** of the November 15, 2025 family gathering referenced in the record; and
  - b. certified laboratory testing documentation relevant to the testing narrative affecting Defendant's parenting time.
2. Defendant does **not** seek reconsideration of prior rulings, does **not** request credibility determinations, and does **not** allege misconduct by the Guardian ad Litem or Plaintiff. The sole purpose of this filing is factual clarification and supplementation of the record.

## 2. PROCEDURAL POSTURE

3. On **November 24, 2025**, the Court entered an Order Immediately Suspending Visitation.
  4. Subsequent proceedings and orders, including clinical evaluation directives, relied in part on representations related to events occurring on **November 15, 2025** and Defendant's testing history.
  5. Because the current temporary order posture materially affects Defendant's parenting time, Defendant respectfully submits that supplementation of the record with sworn factual materials is appropriate.
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## 3. FACTUAL BASIS REQUIRING SUPPLEMENTATION

### A. November 15, 2025 family gathering

6. The family gathering referenced in the record was a wedding shower / family engagement gathering held on **November 15, 2025**, hosted by the Trotter family in Augusta, Georgia.
7. The gathering occurred between **4:00 p.m. and 6:00 p.m.** and was a family-oriented event connected to Defendant's sister's upcoming marriage.
8. On November 15, 2025 at 1:51 PM, **Defendant sent a text message to Plaintiff** inquiring whether the parties could accommodate Brooks's attendance at the previously scheduled gathering. **Plaintiff did not respond** to that message.
9. Defendant did **not** have any **in-person, video, or telephone communication** with Plaintiff on November 15, 2025.
10. Defendant seeks to supplement the record with sworn affidavits from **individuals who were present** at the gathering and who have first-hand knowledge of:
  - the date, time, and location of the gathering;
  - the nature of the gathering;
  - Defendant's conduct and demeanor during the gathering; and

- the absence of any in-person contact between Defendant and Plaintiff on that date.

## **B. Drug testing documentation**

11. Defendant further seeks to supplement the record with certified laboratory documentation reflecting the testing history relied upon in the current posture of this case.
  12. The subsequent testing was completed promptly by Defendant **following instruction to retest**.
  13. This documentation includes an initial reported test result that was disputed and subsequent testing completed thereafter, including expanded-panel hair testing and PEth testing, which returned negative results.
  14. Defendant submits this documentation **without characterization or argument**, for the limited purpose of ensuring the record contains the laboratory reports themselves.
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The affidavits submitted herewith are provided by Defendant's grandmother (Nancy Willis), father (Brad Willis), brother (Tucker Willis), and a longtime family friend (Parker Ray), each of whom has first-hand personal knowledge of the November 15, 2025 family gathering.

## **4. EXHIBITS SUBMITTED**


15. In support of this Motion, Defendant submits the following exhibits:
  - **Exhibit A:** Affidavit of **Nancy Willis**, including invitation confirming the date, time, and location of the November 15, 2025 gathering.
  - **Exhibit B:** Affidavit of **Brad Willis**.
  - **Exhibit C:** Affidavit of **Tucker Willis**.
  - **Exhibit D:** Affidavit of **Parker Ray**.
  - **Exhibit E:** Certified laboratory testing reports reflecting Defendant's testing history.
  - **Exhibit F:** FaceTime call record reflecting Defendant's return home and daily FaceTime call with the minor child on the evening of November 15, 2025.
  - **Exhibit G:** Testing timeline summary, submitted solely as an organizational aid.

## 5. REQUEST FOR RELIEF

WHEREFORE, Defendant respectfully requests that the Court:

- A. Accept and file this Motion and Exhibits as a supplement to the record; and
- B. Grant such other and further relief as the Court deems proper, consistent with the limited, factual purpose of this Motion.

Respectfully submitted this 17th day of **December, 2025**.

  
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Wayland B. Willis  
Defendant, Pro Se  
806 Whispering Willow Court  
Grovetown, Georgia 30813  
Phone (706) 631-0526  
[bhbwillis@gmail.com](mailto:bhbwillis@gmail.com)

## **CERTIFICATE OF SERVICE**


I hereby certify that I have this day served a copy of the foregoing *Defendant's Motion to Correct and Supplement the Record with Affidavits and Certified Documentation*, together with all exhibits, upon the following parties by electronic service through PeachCourt eService:

**Adam B. Land, Esq.**  
Counsel for Plaintiff  
adam@tisdalelawfirm.com

**Renee Bell**  
Guardian ad Litem  
kidsgal@aol.com

This 17th day of December, 2025.

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Wayland B. Willis  
Defendant, Pro Se  
806 Whispering Willow Court  
Grovetown, Georgia 30813  
Phone (706) 631-0526  
bhbwillis@gmail.com

**EXHIBIT A**  
**Affidavit of Nancy Willis**

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA  
DOMESTIC RELATIONS DIVISION

Haley Crowe

Plaintiff

-vs-

Wayland Willis

Defendant

2025EDR0053

(Case I.D. Number)

**AFFIDAVIT**

I, Nancy Willis, in Richmond County, Georgia, MAKE OATH AND SAY THAT:

1. On Saturday, November 15th, Braxton Willis came to my house and drove us in my car to Johns Road for an engagement party for Abi- Grace Willis (Braxton's sister) at the home of the Trotter Family. While at the party, Braxton talked with many of the guests that he knew and the host and hostess who were friends of the family. Braxton and I talked numerous times during the evening, he helped me up and down steps that did not have a handrail, entertained the guests playing the piano, and then around 6:30pm, drove him and I back to my residence. Braxton did not exhibit any signs of impairment at any time during this evening.

STATE OF GEORGIA  
COUNTY OF RICHMOND

SUBSCRIBED AND SWORN TO BEFORE  
ME, on the 24 day of  
November, 2025

(Signature)

Nancy Willis

Signature Gracie Williams  
(Seal)

NOTARY PUBLIC  
My Commission expires:  
05/16/2028



HOSTED BY  
TROTTER FAMILY 

DATE  
SATURDAY, NOVEMBER 15  
4:00PM – 6:00PM EST

LOCATION  
1121 JOHNS RD  
AUGUSTA, GA 30904

*Please join us to celebrate Abi  
Grace and Henry's engagement!*



PLEASE JOIN US FOR AN

*Engagement Party*

HONORING

*Abi Grace and Henry*

SATURDAY, NOVEMBER 15  
AT 4 P.M.

1121 JOHNS ROAD  
AUGUSTA GA 30904

**EXHIBIT B**  
**Affidavit of Brad Willis**

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA  
DOMESTIC RELATIONS DIVISION

HALEY CROWE

Plaintiff

-vs-

WAYLAND WILLIS

Defendant

2025EDR0053

(Case I.D. Number)

**AFFIDAVIT**

I, BRAD WILLIS, in Richmond County, Georgia, MAKE OATH AND SAY THAT:

1. I am Brad Willis, and I am the father of Wayland Braxton Willis. This statement is in reference to the evening of November 15 and Haley Crowe's related false allegations. I was attending my daughter's (Braxton's sister) family bridal shower at the Trotter's residence. I personally did not witness Wayland Braxton Willis drinking alcohol at the event. I had a conversation with Braxton right before he was leaving and I didn't notice or suspect any alcohol drinking from his demeanor. He was driving my mom (his grandmother) home that night so I would have addressed a problem if I saw one.

STATE OF GEORGIA

COUNTY OF RICHMOND

SUBSCRIBED AND SWORN TO BEFORE  
ME, on the 24 day of November, 2025.

Signature Gracie Williams  
(Seal)

NOTARY PUBLIC

My Commission expires:  
05/16/2028



BRAD WILLIS

(Signature)

BRAD WILLIS

**EXHIBIT C**  
**Affidavit of Tucker Willis**

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA  
DOMESTIC RELATIONS DIVISION

HALEY CROWE

Plaintiff

-vs-

WAYLAND WILLIS

Defendant

2025EDR0053

(Case I.D. Number)

**AFFIDAVIT**

I, TUCKER WILLIS, in Richmond County, Georgia, MAKE OATH AND SAY THAT:

1. I'm Tucker Willis, Braxton's younger brother. On the night of November 15th, I was at our sister's bridal shower at the Trotter's. I was with Braxton all throughout the night, and at no point did I see him drink anything alcoholic or acting like he had. If he had been drinking, I would've noticed because there was little to no alcohol there — but he wasn't.

STATE OF GEORGIA

COUNTY OF RICHMOND

SUBSCRIBED AND SWORN TO BEFORE

ME, on the 24 day of

NOVEMBER,

2025

Signature

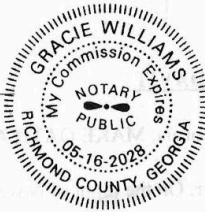
*Gracie Williams*

(Seal)

NOTARY PUBLIC

My Commission expires:

05/16/2028



*Tucker Willis*

(Signature)

TUCKER WILLIS

**EXHIBIT D**  
**Affidavit of Parker Ray**

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA  
DOMESTIC RELATIONS DIVISION

HALEY CROWE

Plaintiff

-vs-

WAYLAND WILLIS

Defendant

2025EDR0053

(Case I.D. Number)

**AFFIDAVIT**

I, PARKER RAY, in Richmond County, Georgia, MAKE OATH AND SAY THAT:

1. I, Parker Ray, am providing this statement about the evening of November 15 at the Trotter residence, where I attended a bridal shower.

Throughout the event, I never saw Wayland Braxton Willis drink any alcohol. I talked with him several times that night, and at no point did he appear to be drinking or show any signs of having consumed anything. From everything I've seen over the past several months, Braxton has been committed to living a sober lifestyle. I can't speak for every single day, but at all the recent family gatherings and wedding events — including the ones Brooks wasn't able to attend — I've never seen him touch alcohol.

What I can say confidently is that his focus has been entirely on Brooks. Even when he tries to hide how heavy this situation has been on him, it's clear how hard he's working and how seriously he's taking everything. His commitment to sobriety has been obvious to all of us, and we're very proud of him for that.

STATE OF GEORGIA  
COUNTY OF RICHMOND

SUBSCRIBED AND SWORN TO BEFORE  
ME, on the 24 day of  
November, 2025



(Signature)

PARKER RAY

Signature Gracie Williams  
(Seal)

NOTARY PUBLIC

My Commission expires:

05/16/2028



**EXHIBIT E**

**Certified laboratory testing documentation reflecting Defendant’s testing history, including initial reported results and subsequent retesting.**



Requesting Agency:  
Analyze America Labs, Inc.  
1840 Wrightsboro Road  
Augusta, GA 30904  
Telephone: 706-738-3145

LAN: 05197033  
Specimen ID: 6792643  
Reason For Test: Random  
Date Collected: 10/16/2025  
Date Received: 10/20/2025  
Date Reported: 10/22/2025

Donor Name: Willis, Wayland

SSN/ID: 057-63-1540

**Test(s) Requested: Hair 5 Drug Panel & Extended Opiates**

The Hair 5 Drug Panel and Extended Opiates Test includes the testing of the following:  
Amphetamine, Methamphetamine, Ecstasy (MDMA), MDA, Cocaine/Metabolites, Codeine, Morphine, Heroin Metabolite, Hydrocodone, Hydromorphone, Oxycodone, Oxymorphone, Phencyclidine (PCP), THC Metabolite (Marijuana)

**Hair 5 Drug Panel & Extended Opiates Test Result: Positive**

A positive result indicates that the drug was identified at a level equal to or greater than the above listed cutoff and was confirmed by the method listed below.

Drugs Tested For	Result	Screening Cut off	Screening Method	Confirmation Cut off	Confirmation Method	Quantitative Result
Amphetamine	Positive	500 pg/mg	ELISA	500 pg/mg	GC/MS	3143 pg/mg
Methamphetamines	Positive	500 pg/mg	ELISA	500 pg/mg	GC/MS	
Methamphetamine	Positive			500 pg/mg	GC/MS	32407 pg/mg
Cocaine/Metabolites	Negative	500 pg/mg	ELISA	500 pg/mg	LC/MS/MS	
Opiates	Negative	200 pg/mg	ELISA	200 pg/mg	GC/MS	
Extended Opiates	Negative	200 pg/mg	ELISA	200 pg/mg	GC/MS	
Phencyclidine	Negative	300 pg/mg	ELISA	300 pg/mg	GC/MS	
THC Metabolite	Negative	1.00 pg/mg	ELISA	0.10 pg/mg	GC/MS/MS	

**REPORT NOTATIONS**

Dates on COC & Specimen do not match.  
1.5 inches (3.81 cm) - Head Hair

Certified By: Shaza Deeb  
Result Report Version: US.11.2018

Test Version: 5662948.17  
- Page 1 of 1 -

David Engelhart, Ph.D.  
Laboratory Director

Omega Laboratories, Inc. | 400 N. Cleveland Ave. | Mogadore, OH 44260



Requesting Agency:  
 Analyze America Labs, Inc.  
 1840 Wrightsboro Road  
 Augusta, GA 30904  
 Telephone:706-738-3145

LAN: 05212102  
 Specimen ID: 6792647  
 Reason For Test: Random  
 Date Collected: 11/04/2025  
 Date Received: 11/07/2025  
 Date Reported: 11/07/2025

Donor Name: Willis, Wayland

SSN/ID: 057-63-1540

**Test(s) Requested: Hair 17 Drug Panel**

The Hair 17 Drug Panel Test includes the testing of the following:  
 Amphetamine, Methamphetamine, MDMA, MDA, Cocaine/Metabolites, Codeine, Morphine, Heroin Metabolite, Hydrocodone, Hydromorphone, Oxycodone, Oxymorphone, Phencyclidine, THC Metabolite, Alprazolam, Clonazepam, Diazepam, Nordiazepam, Lorazepam, Oxazepam, Temazepam, Meperidine, Normeperidine, Methadone, EDDP, Fentanyl, Norfentanyl, Tramadol, Zolpidem, Buprenorphine, Norbuprenorphine, Propoxyphene, Amobarbital, Butalbital, Pentobarbital, Phenobarbital, Secobarbital, Ketamine, Norketamine.

**Hair 17 Drug Panel Test Result: Negative**

A negative result indicates that none of the drugs listed were detected at a concentration equal to or greater than their listed cutoff levels.

Drugs Tested For	Result	Screening Cut off	Screening Method
Amphetamine	Negative	300 pg/mg	ELISA
Methamphetamines	Negative	500 pg/mg	ELISA
Cocaine/Metabolites	Negative	500 pg/mg	ELISA
Opiates	Negative	200 pg/mg	ELISA
Extended Opiates	Negative	200 pg/mg	ELISA
Phencyclidine	Negative	300 pg/mg	ELISA
Marijuana (THC/Carboxy THC)	Negative	50 pg/mg	ELISA
Benzodiazepines	Negative	100 pg/mg	ELISA
Meperidine/Metabolites	Negative	40 pg/mg	ELISA
Methadone/Metabolites	Negative	200 pg/mg	ELISA
Fentanyl/Metabolites	Negative	40 pg/mg	ELISA
Tramadol	Negative	40 pg/mg	ELISA
Zolpidem	Negative	40 pg/mg	ELISA
Buprenorphine/Metabolites	Negative	40 pg/mg	ELISA
Propoxyphene	Negative	8 pg/mg	ELISA
Barbiturates	Negative	200 pg/mg	ELISA
Ketamine/Metabolite	Negative	500 pg/mg	ELISA

**REPORT NOTATIONS**

1.5 inches (3.81 cm) - Head Hair

Certified By: John Masimore  
 Result Report Version: US.11.2018

Test Version: 5680878.2  
 - Page 1 of 1 -

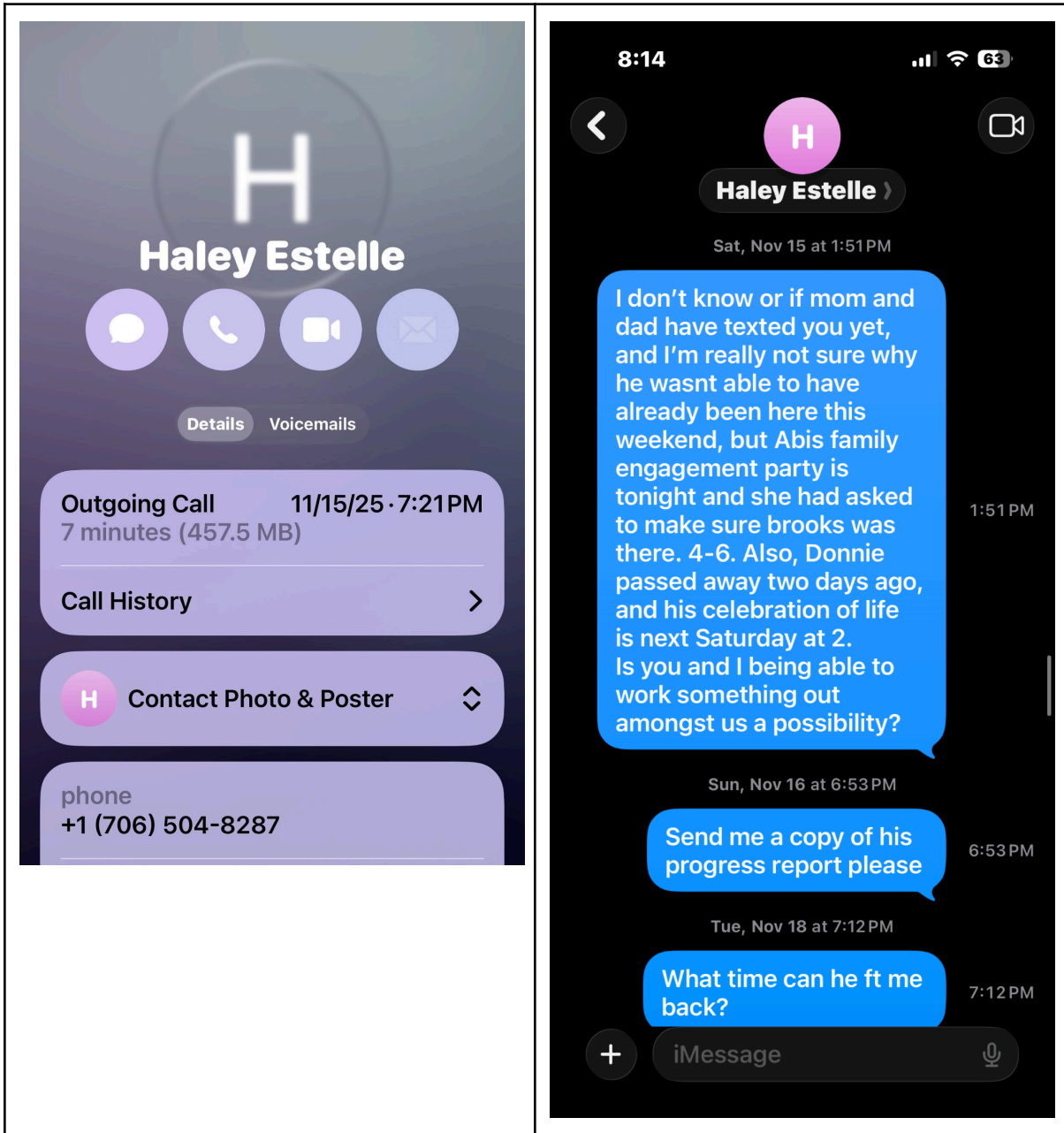
Shaza Deeb  
 Laboratory Director

Omega Laboratories, Inc. | 400 N. Cleveland Ave. | Mogadore, OH 44260

**EXHIBIT F**

**Communications Record – November 15, 2025**

1. FaceTime call record reflecting Defendant’s return home and FaceTime call with the minor child
2. Text message sent by Defendant to Plaintiff regarding the family gathering, which received no response



**EXHIBIT G**  
**Drug Testing Timeline Summary**

**October 16, 2025** – Hair follicle drug test administered (5-panel)

**October 22, 2025** – Reported result issued for 5-panel hair follicle test

**October 30, 2025** – Retest instructed

**October 31, 2025** – Retest appointment scheduled

**November 4, 2025** – Hair follicle retest administered (17-panel)

**November 7, 2025** – Reported result issued for 17-panel hair follicle retest