

  
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 PROTECTIVE FINDINGS REGARDING REPEATED  
FALSE ALLEGATIONS & ABUSIVE LITIGATION CONDUCT**

COMES NOW Defendant, Wayland Braxton Willis, and respectfully moves this Court for entry of protective findings regarding Plaintiff’s repeated initiation of severe, unproven allegations that have generated custodial disruption, reputational harm, and structural instability without evidentiary support.

In support thereof, Defendant shows the Court as follows:

**I. Procedural Background and Custodial Baseline**

In June 2022, Plaintiff sought emergency intervention through a Temporary Protective Order alleging extreme parental misconduct. That proceeding did not result in any evidentiary hearing, evidentiary record, or finding of abuse, neglect, or danger.

Following that episode, the parties continued exercising substantial parenting time. In 2023, after mediation, the parties agreed to joint legal custody and a 50/50 shared physical custodial arrangement, which was incorporated into the Final Judgment and Decree of Divorce.

That agreement reflected a functioning shared parenting structure. It was inconsistent with any premise of imminent danger or parental unfitness. No evidentiary record

substantiating Plaintiff's 2022 accusations existed because no evidence existed.

The custodial framework was not shaped by proven misconduct. It was later destabilized, once again, by renewed accusations unsupported by proof.

## **II. Recurring Severe Allegations Without Evidence**

Since the dissolution of the marriage, Plaintiff has repeatedly asserted severe accusations of parental misconduct, including allegations implicating abuse, sexual impropriety, substance misuse, and danger to the minor child.

These were not minor parenting disputes. They were extreme allegations designed to invoke emergency mechanisms, agency involvement, and immediate custodial consequence.

No evidence has ever existed establishing that Defendant abused, neglected, or endangered his child. No evidentiary record supporting such claims has ever been created because none exists.

Yet materially similar accusations were reintroduced through successive procedural vehicles at successive litigation junctures with the same immediate effect: disruption first, substantiation never.

## **III. Recurring Emergency Allegations and Evidentiary Absence**

In December 2023, Plaintiff initiated a DFCS investigation and filed another Temporary Protective Order. DFCS conducted its investigation and did not substantiate abuse, neglect, or danger. The Protective Order was voluntarily dismissed on January 10, 2024. No evidentiary hearing occurred. No evidence was introduced. No findings were entered.

In mid-2024, Plaintiff initiated an additional DFCS referral. According to Plaintiff's own sworn deposition testimony, that referral did not result in an open case or any substantiated findings. Defendant was not contacted, no hearing

occurred, and no evidence was produced establishing abuse, neglect, or danger.

On January 9, 2025, Plaintiff once again sought emergency intervention through a third Temporary Protective Order and another DFCS referral. The Protective Order was voluntarily dismissed on April 3, 2025. No evidentiary hearing occurred. No evidence was produced. No findings of abuse, neglect, or danger were entered.

Across each cycle – 2022, 2023, 2024, and 2025 – the outcome remained constant. Allegations were made. Emergency mechanisms were triggered. Custodial disruption followed. Yet at no point did any allegation mature into evidence, any evidence into a record, or any record into a finding.

The pattern is unmistakable. Severe accusations were deployed through successive procedural vehicles at successive litigation junctures, each time producing immediate disruption and never producing substantiation. Disruption first. Substantiation never.

This is not isolated conflict or routine post-divorce friction. It is the repeated deployment of severe accusations without evidence.

#### **IV. Structural Consequence of Repetition**

Each cycle of severe allegations has produced immediate custodial consequences. Parent-child contact has been curtailed, suspended, or materially destabilized. Agency investigations have been initiated. Medical examinations and child interviews have occurred under the premise of extreme misconduct. These consequences arose upon accusation – before any evidence existed – and persisted after no evidence materialized. No evidentiary foundation preceded the disruption. No evidentiary foundation followed it.

When extreme allegations are repeatedly asserted without proof and never substantiated, the disruption itself becomes the operative injury.

The harm is structural.

The minor child has been subjected to recurring investigative intrusion and custodial instability untethered to any demonstrated misconduct. Defendant has been repeatedly branded with allegations of abuse, sexual impropriety, substance misuse, and danger without evidentiary support, corroboration, or validation. This is not episodic instability. It is cumulative destabilization.

A custodial framework cannot stabilize where extreme accusations are cyclically deployed, collapse under absence of evidence, and are reintroduced through successive procedural vehicles. At some point, repetition ceases to be incidental and becomes the destabilizing force itself.

#### **V. Necessity of Protective Findings**

WHEREFORE, Defendant respectfully requests that this Court enter the following findings and clarification:

1. That the severe allegations previously asserted by Plaintiff did not result in any evidentiary hearing, evidentiary record, or substantiated finding establishing abuse, neglect, or danger to the minor child.

2. That the repetition of materially similar allegations, absent evidentiary support, has produced custodial disruption independent of proof.

3. That no evidentiary basis presently exists in the record substantiating a finding of abuse, neglect, or danger sufficient to restrict Defendant's court-ordered parenting time or daily communication.

4. That, absent competent and demonstrable evidence establishing actual risk, the custodial provisions reflected in the Final Judgment and Decree remain operative and enforceable.

Without such findings, the same destabilizing mechanism remains available for indefinite redeployment.

#### **VI. Conclusion**

This Motion does not seek clarification. It seeks findings. The record reflects a recurring pattern in which Plaintiff has asserted extreme allegations that have generated immediate custodial interference despite the complete absence of evidence. The consequences have been real. The evidence has never existed. The repeated assertion of severe accusations without proof has itself become the destabilizing force.

Defendant respectfully requests that this Court enter protective findings consistent with the foregoing and grant such other and further relief as is just and proper.

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



**Wayland Braxton Willis**

Defendant, Pro Se  
806 Whispering Willow Ct.  
Grovetown, Georgia 30813  
c: (706) 631-0526  
e: bhbwillis@gmail.com

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HALEY CROWE	)	
Plaintiff,	)	
vs.	)	Civil Action File No.:
	)	2025EDR0053
WAYLAND WILLIS,	)	
Defendant.	)	
_____	)	

**DECLARATION OF WAYLAND BRAXTON WILLIS IN SUPPORT OF EXHIBITS**

I, Wayland Braxton Willis, declare as follows:

1. I am the Defendant in this matter and have personal knowledge of the facts stated herein.
2. Exhibits A-E attached in support of Defendant's Motion for Protective Findings Regarding Repeated False Allegations and Abusive Litigation Conduct are true and correct copies of court records, sworn testimony excerpts, text message communications, correspondence, and demonstrative exhibits prepared from those records.
3. The text message exhibits are accurate screenshots of communications between Plaintiff and Defendant obtained from my device.
4. The deposition excerpts attached are true and accurate excerpts of Plaintiff's sworn deposition testimony.

I declare under penalty of perjury under the laws of the State of Georgia that the foregoing is true and correct.

Executed this **22nd** day of **February, 2026.**

  
\_\_\_\_\_

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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 Protective Findings Regarding Repeated False Allegations & Abusive Litigation** together with all exhibits, upon the following parties by electronic service through PeachCourt eService:

**Adam B. Land, Esq.**  
Counsel for Plaintiff  
[adam@tisdalelawfirm.com](mailto:adam@tisdalelawfirm.com)

**Renee Bell**  
Guardian ad Litem  
[kidsgal@aol.com](mailto:kidsgal@aol.com)

This 22nd day of **February, 2026.**

  
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**Wayland Braxton Willis**  
Defendant, Pro Se  
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Grovetown, Georgia 30813  
c: (706) 631-0526  
e: bhbwillis@gmail.com