

  
Cindy Mason, Clerk  
Columbia County, Georgia

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

HALEY CROWE )  
Plaintiff, )  
vs. )  
WAYLAND WILLIS, )  
Defendant. )  
\_\_\_\_\_ )

Civil Action File No.:  
2025EDR0053

**DEFENDANT’S MOTION FOR ENFORCEMENT, SANCTIONS, AND WRITTEN FINDINGS, BASED ON WILLFUL CONTINUED CONDUCT AFTER NOTICE**

COMES NOW Defendant, Wayland Braxton Willis, pro se, and files this Motion for Enforcement, Sanctions, and Written Findings Based on Willful Continued Conduct After Notice. This motion is filed after Defendant placed squarely before the Court (1) the non-operative status of unadjudicated and unsubstantiated allegations and (2) the requirement that Guardian ad Litem (“GAL”) authority be defined and grounded in written findings.

Despite notice and opportunity to clarify, define, or disavow reliance, restrictions and authority affecting Defendant’s parental rights have continued without adjudicated findings or express judicial authorization. At this stage, continued conduct is no longer attributable to ambiguity, delay, or discretion. It is willful.

1. On January 19, 2026, Defendant filed a Motion to Prohibit Continued Reliance on Unadjudicated and Unsubstantiated Allegations, placing the operative status of such allegations squarely before the Court.
2. On January 20, 2026, Defendant filed a Motion to Define and Limit Guardian ad Litem Authority and for Written Findings, expressly requesting judicial clarification of the scope and limits of any authority being exercised.

3. These motions provided clear notice and a meaningful opportunity for clarification, correction, or disavowal.
4. No written findings of fact or conclusions of law have been issued identifying adjudicated bases for continued restrictions or expanding GAL authority.

Following the filing of the foregoing motions, conduct affecting Defendant's parental rights has continued, including reliance on allegations not adjudicated or substantiated and continued exercises of authority with binding or practical effect absent written findings or express judicial delegation.

The continuation of such conduct after notice converts any prior uncertainty into willfulness. Allegations do not acquire operative legal status through repetition or accumulation. Continued reliance after notice constitutes impermissible use of non-operative material as fact.

GAL authority is derivative and limited to that conferred by appointment order and governing law. Exercise of authority affecting parental rights without written findings or express delegation is ultra vires. Where deprivation continues after notice and opportunity, the absence of findings and authority definition constitutes a due-process violation and undermines the integrity of the Court's supervisory role.

**WHEREFORE**, Defendant respectfully requests that the Court enter an Order providing the following relief:

1. Enter written findings of fact and conclusions of law identifying the basis, if any, for continued restrictions and authority exercised after notice, or finding that no such basis exists
2. Enforce the prohibition on reliance upon unadjudicated and unsubstantiated allegations as operative facts and prohibit any party or the GAL from continuing such reliance.
3. Define and limit the GAL's authority to the scope expressly granted by appointment order and governing law; prohibit any exercise beyond that scope absent written findings and express judicial authorization.

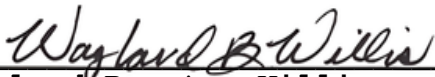
4. Impose appropriate procedural sanctions necessary to halt willful continued conduct after notice, including but not limited to striking reliance on non-operative material, limiting authority, and ordering compliance mechanisms.

5. Award reasonable fees and costs incurred as a result of addressing willful continued conduct after notice, to the extent authorized by law.

6. Enter findings sufficient to permit appellate or civil review of the issues raised herein.

Grant such other and further relief as the Court deems just and appropriate.

Respectfully submitted, this **22nd** day of **January, 2026**.



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**Wayland Braxton Willis**

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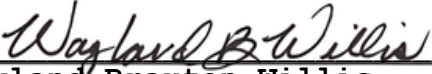
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **Defendant's Motion For Enforcement, Sanctions, And Written Findings, Based On Willful Continued Conduct After Notice**, upon the following parties by electronic service through PeachCourt eService:

**Adam B. Land, Esq.**  
Counsel for Plaintiff  
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**Renee Bell**  
Guardian ad Litem  
[kidsgal@aol.com](mailto:kidsgal@aol.com)

Submitted this **22nd** day of **January, 2026**.

  
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