

JUDICIAL MERIT SELECTION COMMISSION]

In the Matter of: CASE 2019-DR-10-1147]

Candidate for – Family Court, Ninth Judicial Circuit]

Judge Spiros S. Ferderigos]

] WITNESS: Lee Carlton Walker. —

-----] AFFIDAVIT

Submitted to the South Carolina Judicial Merit Selection Commission

Concerning Judge Spiros S. Ferderigos – Family Court, Ninth Judicial Circuit

I will appear to testify concerning the qualifications of the above-named candidate and will produce all documents in my possession, if any, which will further develop or corroborate my testimony. I understand that this written statement and all supporting documentation, if any, must be completed and the hard copies of all such documents shall be returned to the

Judicial Merit Selection Commission by the deadline for complaints in order for the Commission to hear my testimony, and that the deadline for complaints is 12:00Noon, Monday, November 3, 2025. I understand I must be available to testify at the Public Hearing, and failure to appear will result in a dismissal of my complaint.

AFFIDAVIT OF LEE CARLTON WALKER

Submitted to: South Carolina Judicial Merit Selection Commission

Concerning: Judge Spiros S. Ferderigos — Family Court, Ninth Judicial Circuit

Case Reference: 2019-DR-10-1147

I. INTRODUCTION AND OATH

I, Lee Carlton Walker, being duly sworn, submit this affidavit to the South Carolina Judicial Merit Selection Commission (“the Commission”) regarding the judicial conduct of Family Court Judge Spiros S. Ferderigos of the Ninth Judicial Circuit.

I respectfully request that this affidavit and its supporting documentation be considered in evaluating whether Judge Ferderigos has demonstrated the impartiality, diligence, and fidelity to law required for continued service on the bench.

II. BACKGROUND

I am the plaintiff and father in the matter referenced above. On January 20, 2021, Judge Ferderigos presided over a WebEx hearing that resulted in a temporary order signed on February 11, 2021.

Although labeled “temporary,” that order:

- Removed my legal and physical custody of my daughter;
- Restricted my visitation to supervised contact;
- Assigned all decision-making authority to the mother; and
- Imposed psychological evaluations and counseling obligations without evidentiary basis.

Judge Ferderigos later refused to allow reconsideration or correction, converting what was meant to be a temporary arrangement into a continuing deprivation of parental rights that persisted until the final hearing began in November 2023 — nearly three years later.

III. PROCEDURAL MISCONDUCT AND FAILURE TO REVIEW RECORD

The certified transcript of the January 20, 2021 hearing (Exhibit 1) shows Judge Ferderigos beginning the proceeding without having reviewed the filings. On pages 5–8 he states he is “missing filings from October 30th” and must “go through the file.” Despite this, he proceeded to hear argument.

My counsel, Jessica Partain, and opposing counsel both referenced multiple affidavits — including those of my parents and myself — that were not before him. Judge Ferderigos never recessed to verify the record and issued rulings based on incomplete information. This failure to review all evidence before ruling violates the diligence required under Canon 3(B)(2) of the South Carolina Code of Judicial Conduct.

IV. FALSE STATEMENT REGARDING SCHOOL ATTENDANCE

During the hearing (Transcript p. 25), the Guardian ad Litem’s attorney, Lindsay Blanks, told the Court that my attorney, Ms. Partain, had “inaccurately stated” that my daughter missed 54 days of school and claimed “attendance was not a problem.” That statement was false. The official school attendance records filed by Ms. Partain confirm that my daughter missed 54 days while in her mother’s custody, not mine. Judge Ferderigos made no inquiry into which parent’s custodial period those absences occurred under and accepted the Guardian ad Litem’s unsworn assertion as fact. This judicial failure reversed the truth of the record, painting me as negligent while excusing documented neglect by the custodial parent.

V. FALSE IMPRESSION OF MISCONDUCT AND MISREPRESENTATION OF MY STATEMENTS

Guardian ad Litem counsel Lindsay Blanks further told the Court that I had allegedly told my daughter that “they are going to get our emails,” implying I was hiding or deleting evidence. That claim was false. When my daughter asked why the Guardian ad Litem, Sharon Lovett, wanted her iPad, I replied, “So she can look at the emails that you and I have.” My daughter simply said, “Oh.”

I never said or implied that anyone was “going to get our emails” or that I wished to conceal information. I have — and always have had — nothing to hide. I will provide the transcripts as evidence showing that nowhere did I say the phrase “they are going to get our emails.” Mr. Blanks’s representation to the Court was untrue. By presenting this false narrative, the Guardian ad Litem’s attorney created an unwarranted appearance of deceit that the Judge accepted without verification, further damaging my credibility and influencing the restrictions imposed.

VI. DISREGARD OF SWORN TESTIMONY AND IMPROPER RELIANCE ON UNSWORN STATEMENTS

Multiple sworn affidavits (Exhibits 2A–2E) detailed that my daughter’s anxiety and school regression began only after the mother restricted all contact with me. The Guardian ad Litem, Sharon Lovett, made direct custodial recommendations — actions expressly prohibited by S.C. Code § 63-3-830(B)(2) — and her attorney presented psychological opinions and accusations without evidentiary foundation. Judge Ferderigos permitted these unsworn statements to be treated as evidence, while my sworn affidavits and those of my witnesses were ignored. I was never permitted to testify, clarify the record, or defend myself against the accusations presented. By relying on advocacy rather than sworn testimony, the Judge abandoned his duty to safeguard due process.

VII. REFUSAL TO ALLOW RECONSIDERATION OR FINAL HEARING

After the February 11, 2021 temporary order, I filed timely Rule 59(e) and Rule 60(b) motions seeking reconsideration based on new evidence and clear factual errors. Judge Ferderigos refused to schedule or hear those motions, stating that the matter was “temporary” and could be addressed “later at final hearing.” However, no final hearing was held until November 2023 — nearly three years after the temporary order was issued. His refusal effectively converted a temporary order into a de facto permanent judgment. This denial of any opportunity for review deprived me of procedural due process and extended the loss of my parental contact indefinitely.

VIII. CONTINUING FINANCIAL AND EMOTIONAL HARM

As a direct consequence of Judge Ferderigos's rulings and refusals, I have incurred more than \$860,000 in combined legal fees, lost income, and related expenses. My parents, James J. Walker Jr. and Helen R. Walker, both retired professionals, mortgaged their paid-off home and depleted retirement savings to fund the ongoing litigation. They have each submitted their own sworn affidavits directly to the Commission regarding what they witnessed in this matter.

I have been the victim of Parental Alienation perpetuated by the Guardian ad Litem, Sharon Lovett, her attorney Lindsay Blanks, and my child's mother, Ashley McAdams. This alienation has been allowed to continue under Judge Ferderigos's supervision for more than four years. Ashley McAdams's relationship with our daughter remains fully intact — it is my relationship with my daughter, and that of my family, that has been destroyed. Judge Ferderigos was aware that the Guardian ad Litem's firearm allegation was false — as reflected in his own order denying that claim — yet he still allowed the GAL and opposing counsel to isolate me from my daughter, compounding the alienation and harm.

IX-A. MISREPRESENTATION OF RACING ACTIVITIES AND SCHOOL ATTENDANCE (TRANSCRIPT PP. 9–11)

On page 9 of the January 20, 2021 transcript, Mr. Hopkins told the Court that I had "disregarded school" to take my daughter racing "any time I wanted." That statement was false. I filed a motion seeking permission to take my daughter racing once per month, not at random, at AK Performance Racing in North Carolina. The racecar remained at AK Performance Racing, not Stillwell Racing as Hopkins alleged.

My daughter's school principal had approved her being checked out once per month on a Tuesday at 1:00 p.m. for travel to the race event, with classes dismissing at 2:45 p.m. Judge Ferderigos ignored this documented approval and accepted Hopkins's claim of "educational disregard." My daughter was also engaged in ballet and tap dance, karate, swimming lessons, and art on her own initiative. The mother, Ashley McAdams, opposed racing and aligned with Hopkins's misrepresentations. Hopkins even referenced Judge Landis's prior order, falsely claiming it prohibited racing — though it did not — and failed to disclose that Judge Landis's niece's husband worked for Mr. Hopkins, a clear appearance of conflict.

The allegation that I "poisoned" my daughter emotionally originated entirely from the mother's own deposition testimony, not from me. In that deposition — attended by the Guardian ad Litem and Mr. Hopkins — Ms. McAdams herself said that her own mother was the one influencing the child. Even the mother's employer confirmed that account. Nonetheless, the Guardian ad Litem and Hopkins falsely told the Court the statements came from me.

On page 11 of the transcript, I was questioned about online activity, and I explained that law enforcement officers had instructed me to remain at home and type my statements from my computer while they advised me on what to include. This was under their supervision and with their full knowledge — not a violation of any order or sign of instability. These facts were ignored, and the Court relied on Hopkins's distortions instead of the verified record and sworn documentation.

X. SUMMARY OF JUDICIAL MISCONDUCT

Judge Ferderigos's conduct demonstrates a consistent pattern of:

- Convening hearings without reviewing the full record;
- Accepting unsworn and false statements from the Guardian ad Litem and her counsel;
- Ignoring sworn affidavits filed by myself and witnesses;
- Failing to verify documentary evidence (notably the 54 absences under the mother's care);
- Allowing a "temporary" order to function as a permanent deprivation for nearly three years;
- Refusing to hear Rule 59 or Rule 60 motions despite timely filing;
- Permitting false insinuations about my honesty and transparency to go uncorrected; and
- Relying on counsel's misrepresentations (e.g., racing, firearm, and "poisoning" claims) rather than verified evidence.

These actions collectively erode public confidence in the Family Court and violate both Canon 1 (Integrity) and Canon 3 (Diligence and Impartiality) of the Judicial Code of Conduct.

XI. REQUEST FOR COMMISSION ACTION

I respectfully request that the Judicial Merit Selection Commission:

1. Deny reappointment of Judge Spiros S. Ferderigos to the Family Court bench; and
2. Investigate the practice of allowing "temporary" custody orders to remain in effect for years without final hearings or review.

XII. CONCLUSION AND AFFIRMATION

I affirm that the foregoing statements are true and correct to the best of my knowledge and belief. I make this statement voluntarily to assist the Commission in its constitutional duty to ensure that the citizens of South Carolina are served by judges of integrity, fairness, and diligence.

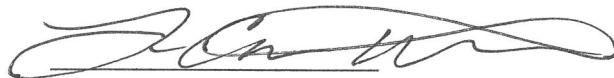
Attached are exhibits to go with my affidavit:

Lee Carlton Walker
639 McCutchen Street
Charleston, SC 29412
(843) 478-5980
lcarltonwalker@gmail.com
Affiant

WAIVER

I understand that my testimony before the Judicial Merit Selection Commission may require disclosure of information otherwise protected by attorney-client privilege. To allow the Commission to fully investigate this matter, I hereby waive any right I may have to raise that privilege as it relates to this complaint. I authorize the Commission to question other parties, including my attorney, regarding the facts and issues of this case.

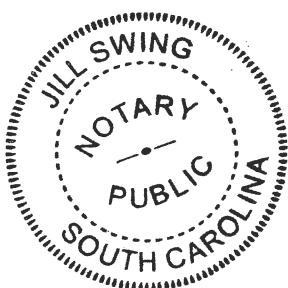
Signed this 3 day of November 2025, at Charleston, South Carolina.



Lee Carlton Walker, Affiant

Subscribed and sworn before me this 3rd day of November 2025.


Notary Public for South Carolina
My Commission Expires: 10/5/2032



(1)

Ex 1

STATE OF SOUTH CAROLINA)	IN THE FAMILY COURT
)	
COUNTY OF CHARLESTON)	9TH JUDICIAL CIRCUIT
)	
)	CHARLESTON, SOUTH CAROLINA
LEE CARLTON WALKER,)	
PLAINTIFF,)	
)	JANUARY 20, 2021
VERSUS)	
)	
SYLVIA ASHLEY McADAMS.)	DOCKET NUMBER
DEFENDANT.)	2019-DR-10-1147
)	
)	

BEFORE THE HONORABLE SPIRO S. FERDERIGOS, JUDGE

JESSICA PARTAIN, ESQUIRE
REPRESENTING THE PLAINTIFF

WILLIAM HOPKINS, ESQUIRE
REPRESENTING THE DEFENDANT

LINDSAY BLANKS, ESQUIRE
REPRESENTING THE GUARDIAN AD LITEM

SHARON LOVETT
GUARDIAN AD LITEM

PATRICIA A. NYE
OFFICIAL COURT REPORTER
FOR THE THIRD JUDICIAL CIRCUIT

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1 (WHEREUPON COURT WAS CONVENED WITH ALL PARTIES PRESENT)

2 THE COURT: We're going on the record in case 2019-DR-10-
3 1147. Lee Carlton Walker versus Sylvia Ashley McAdams. Present on
4 this Web Ex hearing is Ms. Jessica Partain who's the attorney for
5 Lee Carlton Walker; is that correct Ms. Partain?

6 MS. PARTAIN: That's correct, Your Honor.

7 THE COURT: And Mr. Walker is present, as well, by Web Ex.
8 We have Mr. William Hopkins present as well, representing the
9 Defendant. Is the Defendant here today? Is Ms. Sylvia Ashley
10 McAdams present? Raise your hand if you're here. There you are.
11 Ms. McAdams is present as well. And we have Sharon Lovett here
12 today, the Guardian ad Litem. Please raise your hand, ma'am.
13 There she is. Ms. Lovett is present as well.

14 We are here following the issuance of -- let's see, the last
15 order I have is Judge McGee's order that was filed December 29,
16 2020. It's an order of continuance that does not end the case.
17 And before we get into the motion let's see if we have any
18 procedural matters. Ms. Partain, any procedural matters that we
19 need to address before we begin, ma'am?

20 MS. PARTAIN: I don't have any, Your Honor.

21 THE COURT: Thank you, Ms. Partain. Mr. Hopkins, any
22 procedural matters from you, sir?

23 MR. HOPKINS: No sir, Your Honor.

24 THE COURT: Thank you very much. And likely to the guardian,
25 any issues? I see there's another person with the guardian

1 raising his hand. Yes, sir.

2 MR. BLANKS: Yes, Your Honor, my name is Lindsay Blanks, I'm
3 the attorney for the guardian.

4 THE COURT: Thank you very much. And your name was what?

5 MR. BLANKS: Lindsay Blanks, Ervin Blanks.

6 THE COURT: Thank you, Mr. Blanks.

7 MR. BLANKS: Your Honor, I do have one issue. I just want to
8 make sure you have my client's supplemental affidavit that was
9 filed November 18th. It is on Court Plus, but we did not refile it
10 for this hearing.

11 THE COURT: What I'll do is go through the file and make
12 sure I have everything. I have a procedural matter that I need to
13 figure out as well. So, there have been a number of motions from
14 a number of different parties, and I want to make sure I'm
15 looking at the correct motion that we're here for today. It
16 appears from the last court order and what is before me is the
17 Defendant's motion for ex parte order expedited temporary relief;
18 is that correct Mr. Hopkins?

19 MR. HOPKINS: That's correct, Your Honor. Actually the ex
20 parte motion was granted, and that order was filed. It's just the
21 motion for expedited temporary relief.

22 THE COURT: Sir, do you have a copy of that in front of you
23 so you could tell me the date that was filed?

24 MR. HOPKINS: Yes, sir. I believe it was October 29, 2020.

25 THE COURT: Thank you very much. One moment.

1 MR. HOPKINS: I think it may have been hand delivered to the
2 Court on November 30th, Your Honor.

3 THE COURT: And do you have the filed date on yours Mr.
4 Hopkins? If you don't, I'll ask Ms. Partain.

5 MS. PARTAIN: October 30, 2020.

6 THE COURT: Thank you, ma'am. Everybody bear with me one
7 moment. I am missing that. Ms. Bott, can you hear me, ma'am?

8 MS. BOTT: Yes, sir.

9 THE COURT: Can you get the clerk to get a copy of the
10 motion for temporary relief that was filed October 30th in this
11 matter. Everyone, we're going to stand down, I do not have the
12 motion in front of me. Yes Mr. Blanks?

13 MR. BLANKS: Yes, Your Honor. I just want to call the
14 Court's attention to the fact that the guardian filed a return to
15 motion and motion for temporary relief that also needs to be
16 heard. We submitted it on November 3rd, and I believe it was filed
17 on November 18th.

18 THE COURT: The filed date was what, sir?

19 MR. BLANKS: We submitted it on November 3rd, but I believe
20 it didn't get filed until November the 18th.

21 THE COURT: Here, I've got. Return to motion and notice of
22 motion of Guardian ad Litem, correct sir?

23 MR. BLANKS: Yes, sir.

24 THE COURT: If y'all will hang tight for a moment while I
25 get a copy of the motion that's before the Court. All right, so,

1 I have been provided with a copy of Defendant's notice of motion
2 and motion for ex parte order pursuant to South Carolina rules of
3 Civil Procedure, Rule 65, and expedited temporary relief. It was
4 filed October 30, 2020. Mr. Hopkins, that is the motion before
5 the Court today, correct sir?

6 MR. HOPKINS: Yes, sir.

7 THE COURT: And we also have the Guardian ad Litem's motion
8 that was filed November 18, 2020, and that is the other matter
9 that's before the Court. Is that correct, Mr. Hopkins?

10 MR. HOPKINS: Yes, sir.

11 THE COURT: Thank you very much. Now, I'm going to go
12 through the file and let y'all know what filings I have because
13 I'm concerned, I was missing some filings from October 30th, so I
14 want to make sure I have everything. I have the motion, the ex
15 parte order filed October 30th. Going through the list I have the
16 affidavit of William E. Hopkins, Jr. that was filed January 20,
17 2021. Defendant mother's affidavit filed January 20, 2021.
18 Supplemental affidavit of Sharon Lovett filed January 15, 2021.
19 Affidavit of Colleen Sullivan that was filed January 19, 2021.
20 Affidavit of Helen R. Walker, paternal grandmother, filed January
21 19, 2021. Affidavit of Lee Carlton Walker filed January 10, 2021.
22 Order of continuance December 29th. Order on Plaintiff's motion
23 for expedited supplemental temporary relief filed December 14,
24 2020. Affidavit of attorney's fees, motion for expedited
25 supplemental temporary relief, that's by Mr. Hammett on November

1 6th. Supplemental affidavit of Sharon Lovett, Guardian ad Litem,
2 filed November 18th. A filing November 17, 2020 by Lee Carlton
3 Walker. I have a bunch of handwritten documents and emails.
4 Affidavit of Sharon Lovett, Guardian ad Litem, November 6th.
5 Return to motion and notice of motion of Guardian ad Litem filed
6 November 6, 2020. Plaintiff's reply to ex parte order without
7 legal representation filed November 2nd. Mr. Hopkins, do I have
8 all your filings, sir?

9 MR. HOPKINS: It's my understanding, Your Honor, that's all
10 the filings filed by the parties.

11 THE COURT: Ms. Partain?

12 MS. PARTAIN: That's my understanding as well, Your Honor.

13 THE COURT: Mr. Blanks?

14 MR. BLANKS: Yes, sir. You have all of ours.

15 THE COURT: Thank you sir. We can begin and this is the
16 Defendant's motion so that is Ms. Partain.

17 MS. PARTAIN: It's actually the Plaintiff's. We're the
18 Plaintiff so it's Mr. Hopkins.

19 THE COURT: Thank you, ma'am. Mr. Hopkins, you may proceed
20 sir.

21 MR. HOPKINS: Thank you, Your Honor. If it pleases the
22 Court, I'll try to be brief. I'll just let the Court know the
23 background and how we got here. This, Your Honor, is the latest
24 lawsuit filed by Mr. Walker. This one is about racing. That was
25 the subject of the pleadings. What started off as a nice hobby

1 for the minor child, we contend sort of developed into Mr.
2 Walker's latest obsession. I won't rehash the last hearing but in
3 that hearing Mr. Walker had asked the Court to allow the minor --
4 this is a ten-year-old girl to be taken out of school early
5 anytime there was a race in North Carolina. The racing is done in
6 North Carolina, Your Honor. In Concord or the Huntersville area.
7 So, he wanted to take the child out of school anytime there was a
8 race without regard to what was happening at school. That hearing
9 cumulated Your Honor in Judge Landis telling Mr. Walker what he
10 was doing was inappropriate and wasn't allowed. So, I would say
11 this Your Honor, my client, the mother, has never been opposed to
12 the child racing. She hasn't tried to stop it; she just didn't
13 want it to be the number one priority to the exclusion of all
14 other things. And so now that Judge Landis has not said the child
15 couldn't race, she just can't leave the school early to race. In
16 fact, Your Honor, the mother, accompanied by the guardian, went
17 to the state of North Carolina. They met the race team manager;
18 his name is Stilwell. His own child races, Your Honor. He agreed
19 to handle the entire racing program for the minor child; to be
20 her manager. And mom agreed and the Guardian ad Litem agreed. And
21 we believe it would save some money as Mr. Walker would not have
22 to bring the racecar back and forth on a trailer to North
23 Carolina. So, in addition to being a professional racer it taught
24 the child a number of things. But Mr. Stilwell made clear a
25 couple of things, Your Honor. He's told his own children he will

1 not allow them to race all year round; they have to take a break.
2 Also, he's told them they cannot only race, they have to
3 participate in other activities and school events. In other
4 words, he will not allow racing to be the number one priority in
5 his children's lives. And so, when Mr. Walker heard this, Your
6 Honor, he refused to have Mr. Stilwell to be the child's manager.
7 And so, as you'll see even in Mr. Walker's affidavit he filed
8 with the Court, Your Honor, in paragraph eleven, he says he can't
9 believe they wanted to give Stilwell control. And we think this
10 has always been about control, Your Honor.

11 So, this is where things took a dark turn to get us to where
12 we are today, Your Honor. Despite Judge Landis's ruling that the
13 child could not be taken out of school early for racing, Mr.
14 Walker told the child she couldn't race at all. That it was
15 because of the mom, the Guardian ad Litem, and the courts. In
16 effect, this made the child against all of them. He then sent a
17 long message with a long rambling email, Your Honor, to the
18 child's therapist saying that he was removing her from racing all
19 together. And so, what happens next, Your Honor, is the ten-year-
20 old girl goes to school the next day and tells a counselor there
21 that her mother is poisoning her so she can't race. We don't
22 think that's something a ten-year-old can come up with on her
23 own. Shortly thereafter, Your Honor, the child ran away from
24 school after mom dropped her off one morning. She ran away,
25 caused complete chaos and panic. Mom was in panic; mom left her

1 job immediately and went to the school. The police were called.
2 Mom, the police, the school officials are all looking for this
3 child, but Your Honor, Mr. Walker never left his house. Mr.
4 Walker was communicating with his child electronically while
5 everybody else is looking for her and can't find her. We believe
6 this thing was choreographed. And then, Your Honor, some folks
7 have some transcripts and recordings of some phone calls and the
8 first phone call after the girl ran away Mr. Walker asked, Well,
9 are they listening to you now? So, we think that he has
10 encouraged or lead the child to act out enough so other adults
11 will realize the errors of their ways and allow this child to
12 race so this child will behave.

13 And so, then what prompted the motion, Your Honor, the ex
14 parte on October the 30th was after telling the child and everyone
15 else the child was done with racing, there would be no more
16 racing. On that Friday, October the 30th, he not only after Judge
17 Landis said he couldn't take the child out early; he just didn't
18 take her to school at all. He held her out from school October
19 30th and left for North Carolina so that she could race. So, when
20 we found out about this, Your Honor, we filed an ex parte motion
21 and Judge Richter signed the order. Friday evening Mr. Walker's
22 counsel advised him of the order, and they told him he should
23 bring the child back to South Carolina. So, Your Honor, on Friday
24 evening my client was on her way to Greenville to see her father
25 so she suggested they meet off of I-26 in Orangeburg which would

1 have been convenient. Well, Mr. Walker told her, Your Honor, that
2 he refused, said this was a Charleston County order and he would
3 only exchange the child in Charleston County. So, Ms. McAdams had
4 to drive all the way back to Charleston late at night and Mr.
5 Walker called the police to supervise the exchange even though
6 there was no basis. So, now the child sees the police are
7 present, this thing has been escalated, there's an exchange in
8 Charleston. And so, for that night, Your Honor, Ms. McAdams
9 looked in the child's backpack and she had \$126 in cash. My
10 client certainly doesn't have that kind of money or knows where
11 or why she would have that kind of money in her book bag. Shortly
12 after that, the child had been told there was no more racing.
13 She's formerly a very respectful good child making all A's. Her
14 conduct, her grades, everything went south quickly. She began
15 failing, she refused to listen, she failed a test that the mother
16 was able to convince the teacher to allow her to take the test
17 again, and this time, Your Honor, she did even worse. It was
18 clear to the teacher; she clearly didn't even try. She missed
19 things she had previously gotten right, and she failed again.

20 So, we learned shortly thereafter, Your Honor, that Mr.
21 Walker had posted an online fund raiser on Facebook called God's
22 Plan for Roslyn. Where he sort of makes it appear she's in
23 distress or pain or sick and talks about the day maybe she can
24 race again and ask them to raise money for the child's racing.
25 So, in a nutshell, Your Honor, she went from a very respectful

1 straight A student to a child that was thumbing her nose at
2 authority until adults let her race.

3 So, on November the 3rd we came to court on the ex parte
4 matter and Mr. Walker had terminated his relationship with Will
5 Hammett. So, at that time the Judge issued an order and said no
6 contact and we'll give Mr. Walker time to get a lawyer. No
7 contact with the child until the matter was ruled upon. Now
8 November 17th rolled around, we had another hearing and Mr. Walker
9 still did not have counsel. And so, at that time the Court said
10 they were going to give him 45 days to find a lawyer and
11 continued no contact with the minor child, but the Court would
12 allow a phone call on Thanksgiving and a phone call on Christmas.
13 Well, the phone call on Thanksgiving did not occur. Mr. Walker
14 would not agree to the terms and conditions set forth by the
15 guardian and the supervisor of the phone call, which was not to
16 discuss the case, not to discuss litigation, not to discuss some
17 other things, and so, that phone call did not happen. A phone
18 call did happen on Christmas day, Your Honor, where the Guardian
19 ad Litem, Ms. Lovett, supervised the call.

20 Your Honor, I have to tell you where we are today is that
21 things have turned around completely in light of Mr. Walker's
22 restricted or limited contact with the child, she's making all
23 A's again or close to all A's. She's doing great in school, her
24 behavior has improved, her relationship with her mother has
25 improved, and most importantly, Your Honor, since there's been no

1 contact this child has not even mentioned the word racing.
2 There's been no talk about racing, no discussion about racing,
3 she doesn't mention it to the counselor, the therapist, the
4 guardian, the mother. And so, the child has improved in this lack
5 of contact with the father.

6 I believe that sort of brings you up to date on where we
7 are, Your Honor. Again, at the time when the motion was filed or
8 shortly thereafter the child was at risk, the child was being
9 alienated from mom and the Guardian ad Litem and the therapist.
10 So, what we're asking for now, Your Honor, things have improved,
11 I'm not going to say they haven't. So, now what we're asking for
12 is for the Court to continue sole custody to mom on a temporary
13 basis, supervision to the father, to be supervised on whatever
14 terms Your Honor deems appropriate, child support on a temporary
15 basis, and attorney's fees. Your Honor, I have not included
16 attorney's fees for the two trips to Charleston when the matter
17 got continued. And then finally, one other thing Your Honor, I
18 know that the Guardian ad Litem has filed her motion seeking to
19 have an evaluation for parental alienation. I'll leave that to
20 the Court's discretion, but I would say this, if the Court is
21 going to do it, we respectfully ask that Mr. Walker pay for it
22 subject to some allocation later. Your Honor, these parties are
23 in a very different financial situation. My client is single, she
24 doesn't have financial support from family. She's a single mother
25 getting no child support. Very simply she can't afford it, and

1 moreover, Your Honor, there's been no allegations of alienation
2 by her. All of the allegations or things being investigated for
3 alienation are on Mr. Walker. So, Your Honor, we respectfully ask
4 that if Your Honor orders some evaluation for alienation, we just
5 ask that Mr. Walker be ordered to pay for it subject to
6 allocation later. Ms. McAdams is happy to participate and make
7 herself available we just ask that she not pay for it. And Your
8 Honor, that's it for the Defendant.

9 THE COURT: Thank you very much. Regarding supervised
10 visitation for the father, do y'all have an agreed upon
11 supervisor that doesn't cost any money, Mr. Hopkins? Is there a
12 family member or anyone that can supervise? I'm not saying I'm
13 going to order that but, in the event I do, is there somebody
14 that y'all will be agreeable to?

15 MR. HOPKINS: Not a family member, Your Honor. I know that
16 the Guardian ad Litem had put in place or discussed with Mr.
17 Walker some supervisors from a couple of organizations there in
18 Charleston. We'll leave that to the Court's discretion, but
19 unfortunately, we have not agreed, and I don't believe the
20 Guardian ad Litem would agree to his mother. His mother's alive
21 but we couldn't agree to that, Your Honor.

22 THE COURT: No friends or family other than the mother?

23 MR. HOPKINS: Your Honor, I'll defer to the guardian. She
24 really has been more involved with things on their side. Ms.
25 Partain may have some suggestions, but the guardian has been

1 handling the contact with the father who supervises.

2 THE COURT: Thank you, sir. Ms. Partain, your case ma'am.

3 MS. PARTAIN: Thank you, Your Honor. I just want to maybe go
4 through a little bit of the timeline to clean a few things up for
5 the Judge. I obviously was not on the case when all the original
6 motions were filed. I do know that my client did start this with
7 a motion to protect racing. It is a competitive extra curricula
8 activity that this child has been involved in for many years. She
9 has done well, she has been successful, and she has been an A/B
10 honor roll student while maintaining this activity. He was
11 advised by counsel that the only way to protect that activity at
12 the time was to file the motion that Judge Landis ruled on. I was
13 not involved in the case then, so I cannot speak to that, but
14 ultimately, we all know what Judge Landis decided. What is not
15 popular in this room today and what Ms. Lovett does not want to
16 hear and what Ms. McAdams does not want to hear is that Judge
17 Landis's ruling does in fact mean that the child can't race
18 currently. It is not a part-time sport any more so than being on
19 a travel ball team or in my own personal experience a competitive
20 cheerleading team. You cannot dabble. There are rankings, there
21 are seasons, and it is a commitment. To spend the money and have
22 a child do this part-time really sets her up for failure. Really
23 makes her never able to be truly successful in the sport. So
24 unfortunately, the harsh reality that none of the professionals
25 on this case know is that you can't do it partially and that the

1 child was not going to be able to race anymore. Now, I'm not here
2 to talk about racing today so it's interesting that Plaintiff's
3 argument is that this is all about racing. That's not my stance,
4 Your Honor. It's my stance that there was an ex parte motion made
5 to this court with some skewed facts that resulted in an order
6 cutting off all contact for father and daughter for now over 80
7 days because maybe she said something she shouldn't have said.
8 This is an egregious and punitive response Your Honor that places
9 all the blame for the child's struggles solely at my client's
10 feet, and really does not give any consideration to what losing
11 racing and being cut off from her father may have done to this
12 child.

13 So, let's go through the actual timeline. Mr. Walker informs
14 his daughter that she will not be able to race anymore. Now, Mr.
15 Hopkins, Ms. Lovett, Ms. McAdams may have handled that situation
16 differently, none of us know if it would have been handled
17 better. It resulted in the child being very traumatized, and she
18 did ultimately run away from school. There are a few things that
19 I think it's very important for the Court to know about this. She
20 was able to run away from school because her mother did not drop
21 her off at the front door. Her mother dropped her off on a side
22 street, where she was immediately exposed to the dangers of being
23 able get away. Her father was instrumental in orchestrating her
24 return. Your Honor, Mr. Walker's affidavits provide very
25 specifically the conversations that he exchanged with this child

1 while she ran away. He was stern, he was parental, and he in no
2 way encouraged this. He was clearly appalled and frustrated. The
3 police report will also echo that he was appropriate in his
4 communications and in helping secure her quick return. The Court
5 was told that he didn't show up to school to paint a picture that
6 he had conspired in this with this young child to run away. That
7 was not only inaccurate but very misleading to the Court. He was
8 involved, he was communicating with her, and helped plan her
9 return. It's also important for the Court to know that he did try
10 to get assistance from the counselors on how he should notify his
11 daughter that she wouldn't be attending her upcoming race. Those
12 efforts were rebuffed, and ultimately this child was seen by
13 Leslie Armstrong immediately following her runaway. Leslie
14 Armstrong's summary of that visit has been provided to the Court,
15 and she did not raise concerns about father. She raised concerns
16 about the child's behavior and instructed that the parents were
17 to be vigilant in schoolwork, attendance, and the like. Mr.
18 Hopkins told the Court that Mr. Walker kept the child home from
19 school on the day following. I think the Court will be able to
20 review in their file that Mr. Walker kept the child home to allow
21 her to catch up on schoolwork, to supervise her, and to help her
22 mend. This had been a very emotional week. This resulted in
23 running away, acting out, everybody needing to come together and
24 do what was best for Roslyn, and Mr. Walker by all verifying
25 accounts was doing that. However, instead what Mr. Walker got was

1 a recommendation from the Guardian ad Litem that he turn the
2 child over.

3 I ask this Court to review the numerous recommendations
4 that the guardian has made in this matter which I believe are
5 completely in violation of her statutory duties. She has made
6 custodial recommendations; she has effectively inserted herself
7 as a litigant in this litigation. I think you heard it from Mr.
8 Hopkins he'll refer to the guardian as to what the Court should
9 do. The guardian is making offers of settlement in the case and
10 recommending there be no contact. Your Honor, guardians are
11 barred by statute from making custodial recommendations or from
12 mediating cases. These are duties that Ms. Lovett has not only
13 skirted but has disregarded all together. I do believe that it's
14 within the Court's discretion to remove her or to admonish that
15 such conduct does not continue. I do, of course, understand that
16 that probably should be addressed on full and appropriate motion,
17 but I want the Court to be aware of the involvement of this
18 guardian. There seems to be a very poor relationship between Mr.
19 Walker and Ms. Lovett, and she seems to want to be more punitive
20 to him than even mother herself. Mother, herself, filed this
21 motion and the relief she asked for in this motion is that his
22 time be supervised. She didn't ask to limit the time; she didn't
23 ask for it to be professionally supervised. She asked that it be
24 supervised. And in fact, the first ex parte order found that his
25 mother was appropriate. Ms. McAdams has allowed his mother her

1 own contact with the child, so she certainly believes she's
2 appropriate. So again, this all seem to be quite punitive in
3 nature, Your Honor. This is the action that followed after Mr.
4 Walker was not willing to heed the guardian's recommendation that
5 he turn over custody is where we find ourselves in the current
6 motion.

7 Mr. Hopkins would have you believe that this child is
8 thriving now that Mr. Walker has been removed. This child is not
9 thriving Your Honor. This child has 54 absences as of this
10 morning checking Power School. This child was failing immediately
11 after her father being removed from her life. Nothing about her
12 situation was thriving. Instead, she was clearly in a period of
13 distress after having contact with her father cut off. The
14 dispute that arose over the Thanksgiving call, Your Honor, I
15 think it's also important for you to see how the facts were
16 intentionally skewed to the Court. No, Mr. Walker did not refuse
17 to not discuss litigation with the child. Mr. Walker wanted to
18 discuss with the child the fact that her grandfather was very
19 sick and to discuss her grades with her. Those two items were the
20 disputed topics of conversation over the Thanksgiving holiday.
21 Ultimately Mr. Walker did agree to the parameters of the call and
22 not to discuss it, but Ms. Lovett refused to go through with the
23 call anyway because it was too late, and he did not get a call
24 over Thanksgiving. It's interesting to me that Ms. Lovett did not
25 point out to the Court how wonderful and appropriate the

1 Christmas call was, and she did not point out to the Court that
2 the child said on the Christmas call that Ms. Sherry said I can
3 see you in January. That is directly correlating to the time the
4 child started performing better in school. Instead, Ms. Lovett
5 phrased it in her affidavit that the child does not talk about
6 racing anymore. Mr. Hopkins argues how wonderful it is that the
7 child does not talk about an activity that she loves so much
8 anymore. I don't find it remarkable or wonderful. I feel that the
9 child knows she's not free to talk about it in front of Ms.
10 Lovett or in front of her mother and has expressed concerns with
11 Ms. Armstrong because her mother makes fun of her about it. These
12 aren't examples of remarkable conduct by this child.

13 Ultimately, Your Honor, where we are today is to determine
14 whether the ex parte order that was signed in this case should
15 continue. We would offer to you that it should be vacated, that
16 the regular schedule shall resume. We think that your independent
17 review of the actual evidence will show a direct contradiction to
18 the case that's painted by Ms. McAdams and the guardian. We
19 believe that Mr. Walker has gone above and beyond to try to
20 assist his daughter from harm. He has also independently gone and
21 gotten a parental assessment. Ms. Lovett and Ms. McAdams tell the
22 Court, Well let's just keep him cut out of his daughter's life
23 indefinitely until we can assess and figure out what's going on.
24 We've done that. We voluntarily went and sought an independent
25 assessment to gauge and provide to the Court that he poses no

1 danger to this child. He poses no risk of harm and there is no
2 reason to believe that there has been any conspiracy between Mr.
3 Walker and the child. Your Honor, ultimately what they're asking
4 you to do today is to upend the final order in this case. There's
5 a final order that addresses their custody and they're asking you
6 to upend that on a temporary basis.

7 We don't believe there's been actual showing that their
8 fearful speculations are true. They would suggest to you that
9 maybe Mr. Walker told his daughter that mother was poisoning her.
10 There's no evidence that that happened. In fact, you'll see call
11 transcripts where Mr. Walker seems appalled at the suggestion.
12 They're asking you to upend a final order of this Court based on
13 mere speculation. We ask the Court not to do the same.
14 Additionally, Your Honor, there's been much dispute over
15 evaluations in this case. The parties cannot afford the
16 litigation that the guardian continues to recommend. We are now
17 hand selecting evaluators that specialize in alienation. We all
18 know that there's no true way to test for or measure a way
19 of alienation. It's not a recognized mental health diagnosis or
20 criteria; it's speculative. There's a recommendation that Allison
21 Foster whose entire career is treating alienated families do the
22 evaluation. Your Honor, I do not believe in evaluations at this
23 time solely because of the cost, solely because the parties have
24 been evaluated in previous litigation. We know what we're dealing
25 with. However, to the extent the Court does want any evaluations

1 done, I would offer MUSC as a very appropriate alternative. They
2 are local, they are cost effective, they are respected, and they
3 handle these in a very high volume. I believe that we need to
4 shift away from allowing the guardian to handle the issue. I
5 believe she has shown an uncontrollable alliance in this case,
6 and that my client deserves a fair shake and some independent
7 review. I ask the Court to consider the same. I'd also ask that
8 each parent be responsible for their costs because there's been
9 no finding of wrongdoing of my client at this point and that the
10 fees be subject to reallocation. Thank you, Your Honor.

11 THE COURT: Ms. Partain, does the minor child have her own
12 cellphone?

13 MS. PARTIAN: I'm aware that the child has an iPad that she
14 communicates through. I'm not aware of whether she has her own
15 cellphone.

16 THE COURT: Thank you, ma'am. Mr. Blanks.

17 MR. BLANKS: Your Honor, the father in this case -- the
18 guardian in this case has some concerns that the father in this
19 case has attempted to weaponize this child. And the reason that
20 she has those concerns, it's not just what she's seen in this
21 case, but what two other counselors and evaluators have seen in
22 this case. What Ms. Partain did not tell you was that the father
23 has been evaluated and assessed by Karen Tarpey who he selected
24 by the way. Ms. Tarpey saw him for about a year and Ms. Tarpey --
25 this is all in my client's affidavit, the records from Ms. Tarpey

1 are attached to my client's affidavit. And so, Ms. Tarpey said,
2 and I quote, The father is basically using child therapy as
3 evidence for litigation and was using his child to parrot his
4 position through the counseling and she recommended, not the
5 guardian, Ms. Tarpey, the counselor that the father selected, she
6 recommended that the parties record all the cell phone calls
7 because she was so concerned about the alienation that was going
8 on by the father. Also, she recommended that the parties see
9 Leslie Armstrong for an alienation assessment, and they did that
10 and what did Ms. Armstrong find? Ms. Armstrong found more of the
11 same. That the father was stating things and influencing the
12 child. You know this child who loved the mother and the father
13 all of a sudden accuses the mother of poisoning her and says that
14 it's the mother's fault that she can't race anymore. Ms.
15 Armstrong actually recommended that the father and the mother be
16 assessed for alienation. Ms. Armstrong says that the father had
17 discussed issues with the child. For example, the father told the
18 child that he was done fighting about the racing.

19 And I'd like to go back just for a minute and discuss the
20 racing issue. The timeline was not clear. This child ran away
21 from home and basically went on strike and refused to do any
22 schoolwork following this hearing that the father brought to
23 basically require the mother to assist with the racing. On its
24 face that doesn't sound too bad but when you look at the details,
25 what the father wanted to do was to pull the child out of school

1 a little bit early, he wanted then to take the child to North
2 Carolina, drive two or three hours to North Carolina. I believe
3 it was Moorhead, North Carolina. And then have the child race and
4 bring the child back. The guardian expressed concerns primarily
5 about the disruption to the child's scheduled, and the fact that
6 the child would be sleeping in the car on the way home, and not
7 arrive home until late that night, eleven or twelve that night,
8 and then get up and go to school the next day. The father, that's
9 what he wanted the Judge to do. That's why Judge Landis
10 understandably said it was completely inappropriate. Because the
11 Judge would not go along with him on that, following that the
12 child for some reason gets the idea she can run away from school
13 and also refuse to do any schoolwork. It was only after contact
14 with the father was terminated that the child began to respond
15 and do her schoolwork again things like that. Also, Ms. Partain
16 inaccurately stated that the child had missed 54 days of school.
17 The guardian spoke to the school counselor yesterday who said
18 school attendance was not a problem with the child.

19 Also, to the guardian's supplemental affidavit, this is the
20 one we just posted. We actually gave the Court school records,
21 school grades and attendance records. So, that's misleading. The
22 child's not doing terribly, the child's recovered very well since
23 contact with the father has been stopped. Ms. Partain also said
24 the guardian didn't talk about how wonderful this call went with
25 the father over Christmas. You know, what struck me about that

1 call, Your Honor, was not what was said but what wasn't said.
2 This father who hasn't seen his daughter in 50 to 60 days by that
3 point doesn't say, Hey honey, how are you? I've missed you.
4 Nothing like that. He talks about the racing which is what got
5 her in this mess to begin with. He talks about his new business.
6 None of it relates to you know, how are you doing, I've missed
7 you. It was a strange sort of call.

8 Leslie Armstrong specifically recommended that the parties
9 see an alienation specialist either Allison Foster or Marc
10 Harari. We are agreeable to either one of those people. I think
11 Ms. Partain expressed a preference for Mr. Harari, we're fine
12 with that if he'll do it. If he won't do it then we'd like to
13 have Ms. Foster do it. Your Honor, this is an unusual kind of
14 case because the father's got some issues, some psychological
15 issues that need to be evaluated. For example, another doctor
16 that he was seeing, Dr. Alexander, said that the father was
17 suffering from cognitive distortion. Ms. Partain didn't tell you
18 about that. She also said he was evaluated by this parental
19 evaluation. If you read that report, which I know you will, the
20 evaluator said that he was suffering from PTSD. This is the
21 evaluator they picked. Also, in the assessment there were some
22 issue about, tends to be controlling and authoritarian. When you
23 read the evaluation as well as the reports, I think you can reach
24 no conclusion except that there needs to be an evaluation for
25 alienation in this case. We are requesting that. We take no

1 position on who should pay for that but there needs to be an
2 evaluation for that. The guardian does have some concerns about
3 the mother. The father has stated that the mother is bipolar. If
4 we do the evaluation with Dr. Harari or Dr. Foster, then that
5 concern can be addressed as well.

6 Your Honor, I do want to talk about the audio tape. What
7 really prompted this motion for expedited relief was the
8 discussions that the father was having with the child. Ms.
9 Partain attached a copy of the transcript of the telephone call
10 between the father and the child. There's a specific family court
11 rule that says that a child is not supposed to be a witness in a
12 case. Well, this father is tainting this child, he's talking
13 about discovery issues. He says they're trying to get our emails,
14 the emails between you and me. These were the emails done before
15 the child ran away from school. Why is he talking to the child
16 about discovery issues, that's clearly inappropriate? He's also
17 asking the child and he sort of hints around about, you know if
18 you're not happy with the guardian or school counselor, then you
19 don't have to talk to them. The actual audio recording is better,
20 but the transcript they provided is clear on those issues. When
21 you read the father's affidavit, it's clear everyone in this case
22 is at fault except him. Karen Tarpey is at fault, the Guardian ad
23 Litem, who they picked by consent, is at fault. Karen Tarpey and
24 Leslie Armstrong are conspiring against him to require him to
25 have an alienation evaluation. He says in his affidavit that

1 she's doing that just for the money. He blames his own lawyer for
2 making the motion to require this absurd travel between here and
3 Charlotte, North Carolina for this racing. That's his lawyer's
4 fault. It's everybody's fault but his. He blames the mother
5 because the child ran away. You know, there's a lot going on here
6 that needs to be sorted out and we need a specialist to do it.
7 Dr. Harari or Dr. Foster are just the proper people to do that.
8 We would also ask the Court to address the issues about the
9 emails and discovery of devices that was suggested in the
10 guardian's motion.

11 THE COURT: Mr. Blanks, does the minor child have her own
12 cellphone?

13 MR. BLANKS: Yes.

14 THE COURT: So, the communications are through the
15 cellphones?

16 MR. BLANKS: There's some communication through the iPad and
17 through the mother's phone as well.

18 THE COURT: So, you can get any discovery documents you need
19 through the child's phone or the mother's phone, correct?

20 MR. BLANKS: No, sir. We think that the father and daughter
21 were communicating between themselves and that's why we've asked
22 for those items.

23 THE COURT: Because that's very broad. There could be a lot
24 of different information on his cellphone.

25 MR. BLANKS: And we're willing to agree to a reasonable

1 protective order. I had discussed that with Ms. Partain's
2 predecessor, Mr. Hammett. We just want to preserve it right now.
3 We don't want to actually get the phone. We don't want any
4 attorney-client privilege that may be on the phone. Mr. Hammett
5 and I had discussed the possibility of preserving it, getting
6 copies of all the appropriate devices, and then taking the next
7 step to decide what we agree is discoverable and what is not.

8 THE COURT: And regarding racing, that's totally out of the
9 picture now, correct?

10 MR. BLANKS: Well, not necessarily Judge. I mean, counsel
11 and I disagree on that because she says that because he can't
12 drive with the child in the middle of the night on a school night
13 to North Carolina that -- actually that prohibits her from doing
14 racing. That's not accurate. She could still go on weekends,
15 holidays things like that. They have races, it may not have been
16 perfect, but she would still have been able to participate in the
17 racing. The mother did not object to that from my understanding.

18 THE COURT: That's not my question. My question is,
19 currently the racing is out of the picture. She's not going to do
20 any racing right now per the prior order, that's done.

21 MR. BLANKS: That's correct.

22 THE COURT: Regarding a substantial change in circumstances
23 since the final order, other than this racing what other matters
24 can you bring to my attention. I'm going to read everything. I'm
25 going to take this under advisement. I have a whole stack of

1 papers to read, I'll read every single document, just so I can
2 understand the position of the Guardian ad Litem. I understand
3 about the racing, I understand what's being said about Ms.
4 Tarpey, Ms. Tarpey and Ms. Armstrong matters that were raised by
5 her since the final order?

6 MR. BLANKS: Yes, sir.

7 THE COURT: Is there anything else you need to bring to my
8 attention since the final order? You talk about cognitive
9 distortion or whatnot of the father. That was made aware to
10 everyone that would need it at the final order, correct?

11 MR. BLANKS: No, sir. These are all things that have arisen
12 since the final order.

13 THE COURT: So, the cognitive issue is since the final
14 order?

15 MR. BLANKS: Yes, sir.

16 THE COURT: Thank you, sir.

17 MR. BLANKS: And also, Your Honor, Ms. Tarpey, their
18 recommendations, their evaluations of the father and also Ms.
19 Armstrong's evaluation have all come since the final order.
20 Oh, and Dr. Alexander's.

21 THE COURT: Thank you, sir. Mr. Hopkins, I'll give you a few
22 moments and I'll give Ms. Partain a few moments, and then we'll
23 wrap it up.

24 MR. HOPKINS: Thank you, Your Honor. Your Honor, what has
25 happened since the final order is this child that was in a crisis

1 and that would be an understatement to say crisis. This child is
2 not great, but she is doing better since the father's time has
3 been limited, she's doing much better. What was going on with
4 this child could not be sustained. In the affidavit that was
5 filed by Mr. Walker and Ms. Partain on Monday of this week, they
6 include another assessment -- now this is his assessment. Judge
7 four of the five factors in that the assessment were high to
8 medium to high risk. Judge that's his assessment. Of the five
9 factors there was only one that was low to medium risk, and that
10 was role reversal with the child. That was low to medium. All the
11 other four were all medium to high risk on all of the factors.
12 That's happened since the final order. A lot has happened since
13 this final order, Your Honor. We believe there's definitely a
14 need for limited visitation. Your Honor, we don't believe the
15 mother is an inappropriate person. I would say this, my client
16 really opposes MUSC, Judge, she's worried that Mr. Walker's
17 mother has relationships at MUSC, and she's worried about some
18 conflict there. Again, I know that Ms. Armstrong recommended, as
19 they always do in these cases, that both parents be evaluated for
20 alienation, but to date, there's no allegation in this case of
21 alienation by the mother, only by the father. My client will
22 participate, but I don't understand why she should pay when
23 there's no allegations by the mother, Your Honor. So, if Your
24 Honor orders the alienation evaluations, we would ask that Mr.
25 Walker be required to pay for it.

1 Judge Landis did not order that the racing has to end, he
2 ordered that the child can't be taken out of school for the
3 races. Mr. Walker voluntarily ended the racing. So, my client,
4 and I believe the guardian, were not opposed to racing at all,
5 we're opposed to her leaving school early, we're opposed to her
6 getting home at one in the morning with school the next day.
7 We're opposed to racing becoming all consuming with this child is
8 what we're opposed to, Your Honor, instead of a hobby the girl
9 can enjoy with her dad on their time.

10 So lastly, Your Honor, we respectfully request sole custody
11 at this time, we'd ask for child support, we'd ask for Mr.
12 Walker's visitation be supervised by someone other than the
13 mother, and again, of course if any evaluation is ordered that he
14 pay for it.

15 THE COURT: So, you're not asking for a restraining order
16 from discussing racing at all?

17 MR. HOPKINS: Your Honor, I'll leave to the professional
18 under what terms racing should be discussed with the child.

19 THE COURT: My question is, from your perspective, from
20 your request, are you asking for a blanket do not discuss racing?
21 According to you, your client is one of the big emphasis on how
22 he is alienating the child from her.

23 MR. HOPKINS: Your Honor, on a temporary basis we don't
24 think that racing should be discussed until the child gets back
25 to where she was. If she gets back to making straight A's and

1 being a good student, and respectful there can be a conversation
2 about racing. But what we do object to is racing being used as a
3 tool. You know, your mom and the guardian are against you in
4 racing therefore don't talk to them. Anytime racing is going to
5 subject or be a weapon against mom or the guardian we oppose
6 that. And I'll just mention also this, the guardian, Ms. Lovett,
7 was recommended by Will Hammett, I didn't know her.

8 THE COURT: Thank you, very much. Of course, Ms. Partain can
9 file a motion regarding the guardian anytime she pleases. That's
10 not before me at this time. Ms. Partain and Mr. Walker can file a
11 motion that they deem appropriate regarding phone calls. Two
12 things, is there any objection from you Mr. Hopkins, and Ms.
13 Partain I'll come to you next on this question, regarding there
14 being Zoom phone calls that way you can monitor phone calls. I
15 read your allegations the father's making that the phone is being
16 hung up or recorded, but if it's a Zoom phone call there's no way
17 not to record that. Does that seem reasonable to you from your
18 client's perspective, sir?

19 MR. HOPKINS: Yes sir, as long as they are preserved and not
20 deleted.

21 THE COURT: And I'll ask the guardian if you need me to, but
22 why not the paternal grandmother supervise the visitation?

23 MR. HOPKINS: Your Honor, she's has some issues of her own.

24 THE COURT: Explain that for me. I need more than
25 allegations.

1 MR. HOPKINS: She is complicit, Your Honor, on several of
2 the issues regarding the minor child and setting up mom and
3 guardian as enemies of hers or opponents of hers. Instead of
4 saying the guardian is on your side, she's trying to help you.
5 We've seen several incidences where we believe she's allowed Mr.
6 Walker to intercede and say things he shouldn't say. I don't
7 think Ms. Walker has the ability to control Mr. Walker to stop
8 him from saying things he shouldn't say or to intervene when he
9 does something he shouldn't do. She's proven she does not have
10 the ability to do so, Your Honor. I'll say this, a couple of
11 years ago we had a meeting in front of Judge Creech and Judge
12 Creech told Mr. Walker to call Ms. Walker in and said, Ms. Walker
13 unless you have the ability to stop these things then we'll see
14 no change at all. I'm sure Ms. Walker means well; she doesn't
15 have the ability to control her son. I think she enables him, and
16 she won't follow the order.

17 THE COURT: Do you have examples of that in the affidavits?
18 You're speaking of generalizations and I understand where you're
19 coming from, but if I'm going to look at supervisors, I prefer to
20 have someone who's not going to cost the other party money to
21 supervise. However, I need examples.

22 MR. HOPKINS: Your Honor, if you don't mind, I'll let you go
23 to Ms. Partain. My client is texting me right now, and I'll let
24 you go to Ms. Partain.

25 THE COURT: I'll come back for the answer to that question.

1 Ms. Partain, briefly ma'am.

2 MS. PARTAIN: Thank you, I'll be very brief. I am on a 10:30
3 docket in another courtroom. I would just urge you to please
4 review the actual documents that are in the file that contradict
5 the picture that Mr. Hopkins is painting. He is misrepresenting
6 to you statements that exist in all the transcripts. There is an
7 evaluation report from Dr. Wade (Phonetic) in this case. Ms.
8 Tarpey does have some submissions in the file for you to review.
9 She has never evaluated my client, nor has Ms. Armstrong, and so,
10 we're opposed to that. We think that the record, and the actual
11 facts, and distortion of those facts speak for itself, and we
12 would urge the Court to please take the time to review the actual
13 documents and exhibits that show where the conflicts are. You
14 know, I have no objections to the recorded phone calls; I have no
15 objection to that whatsoever. The problem with Tape a Call is
16 that it's very interfering in a phone call. It causes a delay, it
17 causes skipping; it's problematic. So, we're not opposed to the
18 calls being recorded so long as that's a mutual restraint. I
19 would even be agreeable to, you know, if any, you know,
20 objections to Carlton's mother being provided by Mr. Hopkins
21 after the fact, after he's had a chance to confer with his
22 client. She didn't previously object to her until she heard from
23 the guardian that a professional should be involved. So, it seems
24 to me a bit of an after-thought.

25 THE COURT: Thank you very much. Mr. Blanks you raised your

1 hand. You have the last word.

2 MR. HOPKINS: We would suggest a family member from Mr.
3 Carlton's family an Aunt Deb. She might be somebody who would be
4 appropriate to supervise the visitation. We do not agree with the
5 mother being the supervisor since she's been involved in this
6 very heavily. Also, just read the reports from Ms. Alexander and
7 Ms. Tarpey.

8 THE COURT: Thank you very much. Ms. Partain, I know you
9 have to leave, but I want you to look into Aunt Deb with your
10 client, please get back with that to Mr. Hopkins, and if that is
11 agreeable, I want y'all to email my administrative assistant and
12 let me know if she is agreeable. I want y'all to work hard to
13 find somebody, if possible, who is an unpaid supervisor, whether
14 it's a friend or relative.

15 Thank y'all very much. This concludes the hearing. Of
16 course, I'm taking the matter under advisement so I can read all
17 the files. Thank you very much.

18 (WHEREUPON THE HEARING IN THE ABOVE CAPTIONED CASE WAS CONCLUDED)

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CERTIFICATE OF REPORTER

2 I, the undersigned PATRICIA A. NYE, Official Court Reporter
3 for the Third Judicial Circuit of the State of South Carolina, do
4 hereby certify that the foregoing is a true and accurate
5 transcript of record of all the proceedings had and evidence
6 introduced in the trial of the captioned case, relative to
7 appeal, in the Family Court for Charleston County, South
8 Carolina, on the 20th day of January 2021.

9 I do further certify that I am neither of kin, counsel, or
10 interest to any party.

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February 13, 2021

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*Patsy Nye
Court Reporter, Family Court
1680 Shady Lane
Columbia, South Carolina 29206
(803) 960-3997
Pnye@sccourts.org*

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Thank you,
Patsy Nye
Official Court Reporter
State of South Carolina

(2)

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
COUNTY OF CHARLESTON) NINTH JUDICIAL CIRCUIT
LEE CARLTON WALKER,) Case No.: 2019-DR-10-1147

Plaintiff,)

v.)

SYLVIA ASHLEY McADAMS,)

Defendant,)

PLAINTIFF'S REPLY TO
EX- PARTE ORDER
STATEMENT WITHOUT
LEGAL REPRESENTATION.

JU
CLE...
BY

DAW

1. I am the plaintiff and I Lee Carlton Walker do not have legal counsel at this time. I am representing myself until I can hire new legal counsel.

2. I gave notice on Thursday October 29, 2020 to both the defendant and to the GAL that I did not have legal counsel and that my current attorney was released from this case on Thursday and I would be finding new legal counsel. I am under the belief that there was a conflict of interest between the GAL and my previous legal counsel. I asked that they send any notifications directly to me and therefore this is why I believe your clerk of court did not get a reply from my released attorney. This notice of release was given before this Ex Parte Motion was filed. (Exhibit 1) I was forwarded the Ex Parte Order from both my released attorney and his paralegal once they received the order from the clerk of court David McKeown after 5pm on October 30, 2020.

3. There is no evidence whatsoever that I have ever put our Child in any danger or that I have been careless with our child's safety, and they have no evidence that they can present to this Court of this. This is the first time the court has taken away custody from me when the defendant has had custody taken away multiple times dating back to the first time in 2010 when she was arrested for CDV against me. There is however, a long history

and list of the Defendant putting our Child and her safety in danger including the defendant being committed to MUSC IOP for 7 days with a diagnosis of Bi-Polar April of 2019 as stated in her discharge papers which I have seen. Of which she was ordered twice since June of 2019, at which time the GAL was assigned to our case, to give me access to her medical records and still to this day I have not seen those full records from her 7 day stay at MUSC IOP. The most recent example of the defendant putting our child's safety at risk is mentioned in this Motion that during the Defendant's week of custody last month, she dropped our child off a block from the school instead of the front door of the school where teachers accompany the children into the school. Because of this lack of judgement for our child's safety our child took this as an opportunity to run away.

4. To refresh the court's memory please see the Honorable Judge Richter's ruling on this case before, where the judge ordered restraints of the mother's boyfriend to never have any contact with our child. (**Exhibit 2**). Also see (**Exhibit 3**) the affidavit of our child's counselor at the time where the counselor describes the boyfriend and mother arguing over a firearm brought into the Mother's home. Also see the (**Exhibit 4**) of the Private Investigator's affidavit at the time, where he confirms the boyfriend saying there was a fight and the investigator states that the paramour was spending overnights with the minor child. Now please see the (**Exhibit 5**) of the Mother's affidavit at which time she did not know of the PI's affidavit, where she presented false statements to the court completely contradicting the affidavits of the PI and the counselor's statements. Including the mother saying in her affidavit that our child was not traumatized by the Mother leaving our child $\frac{3}{4}$ of a mile away from the school because she was running late to work, and a good Samaritan walking the crying child to the school. This latest situation with our child

running away during the Mother's custody time is not the first time with the Mother dropping our child off away from the school because she was running late or leaving our child unattended without supervision and not ensuring our child was given to the school properly.

5. Now in this current Ex Parte the court has once again been presented with half-truths, false statements and things taken out of context and I will show the court of the evidence that the defendant committed perjury with her affirmed statement concerning the phone call in this Ex Parte motion that had my custody taken away based on false statements. It is very important that the court listen to the recording of the call and review the transcript that will be certified by the hearing at 9:30 am on November 3, 2020. This will be the defendant's (2nd) second time presenting the Honorable Judge Richer with a false affirmed statement before her bench. The first time it was advised that it not come before the bench and the defendant settled outside before going before the Honorable Judge Richter.

ANSWER TO DEFENDANT'S AFFIDAVIT

6. The Defendant is correct that almost all litigation was initiated by me, and I state with merit. Example is of the honorable Judge Richter's restraining order, ordering the boyfriend not to be around our minor child.

7. Answering the statement of almost all litigation was filed by me. During the last 3 years I have filed on November 2018 Rule 60, the Judge Ruled in my favor granting me the rule 60. March-April of 2019 defendant was committed to MUSC IOP for 7 days. Then I filed April of 2019 for a change of custody and the judge granted me temporary full

custody. My attorney at the time advised me to put she was "Involuntary" committed to MUSC IOP because it was my belief based on the information I had at the time because I went to visit her because of great concern for our daughter's mother's mental wellbeing. When I went to visit her there was serious security measures and everything on my person was not allowed in the MUSC IOP and I had to go through multiple security doors to enter where all of the MUSC IOP patients were located. During my visit our daughter's mother was still talking about things that were not real and were imaginary to her. I was happy that she allowed me to come see her, but very upset for the future of our daughter's mother and this was the worst case scenario for our daughter. I would not wish this on any child to have a parent committed to MUSC IOP. At the June 2019 hearing the defendant's attorney had her discharge papers saying she was "Voluntarily" committed, and he called me a liar to the court. I was under the belief it was "Involuntary" based on what I was told by the nurses and doctors at the time of her being admitted to MUSC Emergency Room and IOP that night. Her sister, cousin and my mother convinced her to go to MUSC Emergency to get her checked out for her knees that she said were in pain and then her sister, her cousin and myself asked the staff to examine her for mental health issues and MUSC kept her for mental health issues. The fact still stands she was committed for 7 days regardless if it was voluntary or involuntary. I still have not seen the full medical records that were court ordered twice, to depose the doctors and nurses to verify the extent of her mental illness and the current GAL has not assisted me in any way of getting any information she may have or who she (the GAL) has interviewed from MUSC IOP. I was told that she was put on psychosis medication during her stay I do not know if that is the case because I am not an MD. I do know that our daughter's mother stated she was not letting our daughter drink

out of anything except the water faucet because Navy Seals were following her and that people were trying to put stuff in their drinks and food to harm them. Of which our daughter witnessed this behavior of her mother and staying up for 5 days straight and keeping our child out of school. Now they make a big deal for me keeping our child out for 1 day to get her schoolwork caught up. Our child has also reported of hiding under furniture still to this day at night while her mother gets up and walks around at night. (See Exhibit 6A) Where I sent notice to the GAL and mother notifying them Friday morning that I had notified the school the night before that I would keep our daughter out to get her school work caught up.

8. This was an exceedingly difficult time for our child, and I hired Karen Tarpey to help our daughter in March of 2019 by the recommendation since Victoria Skinner was no longer available from the previous incident involving the mother's boyfriend. Karen Tarpey and I had a good relationship until the current GAL was assigned to this case June of 2019.

9. To answer about the speed and safety of the car. The bandolero series was started in the year 1997 and has had (0) Zero fatalities since 1997 to date. In the series Rosalyn was a beginner and the beginner bandit series the car is governed to 45 mph and the mother saying 70 is correct but not in the beginner series. Also, before I bought our daughter a Bandolero Racecar I researched safety and that is when I found out that there are 2-3 deaths in kids soccer each year and my daughter also learned this info in 2018. To also answer the GAL's question on how my daughter learned this info about soccer, anyone can Google this info.

10. Also, at the most recent temporary hearing I was asking the judge to enforce our current court order as it is written and define racing as an Extra-curricular activity. (See **Exhibit 6B, page 5 bottom, page 6 top**) Even the defendant's own affidavit stated that marriage or reading a book is in some studies defined as an extra-curricular activity. The defendant's own attorney testified that they support racing, and she our daughter's mother has traveled to Charlotte herself. Which was only done this year for the first time.

11. During the defendants visit to Charlotte she met with a Bandolero racing team called Stillwell Racing with the GAL. After returning they both indicated Rosalyn could race Bandoleros if Rosalyn would switch to that team and leave team AK Performance which Rosalyn was with for 7 months. They wanted me to give Mr. Stillwell complete control of our daughter's racing future until she was 18. This is a man they only met one time and wanted me to agree to give him control when they have never been involved with our daughter's racing not one time.

12. At the most recent temporary hearing Judge Landis said he would not define what was accommodating or define racing as an extracurricular activity and leave it up to the final hearing which I took to mean the 2018 Rule 60 hearing or the 2019 Change of Custody hearing. My attorney made a huge error because I already had the authority to take our daughter out of school early during my time to attend races in Charlotte. The way my attorney worded the document made it sound like I was asking the court for my time and our daughter's mother's time too. The judge denied my request and I lost the ability to even take her out during my time that I already had permission for.

13. The reason for asking for this is because for the 2020 racing season which started in February of 2020 our daughter had spent the entire year working so hard to win the

Championship and was in 3rd place with a chance to be on the podium of the top 3 or win the Championship and receive a year long trophy for her efforts and her mother stopped her because she would not follow our court order as it is currently written and that she signed and agreed to. She is basing her whole non compliance on the fact that she is saying racing is not an extra-curricular activity and if it is defined as not then she is not in contempt but if it is then she is in contempt of our 2012 court order. (See page 5 & 6, Exhibit 6B)

14. Currently we have 4 rules to show cause that were filed in January of 2020 that have been postponed due to covid and are still open. Then as far as I am aware there are 2 more that were filed by my released counsel that are still open. There are 3 more that are going to be filed once I hire new counsel. I will Explain below and give Exhibits.

15. As far as the new objection to this 2020-2021 school year that lack of sleep is adversely affecting our child, there is no evidence, and the lack of evidence is evidence. For the school year of 2019-2020 our child attended all of the fall 2019 races and the spring 2020 races in Charlotte NC and also for her final grades for the school year made all A's and 2 high B's with an 88 and an 89 so she missed a perfect 4.0 by literally 3 points. This is because I signed an "Action Goals" Contract with our child that if she would try to make 1st place in her class, like she tries to get first place in racing then she could race every weekend she was with me. This is the reason she made almost straight A's. Our child has 230 WINS racing go-karts and still to this day her mother has not seen her race one race even though I have offered many times to pay and have one of her coaches do a mother daughter weekend without me being at the race track. My Daughter is almost 11 and has been racing since she was 7. Before that at age 4 her mother and I bought her an electric car. What started this whole racing thing is Father's Day weekend 2017, when we watched



the movie Cars 3, which is about a girl car who wanted to race and the boys always told her she could not race. Then when she was given a chance, she was really good at racing and won her first race. After the movie we went to Myrtle Beach for Saturday and Sunday. Saturday we spent all day at the water park then Sunday she wanted to try the go-kart track next door and here we are now with 230 WINS and she has been recognized by some big names in the Racing world.

16. To answer the objection to our daughter being signed out early I have an email from her principle giving her permission to leave early to attend the 6 monthly racing events that will happen during the school year. Even Rosalyn's principle use to race go-karts and the principle even okayed Rosalyn to miss 5 days of school to attend a week long national event in Florida in 2021. The school would put Rosalyn on E-learning to do work while not being physically at the school. (See **Exhibit 7**) Principle's email.

17. I also had an affidavit from My counselor Dr. Alexander that stated that my request was reasonable. (See **Exhibit 8**)

18. To answer the statement defendant objects to the safety of our daughter with racing and that I have erratic behavior please ask her to provide an example because there is not an example. To let the court know of an erratic behavior that was described by her former employer from March and April of 2019. During the deposition of her former employer while the current GAL, defendant's attorney and my released attorney the former employer described how our daughter's mother was ripping cords and wires out of the walls to the computers at the diving school and how she was telling all of the students to go home. The former employer said that the Police and EMS were called and she left before their arrival and that they immediately called a lock smith to have the locks changed so she could not

enter the building again. We were also informed that she went to her previous employer (another school) and caused another scene, and the police were called to that location too as I was informed at the deposition. The defendant then went and picked up our daughter in this state of mind and drove with our child in the car and this proceeded her 5 days of being up without sleep with our daughter witnessing this behavior. After these incidents is when the defendant was committed to MUSC IOP.

19. As far as her objecting to racing over safety the defendant was asked numerous times by my mother, our daughter and by myself. (See Exhibit 9) "Bullet Point Outline" showing the bullet points of the case that are highlighted. Also see letter written by our child in April of 2019 that I stopped our child from giving the letter to her mother because it is rude and not appropriate to give to a parent. In the letter our child begs her mother to please look at the safety equipment. Our child and myself were blindsided by her coach on speaker phone, when it was normal for us 3 to be on speaker phone when setting up the next practice, when he disclosed that her mother sent letters to all tracks unannounced and that our daughter could not race at any tracks.

20. As far waiver signing. The series requires both parents to sign to race. There was Concord Motor Speedway that only required (1) one parent's signature for Rosalyn to practice racing. I wanted her to have lots of practice and we were ok with practicing until she could one day race like the girl car in the movie Cars 3. I was okay with this because I knew we had a Rule 60 to be heard. Our daughter practiced with her mother knowing for 7 months without her mother filing anything with the court. My daughter told me she would be like the little girl car in the movie Cars 3, that one day when she was given the chance to race, she would win her first race in the Bandolero Racecar. Then her mother unilaterally

stopped even the practicing track from letting us practice by her letter. Which was taking the law into her own hands based on the Rule 60 that was granted is what I was told. Our daughter then regressed back to racing go-karts.

21. To answer the about Leslie Armstrong the counselor. She would not answer my questions about a Nikki incident that was first reported in August or September of 2020 of a sexual incident involving adultery witnessed by our daughter by our daughter's mother's friend Nikki Ray. (See **Exhibit 10 & 11**) Email between Leslie Armstrong and Father. Still the counselor nor the GAL will acknowledge this nor will they report it. In our court order this is a serious change in circumstance that is being covered up and not reported. Our daughter can disclose this story of sexual adultery committed in front of her and alcohol involved and the child being at a bar. I have our daughter on a recording explaining exactly the story while she was on her mother's phone about when and how many times, she told both the counselor and GAL. At the end of the call you can hear her mother get very angry and end the call. This recording is also being transcribed and will be certified for the hearing on November 3, 2020. This part is of the 23 minutes that the GAL states was unrecord in her affidavit. After the runaway is only when Leslie Armstrong mentioned the reports about Nikki Ray.

22. Now let me answer about the ruling from the previous hearing ending Our Daughter's racing "Forever." It ends her monthly racing league that takes place in Charlotte if she cannot be checked out early to make the event on time. She would show up late after the qualifying and racing has begun thus ending her of ever racing in the K1 Speed Racing League. Her Mother had already ended her Bandolero Series and now has ended her go-kart league. The last go-kart series is an owner kart series at Go-Pro Motorplex and because

the mother will not switch weekends like our court order requires the mother to be accommodating if racing is defined as an extra-curricular activity. My released attorney advised me since I was the only one facilitating our daughter's racing that I should give up fighting the GAL and Mother and end racing all together. I did as he advised me, and afterwards I realized it was a grave mistake on my part for following that advice.

23. The runaway incident happened on the mother's custody. I was in my bed that morning on Facebook and received an email that said "Hi" from our daughter at 8:42am. Not thinking I replied "Hi." Then it dawned on me that our daughter sent that from her iPad which she should not be on at school. I replied with. "Why are you on your iPad this morning?" at 8:44am. Our daughter replied at 8:45am "I ran away." I immediately called my now released attorney and told him of the situation. He said to call the school to confirm if she was not there. If not then inform the mother and GAL and call the police. I followed his advise and then the resource officer called me and we stayed on the phone with him calling me back between lines and I could hear someone saying recording started and I believe my entire time with the police keeping me on the phone in constant contact and them trying to trace her location with her iPad off of the towers. It was the most stressful time of my life. Finally I told the office I would tell her she will never race again ever if she does not tell me where she is. Once I said this she stopped communicating with me every minute like she was and 10 minutes went by and both the officer and myself agreed it was the longest 10 minutes and the longest of my life until our daughter replied "I am at refuel on Daniel insland" at 10:27am. I believe I was told the police had over 6 cruisers looking for her and they had her in their safe custody within a couple of minutes. The whole ordeal lasted 1 hour and 45 minutes. I cried during and thanked them once I was told by

the officer, who walked me through what to write back to my daughter during this terrifying ordeal. This was the scariest thing I have ever experienced in my life. So I waited until Friday evening between 7:30-8:30

24. I must cover part of the GAL's affidavit at his point on **page 3 of 6** at the top the GAL states the child would not disclose her location until both parents agreed to her demands concerning racing. This is not what the reason why our daughter disclosed and gave up her location. **Our daughter did not give up her location until I told her she would never race again.** Also, the GAL gives another exaggerated statement that "Several hours later with the assistance of law enforcement the minor child was returned to her Mother's custody." I was told that her mother was at the school and her mother's job is within 30 minutes from the school, this means that our daughter was back with her mother under 2 hours and not the exaggeration of Several hours later meaning 3 or more. The Mother even states "I rushed to Daniel Island school to try and find her" I know that she was with my daughter under 2 hours and not as the GAL described in her statement.

25. Later I was told by the guardian that my scheduled day to take our daughter to the counseling appointment with Leslie Armstrong was canceled because her mother would be taking her because of the serious allegations my daughter said. **(See Exhibit 12)** My daughter reported for the second time in 2 weeks that her mother was poisoning her. To me this made no sense because to me it would be like telling a rape victim that the accused rapist is taking the victim to the hospital to be examined. I was also told by my released attorney to not call my daughter the rest of the week and I called the GAL and she said that Rosalyn was fine and she too gave me vibes not to call. So, I waited until Friday evening



between 7:30-8:30pm to call my daughter for the first time as hard and stressful not knowing how she was doing in her mother's home.

26. Now let's cover the "Quoted" phone call statements. The quote by the defendant states that plaintiff asked her (our daughter) during the call "**you know they're going to get our emails now, right?**" as if it was a question that the father had something to hide. Actual call at 2:38 is "**Well they're checking your email. The the email that me and you had.**" I had and still have nothing to hide from this runaway incident that happened during our daughter's mother's custody time. This phone call was the first one between me (father) and our child after she ran away. I asked our daughter about the counseling appointment with Leslie and then about talking to the guardian and then recommended she talk to her guidance counselor. This is no different than if your child was in a car accident and was taken to the hospital. The first questions any parent would ask is "What are all the doctors saying about your injuries? What did each doctor say? Also, the parent would ask where is your wrecked car?" Just as I asked "Where is your iPad?"

27. The defendant affirms and states, (Carlton (father) asked "**are they listening to you now?**") the actual statement at 4:13 is "**Did they listen to you this time?**"

28. As far as the iPad goes all the emails were turned over to the GAL by 12:58pm the same day of the runaway within 4 hours from the start of the incident. Also the police had me on the phone and on my computer from home telling me what to write to our child in real time and I believe the police recorded my entire call and I even forwarded the office my emails throughout the call. I was the one who helped the officer find our daughter. Since it was her mother's visitation week, it was not my place to go to the school and it was best not to go. The officer even told me she was with her mother. Her and I in the same

place after this drastic situation would not have been a good situation for anyone to see. I also called back regularly that day to speak to the Police officer and check on our daughter.

29. As far as Karen Tarpey recommending recording calls it was both Karen and the GAL that insured my daughter in March of 2020 that she was not being recorded. Our daughter told me, and I asked my daughter to record her statement, to show Karen and the GAL. Our daughter believe the GAL was somehow recording her phone calls because the GAL was bringing things up that our daughter had not told the GAL.

30. I have turned over the emails and the passwords to the iPad and passwords to Rosalyn's email. I also offered to turn over my phone and when my released counsel said that I would if the mother turned over hers, they replied they did not need my phone. This is of record with the GAL's attorney. I have been open and honest and have nothing to hide but to randomly ask for all of my phone records and computers which I have a right to privacy with things that do not pertain to this case. It is my right to keep anything that is not related to this case my personal information. I believe they are using this a a fishing expedition.

31. Now lets talk about her comment of the 'walls closing in on him" on Thursday October 29th I had my final call with Dr. Alexander who was in support of my request to continue to sign out my daughter early. (See Exhibit 8 again) Dr. Alexander's affidavit. He states that my request was met with resistance because my daughter's mother. She was not following her court ordered psychological evaluation from June 2019, the doctor's recommendation February 8, 2020 to start doing 20 appointments, 10 individual counseling and 10 sessions of co-parenting. (See Exhibit 8 again) As of Dr. Alexander's affidavit dated October 8, 2020 she had only completed 2 appointments in 8 months. I am in firm

believe that this early check out of school supported by the principle would not have been an issue if she was following the court ordered evaluation doctor's recommendation. (See **Exhibit 13**) mother's evaluation and read the recommendations. Mind this is 8 months after the court ordered the evaluation and was only done after my attorney was going to file a rule to show cause in January of 2020. Instead of 5 rules he filed 4.

ANSWER TO GAL'S AFFIDAVIT

32. Now that you know of our daughter's mother only doing 2 appointments let me show hard proof of the double standard by the GAL which I believe is against SC law on GAL's (See **Exhibit 14**). I have highlighted the law that I believe were ignored or broken by GAL.

33. Now (See **Exhibit 15**) how I was threatened by GAL with a consent order if I did not leave my counselor and go to the one, she wanted. This was written March 7 2020 and she did not file a consent order for our child's mother not following the court ordered evaluation doctor's recommendation that the mother start counseling in March 7, 2020. It is clear she ignores the mother and did not enforce counseling like she did on me the father.

34. Also, it is very important how you read how my attorney at the time calls her out for lying in a nice manner about me. Also note how she talks very badly about me and suggest in so many words that I am the mental problem. Also read my reply at the time to her lying about me.

35. If this would have been enforced on the mother like it was the father I believe it would have save the child great stress and emotional wellbeing. If this enforced and done my 50th birthday April 7, 2020 would not have been ruined by the mother to where my



child was crying. Our daughter's mother said I did not deserve first right of refusal on my 50th birthday and she forced our daughter to go with Nikki instead of staying with me for my 50th birthday. Then on my court ordered visitation of 6-8pm which my family had dinner planned. My daughter's mother would not turn over my child and I saw my child crying in a window and she saw me. This is how I spent my 50th birthday and is one of the current filed rules to show causes that is pending. If the mother was following the program, she would have been advised to be reasonable just like Dr. Alexander stated in his affidavit.

36. Also, the GAL's own attorney stated that the mother had not paid her attorney which was a broke consent order by the court. (**See Exhibit 16**) because of this great double standard of enforcement by the GAL. The lack of following the child's recommendation when appropriate, which is the SC law on GAL's, there has been overwhelming great irreversible harm done to the child that can never be erased from her mind.

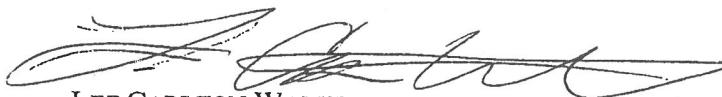
37. (**See Exhibit 8 again**) The child has exhibited what Dr. Alexander called in his affidavit about exhibiting mental distress acting out behaviors, depressed moods and eventually not being interested in any activities that will be suggested from either parent. The worst has come true.

38. After speaking with Dr. Alexander on Thursday afternoon he disclosed to me that the next thing the child does is begins to cut themselves and harm themselves and then stealing medications and taking them and eventually suicide. He said he has worked with 100's of kids over the years and seen it happen too many times. After this phone call I had successfully completed his mental health program (**See Exhibit 17**). The letter from his office congratulating me and I completed 30 or almost 40 appointments with Dr. Alexander.

39. After this I got off the phone with him, I used his techniques. Stop, evaluate the situation, then know all the facts and make a rational decision. Based on knowing my daughter's situation I had to go get her and I had my right to by my current visitation order set by this Honorable Judge Ritcher, because the GAL had taken my child away without a court order. I got my child on Thursday and she was so happy. Then my worst nightmare came true on Friday. After a successful day of homework and a 180 with my daughter as we are traveling to Charlotte to race she shares with me she discussed suicide with her friend Emma. Then it got even worst when the Ex-Parte Order came to me by email. Knowing this would be devastating. I prayed with her and told her the GAL Mrs. Sharon wanted me to take her back to her mother when she has told the GAL many time she does not want to live with her mother. I was able to calm her down and she was at peace with herself and GOD was watching over her. I told her to be strong and she is just like one of her favorite Racecar drivers Kyle Larson who lost everything but eventually replaced Jimmie Johnson GOAT to drive for Rick Hendrick which is the best of the best team. I said Rosalyn be strong please. It will all work out. I believe it is a GOD send to have the Honorable Judge Richter on this case because she has dealt with this case before. She is A Little Girl with A BIG DREAM. To have a chance to race like the little car from Cars 3 and if given the chance she will win. The worst of this whole situation is that the mother took her to stay under the same roof with Nikki and her husband Grant who the child asked Leslie Armstrong if she should tell Grant of the adultery. Our plan was to be at the GoPro Motorplex for the Halloween race for her to hang out with Keelan Harvick who is Nascar Champion Kevin Harvick's son and Kyle Busch and his son. Instead because the court was

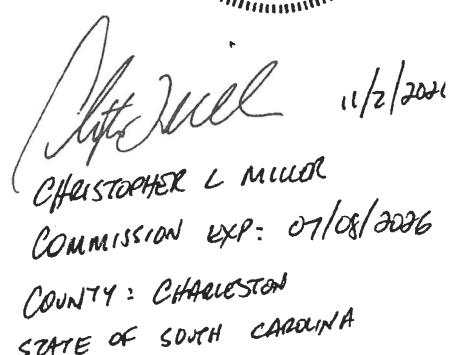
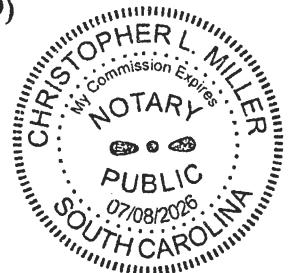
lied to she was in the middle of adult drama of a husband who had adultery committed against him.

40. I pray for the court for great relief for Rosalyn.
41. Please restore my custody and grant me full custody.
42. Please remove the lay GAL and appoint a new Attorney GAL
43. Please appoint an MD mental health Doctor to do an EVAL and the court will find that what was said in this affirmed statement to be the truth just like last time when the mother lied about the paramour spending overnights. *EVAL For Rosalyn.*
44. Please hold the mother in contempt for these false statements about the father in this order.
45. Also, anything the court finds just and proper.
46. Please end this nightmare for the child that was predicted by Dr Alexander in his affidavit.
47. I have started back to my previous counselor Dr. Kathleen Stringer on October 30, 2020 at 10 am and am going to an MD Mental Health doctor to clear me of any mental health issues. I am a step ahead of their request in this motion. I acted for the best interest of my daughter your Honor and will continue to do so. (See Exhibit 18 and 19)



LEE CARLTON WALKER

FATHER OF ROSALYN CHARLISE WALKER



Christopher L. Miller 11/2/2021
Commission Exp: 07/08/2026
County: Charleston
State of South Carolina

Sharon Lovette
+18438069078



Ex1

Thursday, October 29, 2020

You do not have the authority to take away my scheduled visitation. You have over reached bounds

3:04 PM

2020-10-29 02:00

RE: 18438069078
Sharon Lovette
2020-10-29 02:00

I have Rosalyn in my custody for the rest of my court order custody week until Ashley's starts on Monday at 5-6pm. I did not discuss any litigation like I was accused of. I believe you over reached



Me

5:44 PM, Oct 29

:

I have Rosalyn in my custody for the rest of my court order custody week until Ashley's starts on Monday at 5-6pm. I did not discuss any litigation like I was accused of. I believe you over reached your boundaries. Rosalyn and her grades were imploding. I am making another Action Contract with her to pull up her grades asap. I made this decision after speaking to Dr Alexander today. William was removed from my case by his Managing partner. I am meeting with my new attorney on Monday at 10am to 12pm. Until then I am my own attorney. I am attaching the transcript of the calls that were recorded and I will be forwarding them to you tonight by email. You can have a paralegal certify it for the court if you are filing something about those calls. After speaking to other attorneys and Dr Alexander and William's Managing partner removing him from my case I am in firm belief you way overstepped your rights as a GAL. This will be address once my new attorney is hired. Until then we will go back to our current court ordered week on week off visitation until further notice by the court. You can notify Ashley of this information. Thank you, Carlton



Copy text



Share

Sharon Lovette, Ashley ... (2)
2 recipients

We are going to
Mooresville NC
tomorrow around
330pm. We will
return on Sunday
evening. I will send
you an email with
the address where
we will be staying.
You can discuss
this with Sharon.
We will be going
back to our court
ordered week on
week off visitation
until further notice
by the court. Will

5:52 PM

 View all

Friday, October 30, 2020



< Me
5:52 PM, Oct 29

:

(No subject)

We are going to Mooresville NC tomorrow around 330pm. We will return on Sunday evening. I will send you an email with the address where we will be staying. You can discuss this with Sharon. We will be going back to our court ordered week on week off visitation until further notice by the court. William was removed from my case by his Managing partner. I am my own attorney until I hire my new one come Monday.



Copy text



Share

F I L E D

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON) 2017 FEB -7 AM 9:12)
LEE C. WALKER, ^{JULIE J. ARMSTRONG}) CLERK OF COURT)
BY Plaintiff,)
-vs-)
SYLVIA A. McADAMS,)
Defendant)

IN THE FAMILY COURT
NINTH JUDICIAL CIRCUIT
CASE NO.: 2016-DR-10-4570

Ex 2

TEMPORARY ORDER

Hearing Date:	January 4, 2017
Presiding Judge:	<i>Nancy C. McLin</i> <i>Alice A. Richter</i>
Plaintiff's Attorney:	Ryan Schwartz, Esq.
Defendant's Attorney:	Bill Hopkins, Esq.
Court Reporter:	Maria Dempsey

THIS MATTER come before the Court upon Plaintiff's motion for Temporary Relief, filed December 9, 2016. The Defendant was personally served with the aforementioned pleadings and service was proper in time.

Prior to the call of the case parties informed the Court that they had not reached an agreement and would ask the Court to make a finding of fact and a ruling on a temporary basis. The parties argued and presented evidence and affidavits. Based upon representation of counsel for the parties, the Court's observation of the parties and the Court's review of the Clerk's file in this matter, the Court makes the following Order on a Temporary basis:

1. **Jurisdiction:** Jurisdiction and venue are proper.
2. **Child Custody and Parenting Time:** Pending the initial report within thirty days (30) either party can request a second temporary hearing to determine the issues if needed based on the findings of the guardian ad litem. Also pending a recommendation from the Guardian Ad Litem's

*3c
RSL (pw)*

AN

initial investigation the parties will have week on, week off overnight visitation. The minor child is not to be removed from the State of South Carolina pending the initial guardian investigation; This visitation will begin Wednesday, January 4th 2017 when Mother will pick up the minor child after the hearing. The parties shall share custody of the minor child.

3. Mediation: Mediation shall take place with Todd Manley, Esq. within one-hundred and twenty (120) days or as soon thereafter as scheduling will allow.

4. Discovery: Discovery is ordered per the South Carolina Rules of Civil Procedure and initial discovery shall be completed within ninety (90) days.

5. Child Support: Neither party shall pay child support at this time. Plaintiff will continue to cover the minor child under health insurance.

6. Guardian ad Litem: John Knoblock, Esq. shall be appointed as the Guardian ad Litem in this action. Each party shall pay directly to John Knoblock seven-hundred and fifty dollars (\$750.00) within fifteen days of this hearing. The Guardian's fee cap shall be four-thousand dollars (\$4,000.00). The parties will equally split the guardian fees but the percentage split can be reallocated in the future. The Guardian shall do an initial report within thirty (30) days of the signing of this order. The Guardian also has the power to assess whether either or both parties should be required to obtain a psychological evaluation and will designate an examiner but either party may have a hearing on who the examiner is and any objections.

7. Restraints: The parties shall continue to be restrained from the same behavior noted in their Final Agreement with the additional provisions:

a. There is an absolute bar from exposing the children to a member of the opposite sex not related by blood or marriage, who could easily be construed as a paramour; Pending the

initial GAL investigation the child is to have absolutely no contact with Chad Lanham, the Mother's boyfriend.

b. Any restraints not named herein but named in the prior Agreement shall remain in effect if not specifically mentioned here.

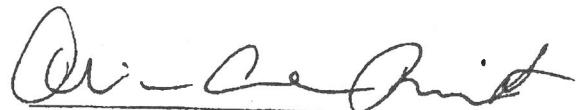
8. Attorney's Fees: Attorney's fees shall be held in abeyance.

9. All other issues not addressed in this Order are held in abeyance, without prejudice, until further agreement of the parties or Order of this Court.

THEREFORE, based on arguments and evidence presented, it is

ORDERED that the above temporary order is made an Order of this Court.

AND IT IS SO ORDERED!



Alice Anne Richter
Presiding Family Court Judge
Ninth Judicial Circuit

6 Feb., 2017
Charleston, South Carolina

CONTEMPT POWERS OF THE COURT

ANY VIOLATION OF THE TERMS OF THIS ORDER MAY SUBJECT THE VIOLATOR TO UP TO ONE (1) YEAR IN JAIL, UP TO \$1,500.00 IN FINES, AND/OR UP TO THREE-HUNDRED (300) HOURS OF COMMUNITY SERVICE.

FOUNDATIONS COUNSELING CENTER, LLC
105 Central Avenue, Suite 300-A
Goose Creek, SC 29445
(843)-425-2898

December 29, 2016

Re: Rosalyn Walker

To Whom It May Concern:

I am submitting the following documentation as a follow up to the treatment summary I wrote on September 23, 2016. Since that time, I have continued to meet with Rosalyn Walker most weeks, with her father bringing her to sessions, and have met with Ms. McAdams on two occasions. The following summary documents my conversations with Rosalyn's mother, Ms. Ashley McAdams, as directly related to Rosalyn's treatment with me.

I met with Ms. McAdams on November 2, 2016 and November 9, 2016 to inform her of the treatment concerns and progress Rosalyn has made since beginning therapy on September 13, 2016. We agreed that overall, Rosalyn is a well-adjusted and happy child, who is successful in school and seems to enjoy her relationship with both parents. I reviewed three primary concerns with Ms. McAdams that Rosalyn had disclosed, during the course of treatment, that were concerning to me, including being left unsupervised prior to school one morning of Kindergarten while under mother's care, Rosalyn's reports that mother's boyfriend stays overnight in the home, and that mother and her boyfriend had an argument about a gun on one occasion. My intention was to facilitate communication so that these issues can be directly addressed to ensure Rosalyn's continued safety and well-being.

I shared with Ms. McAdams that Rosalyn told me about a time when her mom had "sent me to Emma's house to go to school, but they (Emma and her mother) weren't home." I explained to Ms. McAdams that her daughter had shared she went back home, but "mom was gone too", and when I asked Rosalyn what she did next, Rosalyn had told me she had stood crying on the street until "a nice lady with a blond dog walked me to school". When I assessed the time frame for this event with Rosalyn, she shared it was not this school year (2016-2017), but she didn't recall how old she was at the time. Based on the fact she is currently in 1st grade, this event likely occurred during kindergarten last year between August 2015 and May 2016. In sharing this disclosure with Ms. McAdams, she shared she was aware of the event and that she had asked Rosalyn to walk down the one flight of steps to her friend's house while mom finished getting ready for work, and when mom left for work she did not see Rosalyn and assumed she had left with their friends for school. During this session, I discussed safety and supervision with Ms. McAdams, and she indicated she had visual contact of the stairwell to watch client leave, and she was not overly concerned about Rosalyn going on her own as the friend lives one story directly below them in their apartment building. Discussed options that Ms. McAdams can implement, such as calling or texting to confirm that Rosalyn arrives safely in the future when she is walking on her own to friend's home, to ensure this event does not repeat itself.

FOUNDATIONS COUNSELING CENTER, LLC

105 Central Avenue, Suite 300-A
Goose Creek, SC 29445
(843)-425-2898

I also shared with Ms. McAdams that Rosalyn indicated that she has been exposed to overnight visits with mother's boyfriend "sometimes", and that she was uncomfortable because she was unable to cuddle in mother's bed when he was there. Ms. McAdams stated that Chad stays with mother only when Rosalyn is with her father. She indicated that "Chad has never stayed the night while Rosalyn has been present in the home", so we did not discuss this issue further.

We also discussed Rosalyn's reports that sometimes mother and her boyfriend argue and specifically that Rosalyn had told me that Chad had brought a gun into mother's home and mother argued with him because she did not want a gun in the house. Ashley stated that there has never been a gun in her house, and that she did not believe that Chad even owned a gun. We briefly discussed gun safety, but Ms. McAdams assured me she did not have any guns in her home.

Following the above conversation and our general agreement that Rosalyn is emotionally and behaviorally doing well, we agreed that counseling could be used as needed for Rosalyn. However; understanding that Ms. McAdams and Mr. Walker have a highly contentious relationship and were likely in the future to engage in legal conflicts, counseling would be recommended to support Rosalyn through any potential changes in custody or visitation arrangements.

If there are any questions or concerns about the above information, I can be reached at 843-425-2898.

Respectfully,


Victoria Skinner, MA LPC

Ex 4

360 SECURITY OPTIONS, LLC
PRIVATE INVESTIGATIONS DIVISION
OLD JACKSONBORO ROAD
RAVENEL, SC 29470
843-609-6349

SUBJECT: Domestic Case Report

Client: Carlton Walker

DATE: November 20th 2016

TARGET: Sylvia McAdams / Chad Ladham

On Tuesday 9-25-2016 I was contacted by the above listed client, Carlton Walker, about him needing a Private Investigator to document his daughter's mother, Sylvia McAdams, activities. The client and Ms. McAdams have a young daughter together. They have joint custody with the understanding that neither of them could have a romantic partner spend the night at any time they have the child in their custody. The client believes that Ms. McAdams violates that agreement on a regular basis when her boyfriend, Chad Lanham, comes to visit her at her apartment on Daniel Island and when she travels to Columbia SC to see him. The client's daughter, Rosalyn Walker, has advised client that the boyfriend stays at mom's apartment often and sleeps in the same bed with her mom stating he sleeps in my spot in mommy's bed and I can't when he is there. The child also states that her mother's boyfriend has taken her to breakfast before when he spends the night.

Client filled out the necessary agreement for the investigation to begin and met the retainer obligations. The client gave information pertinent to this case and was unsure about the boyfriends' exact name and vehicle information.

Upon running intelligence for the backgrounds of all involved it was found that the boyfriends name is Chad Lanham of 355 Wyncombe Road in Columbia SC. The significance of this address is that on one occasion when Ms. McAdams had custody of the daughter she sent word to the client she was going to Columbia for the weekend and gave that specific address as the residence of the boyfriend's grandmother and that is where they would stay. Client advised her once again of the violation of the agreement that she could not stay overnight with her boyfriend why the child was in her custody. Ms. McAdams stated she was not, this was his grandmother's residence, not his. Per the TLO database this was not true.

It was agreed upon that surveillance would take place the weekend of October 21st when the mother has custody for the weekend again. The daughter advised the client that Mommy's boyfriend was coming down for the weekend.

Friday October 21st 2016 = 16:00 hrs. on Daniels Island for surveillance, 305 Seven Farms Drive Apartment 414. Upon arrival, I walked to the apartment and observed it is on the street side furthest from the parking lot. It has a balcony with chairs and plants on it. I placed a video camera under a fire extinguisher box across from the door with an un-obstructed view of the doorway to apartment 414.

Page 2 Walker Case

I responded back to the parking lot for surveillance. At approx. 17:45 hrs. an older model Toyota 4runner passed my location bearing South Carolina tag# ARS-616 driven by a white male that was looking very hard towards the Apartment building I was surveilling. The 4- Runner had clothes hanging behind the driver as though this person was traveling. A short time later I observed the target, Ms. McAdams with a small female child that I know by a photograph to be Rosalyn. As I was attempting to photograph the mother and child, Ms. McAdams turned to observe me as I passed by in my vehicle, therefore stopping my attempt to document them entering with a photograph. I began to drive the area and found the 4-runner parked across the street at the church parking lot, it was unoccupied. Upon running the tag, it came back registered to the boyfriend Chad Lanham. His entering the residence was documented by the camera that was placed outside the apartment. He was videotaped with an overnight duffle bag and groceries entering the apartment. I positioned myself in the church parking lot to watch the 4-runner for movement. At approx.: 19:00 hrs. I observed people on the back porch but could not identify them. From 19:00 to midnight I continuously drove the 2 parking lots and neither of their vehicles ever left the area. At midnight, all lights were out in the apartment.

02:00 Hours I observed a white male walk from the apartments to the church lot. The person entered the driver's side of the 4-runner. At approx. 02:45 hrs. I approached the 4-runner and observed a white male sleeping in the driver's seat. I shined a flashlight in the vehicle and the person awoke. I told him I was Security for the Church and asked what he was doing. He replied "I got kicked out by my girlfriend after a fight at her apartment, can I sleep here? I told him he could. I secured at 4 am due to boyfriend now being out of the apartment sleeping in his vehicle.

Saturday October 22nd 2016= After speaking to Attorney Ryan Shwartz and the client it was determined that additional surveillance was needed. I responded back at 16:00 hrs. for camera placement again and checking the tires on the 4 runners, the passengers rear tire had been marked with chalk to see if the vehicle had been moved, it had not and was still in the same position as the night prior. The driver's seat was reclined where he had slept and personal items were still present in the unoccupied vehicle. I placed several cameras outside the truck to observe the subject if he returned to sleep there again tonight.

19:00 to 21:00 hours I had to break surveillance due to a prior security detail. Upon arrival, the vehicles were still in the same location and the tire chalked was the same position showing the 4 runners has never moved. All cameras were checked and still in position. 01:00 hours October 23rd I pulled cameras from truck observation. Upon video review, no one has walked or entered that vehicle since placement at 16:00 hours. I personally confirmed the 4-runner was unoccupied and a video was made of the vehicle. All lights are off in the apartment except for a small light in the 2nd bedroom which, per the client, is the mother's bedroom.

01:00 hours until 06:00 hours lights are out in the apartment and all vehicles in same position placing the boyfriend at the apartment the entire night. Upon review of the camera facing the apartment, the

boyfriend was observed during initial entry on Friday, leaving after fight on Saturday 2 am and then entering again Saturday evening. The mother was also captured on video several times at the apartment. No footage of the child exists and only my personal observation on Friday places her at the Apartments entering with her mother. The client states it is not un common for the child to never leave the apartments when staying with her mother especially if the boyfriend was spending the weekend.

Page 3 Walker Case

Case synopsis: Per arrangement and court order the mother of the child had custody of the child in question for the weekend. No arrangements or facts were given to the client that the child would be elsewhere but with the mother over this weekend at her apartment. The boyfriend arrived Friday afternoon and was confirmed by video entering the apartment. A fight occurred on Saturday am which resulted in him sleeping in his vehicle. Saturday afternoon client never told child was elsewhere so assumption is child still at apartment per court agreement. Saturday into Sunday, boyfriend on video entering apartment and never leaving as of Sunday 06:00 hrs. Boyfriends vehicle tire marked with chalk and documented in same position all weekend.

Jack Scarborough
Owner / Operator
360 Security Options, LLC

Ex 5

FILED

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT FOR THE
COUNTY OF CHARLESTON) 2017 JAN -5 AM 11:47 NINTH JUDICIAL CIRCUIT

Lee Carlton Walker,

JULIE J. ARMSTRONG
CLERK OF COURT

C/A No.: 2016-DR-10-4570

Plaintiff,

BY _____) *Jo*

v.

Sylvia Ashley McAdams,

Defendant.

AFFIDAVIT OF SYLVIA ASHLEY

MCADAMS IN OPPOSITION TO

PLAINTIFF'S MOTION FOR

TEMPORARY RELIEF AND IN SUPPORT

OF DEFENDANT'S RETURN TO

MOTION FOR TEMPORARY RELIEF

PERSONALLY appeared before me, Sylvia Ashley McAdams, who being duly sworn, deposes and says that:

1. Carlton and I entered into a Custody and Visitation Agreement ("Agreement") regarding our minor child, which Agreement was approved and incorporated into an Order Approving Agreement signed by the Honorable Judy L. McMahon on April 18, 2012, and filed with the Charleston County Clerk of Family Court that same day.

2. I am filing this Affidavit both in opposition to Carlton's motion and in support of my motion for temporary relief. Carlton makes a number of unwarranted allegations in his complaint and motion, totally unsubstantiated by any evidence. Carlton has made such false allegations since the onset of this case back in 2010 in an attempt to sever my relationship with our daughter, RCW. Carlton's actions have become much more severe in nature, however, since Jan. 4, 2016 when Judge Wayne Creech found him to be in willful contempt of the Court's Order (Exhibit A) for a litany of misconduct and gave him a very stern lecture about his conduct in the presence of his mother. Carlton has made many of the same allegations here as he initially made in his counter rule to show cause, and Judge Creech found them all to be without merit and unsubstantiated.

3. The purported premise of this action seems to be a report (Exhibit B) that Carlton obtained by, again, disregarding the Court's Order, specifically, the Decision Making Authority provision located on page 4 (Exhibit C) and secretly hiring a "counselor" for RCW. I first learned

of this action in October 2016 when RCW mentioned to me that she had been visiting a woman named Victoria to "talk about her feelings." On October 13, 2016 at 9:00 a.m., I asked Carlton via email who Victoria was. At 9:22 a.m., Carlton responded with, "Give me a few days and I will get back to you on that" (Exhibit D). Carlton continued to refuse to provide the information after I asked numerous times, despite the Court Order's clear language and mandate. I was concerned and wanted to know why Carlton felt RCW needed a counselor.

4. After nearly a month of pleading with Carlton for the information, I was finally able to find out on my own that the counselor was Victoria Skinner. I first contacted Victoria Skinner via telephone on Nov. 1, 2016. Ms. Skinner stated she was glad that I had contacted her and further explained that she had wanted to speak with me, but Carlton had strictly demanded that she not contact me or inquire with me about any of the counseling agenda. Victoria stated that per her professional guidelines, she was not permitted to reach out to me, but that she was now required to release the information since I had inquired as a parent. At my request, Ms. Skinner met with me on Nov. 2, 2016 at 9:30 a.m. and again on Nov. 11, 2016 at 4:30 p.m. During our meetings, she reviewed the information discussed in phone conversations with Carlton and various appointments she had with Carlton and RCW. Carlton provided directives on the counseling topics that he wished for her to cover with RCW and the information would then be compiled into a written report to be sent to his attorney, Ryan Schwartz. Ms. Skinner provided me with a copy of the report. On Dec. 29, Carlton requested another revised report from Victoria (Exhibit E).

5. As you can see, the theme of the counseling agenda was Carlton's expressed concerns related to the safety and well-being of RCW while in my home. Ms. Skinner and I went through each of the alleged concerns. Some of what we talked about were convoluted, but had some truth. Others were outright shocking and nowhere near the truth. I provided any knowledge that I had and answered any questions she asked of me.

6. I informed Ms. Skinner that Carlton and I had a Court Order in place that requires us to discuss and agree together on any decisions regarding RCW, including education, medical, or religious decisions regarding the minor child's physical or emotional well-being and safety. I asked Ms. Skinner if Carlton had informed her or provided her with the Court Order. Carlton had not provided the order to Ms. Skinner, so I sent it to her via email on Nov. 4, 2016 at her request (Exhibit F). I left the meeting with mixed feelings—relieved in a sense, but also shocked and baffled. I was relieved to hear that a professional counselor had deemed that RCW was well-

adjusted and did not appear to have significant emotional or behavioral problems. I was shocked and confused that Carlton had never addressed these concerns with me as well as the content of the report. I was surprised that throughout the report, RCW only recalls negative experiences with me and only positive experiences with Carlton (going to the movies). She did not mention our trips to Disney, Carowinds, the fair, Mermaids at the Aquarium, beach trips, mountain trips, trips to Biltmore House, trips to the zoo, birthday parties, sleepovers, ear piercing outing, weddings we had attended and RCW was a flower girl—all exciting times for her.

7. Although I have already testified to these issues under oath once at the Rule to Show Cause hearing, I will state them again for the benefit of the Court. Chad Lanham and I began dating in the early part of 2014. Chad resides in Columbia and often comes to visit us and some of his close friends who also live in Charleston. When Chad and I began dating, I made it very clear that I had a custody agreement that I strictly follow. Chad has never had a problem with following the rules in my custody agreement. I have never allowed Chad Lanham or anyone of the opposite sex to spend the night while I have care and custody of my child and have not violated the agreement. Carlton has continuously accused me of allowing Chad to spend the night while RCW was in the home, which has already been found by this Court to be untrue and unfounded.

I thought that Carlton would stop making accusations after the Court's ruling on Jan. 4, 2016, however, he has continued. I have encouraged Carlton on many occasions to hire a private investigator to put his mind at ease. Chad has also offered to meet with Carlton so they could become more acquainted. From my knowledge, Carlton has not hired a private investigator and has also declined to meet with Chad yet continues to make the same accusations. Despite his accusations, Carlton has never requested a background check on Chad.

8. Carlton also claims he "is informed and believes that the paramour brings firearms into the home and exposes the minor child to firearms." I do not allow firearms or weapons in my home. Chad has never brought firearms or weapons into my home. Chad does not own or operate guns or any other weapons, to my knowledge. He does not partake in any hunting or shooting activities that would require a gun or weapons of any kind. Carlton, however, is very fascinated with guns and possesses guns in his home (Exhibit G). He has used weapons in the past. Carlton has armed himself with a gun in the past and was arrested after he pepper sprayed 2 elderly men in his neighborhood over a dispute of the placement of a mailbox (Exhibit H). Without my knowledge or consent, he purchased a bb or pellet gun for our 6-year-old daughter to shoot while

vacationing in West Virginia in June 2016. Carlton's stepfather, Jay Walker, is also an avid gun collector and is a civil war re-enactor. I know that Jay Walker practices gun safety, so I have never felt that RCW was in danger while in Jay's home. When I learned from RCW that Carlton had purchased the gun for her, I made it clear to him that I did not approve of RCW, at the age of 6, using a gun and told Carlton he should have discussed it with me prior to making the decision to purchase it. He ignored me. I then spoke with Jay and asked that he please take extra precautions and be sure that RCW is in his care and safe if and when using the bb gun. This issue hits home particularly for me because I have a cousin who lost his left eye due to a childhood incident with a bb gun. The doctors said that the bb barely missed his brain and had it been even a millimeter closer, he likely would have passed away. I have always been fearful of weapons and they have no place in my home. I am disturbed that Carlton has never brought a concern of this magnitude to my attention. Had Carlton discussed this with me prior to filing this action, I would have been more than willing to discuss his concerns and work with him as a co-parent to resolve any issues.

9. RCW often carools to school with her school and best friend Emma and Emma's Mother, Rebecca. They live in the apartment directly below us (Exhibit I). One morning, approximately 8-9 months ago, RCW missed her ride because she did not follow my rules and return upstairs to our apartment immediately when there was no answer at the door. Rather, RCW walked off looking for Emma. By the time RCW did return upstairs, I had already left for work. During her daily dog walk, a Daniel Island resident noticed RCW was upset and walked with her to school and to the care of Assistant Principal, Ms. Brown. Soon after I arrived at work, Ms. Brown contacted me and informed me of what had taken place. She said RCW was a little shaken up initially, but quickly regained her composure and was safe, sound, and in class on time. I was concerned that RCW may still be upset, so I left work and drove to the school to console her. Once I arrived, Ms. Brown reassured me that RCW was fine and there was no need to pull her from class. I agreed and returned back to work. After school, I spoke with RCW about the accident. She said that it did scare her when she realized she had missed her ride and I had already left, but seemed un-phased by it overall. She was more interested in telling me about the dog from that morning. This was an accident and RCW and I made it a learning experience for both of us. Though I regret that RCW missed her ride to school, I was thankful that we live in a safe place like Daniel Island. The community is very active and many of the school students either walk or ride bikes to school. Due to the school's high number of walkers and bikers, each school day a

crossing guard is posted at each street corner from our apartment to the school. I was also thankful that the walk RCW endured was only a couple of blocks, a straight shot from our apartment, and for the crossing guards at each street corner to assist (Exhibit J). Again, Carlton has never brought this to my attention as a concern. Had he discussed it with me prior to filing this action, I would have been more than willing to discuss his concerns and work with him as a co-parent to resolve any issues because I have nothing to hide.

10. I have never told RCW to withhold any information from her father and have always instilled that she can tell her father and I anything. I've also taught her that if an adult ever asks her to keep a secret, that adult is likely doing something wrong. Carlton has never brought this to my attention as a concern. Had he discussed it with me prior to filing this action, I would have been more than willing to discuss his concerns and work with him as a co-parent to resolve any issues. RCW was not left alone, lost, or traumatized by the walk to school. If RCW was suffering in any way, I would have taken the necessary measures to get her the help she needed. Suppressing this information for 8 months plus is not typical of RCW, or any 6-year-old child.

11. I do not leave RCW with unapproved sitters. Our Court Order requires that any sitter be a relative or on an Approved Sitter list. In the past, I relied on Helen Walker (Carlton's mother) in the rare occasion I needed a sitter if Carlton was unavailable. I did this for two reasons—1) I have no family in Charleston and 2) as an attempt to avoid foreseen conflict with Carlton approving sitters. This worked for a while, but over time, became burdensome. Carlton would become angry with Helen at times and would dictate whether she could or could not assist me. This inconvenienced me once with having to leave a work meeting with the owner of my company. At that time, I knew I must find another option. I developed an Approved Sitter List (Exhibit K) and provided all required information, per our order, to Carlton so that he could run background checks, check sex-offender registries, and have full names and contact information. With no consideration and without performing background checks, Carlton rejected each person that I had submitted as an approved sitter. Bizarrely enough, Carlton later asked to add sitters to the list, none of whom he provided the required information for, one of which he only knew as "Kate's mom" (Exhibit L). Per our agreement, if Carlton and I are unable to come to a decision, we are to consult with Linda Toporek and she is to act as "tie-breaker." I contacted Linda and we discussed through email, phone, meetings with Carlton and I separately, and meetings together. A large bill was incurred for Linda's services. Linda ran the background checks and sex offender

searches on all of the sitters I submitted for approval and they all passed the checks (Exhibit M). Once Linda expressed her approval of the sitters, Carlton threatened to sue her company). Linda was fearful of the threats and resigned as our co-parent counselor.

12. I have exhausted every option possible to follow our agreement and to appease Carlton in regard to sitters. This issue alone has taken an extreme toll on my time, energy, and finances. It is very frustrating to know all of the effort I have made to comply, only to be accused of this out of thin air. Carlton has proved he is simply incapable of co-parenting in accord with our Court Order, which is one reason for my request to have sole custody of RCW now.

13. It is true that I refused to switch days with Carlton on Jan. 18-19. It is also true that "the minor child would be missing out on an important educational experience"—School. RCW's education and school/work ethic are very important to me and I take responsibility to be the example to her. Carlton was banned from one or more high schools before being sent to Camden Military Academy as a last resort. He ultimately graduated high school at the age of 21. Years later he enrolled into college, then dropped out. Carlton's work-ethic is not much different. He moves from self-employment job to job and solicits for donations to various, what seem to be fly-by-night charities of which he claims ownership. Carlton has never had the responsibility of showing up to work regularly or on time. His mother has always filled his financial gap and is very supportive of the career changes, so he has never endured real consequences. I do not want this lifestyle for RCW. I want her to grow into a responsible adult who can take care of herself. I believe this starts at childhood and I feel that I'm the only parent she has who is capable of instilling this. Carlton has been irresponsible in regard to RCW's schooling. Since this school year began on Aug. 15, 2016 through Jan. 3, 2017, Carlton was responsible for taking RCW to school 35 days. Of his 35 days, RCW has been either absent or tardy 10 of those days (Exhibit N). The absence on Monday, Oct. 17, 2016 was because RCW fell and received some scratches the previous weekend. The absence on Nov. 9, 2016 was because RCW was tired from attending a party the night before to watch the election results and to hear Donald Trump's acceptance speech, which started at 3am, in its entirety (Exhibit O).

14. On Nov. 9, 2016, I received a voicemail from RCW's school nurse telling me that RCW wanted to leave school early because she had a headache. I immediately called the nurse back. The nurse stated that she did not think RCW was very sick and could likely stick it out for

the remainder of the day and that she had called Carlton after getting my voicemail. Since there was no school on Nov. 8 and RCW had been absent Nov. 9, and from what the nurse said I expressed to Carlton that RCW should not be picked up early. He picked her up anyway (Exhibit P). During my first parent-teacher conference on Oct. 20, 2016 at 4:30 pm, RCW's teacher, Ms. Franko gave an overall good report, but told me RCW needs to work on being more prepared and being on time every day. Throughout the school year, I've noticed a strong pattern with this and I made the decision not to allow RCW additional absences from school this year that aren't illness related. I do not promote the idea that school can be missed if there is something better or more fun to do.

15. Carlton uses threats, intimidation, and bullying to get his way. This situation is no different. He assumes that he can use these tactics and gain control of every situation. Going forward, I hope that Carlton will first consult with me before making decisions that interfere with my time with RCW. It is unfortunate that he purchased the tickets to the Inauguration before discussing it with me, but he was aware that the dates fell during my time (Exhibit Q). He has done this many times in the past with purchasing flight tickets and demanding that I swap time. Typically, I give in to prevent conflict. In this case, responsible parenting takes priority over appeasing Carlton. I feel that I have done everything possible to co-parent with Carlton but he is simply too selfish and irresponsible to put our daughter's best interests ahead of his own.

16. While there has been a material change in circumstances since the Court issued its original Order in April 2012, such changes only support my being the sole custodial parent for RCW. I simply do not have the financial resources to continue litigating with Carlton every time he gets mad at me. Every dime I earn goes to support RCW. I do not have a parent like Carlton does to finance me or litigation.

17. I am asking the Court to award me the sole custody of RCW and to award Carlton "standard" visitation every other weekend and holiday sharing. I want RCW to have a good, healthy relationship with her father and feel I have done everything in my power to promote, encourage and foster that relationship but am met with obstacles and backlash at every turn by Carlton. There is no spirit of cooperation with Carlton but rather only fighting, nitpicking, constant accusations of supposed "misconduct" and other energy draining nonsense. Incredibly, after being sanctioned by Judge Creech, ordered to pay my attorney's fees, and receiving a strong admonition from the Judge, Carlton asked me one day "didn't you learn anything at that hearing".

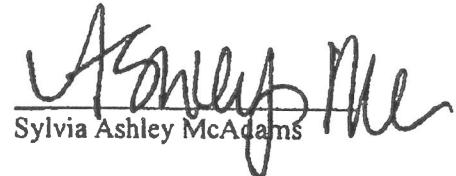
I was stunned and knew instantly that HE did not learn or hear anything Judge Creech said, even with his mother in the Court.

18. I have attached some recent photos which Carlton has publicly published on his Facebook page. As you can see, the photos show 6-year-old RCW sitting at a bar with (what I hope) is a virgin of the "Nitrotini" cocktail which comes with a warning label (Exhibit R, S, T). A parent having their 6-year-old drinking an unknown beverage from a martini glass at a bar, surrounded by adult patrons consuming alcohol is unhealthy, inappropriate, and not the environment in which I want my daughter spending her free time. Furthermore, this incident is yet another inkling into Carlton's true concern for safety. There are any number of age-appropriate places and things for Carlton to do with RCW, but drinking at a bar is not one of them. I can only assume Carlton was drinking. Carlton also openly admitted in Court that he has, on occasion, transported RCW in the vehicle without a car seat at the age of 4 (Exhibit U) (Pg. 6 of Judge Creech's Order and transcript from Sept. 2, 2016), showing a total disregard for her safety.

THEREFORE, I respectfully ask the Court for the following relief:

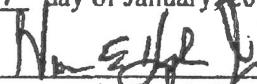
- (A) denying Carlton's motion for temporary relief in its entirety;
- (B) granting my request for temporary relief;
- (C) requiring Carlton to pay my attorney's fees incurred in defending and bringing these motions for temporary relief;
- (E) any other relief the Court may deem just and proper.

Further the deponent sayeth not.



Sylvia Ashley McAdams

SWORN TO AND SUBSCRIBED BEFORE ME
this 4 day of January, 2017



Notary Public for South Carolina
My Commission Expires: 1-b-2017

Fwd: Rosalyn Walker catch up work.

Ex 6A

Carlton Walker <lcarltonwalker@hotmail.com>

Fri 10/30/2020 9:43 AM

To: Sharon Lovette <sharonlovette06@gmail.com>; Ashley Mcadams <samcadams@gmail.com>

Bcc: Helen Walker <gammywalker47@gmail.com>

Powered by Cricket Wireless

Get [Outlook for Android](#)

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Friday, October 30, 2020, 9:42 AM

To: Chia-ni Julia Wang

Subject: Re: Rosalyn Walker catch up work.

Ok, thank you. She is going to be working all day. We started at 8am and will be working through the weekend. She will be back at school Monday morning.

Powered by Cricket Wireless

Get [Outlook for Android](#)

From: Chia-ni Julia Wang <wangc@bcsdschools.net>

Sent: Friday, October 30, 2020 9:07:33 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject: Re: Rosalyn Walker catch up work.

Rosalyn should know what she is missing and needs to complete. She is very aware of the due dates. I'm not making any exceptions for late work. Each day the assignment is late, 10 points will be deducted from her grade. Thank you!

Julia Wang
5th grade teacher
Daniel Island School
(843) 471-2301
Wangc@bcsdschools.net

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Thursday, October 29, 2020 8:44 PM

To: Chia-ni Julia Wang <wangc@bcsdschools.net>; Jill Hardy <hardyjill@bcsdschools.net>; Nancy Leigh <Leighn@bcsdschools.net>

Subject: Rosalyn Walker catch up work.

WARNING : This email originated from outside of the BCSD organization. Do not click on links or open any attachments unless you recognize the sender.

Hi all,

I would like to address catching Rosalyn up on her schoolwork. Like last time Rosalyn got a 45 Mrs. Wang was kind enough and gave her the opportunity to make up and retake the grade. Rosalyn has had a hard time due to me following instructions to end all racing. At the hearing, a few weeks ago a judge ordered on a temporary basis that Rosalyn cannot be checked out of school early for racing. Even though being checked out early once per month was supported by the principle. Even though Rosalyn made all 6 racing events for her 4th grade school year and she made almost straight A's and missed 2 subjects by 3 points, with two high B's, an 89 & an 88. This ruling ended Rosalyn being able to complete in her monthly league for the future. This even took her out of the top 3 for the Championship for the 2020 season which started in Feb of 2020 that she worked so hard to earn.

I have sat down with Rosalyn and she is going to get back on track and catch up with her work. If you could kindly email me a list of all her assignments and I am going to keep her home tomorrow and make sure she sits and catches up on all missed homework and classwork. I believe this is best for at least one day for me to supervise her. She will work on this all-day Friday. Continue to work on Saturday and Sunday and she will return to school Monday morning hopefully caught up. I plan on having her on her Chromebook starting at 8:00am Friday morning and doing assignments until the evening. We all know she has had a very bad past 2 weeks due to this temporary ruling. I can see on the school portal lots of missed assignments and bad grades a 20, 35 etc..., that I hope the school will help me work with her to get caught up and hopefully somehow get her back on track to being on the AB honor roll sometime soon.

Thank you for all your help,
Carlton

Vision: Empower all students for success.

Mission:

In partnership with our community, ignite in every student a passion for world-class knowledge and skills through dynamic instruction and personalized educational opportunities.

Berkeley County School District provides employee E-mail access for administrative and instructional use. E-mail correspondence to/from Berkeley County School District is considered public information and may be subject to release under the South Carolina Freedom Of Information Act or pursuant to subpoena.

Ex6B

FILED

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

2012 APR 18 AM 11:27
CUSTODY AND VISITATION AGREEMENT
JULIE J. ARTISATION AGREEMENT
CLERK OF COURT

THIS AGREEMENT entered into this 17th day of April, 2012, by and between LEE
CARLTON WALKER (hereinafter referred to as "Father") and SYLVIA ASHLEY
McADAMS (hereinafter referred to as "Mother").

WITNESSETH

WHEREAS, the Father and Mother are citizens and residents of the County of
Charleston, State of South Carolina, having resided therein for a period in time in excess of one
year; and

WHEREAS, the parties have reached an agreement as to custody and visitation of their
minor child, Rosalyn, and wish to reduce their agreement to writing.

WHEREAS, the Father has been ably represented by independent legal counsel
throughout the negotiations and preparation of this Agreement, to wit: Margaret Fabri, Esquire,
of Charleston, South Carolina, and he recognizes and certifies that he has been competently and
fairly represented and fully advised of all of his legal rights and duties incident to this
Agreement and the matters addressed herein; and

WHEREAS, the Mother has been ably represented by independent legal counsel
throughout the negotiations and preparation of this Agreement, to wit: Roger S. Dixon, Esquire,
of Charleston, South Carolina, and she recognizes and certifies that she has been competently
and fairly represented and fully advised of all of her legal rights and duties incident to this
Agreement and the matters addressed herein.

NOW, THEREFORE, it is mutually covenanted and agreed as follows:



CUSTODY

The parties agree to continue having joint physical and legal custody of Rosalyn with the same schedule of visitation that they now enjoy which is one parent having the child on Monday and Tuesday and the other parent having the child on Wednesday and Thursday and the parents alternating every other weekend. The following week, the parent who had Monday and Tuesday, will then have Wednesday and Thursday and the parent who had Wednesday and Thursday, will then have Monday and Tuesday and again alternate the weekend. The parties agree to use the holiday and summer visitation schedule which they agreed upon with Helen Wheeler during their counseling session. Such holiday and summer scheduled is attached hereto as **Exhibit A**.

If the child is unable to attend daycare or school due to illness or for any other unpredictable reason, the custodial parent with whom the child wakes is responsible for the child's care until the next scheduled change of physical custody pursuant to this Agreement, when the other parent is scheduled to pick up the minor child.

The parties further agree that, if they are going to be gone overnight during the time they are scheduled to have Rosalyn, the other parent would have right of first refusal. However, if the parent cannot exercise his or her right of first refusal, then the parties may select a sitter from a list of approved sitters that the parties shall have naming the sitter, their address and telephone numbers so that background checks, including but not necessarily limited to criminal background checks, DSS abuse and neglect checks and sex offender registry checks, could be performed on any unknown sitters by either party. If a Social Security number is necessary to do such checks, then the proposed sitter will provide that to both parties or not be considered by either party as a sitter. If a sitter is to be added to the list of sitters already known to the other



party, then any new sitter must also include the above-listed information. If either party leaves Rosalyn with a sitter not on the approved list of sitters, this could qualify as a substantial change in circumstance for seeking a change of the custodial arrangement. If either parent brings the other to court regarding this issue and prevails, then the non-prevailing party shall be responsible for the payment of the other parent's attorney's fees and costs.

At all times, the child shall have her own bedroom while in the home of either parent. If either parent intends to have a roommate, the roommate must be of the same sex as the parent and the name, and prior address(es) for the last year and current work address of such person shall be provided to the other parent prior to such roommate moving into either parent's home. In no event shall a roommate have an overnight guest stay at the residence of the mother or father and Rosalyn. If the parents do not agree on the roommate selected by the other as an appropriate roommate to live in the home of either parent and to be in the presence of the minor child, then either parent may file a Motion with the Charleston County Family Court to prohibit such roommate from moving into the other parent's home and being in the presence of the minor child. The parties agree that the Charleston County Family Court shall retain jurisdiction of this matter if such issue is raised by either parent. If a Social Security number is necessary to be provided by any prospective roommate in order to properly check the background of such prospective roommate, then the parent seeking to have a roommate shall obtain such Social Security number from such prospective roommate.

COUNSELING

The parties agree to go to co-parenting counseling with Linda Toporek for at least two sessions, one every other week, to begin immediately. If Linda Toporek believes that the parties should continue on in co-parenting counseling, then the parties agree to do so as recommended

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by Ms. Toporek. The parties are aware that Ms. Toporek charges \$50.00 an hour and the parties agree to share this fee equally. If, at any time, either parent requests that the other parent attend counseling by giving seven (7) days written notice to the other parent, then, in that case, both parties agree to attend at least one counseling session during a four (4) week period unless Linda Toporek or some other agreed upon counselor recommends otherwise.

DECISION MAKING AUTHORITY

The parties agree to discuss and attempt to agree on any decisions regarding the minor child, including education, medical or religious decisions or other decisions regarding the minor child's physical or emotional well-being and safety. If the parties cannot agree on such decisions, then they agree to seek counseling with Linda Toporek and if they cannot come to an agreement, then Linda Toporek would be the "tie breaker." If either party does not agree with the "tie breaking" decision made by Ms. Toporek, then either party may make a Motion before the Charleston County Family Court to seek a resolution of the issue. The parties agree that the Charleston County Family Court shall retain jurisdiction of this case to make such a decision if either party files such a Motion.

CHILD'S MEDICATIONS

The parties agree that, if the minor child is prescribed medication (prescription or over-the-counter medication) by the minor child's pediatrician or any other medical doctor, each of them will administer the medication in a timely manner as prescribed by the doctor or as recommended by the over-the-counter instructions.



MEDICAL INSURANCE

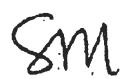
The Father agrees to continue to maintain medical insurance coverage on Rosalyn. The parties agree to share any uncovered medical expenses on a 50-50 basis. The parties agree that if at any time the Father cannot continue to cover Rosalyn on his insurance, then he shall give the Mother thirty (30) days written notice of such event so that coverage will not lapse and the Mother agrees to cover the child on her health insurance provided by her employer. If the Mother is covering the child through her health insurance, then the Father agrees to pay to the Mother whatever he had been paying for his health insurance coverage and if the Mother's health insurance is more than the Father had been paying, she agrees to pay any such overage in health insurance charges.

The parties agree that whomever incurs any uncovered medical expenses of the child shall present an invoice to the other party as soon as possible and payment by the other party shall be made to the party who has paid out-of-pocket no later than thirty (30) days after presentation of such invoice.

DAYCARE COSTS AND SCHOOL FEES

The parties agree to continue sharing equally the cost of daycare for Rosalyn until she starts full-time kindergarten. At the time that Rosalyn starts full-time kindergarten, the parties agree to share equally any after school care which is necessary.

The parties further agree to share equally any school fees of the child. Each party agrees to contribute one-half of any extra-curricular fees of the child as long as the party agrees that the child should participate in such activity. If one parent wants the child in an extra-curricular activity and the other parent does not want the child in the extra-curricular activity, the parties agree that the parent who desires that the child participate in the extra-curricular activity shall be



solely responsible for the payment of such activity. The parties agree to reasonably accommodate the child's extracurricular activities even if such activities occur during that parent's time with the child. If either parent believes that the other is interfering with their "parent time" with the minor child by scheduling extracurricular activities not mutually agreed upon, or that the other parent is over scheduling the minor child, then the issue shall be discussed and settled in counseling with Linda Toporek, with Ms. Toporek being the "tie breaker" if the parents cannot agree on this matter.

CURRENT AND/OR FUTURE DAYCARE

The parties agree that, if either party becomes engaged in conflict with Rosalyn's current or future daycare, to the point that the child is requested to be removed from such daycare, then this circumstance may be used as a substantial change in circumstance by either party to seek a modification of custody by the non-offending parent.

CHILD'S CLOTHING AND COMFORT ITEMS

Both parties agree to be responsible for purchasing adequate clothing for the child so that she does not have to pack clothes from one parent's home to the other. If the child arrives at the other parent's home in clothing purchased by the other parent, then that clothing will be returned to the other parent at the end of the child's stay with the parent who did not purchase the clothing. If the parent forgets to return to the other parent the clothing which the child has come to his or her house in, then such clothing shall be returned to the other parent by leaving the clothing at the child's daycare the next day. If the child will not be in daycare the next day, then the parent who forgot to send the clothing, agrees to deliver such clothing to the other parent's home the next day.

The parties acknowledge that Rosalyn is attached to certain items now in her possession. Rosalyn may also become attached to certain other items in the future bought by either of her parents or third parties. The parties agree that they will address in counseling how to deal with the exchange of "comfort items" of the child between the parties for the benefit and in the best interest of Rosalyn.

ATTORNEYS' FEES

Each party agrees to be responsible for their own attorney's fees and costs in this action.

GUARDIAN *AD LITEM* FEES

The parties agree that the Father shall be responsible for paying thirty percent (30%) of the \$4,500.00 of Guardian *ad Litem* fees which remained owed by the Mother to the Guardian as of January 1, 2012. Therefore, the Father agrees to pay \$1,350.00 of the Mother's then balance of \$4,500.00. Such payments shall be paid to the Guardian *ad Litem* within ninety (90) days of the date of the approval of this Agreement. Any additional Guardian *ad Litem* fees owed by the Mother shall be the sole responsibility of the Mother and shall be paid to the Guardian *ad Litem* within ninety (90) days of the approval of this Agreement. The Father agrees to be responsible for his outstanding Guardian *ad Litem* fees and such fees shall be paid within ninety (90) days of the date of the approval of this Agreement.

NOTIFICATIONS AND COMMUNICATIONS

The parties agree to communicate with each other by text or e-mail only on matters of importance regarding Rosalyn or unexpected scheduling changes regarding the child. If an emergency arises regarding the child, the party who has physical custody of the child shall communicate by telephone with the other parent in order to verify that the other parent knows of the emergency. If, in an emergency situation, the notifying parent cannot reach the



other parent, he or she may leave a voice mail on the other parent's voice mail. The parties further agree to keep each other apprised at all times of their current telephone numbers, street addresses and e-mail addresses. The parties agree to only text or e-mail the other parent once a day about important, but non-urgent matters, regarding Rosalyn. The parties agree to respond to the other party's text or e-mail on important but non-urgent matters pertaining to Rosalyn in a timely manner. "Timely" shall be defined as within four (4) hours of receiving the text or e-mail from the other party. No texts or e-mails shall be sent after 10:00 p.m. at night. If an e-mail or text is sent to the Defendant during work hours and she cannot respond during work hours due to her work policies, she shall respond immediately after getting off of work. The parties agree to respond to contact pertaining to emergencies concerning Rosalyn as soon as possible but no later than one (1) hour of receiving such emergency contact if at all possible.

The parties agree to notify the other parent if they intend to take the minor child out of the Tri-County area (Charleston, Berkeley, Dorchester Counties) at any time and to give the location and contact numbers where they can be reached.

RESTRAINING ORDERS

The parties agree to be restrained and enjoined from discussing this litigation in any manner with the minor child and to be restrained and enjoined from disparaging the other parent, and/or any members of the other parent's family, in the presence or proximity of the child and from allowing any third parties from making any disparaging remarks. The parties agree to be restrained and enjoined from having any romantic companions with whom they are not married on an overnight basis while the minor child is in their physical custody. The parties agree that neither will abuse alcohol while the minor child is in his or her custody or use or possess any

illegal substances or allow others to expose the child to the use or possession of any illegal substances while the child is in his or her custody.

The parties agree not to expose the minor child to any violent conduct, to be restrained and enjoined from using vulgar, profane, demeaning or threatening language in the presence of the child; the parties agree to be prohibited from exposing or allowing the child to be exposed to sexually explicit conduct or language by way of television, videos, movies, books, photographs or other types of material which are sexually explicit; the parties agree to be prohibited from exposing the child to tobacco smoke or smoke from any other type of smoking material; the parties agree to only post pictures of the minor child on their own private social media web sites; and the parties agree not to place any tracking devices of any type, including, but not limited to GPS devices, on the property of the other party or on the minor child.

MUTUAL ACKNOWLEDGMENT
AND FAIRNESS OF AGREEMENT

The parties hereby declare that each fully understands the facts and has been fully informed of, or have had an opportunity to be fully informed of, all legal rights and liabilities. Each party believes this Agreement to be fair, just and reasonable and in the best interest of their child and each signs this Agreement freely and voluntarily. Each party has had full input into this Agreement and its provisions and hereby declare that they fully understand the terms of said Agreement and that, in view of the circumstances of the parties at the time of the execution of this Agreement, that the terms of this Agreement are agreed to be fair and equitable as between the parties and in the best interest of their minor child.

PERFORMANCE

Each party shall, at any time, and from time-to-time, hereafter take any and all steps necessary to timely execute and deliver to the other party any and all instruments and assurances,

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which the other party may reasonably require for the purposes of giving full force and effect to the provisions of this Agreement.

MODIFICATION

No modification or waiver of any of the terms hereof shall be valid unless in writing and signed by both of the parties.

REMEDIES FOR BREACH

If either of the parties fails in the due performance of his or her obligation as stated above, either party shall have the right, at their election, to bring a Rule to Show Cause why the other party should not be held in contempt of Court for his or her failure to comply with the provisions of this Agreement. If the party prosecuting a Rule to Show Cause against the other party prevails on such Rule, then the prevailing party shall be entitled to have the other party pay his or her attorney's fees and costs for the prosecution of the Rule.

GOVERNING LAW

All matters affecting the interpretation of this Agreement and the rights of the parties hereunder shall be governed by the laws of the State of South Carolina.

WAIVER

Any waiver by either party of any provision of this Agreement, or of any rights hereunder, shall not be deemed a continuing waiver and shall not prevent or estop such party from thereafter enforcing such provisions or rights as to the future, and the failure of either party to insist in any one or more instances upon the strict performance by the other party shall not be construed as a waiver or relinquishment for the future of any such terms or provisions, but the same shall continue in full force and effect.

ADVICE OF COUNSEL

The parties respectively acknowledge that each has had the opportunity to seek independent legal counsel of his or her own selection, that each fully understands the facts of his or her obligations hereunder, and that having had such opportunity to seek legal advice, and with such knowledge, each of them is signing the Agreement freely and voluntarily.

BINDING EFFECT

This Agreement shall inure to the benefit of and shall be binding on the parties hereto, their heirs, executors, administrators and assigns.

Margaret D. Fabri
WITNESS

Karen Austin
WITNESS

Karen Austin
WITNESS

Loyd J. O.
WITNESS

Karen Austin
WITNESS

Mark Schwartz
WITNESS

Lee Carlton Walker
LEE CARLTON WALKER

Sylvia A. Williams
SYLVIA ASHLEY McADAMS

Paul D. Schwartz
PAUL D. SCHWARTZ, ESQUIRE
Guardian *ad Litem*

Lee Carlton Walker/Sylvia Ashley McAdams

In the interest of the minor child Rosalyn Walker

July 5, 2011

Center For Families

Helen E. Wheeler,
M.Ed.

Licensed Professional
Counselor

Family Court Mediator

Parent Coordinator

Co-Parent Coach

27 Gamecock Ave. #202

Charleston, SC 29407

P (843) 763-5837

F (803) 753-0134

C (843) 224-1782

cfamilies@bellsouth.net

www.HelenWheelerCounseling.com

The following items were discussed and decided upon during Tuesday's conference.

Holidays: Note: Because of the dynamics between the parents that would make switching the calendar to avoid consecutive weekends that Rosalyn might spend with the same parent extremely problematic, after much discussion, it was decided that we would not be resetting the calendar after the holidays.

1. **Mother's Day:** Ashley will pickup Rosalyn at the Day Care on the Friday evening no later than 6:00 pm proceeding Mother's Day and will return her on Monday morning to Day Care.
2. **Father's Day:** Carlton will pick up Rosalyn on the Friday proceeding Father's Day on the above schedule. We discussed the fact that in some years, it is conceivable that either one of them might have three (3) consecutive weekends in a row.
3. **Parent's birthday:** If Rosalyn is not scheduled to be with the parent who is celebrating his/her birthday in a given year based on the following schedule: she will be picked up at the regular after work time of 6:00 pm and returned to the custodial parent by 8:00 pm.
4. **Rosalyn's birthday:** In odd years, Ashley will be able to enjoy her birthday with Rosalyn; while Carlton will spend her birthday with her in even years.
5. **Christmas holiday:** beginning in 2011 the parents will consult with the school calendar of the Charleston County School district for all school holidays. Should either or both parents move from the CCSD attendance area, the parents will meet to renegotiate the scheduling questions/concerns. Likewise, should she attend a private school, and with the consent of both parents, they will adopt the appropriate school calendar. The holidays will be split in the following way: Christmas I which shall commence with the end of the school day and finish at 8:00 am on December 26. Christmas II will commence at 8:00 am on December 26 and conclude with the return to school/daycare in January. Carlton will enjoy Christmas I in odd years beginning in 2011 while Ashley will enjoy Christmas II in odd years beginning in 2011. In Even years, Ashley will enjoy Christmas I while Carlton will enjoy Christmas II.
6. **Thanksgiving holidays** will also be shared in the following way: Thanksgiving I will commence with the conclusion of school and end with exchanging Rosalyn at 8:00 am on the day after Thanksgiving. Thanksgiving II will commence on Friday at 8:00 am and conclude with returning Rosalyn to school/daycare on the following Monday. Ashley will enjoy Thanksgiving I in odd years beginning in 2011. Likewise, Carlton will enjoy Thanksgiving I in even years beginning in 2012.
7. **Easter/Spring break holiday** will be shared in the following way: Easter I will commence on the last Friday (or whichever day is the last day) of school and finish with Rosalyn being exchanged on Wednesday. If she is in school/daycare, she will be returned to daycare but if she is not in daycare, exchange will occur at 6:00 pm. Easter II will begin on Wednesday at 6:00 and will continue until school commences on Monday morning. Easter I will be enjoyed by Ashley in even years beginning in 2012. Carlton will enjoy Easter I in odd years beginning in 2013. Easter II will be enjoyed by Carlton in even years beginning 2012. Ashley will enjoy Easter II in odd years beginning in 2013.

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Exhibit A

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8. Summer vacation for each parent will consist of two (2) non-consecutive weeks. The parents will choose their desired first week and inform (by text and/or email) the other parent by April 1. Carlton will make the first choice of his weeks in even years beginning in 2012. He has requested that typically he be allowed to select the first week of August to join his family for a week of vacation/family reunion at the beach. Ashley makes the next selection; Carlton will select his second week followed by Ashley's second week. In odd years, beginning in 2013, Ashley will make her selection first and notify Carlton on the above schedule.
9. Other holidays: Ashley will enjoy Memorial Day in odd years. Carlton will enjoy 4th of July in even years. Ashley will enjoy Labor Days in odd years. The visitation proceeds like this: the day before a holiday, the parent celebrating the holiday will pick up Rosalyn after work or school and return her to school the following day.
10. Carlton requested a travel weekend to celebrate his sister's birthday. He requested that he get the weekend nearest to May 4 every year. In effect, he wanted to reset that weekend if it was not his year to have Rosalyn the weekend before or following May 4th. Ashley was not ready to agree to that; however, she is willing for him to travel to see his sister the weekend that is closest to the May 4th date.
11. Other decisions include: when traveling outside of the Tri-County area, the traveling parent will inform the other, whenever possible by 48 hours proceeding departure via text/email. When traveling out of town for overnight visitation, the other parent will be apprised of destination, estimated arrival time, contact information, etc. during travel. The traveling parent will inform the other parent upon arrival via either text or voice message. When Rosalyn matures, she will be able to contact the other parent by cell phone as she desires. The non-traveling parent will be discouraged from making repeated phone calls so as to not disrupt the visitation with the other parent.



Fw: Rosalyn Walker

Ex 7

Carlton Walker <carltonwalker@hotmail.com>

Tue 10/6/2020 1:52 PM

To: Helen Walker <qammywalker47@gmail.com>; Jay Walker <jay68walker@aol.com>

0 1 attachments (138 KB)

Attendance Policy-English.pdf:

From: Nancy Leigh <Leighn@bcschools.net>
Sent: Tuesday, October 6, 2020 1:36 PM
To: Carlton Walker <lcarltonwalker@hotmail.com>
Cc: samcadams@gmail.com <samcadams@gmail.com>; Adalia Porcher <PorcherA@bcschools.net>
Subject: RE: Rosalyn Walker

Hello Mr. Walker, please see the responses below that we discussed on our call. Ms. Porcher can answer any additional attendance questions you have. Please also see the attached attendance policy. Thank you.

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Monday, October 5, 2020 3:17 PM
To: Nancy Leigh <Leighn@bcscschools.net>
Subject: Rosalyn Walker

WARNING This email originated from outside of the BCSD organization. Do not click on links or open any attachments unless you recognize the sender.

Ms. Leigh,

Hi, it's Carlton, Rosalyn Walker's Father. Thank you for the call today it was fun talking to you. Especially that you too drove go-karts when you were younger. Please confirm if my understanding regarding Rosalyn's extracurricular activity of racing is accurate:

1. If she is signed out of school 15 minutes early to attend a race in Charlotte later that afternoon, it will not count against her attendance?
2. If she is signed out at 1:00 p.m. to be able to practice before she actually races, she will simply be considered signed out early, again, not counting against her? The 15 mins will be documented in power school. She will be counted present for the day.
3. As far as Winter National goes (the week-long event), if Rosalyn participates, it would be considered an unexcused absence, but because she has ample time, Rosalyn could get with teachers in advance, and she would or could be transitioned to blended/virtual learning for that week, so all her assignments would be completed? Also, this would not create any attendance issues as Rosalyn has up to 10 unexcused absences per year?
4. Fun Question: Is this one of your favorite extracurricular activities or your favorite since you drove karts? ☺ I love seeing girls participate in non-traditional activities/sports!

11/2/2020

Mail - Carlton Walker - Outlook

Rosalyn will be unexcused for the 5 days and we will hold the attendance conference if any additional days occur as she will then be truant. She can participate in blended learning during this time out. Please remind the teachers in advance of the dates and be aware that it is her responsibility to log in to the google meets as scheduled.

Thank you.

Thanks again for the call. I had no idea prior to our conversation that you drove go-karts when you were younger. I'm sure Rosalyn will be excited when you pull her aside and tell her you drove go-karts too. I won't say anything, and you will have to tell me her reaction one day when we talk again. I'm sure she will probably love to talk to you about that! Like I mentioned on our call I am reaching out in advance so we can maintain Rosalyn's AB Honor Roll status this year too.

Sincerely,

Carlton
8434785980

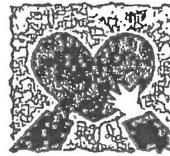
PS. For your convenience. Also, please cc Ashley McAdams on this email, per our discussion, you can copy and paste - samcadams@gmail.com .

Vision: Empower all students for success.

Mission:

In partnership with our community, ignite in every student a passion for world-class knowledge and skills through dynamic instruction and personalized educational opportunities.

Berkeley County School District provides employee E-mail access for administrative and instructional use. E-mail correspondence to/from Berkeley County School District is considered public information and may be subject to release under the South Carolina Freedom Of Information Act or pursuant to subpoena.



Ex 8

True Heart Counseling Services, LLC

255 North Hwy 52, Suite – 1 Moncks Corner S.C. 29461
Phone 843-761-1444 • Fax 843-761-2595
trueheartcounseling@gmail.com

TO: Court or Designee
FROM: True Heart Counseling Services – (Affidavit)
RE: Carlton Walker (DOB: 4/7/90)
DATE: October 8th, 2020

Please be advised, that Mr. Carlton conferred with me prior to asking for early sign out for his daughter Rosalyn's racing event. I believed his request was reasonable and he attempted to compromise by using the Parallel Parenting Components and Techniques that we have been working on for the past several months.

Please note, that the Parallel Parenting Components and Techniques that I've instructed Mr. Walker to use can only be effective if both parents are working together using the evidence based components and techniques that are being taught in our Parallel Parenting Program. Unfortunately, I believe Mr. Walker was met with resistance from Rosalyn's biological mother because she has only completed two (2) Parallel Parenting Session thus far. This information was confirmed by her counselor Dr. Sherri Ashbee. However, Mr. Walker has completed 10 Parallel Parenting sessions and only has 2 sessions left before he successfully completes all of the requirements of Parallel Parenting.



True Heart Counseling Services, LLC

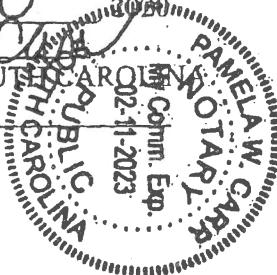
255 North Hwy 52, Suite – 1 Moncks Corner S.C. 29461
Phone 843-761-1444 • Fax 843-761-2595
trueheartcounseling@gmail.com

Parallel Parenting can truly be measured when both parents are compromising to promote mental wellness for Rosalyn. If the parents cannot make reasonable compromises to support the social and emotional wellbeing of Rosalyn, it won't be long before she starts exhibiting mental distress, acting out behaviors, depressed moods and eventually not being interested in any activities that will be suggested from either parent.

FURTHER THE AFFIANT SAYETH NOT!

SWORN TO BEFORE ME THIS

8th DAY OF October 2020
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 02-11-2023



Completed By: (Not Valid Without Signature)		
Print Name: Dr. Darren Alexander Ph.D., NCFC NCC,LPAC,CCBT,MAC,CDVCIII,CACII	Title: Forensic Counselor, Domestic Violence Counselor, Addiction Examiner & Psychopathologist	Date:
Signature: 	SCAADAC / NAADAC Master Addiction Counselor License / Certification #: 1502261 LPAC Licensed Professional Addiction Counselor License #: 284 NCFC National Certified Forensic Counselor License /Certification #: 14352 NCC National Certified Counselor License/ Certification #: 507895 CCBT Clinically Certified Cognitive Behavioral Therapist Certification #: 14352 DHEC Certified License # OPT-0101	10/8/20

Ex 9

Bullet Points Outline

- **June 2017** daughter began racing
- **October 5, 2018** daughter won her 100th race, meeting the goal required by the father prior to purchasing a Bandolero Race Car.
- **October 10, 2018** father viewed potential race car for purchase
- **October 11, 2018** father texted mother requesting one-on-one meeting to discuss purchase
The parties agree to respond to the other parties' text or e-mail on important but unurgent matters pertaining to Rosalyn in a timely manner. "Timely" shall be defined as within four hours of receiving the text or e-mail from the other party (pg. 8 first par).
- **October 17, 2018** six days with no response from mother relative to the one-on-one meeting, father purchased race car
- **October 20, 2018** daughter, grandmother, and father travel to NC and daughter is fitted for safety equipment and custom fitted to the race car
- **October 24, 2018** waiver requiring mother's signature was sent home with daughter; mother responded via text message to the father accusing father of not having involved her
- **October 25, 2018** father responded via e-mail explaining safety standards for a Bandolero Race Car are the same measures required for NASCAR. (no response from the mother)
- **October 31, 2018** grandmother asked the mother (via e-mail) for a meeting with the grandmother and daughter to display the daughter's safety equipment (no response from the mother).
- **November 1, 2018** father notified mother (via text) that the daughter was upset and crying about the mother not meeting with the grandmother and daughter to view safety equipment. (mother responded on the same via text saying she is not signing the waiver and the father needs to stop pushing the issue.)
- **November 2018** grandmother on two other occasions attempted to arrange a meeting with the mother and daughter to show the mother the safety equipment. (mother declined to meet.)
- **November 3, November 17, November 18, 2018** father signed waivers (requiring only one parent signature) at Concord Motor Speedway for the daughter to participate in the extracurricular activity.
- **November 16-18, 2018** Father notifies mother that daughter will be going to Charlotte NC this weekend and each proceeding weekend the daughter is with the father. The daughter will be going to Charlotte NC for the daughter's practice and racing during the father's visitation time.
- **November 17, 2018** Mother notified father of her father's death. The father offered any help and the mother asked the father to bring the daughter to Greenville SC. The father agreed to relinquish his Thanksgiving Visitation and take daughter to Greenville SC.
- **November 18, 2018** The mother asked father when he would be bring the daughter to Greenville SC. Father replied with as soon as the race is over at 6:00 or 6:30 p.m. Mother was aware of these races and never expressed her concern for her daughter's safety or physical well-being nor did she tell the father to cease and desist the daughter's extracurricular activity of racing.

- **December 14, 15, & 16, 2018** The daughter was slated to compete in The Cook Out Winter Heat at the Charlotte Motor Speedway, which requires signatures of both parents. The father to send the waiver to the mother for signature.
- **November 28, 2018** Father asked for mother to sign waiver for Charlotte Motor Speedway for daughter and Mother refused.
- **November 29, 2018** Father contacts the father contacted Attorney Hal Cobb who referred the father to Attorneys William S. Hammett III and Stephanie Richards, which the father hired to handle this matter.
- **On December 5, 2018** in the presence of the father and grandmother, child stated the mother said she would sign the papers (waiver) if the father would drive the child's race car at 60 miles per hour straight into the wall. **In violation of the Restraining Order section of Court Order stating that either parent is "to be restrained and enjoined from disparaging the other parent..." (pg. 8 last para)**
- **December 12, 2018**, The General Manager of INEX the Headquarters for Bandolero Racing confirms via email that there has been ZERO DEATHS in the Bandolero Racing Series since the founding of 1997.
- **On December 12, 2018**, the mother responded via e-mail stating she did not consent to the child racing due to obvious dangers and does not have a tie-breaker due to the father's behavior.
- **On December 17, 2018**, once again Attorney Richards via e-mail offered the mother the opportunity to use Court Mediator Halverstadt who the couple had used in the past as recent as **February 2018** and on that same day the mother via e-mail refused stating she could explain her decision to a family court judge and reiterated Ms. Toporek was no longer a tie-breaker due to the father's behavior. Thus, costing the father more attorney fees and the court's time.

If one parent wants the child in extracurricular activities and the other parent does not, the parties agree the parent who wants the child to participate in the activity shall be solely responsible for the payment of such activity. The parties agree to accommodate the child's extracurricular activities even such activities occur during that parent's time with the child (pg. 5 last para, pg. 6 first par).

In compliance with the court order the mother has never been asked to fund any portion of the daughter's racing activities. The father has sent the child with money to practice the activity and the mother has refused to take the child to participate in the extracurricular activity when in the mother's custody. The child had told the father she has asked the mother more than ten times to take her to practice the activity and the mother has repeatedly told her they will do the activity later.

Court Order regarding decision making authority (physical well-being and safety) states the parties agree to discuss or attempt to agree on any decisions regarding the minor child's physical ...well-being and safety, and in the event an agreement cannot be reached a tie breaking decision would be made by Family Counselor Linda Toporek. In the event either party disagrees with Ms. Toporek either party may make a Motion before the Charleston County Family court to seek a resolution (pg 4 par 2).

Ms. Toporek is no longer available. In approximately 2015 Ms. Toporek acting in the capacity as a tie-breaker in a meeting was leaning toward approving the use of several baby sitters objected to by the father. The objection of the father was based on the fact, that the husband of Sitter #1 had pictures of gang related activities on his Facebook (photos available upon request), and Sitter #2 and best friend of the mother named Nikki had in the past disparaged the father in front of the daughter, as told to the father by the daughter. The father voiced his concerns about the sitters and further stated if anything happened to the daughter while the daughter was in the custody of one of the sitters, that the father would hold both the mother and Ms. Toporek responsible. Ms. Toporek expressed her desire at that time, to no longer stand in as a tie-breaker. She also stated that neither attorney for either the mother or father had asked Ms. Toporek to be named in the court order as tie-breaker with that kind of liability. There was never a final decision about the sitters given by Ms. Toporek. The mother continued to use whomever she desired without the father's approval.

In 2016 the father called Ms. Toporek for her services after he learned from the daughter that in approximately 2015, the daughter while in the custody of the mother, was sent next door to the home of Sitter #1 for transportation to school. Sitter #1 was not home. The daughter returned to the mother's home, and the mother had already left for work. The daughter was 5 years old daughter and was left on the sidewalk unaccompanied by adult supervision. The daughter told the father she was crying on the sidewalk until someone (to this day unknown to the father, mother, or daughter) walked the daughter $\frac{3}{4}$ of a mile to school. When the father

Major Points in Case

- Father is not required by court order to consult the mother prior to involving the daughter in extracurricular activities.
- To alleviate any worries the mother may have with the daughter's safety and physical well-being while participating in the extracurricular activity while in the father's custody the father attempted on three (3) occasions (two (2) times via text messages and once (1) via e-mail), and the grandmother attempted on four (4) occasions, three (3) times by text or telephone and one (1) occasion by e-mail to either meet to discuss any safety or physical well-being concerns the mother may have or share with the mother information about safety measures that have been taken.
- The mother's lack of response to the requested meetings violates the Decision-Making Authority reflected in the Court Order.
- Father's attorney attempted to get mother to agree to discuss the child's safety and well-being concerns with a mediator who mother and father agreed to use in the past as recently as February 2018. Mother refused to discuss this matter in mediation.
- Had the Charlotte Motor Speedway only required one parent signature on the waiver, this likely would not be an issue for the court to address with the mother. The mother has been aware of her daughter's racing activities since June 2017 and has not filed a motion with the court, nor asked for mediation. The mother has not asked the father to "Cease and Desist" with allowing the daughter to participate.
- Asking the court for the father's full signatory authority on behalf of both parents for any required waivers for extracurricular activities; if the court awards the father to sign for both parents during the father's time only, this may not satisfy the insurance requirements for the extracurricular activity. Therefore, we are asking for the father's full signatory authority on waivers on behalf of both parents.
- We ask the court for the mother to pay all of the father's attorney fees and associated court costs because of mother's constant refusal to discuss this safety issue with the father 3 times, grandmother 4 times, and refusing a mediator, which was the cause of this action being filed with the court.

contacted Ms. Toporek for her assistance concerning this incident, Ms. Toporek told the father she could no longer assist him with issues concerning the daughter. Ms. Toporek reiterated her concern about her liability as a tie-breaker. Ms. Toporek also stated the mother owed her money for unpaid services in the amount of approximately \$1,100. After the father paid the debt, Ms. Toporek referred the father to Child Counselor Victoria Skinner for any further assistance with issues related to the daughter in this traumatic matter.

In precis: The mother broke the Court Order by not Discussing the child's Physical Well-being and Safety is the key issue by refusing to meet and talk about safety. The mother has refused a one-on-one meeting twice with the father and did not respond to email on safety issue, refused three times the offer to view safety equipment with the daughter and grandmother and refused response from grandmother's email, and refused mediation. All prior to the father petitioning the court for sole parental signatory authority when the child is participating in extra-curricular activities, so the father does not have to summons the court each time to have a waiver signed, when it requires 2 signatures for the child's extra-curricular activities.

Re: Rosalyn**Ex 10**

Carlton Walker <lcarltonwalker@hotmail.com>

Sat 10/24/2020 5:15 PM

To: Leslie Armstrong <leslie@armstronglawllc.com>

Bcc: Hal E. Cobb <hcobb@cdhlf.com>; William S. Hammett III <whammett@cdhlf.com>

Please explain what the Nicky situation is that you mentioned? As Rosalyn's father who has her best interest at heart. I am entitled to know what the situation is with Nicky that you mentioned. Please explain "what happened and when" that you referred to in your email. It sounds like something that is bothering Rosalyn about Nicky and Trust as you stated, and I am politely asking you for comments and explanations on the 5 questions, instead of a legal statement that is not answering my questions. Are you refusing to answer my questions, which there should be no reason for not to answer my questions? Why would you not answer my simple questions? As Rosalyn's father and the one paying for your services, it is only fair that you answer my questions. By not answering my question it is not building Trust with me, that you are looking out for Rosalyn's best interest. You mentioned my daughter does not have trust in you and others. Can you explain? Please provide the requested information and comments to the 5 questions I asked for. If it is your final answer that you are not going to answer, then I will not ask again.

From: Leslie Armstrong <leslie@armstronglawllc.com>

Sent: Saturday, October 24, 2020 4:58 PM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Cc: Sharon Lovette <sharonlovette06@gmail.com>

Subject: Re: Rosalyn

Carlton,

Please understand that I am here to help Rosalyn and that I am happy to provide feedback when I believe it may be helpful to her. In this instance, I believe I have responded to your inquiries to the extent that would serve her interests.

On Sat, Oct 24, 2020 at 4:43 PM Carlton Walker <lcarltonwalker@hotmail.com> wrote:

Okay and I am asking for you to comment and answer my questions. Can you not answer my questions and concerns about my daughter? Are you refusing to answer my questions? I know you stated you did not comment. I am kindly asking for you to clarify your statements. Please answer my 5 questions, I am kindly asking and believe they are fair questions to ask and especially what is the Nicky situation you stated?

From: Leslie Armstrong <leslie@armstronglawllc.com>

Sent: Saturday, October 24, 2020 4:38 PM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Cc: Sharon Lovette <sharonlovette06@gmail.com>

Subject: Re: Rosalyn

Carlton,

As I mentioned in my previous email just now, I did not comment on my impressions.

On Sat, Oct 24, 2020 at 4:31 PM Carlton Walker <lcarltonwalker@hotmail.com> wrote:
Can you answer the 4 questions I asked?

From: Leslie Armstrong <leslie@armstronglawllc.com>
Sent: Saturday, October 24, 2020 4:29 PM
To: Carlton Walker <lcarltonwalker@hotmail.com>; Sharon Lovette <sharonlovette06@gmail.com>
Subject: Re: Rosalyn

Carlton,

As it appears it may have been unclear, I did not comment on my impressions in my previous email. I hope this helps.

On Sat, Oct 24, 2020 at 11:47 AM Carlton Walker <lcarltonwalker@hotmail.com> wrote:
Leslie,

Can I ask you 4 questions, and can you answer each question? . . .
*What gives you the impression she does not trust you?

*Then, what gives you the impression that she does not trust Sharon?

*What gives you the impression she does not trust Mrs Davidson?

*What makes you think that Rosalyn is getting the impression that she is not loved by both parents? Please be specific so I can address this with Dr. Alexander. If there is anything, I can do on my end I will do it.

Mrs. Davidson has reported to Sharon each time there was something that Rosalyn was concerned about as far as I am aware. I think Rosalyn's issues are that she wants you and Sharon to consider her wishes when they are appropriate and advocate for her best interest when she has issues and I believe she wants the same from Sharon.

Dr. Alexander considered Rosalyn's wishes to be appropriate and stated so in an affidavit that was presented to the court. Dr. Alexander even hit the nail on the head about this behavior that happened this last week. He addressed it in his affidavit before everyone went against Rosalyn's wishes that were reasonable and ended her 2nd racing league.

There are 3 types of cars she drove and leagues she has been in.

#1.) Bandoleros=Ended because mother sent letters to all tracks.

#2.) K1 Speed = No more leaving early to attend the races so that means no more K1 Speed racing.

#3.) GoPro = Her mother will not switch with me to attend a full season. I have even offered to pay and have someone do everything for Rosalyn and Ashley, so they could have a mother Daughter Weekend at GoPro and Ashley ignored it. I don't know what else to do, so I decided to stop fighting for what Rosalyn wants.

If anyone had to answer the question of "What percentage of her racing has been taken away by her mother or the court?" The answer would be 81.1 % has been taken away and with only 19.9% left, I gave up until we can be heard at a normal 1- or 2-day hearing and not a 15-minute hearing.

The one thing I told Rosalyn last weekend is "**Racing does not come first Rosalyn.**" Rosalyn's reply completely shocked me. "**You are right daddy, but my happiness comes first, and I am not happy. I work hard and everything is taken away from me, so I am not working anymore.**" To Rosalyn her fun world has ended so to speak.

Let me be clear, in no way do I condone Rosalyn running away and acting the way she did with running away or making failing grades. Leslie asked you to help me explain this to Rosalyn before last weekend and you decided to wait until her normal appointment which was fine with me, but I wish you could have had an emergency appointment with her and helped me explain she would not be racing another league besides Bandoleros. I think maybe she would not have jumped off the deep end like she did, but who knows. We cannot look back but, in the future, please help me if I point out something, I need help with. I had a bad feeling letting me explain it was not going to be good or go over very well.

Also, as far as this past weekend Rosalyn changed her attitude once I told her no more K1 Speed and we were going to stop racing since she can only do 19% of her racing. She was despondent towards me and stayed in her room most of the weekend and would not sit out in the living room with me like normal. There was a huge change in her behavior, and I was a little concerned.

Please let Rosalyn know that there is no concern about my emotional wellbeing, I am an adult and handle my business with Dr. Alexander weekly and bi-weekly. I was concerned about Rosalyn because of her drastic change in the always happy kid I know. We also went to the storage unit to get some things for making signs for my friend and that is where her GoPro go kart "Katie Corners" and her Bandolero "Racey" is stored right now. She just went and sat next to "Racey" on a bucket and sobbed the whole time while I was getting the materials I needed. It was very sad knowing that she has made excellent grades all last year and attended all the K1 Speed races last year for 4th grade and these activities she loves were taken away from her. In the car ride back to my house from the storage unit, she would not answer any questions from me and she continued to have tears and just look out the window and when we arrived home she went to her room and like I said did not want to do anything.

I do know that Rosalyn feels like she cannot express her true feelings to her mother because Sharon has instructed Rosalyn not to talk to her mother about her racing. I am not understanding this. If Rosalyn did another sport for over 3 years, why would a child be instructed not to discuss the sport with one parent?

Anyway, once again I agree with your statement below. I hope you have a great weekend Leslie.

Sincerely,
Carlton

From: Leslie Armstrong <leslie@armstronglawllc.com>
Sent: Saturday, October 24, 2020 8:57 AM
To: Carlton Walker <carltonwalker@hotmail.com>; Sharon Lovette <sharonlovette06@gmail.com>
Cc: Rosalyn Walker <samcadams@gmail.com>
Subject: Re: Rosalyn

Good morning Carlton and Ashley,

As additional feedback I would note that it is important for Rosalyn to be able to feel that she is loved by both parents and that she is free to love and enjoy you both as well. It is also important for her to understand that she can trust the other adults involved in this case and in her life including (but not necessarily limited to) Sharon Lovette, Kim Davidson, and me to look out for her best interests and that she does not have to worry about adult issues, but that the adults in her life are capable of handling them.

On Thu, Oct 22, 2020 at 1:27 PM Carlton Walker <carltonwalker@hotmail.com> wrote:
Leslie:

Thank you for everything you've done. I wanted to take a day or two to absorb what happened this week before following with your recommendations. I also wanted to consult with my counselor but he's unavailable due to family sickness. Other than keeping an eye on Rosalyn and physically ensuring she makes it to school, and we are there to pick her up as soon as she leaves, do you have any other recommendations on this point? I'm conflicted on how to address how Rosalyn feels. On one hand, I want her to enjoy something she loves doing, but on the other, her mother and I or the Court will make the ultimate decision and whatever is decided, she can't run away, refuse to do her schoolwork, or do other things that hurt her. I feel like the right thing to do is reinforce no racing for now and her mother and I can reevaluate after Christmas. That gives a definite line where there's no point in discussing it for the rest of the year, but maybe given behavior changes, we can next year. Do you have any specific thoughts on this point?

Rosalyn hasn't specifically ever asked me about missing school for counseling but not racing, but if she did, I guess I would say that counseling is something everyone agreed she should do and racing isn't and that's the difference. If you are a kid, sometimes you have to do what adults say even if you don't agree with it. Rosalyn hasn't specifically asked me about grades either, but if she does, I guess I would say life can throw us curve balls, but your education is something than can't be taken away and it's very important. A baseball player could blow out an arm mid-season, a surfer could lose a leg, there's a lot of ways our plans today might not work out and good grades are valuable regardless of other things we do, not something of value only because of racing. Regardless of what activities she participates in, I'd want her to be successful at school.

I don't know what to do about Rosalyn's knowledge of the conflict, at least not while our case is pending. I'm the only one who takes her to races, she knows her Mom is against it. I assume the break will give her some time to destress on this point and long-term, I assume if the judge decides she can't race, that will end the discussion on my end and if a judge decides she can, Ashley will respect that as well. Do you have any recommendations on this point, other than time resolving it? As far as Rosalyn being worried about me, I haven't addressed it yet because I haven't spoken with her on the phone since Monday night and by email since she ran away and we got her back, but I would just tell her that I love her and I'll be ok as long as she's ok, no matter what happens with racing. My immediate goal is no running away and her knowing she is loved and doing well in school.

I share your concerns and above are my thoughts on how to address. I'm open to any additional thoughts you have. I've never been more scared than when Rosalyn refused to tell me where she was. I followed the police every word and action, at first, they told me to tell her she was not in trouble. That did not work. She continued email communication about every minute until finally I told her she would never race again if she did not tell us where she was. Then it was the longest 10 minutes of my life until finally she replied where she was. As to reasonable consequences for running away, I'm ok with just reinforcing that racing is done this year. Since that was the theme of your report, I don't know what else we could take away that would matter more to her. I've cc'd Ashley as I'm open to her thoughts as well. For some unknown reason Ashley's email is coming up as Rosalyn Walker now. Anyway let me know your thoughts.

Sincerely,
Carlton

Ex 11

Fw: Dr. Alexander Rosalyn Walker: Synopsis from Emergency Session 10/20/2020

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 8:48 PM

To: Helen Walker <gammywalker47@gmail.com>; jay68walker@aol.com <jay68walker@aol.com>

✉ 15 attachments (1 MB)

Dream big.jpg; room.jpg; ak 22.jpg; Ballet Racer.jpg; Homework 10.jpg; accom 32.jpg; accom 38.jpg; accom 34.jpg; daddy.jpg; K1 Speed Record 9 19 20.jpg; rr 15.jpg; rr 21.jpg; Noah 3.jpg; rr 110.jpg; safety.jpg;

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 8:47 PM
To: William S. Hammett III <whammett@cdhlf.com>; true heart Counseling <trueheartcounseling@gmail.com>
Subject: Dr. Alexander Rosalyn Walker: Synopsis from Emergency Session 10/20/2020

I highlighted my comments below.

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 8:09 PM
To: true heart Counseling <trueheartcounseling@gmail.com>
Subject: Dr. Alexander Rosalyn Walker: Synopsis from Emergency Session 10/20/2020

Here is the report from my child running away

From: Sharon Lovette <sharonlovette06@gmail.com>
Date: Tuesday, October 20, 2020 at 5:32 PM
To: Bill Hopkins <bill@hopkinsfirm.com>, Ervin Blanks <lindsay@blankslawfirm.com>, "William S. Hammett III" <whammett@cdhlfawfirm.com>
Subject: Fwd: Rosalyn Walker: Synopsis from Emergency Session 10/20/2020

[THIS MESSAGE IS FROM AN EXTERNAL SOURCE]

See synopsis from Leslie Armstrong.

Please contact me if you have any questions.

Regards,

Sharon Lovette
Guardian ad Litem
P.O. Box 2282
Summerville, SC 29484
843-806-9078

----- Forwarded message -----

From: Leslie Armstrong <leslie@armstronglawllc.com>

Date: Tue, Oct 20, 2020, 5:19 PM

Subject: Rosalyn Walker: Synopsis from Emergency Session 10/20/2020

To: Sharon Lovette <sharonlovette06@gmail.com>

Sharon,

Below is a synopsis of today's emergency session with Rosalyn. The session concluded with Rosalyn's agreement that she would not run away from school again tomorrow, but I would still recommend that additional precautions be taken to ensure her safety when she returns to school going forward. Ashley needs to drop her off at the front where the teachers take her temperature and see the kids walk into the building and no more dropping Rosalyn off on the street by the school.

Rosalyn indicated that she ran away because she is no longer allowed to race any type of car at any track at all. She reported that Dad told her cannot race anymore at all and that she believes Mom and Ms. Sharon are against her being able to race at all.

2 out of 3 types of cars have been taken away from mom. Bandoleros and now K1 Speed league because we cannot leave early to make the league events anymore. Mom does not switch for GoPro the third type of car. Pretty much all is gone.

She reported that she does not understand why she can miss school to come to counseling but that she cannot miss school to attend racing. Rosalyn has a great point because the original appointment for today was for 4 pm and they changed it and took her out of school early when she could have showed up at 4pm and did her appointment. The kid has a great point. I was supposed to take her today at 4pm and they changed it and had mom take her instead of me. I believe if I had these kinds of things said against me like poisoning her, hell would have frozen before I would have been allowed to pick her up.

She reported that there is no reason to attend school or to get good grades if she cannot race. I cannot disagree with her because she was making excellent grades and got racing taken away for doing good in school. What is the reward to make good grades now for her?

She reported experiencing distress because she is aware of parental conflict which feels like it is her fault because it is about racing. All we are asking for is to participate in her activity that she has done for 3 years 4 months and now it is gone. Since day one mother has not once seen her race in person and she has 230 wins racing. Mother still does not have a good reason.

She reported being worried about Dad because he has "not been himself lately," since telling her she cannot race at all anymore. Sure, I was upset because I saw how she became despondent and crying and not wanting to do anything. She stopped hanging out with me in the living room and stayed in her room.

When further queried as to why she believes she can not race anymore, she reported as part of that discussion that Dad told her he was "done fighting with" Mom and with Ms. Sharon. TRUE

She reported that she believes that a parent who loves his/her child would let their child race. She reported that she knows this because other children's parents allow them to play soccer and that more people die playing soccer than die racing. She could not initially explain how she knows this, and ultimately indicated that she knows this because of a discussion with Dad. Yes, back when she started racing her bandolero in 2018 we researched the safety aspects of racing bandoleros and other sports before we bought a car.

She reported that she was crying today and that a person she did not know asked her why she was crying. She reported that Mom told the person she was upset because she wanted to be a racecar driver and that she perceived this comment as Mom making fun of her. NOT THE FIRST TIME MOTHER HAS MADE FUN OF HER

RACING AND WEARING RACING SHIRTS. I CAN SEE HOW SHE TOOK THIS AS HER MOTHER MAKING IT OUT LIKE WHO CARES SHE WANTS TO BE A RACECAR DRIVER. WHEN ROSALYN HAS NASCAR ROYALTY HELPING HER AT THE TRACK. Rosalyn can see her path and all she must do is follow her art teacher's niece Isabella Robusto and she will make it to NASCAR.

She reported she did not think that Ms. Sharon and I had talked about her reports about Nicky. She could not explain why she thought this to be the case. They did not talk to each other at first and what is the full report about the friend Nicky? We need to know.

She reported that she believes her Mother has poisoned her again because she had a stomach ache and a headache again recently even though she had eaten dinner the night before. This is the second time being reported also the school guidance counselor reported the same thing about 2 weeks ago and Sharon did nothing.

I am concerned about Rosalyn's perception of events at this time and her belief that she can run away from school in order to coerce adults into conforming to her wishes. I am further concerned that she appeared unable to provide a rational explanation for several of her reported beliefs, her apparent concern with adult issues, and that she appears to feel responsible for her parents' conflict about racing and for father's emotional wellbeing. Leslie had to throw in about my well-being but not the mom's?

Regarding school attendance, I believe it will be critical at this time for both parents to ensure that they are implementing appropriate consequences for the behavior today and to make it clear that this is not an appropriate avenue to attempt to have her needs met going forward. I also recommend both parents ensure she understands the importance of school, independent of racing. Well her dream is to be a motorsports engineer with her friend going to Clemson. If you take away her passion that was supported by her teachers and principle and classmates and it is taken away because it has been restricted until she cannot complete then what reason does she feel she has a passion to study when it was taken away? You have to have goals to reach for or a carrot out in front to get and when it is taken away what do you do? Soccer scholarship or baseball scholarship or a racing scholarship to Clemson's Motorsports Engineering program so what do you do to motivate her to study again when they are talking about the 3 laws of motion that remind her of racing everyday in school.

--
Thank you,

Leslie A. Armstrong, Esquire
Armstrong Family Law, LLC
27 Gamecock Avenue Suite 202
Charleston, South Carolina 29407
(843) 670-3577
leslie@armstrongfamilylawllc.com

Please note that Armstrong Family Law is practicing social distancing in accordance with the recommendations of the CDC and SC DHEC. This means we are limiting face-to-face interaction in the following ways:

- Beginning March 23, 2020, client meetings will take place by telephone.
- Documents that need to be delivered should be sent electronically or placed in the mailbox outside the front door of the office suite.
- If you must come in the office to prepare for a hearing, we will make special accommodations in advance.
- If you need to schedule an appointment, a special accommodation, or have any questions, please call (843) 670-3577 for further information.

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Ex 11

Fwd: Walker v McAdams

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 3:51 PM

To: William S. Hammett III <whammett@cdhlf.com>

I don't understand this logic. I am very concerned and want to see Rosalyn today.

[Get Outlook for Android](#)

From: Sharon Lovette <sharonlovette06@gmail.com>

Sent: Tuesday, October 20, 2020, 11:50 AM

To: Carlton Walker; Ashley McAdams; Bill Hopkins; Ervin Blanks; William Hammett; Leslie Armstrong

Subject: Walker v McAdams

Rosalyn is going to be seen at 2:30 pm today by Ms. Armstrong. Carltons mother was scheduled to transport Rosalyn for the original 4:00 pm appointment. Given the events of today, I believe that Ashley should transport Rosalyn to the session and be available to participate if needed by Ms. Armstrong.

I am also attending. Ashley has agreed to transport Rosalyn to the session.

Please contact me if you have any questions.

Sharon Lovette
Guardian ad Litem
P.O. Box 2282
Summerville, SC 29484
843-806-9078

True Heart Counseling Services Intake & Diagnostic Evaluation

Ex/3

Client Information

Client Name:	<u>Sylvia McAdams</u>	<u>Social Security#</u>	XXX-XX-9345
Race:	<u>White</u>	Gender:	<u>Female</u>
		Date of Birth:	<u>11-22-83</u>
			Race:
			<u>White</u>

What is the Client's Presenting Problem:

Ms. McAdams is a 36-year-old White Female who reported to True Heart Counseling Services with no visual physical limitations, mental distress, or reported acute mental illnesses that would interfere with her ability to complete this assessment. Ms. McAdams was referred by the GAL for a Mental Status evaluation. Client reported that she was voluntarily hospitalized at MUSC for 5 days in March 2019 due to being overwhelmed by job demands combined with legal issues related to custody of her daughter. Client describes the custody situation and related legal proceedings as ongoing since the birth of her daughter. Ms. McAdams reported that MUSC diagnosed her with Bipolar Disorder I and recommended that she follow up with Berkeley Community Mental Health. Client stated Berkeley Community Mental Health determined that she did not have a diagnosis of Bipolar Disorder. BCMH further recommended that she follow up with her primary doctor for any medication management for symptoms of ADHD and Anxiety. While Client reported a diagnosis of ADHD and Anxiety which is being treated medically, this would not interfere with her ability to be successful in this program and follow all recommendations.

List the Justification for Treatment – (Only Highlighted / Checked Items Apply)

<input type="checkbox"/> 295.30 Schizophrenia, Paranoid Type	<input type="checkbox"/> 307.23 Tourette's Disorder	<input type="checkbox"/> 313.90 Emotional Disorder
<input type="checkbox"/> 295.70 Schizoaffective Disorder	<input type="checkbox"/> 307.50 Eating Disorder	<input type="checkbox"/> 313.90 Emotional Disorder Unspecified
<input type="checkbox"/> 296.2x Major Depressive Disorder, Single Episode	<input type="checkbox"/> 307.51 Bulimia	<input checked="" type="checkbox"/> 314.00 Attention Deficit Disorder inattentive
<input type="checkbox"/> 296.3x Major Depressive Disorder, Recurrent	<input type="checkbox"/> 309.0 Adjustment Disorder with Depressed Mood	<input type="checkbox"/> 314.01 Attention Deficit Disorder with Hyperactivity
<input checked="" type="checkbox"/> 296.7 Bipolar I Disorder (not currently present)	<input type="checkbox"/> 309.21 Separation Anxiety Disorder	<input type="checkbox"/> 315.00 Reading Disorders
<input type="checkbox"/> 296.80 Bipolar NOS	<input type="checkbox"/> 309.24 Adjustment Disorder with Anxiety	<input type="checkbox"/> 799.9 Condition Deferred on Axis I
<input type="checkbox"/> 296.90 Mood Disorder NOS	<input type="checkbox"/> 309.28 Adjustment d/o mixed anxiety and depression	<input type="checkbox"/> V62.5 Problems Related To Release From Prison
<input type="checkbox"/> 298.9 Psychotic Disorder Not Otherwise Specified	<input type="checkbox"/> 309.3 Adjustment Disorder with Disturbance of Conduct	<input type="checkbox"/> 315.9 Learning Disorder NOS
<input type="checkbox"/> 299.00 Autism (cannot be primary)	<input type="checkbox"/> 309.4 Adjustment Disorder with Mixed Disturbance	<input type="checkbox"/> V61.1 Partner Relational Problems
<input type="checkbox"/> 299.80 Asperger's Syndrome (cannot be primary)	<input type="checkbox"/> 309.81 Post-Traumatic Stress Disorder	<input type="checkbox"/> V61.20 Parent-Child Relational Problems
<input type="checkbox"/> 299.80 Pervasive Developmental Disorder NOS	<input type="checkbox"/> 309.9 Adjustment Disorder Unspecified	<input type="checkbox"/> V61.21 Neglect of Child
<input checked="" type="checkbox"/> 300.00 Anxiety Disorder NOS	<input type="checkbox"/> 311 Depressive Disorder NOS	<input type="checkbox"/> V61.21 Physical Abuse of Child

<input type="checkbox"/> 300.3 Obsessive-Compulsive Disorder	<input type="checkbox"/> 311 Mild Depression	<input type="checkbox"/> V61.21 Sexual Abuse of Child
<input type="checkbox"/> 312.0 Anger Reaction / Aggressive Outburst	<input type="checkbox"/> 312.22 Conduct Disorder	<input type="checkbox"/> V61.8 Sibling Relational
<input type="checkbox"/> 300.02 Generalized Anxiety Disorder	<input type="checkbox"/> 312.34 Intermittent Explosive Disorder	<input type="checkbox"/> 304.20 Cocaine Use Disorder- Severe
<input type="checkbox"/> 301.83 Borderline Personality Disorder	<input type="checkbox"/> 312.9 Disruptive Behavior Disorder NOS	<input type="checkbox"/> 305.60 Cocaine Use Disorder- Mild
<input type="checkbox"/> 305.20 Cannabis Use Disorder-Mild	<input type="checkbox"/> 305.10 Nicotine Dependence	<input checked="" type="checkbox"/> V62.89 Phase Of Life Problems
<input type="checkbox"/> 304.30 Cannabis Use Disorder-Severe	<input type="checkbox"/> 313.81 Oppositional Defiant Disorder	<input type="checkbox"/> V62.81 Relational Problem NOS
<input type="checkbox"/> 304.00 Opioid Dependence	<input type="checkbox"/> 296.99 Disruptive Mood Dysregulation Disorder	<input type="checkbox"/> V62.82 Bereavement
<input type="checkbox"/> 305.50 Opioid Abuse	<input type="checkbox"/> 313.89 Reactive Attachment Disorder	<input type="checkbox"/> 301.82 Avoidant personality Disorder
<input type="checkbox"/> 303.90 Alcohol Use Disorder-Severe		
<input type="checkbox"/> 305.70 Amphetamine Use Disorder- Mild	<input type="checkbox"/> 305.00 Alcohol Use Disorder-Mild	<input type="checkbox"/> Z65.80 Other Problems Related To Psychosocial Circumstances
<input type="checkbox"/> Z56.00 Stress Related To Employment or Unemployment	<input type="checkbox"/> 304.40 Amphetamine Use Disorder- Severe	<input type="checkbox"/> 312.30 Impulse Control Disorder
<input type="checkbox"/> Z63.79 Other Stressful Life Events Effecting Family & Household	<input type="checkbox"/> Z73.3 Stress Reaction Mental NEC	<input checked="" type="checkbox"/> Z65.3 Problems Related To Other Legal Circumstances
<input type="checkbox"/> Z65.90 Problems Related To Unspecified Psychosocial Circumstances		

Clinical Profile:

Client is a 36-year-old White Female who was oriented x3 and showed no signs of perceptual disturbances. Client support group includes her stepmother and some friends in the area. Ms. McAdams has a 10-year-old daughter of whom she shares custody with the child's father. Ms. McAdams reports that she has a B.S. degree and she presented with no comprehension difficulties during this evaluation. Client reported being currently employed at an area company in pre-sales since September of 2019. Ms. McAdams stated that the significant stress and overwhelming demands she experienced in her previous job and the ongoing legal issues related to the custody of her daughter contributed to a voluntary hospitalization at MUSC in March 2019. Client describes the custody situation as ongoing since the birth of her daughter. Client reported that she spent 5 days inpatient at MUSC and left prior to being discharged but specifically stated that this was not Against Medical Advice. Ms. McAdams reported that MUSC diagnosed her with Bipolar Disorder I but was recommended to follow up with Berkeley Community Mental Health (BCMH). Client stated that she was evaluated by BCMH and determined that she did not have a diagnosis of Bipolar Disorder. She further stated that BCMH recommended that she follow up with her primary doctor for any medication management for symptoms of ADHD and Anxiety.

Ms. McAdams denies any past or present drug use. Relative to legal history, Client stated that 9 years ago that she was charged with DV-Third degree which was dropped to Assault and Battery and latter expunged from her record. Client stated that she was leaving the home of her daughter's father and she overheard him having a conversation over the phone with a perspective nanny about their problems. Client stated that when she heard this conversation that she slapped him and broke his glasses. She stated that her daughter's father had a video camera set up in the home unbeknowest to the client. He called the police and showed the police the video. She was arrested and charged. She reported that she went through classes (parenting, co-parenting, and anger management).

. Client Participation: Active; Mood: Compliant; Affect: bright; Behavior: Cooperative; Physical Aggression: None; Verbal Aggression: None. Client denied past or present suicidal or homicidal ideations or attempts.

Master Problem List Consist Of:

- 1). Errors In Thinking
- 2). High Risk Behaviors
- 3). Anxiety, ADHD
- 4). Problems Related To Other Legal Circumstances
- 5). Phase of Life Problems
- 6). Co-Parenting

Drug Of Choice History: N/A **Last used:** N/A **Drug Test:** Negative **Test Date:** 2-8-2020
Reported Medication: Zoloft, Adderall **Medical / Health Issues:** ADHD, Anxiety

GAF Currently -75 = Impairments are center around thinking, judgment, insight and decision making. Generally satisfied with life, but problems or concerns are centered around not having custody of her children.

Ms. McAdams reported to our office to be evaluated or assessed for the following service(s): (Check all that apply)

CDV Anger Mgmt. Victim Services Drug & Alcohol High Risk Behaviors Parenting

Other (For other explain: Biopsychosocial/Mental Status).

Client was referred by: DSS Probation & Parole PTI Family Court Public Defender

Vocational Rehabilitation DOT EAP Self-Referral Another (For other explain: _____).

- Is client being referred as a result of a failed drug test? Yes (or) No .
- Is client currently receiving counseling services at any other agency? Yes (or) No . If yes, for what service _____
- Does client have a CDV or anger mgmt. history? Yes (or) No . If yes, specify Client reported a DV-3rd charge 9 years ago which she reported being dropped to Assault & Battery but later expunged.
- Has client received any substance abuse treatment in the past? Yes (or) No . If yes, specify:
- Client has a history of: (Check all that apply) Marijuana Cocaine Opiates Meth
 Prescription Drug Alcohol BZO's Heroin N/A
- Does client have a child(ren)? Yes (or) No . If yes, what are the age's 10 years old
- Was the child(ren) present at the time of the incident? Yes No (or) N/A
- What are the allegations? Client reported that she was referred for mental status evaluation by the Guardian ad Litem. She reported that this request may have stemmed from concerns with a voluntary 5-day hospitalization at MUSC due to stress and as the client describes "not feeling like myself."
- Have the child(ren) been removed from the home? Yes No (or) N/A

Comments:

Client stressors are centered around the custody issues surrounding her 9-year-old daughter. Client reported on-going legal proceedings since the birth her daughter and further reports that this is the basis of a great deal of her anxiety and mental stress. Client reported MUSC provided a diagnosis of Bipolar Disorder. However, client states that Berkeley Community Mental Health that did not diagnose her with Bipolar Disorder, that she was not in need of counseling support and that any medications for anxiety and ADHD could be addressed through her primary physician. Client reported that she and her daughter's father do not agree on certain issues in parenting relative to his alleged desire for her to be a race car driver of which he allegedly takes her out of school to go to Charlotte, NC to race.

TRUE HEART COUNSELING LLC
BIO-PSYCHOSOCIAL / MENTAL STATUS EVALUATION

CLIENT NAME: Sylvia McAdams	SS#: XXX-XX- 9345	DOB: 11-22-83
Referral Source: Family Court- GAL	Attn: Sharon Lovette	

Notation Symbols To Use:

ND = No Data and cannot be inferred
 HX = History: Described But Not Demonstrated

NP = Not Present
 S or O = Slight or Occasional
 M or R = Marked or Repeated

		NP	S	O	M	R
APPEARANCE	1. Physically Unkempt, Unclean	X				
	2. Clothing disheveled, dirty	X				
	3. Unusual physical characteristic	X				
	4. Unusual or bizarre clothing	X				

Comments Re: Appearance —Client's appearance was neat and clean. She reported to this appointment wearing professional attire. Ms. McAdams was attentive, alert and fully oriented during this assessment. She presented with no significant discomfort or significant mental distress that would have adversely impacted her ability to complete this assessment.

Posture						
	5. Slumped	X				
	6. Rigid, tense	X				
	7. Inappropriate	X				
	8. Anxiety, fear, apprehension		X			
Mood						
	9. Pleasant, cooperative.				X	
	10. Angry, hostility, rage, irritable		X			
	11. Perplexed, anxious, apprehension			X		
	12. Depressed, sadness, detached		X			
Affect						
	13. Bright, cheerful		X			
	14. Constricted, blunted, flat		X			
	15. Fluctuating,			X		

Comments Re: Affect/Mood — Overall, Ms. McAdams was cooperative with this examiner; however, there were times when her mood appeared flat. While she reported that her mood is typically bright, she did reveal experiencing sleep difficulties. Client reported experiencing mild levels of anxiety which manifest in chronic anxious feelings. Ms. McAdams reports at times feeling tense and feeling "wound up". She reported some difficulty with being able to sit down and relax easily. Currently, Ms. McAdams is reporting that her anxiety is directly related to the legal issues related to the custody of her 9 year old daughter with her daughter's father.

BEHAVIOR						
General Movements	16. Accelerated, increased speed,	X				
	17. Decreased, slowed	X				
	18. Non-Verbal gestures	X				
	19. Restless, fidgety		X			
	20. Sexually inappropriate gestures	X				
Quality Of Speech	21. Voice, tone, rhythm, slurring	X				
	22. Increased, loud	X				
	23. Decreased, slowed	X				

CLIENT NAME: Sylvia McAdams	SS#: XXX-XX- 9345	DOB: 11-22-83
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Behavior	24. Compliant		X		
	25. Disruptive, defiant, uncooperative	X			
	26. Silent, absent	X			
Physical Episodes	27. Touching, property damage	X			
	28. Pushing, horse playing	X			
	29. Self-harm	X			
	30. Fighting, harming others	X			
Verbal Episodes	31. Cursing, sexual improprieties	X			
	32. Threats	X			
	33. Instigating, antagonizing, disrespectful	X			

Comments Re: Behavior – Throughout this evaluation, Ms. McAdams reported a few instances of poor decision making and errors in thinking. During this assessment, Ms. McAdams was compliant and answered all questions without hesitation. She did not present with difficulty with memory recall. Client was able to recognize past high-risk behaviors and errors in thinking in a previous workplace resulting from a stressful work environment. She acknowledged not “feeling like myself” resulting in being voluntarily admitted to MUSC. Ms. McAdams reported frequently having to deal with legal issues related to custody of her 10-year-old daughter. She reported that having dealt with these issues throughout her daughter’s life and revealed feeling that this is a source of her stress and anxiety.

THINKING					
Perceptual Disturbances	34. Illusions,	X			
	35. Auditory hallucinations	X			
	36. Visual hallucinations	X			
	37. Other:	X			
Comments Re: Perception	No Perceptual Disturbances reported or suspected. *Potential for Suicide / Self Harm: (Low Risk) – Client denied any past or present suicidal ideations or instances of self-harm. She denies any past or present diagnoses of depression. * Potential for Assault/Violence: (Medium Risk) –Client reported a history of stress management and some verbal aggression; however, signs of aggression are not present at this time. (See counseling recommendations)				
Intellectual Functioning	38. Impaired level of consciousness	X			
	39. Impaired attention span / concentration	X			
	40. Impaired abstract thinking	X			
Orientation	41. Disoriented to Person, Place or Time	X			
Insight	42. Difficulties in acknowledging the presence of psychological problems	X			
	43. Mostly blames others or circumstances for problems		X		
Judgment	44. Impaired ability to manage daily living Activities		X		
	45. Impaired ability to make reasonable like decision		X		
Memory	46. Impaired immediate recall	X			
	47. Impaired recent memory	X			
	48. Impaired remote memory	X			

CLIENT NAME: Sylvia McAdams		SS#: XXX-XX- 9345	DOB: 2-8-2020																																																																									
<table border="1"> <tr> <td>Thought Content</td> <td>49. Obsessions, Compulsions, Phobias</td> <td>X</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>50. Suicidal Ideations</td> <td>X</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>51. Homicidal Ideations</td> <td>X</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>52. Delusions</td> <td>X</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>53. Drug Induced Disturbances</td> <td>X</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Comments Re: Thinking</td> <td colspan="5"> <ul style="list-style-type: none"> * Thought Process: No Impairments * Thought Content: No Impairments * Judgment: Slight Impairment * Thinking: Slight Impairment regarding errors in thinking and not recognizing high risk situations. * Insight: Slight Impairment regarding insight into impact of anxiety. </td> </tr> <tr> <td colspan="2"> Interview/Test Results: (If applicable) <i>(Scores Are Out Of A Possible 100%)</i> Client's scores on the Mental Health Screening Form-III revealed moderate impairments. Her response pattern on the Adult Wellbeing scale and Promis Emotional Distress-Short form, revealed elevations on the anxiety scale. She has a current diagnosis of anxiety and ADHD. Her scores on the Promis Emotional Distress-Short Form also support normal limits in the area of depression. Her performance on the Promis Emotional Distress-Anger-Short form also suggest normal levels of anger. Clients scores indicate mild impairments in thinking, judgment, and decision making. She has the physical and mental ability to provide good parenting. While her scores on scales of anger are within normal limits, per client interview there were some history of difficulties with stress past indicators of aggression but are not present today. </td> <td>1). Adult Well-Being</td> <td>Scored</td> <td colspan="2">Normal ranges- Depression, and Aggression Potential Problem- Anxiety.</td> </tr> <tr> <td colspan="2"></td> <td>2). PROMIS Emotional Distress-Short Form</td> <td>Scored</td> <td colspan="2">Depression, Anger- (None to slight) Anxiety-Mild</td> </tr> <tr> <td colspan="2"></td> <td>3) Parenting Sense of Competence Scale</td> <td>Scored</td> <td colspan="2">78%-Normal Limits</td> </tr> <tr> <td colspan="2"></td> <td>4) Mental Health Screening Form-III</td> <td>Scored</td> <td colspan="2">6-Moderate Impairments</td> </tr> <tr> <td colspan="2"> GAF: (Global Assessment Of Functioning) <u>Translation of Number:</u> Impairments are center around thinking, judgment, insight and decision making. Generally satisfied with life, but problems or concerns are centered around legal issues surrounding dealing with the father of her daughter. (Recommendations Noted) </td> <td>75</td> <td colspan="3"></td> </tr> <tr> <td colspan="6"> <u>Evaluation Summary and Recommendations</u> <p>Based on the Biopsychosocial Parenting Evaluation and presenting problems, it is recommended that Ms. McAdams attend 10 Sessions of Co-Parenting and 10 sessions of individual counseling. Individual counseling is needed to address mental stress directly related to moderate levels of anxiety and mental distress. In addition, individual counseling will include developing techniques for stress management, coping strategies, problem solving strategies, and identifying triggers for stress. Co-Parenting counseling will center around effective communication, problem-solving, compromise and negotiation to increase the ability to work together with her daughter's father at effective parenting strategies.</p> </td> </tr> </table>					Thought Content	49. Obsessions, Compulsions, Phobias	X					50. Suicidal Ideations	X					51. Homicidal Ideations	X					52. Delusions	X					53. Drug Induced Disturbances	X				Comments Re: Thinking	<ul style="list-style-type: none"> * Thought Process: No Impairments * Thought Content: No Impairments * Judgment: Slight Impairment * Thinking: Slight Impairment regarding errors in thinking and not recognizing high risk situations. * Insight: Slight Impairment regarding insight into impact of anxiety. 					Interview/Test Results: (If applicable) <i>(Scores Are Out Of A Possible 100%)</i> Client's scores on the Mental Health Screening Form-III revealed moderate impairments. Her response pattern on the Adult Wellbeing scale and Promis Emotional Distress-Short form, revealed elevations on the anxiety scale. She has a current diagnosis of anxiety and ADHD. Her scores on the Promis Emotional Distress-Short Form also support normal limits in the area of depression. Her performance on the Promis Emotional Distress-Anger-Short form also suggest normal levels of anger. Clients scores indicate mild impairments in thinking, judgment, and decision making. She has the physical and mental ability to provide good parenting. While her scores on scales of anger are within normal limits, per client interview there were some history of difficulties with stress past indicators of aggression but are not present today.		1). Adult Well-Being	Scored	Normal ranges- Depression, and Aggression Potential Problem- Anxiety.				2). PROMIS Emotional Distress-Short Form	Scored	Depression, Anger- (None to slight) Anxiety-Mild				3) Parenting Sense of Competence Scale	Scored	78%-Normal Limits				4) Mental Health Screening Form-III	Scored	6-Moderate Impairments		GAF: (Global Assessment Of Functioning) <u>Translation of Number:</u> Impairments are center around thinking, judgment, insight and decision making. Generally satisfied with life, but problems or concerns are centered around legal issues surrounding dealing with the father of her daughter. 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Client's response pattern on the on the Adult Wellbeing scale and Promis Emotional Distress-Short Form indicates that she is experiencing moderate levels anxiety of which she has a diagnosis and is being treated medically at this time. During the interview Ms. McAdams was forthcoming with information related to mental distress and difficulties with stress management and some past aggression. It should be noted that while she has demonstrated some past aggression, it is not present at this time. Due to recent events that lead to hospitalization in March of 2019, counseling will include developing techniques for stress management, coping strategies, and identifying triggers for stress. Counseling will also address being more proactive in situations instead of reactive.

Ms. McAdams was forthcoming about her hospitalization at MUSC and being diagnosed with Bipolar Disorder; however, during this assessment she was not presenting any symptoms of Bipolar Disorder. She further indicated that after being reevaluated by BCMH, she was diagnosed with ADHD and anxiety, not Bipolar Disorder. According to the records from MUSC, client was diagnosed with Bipolar Disorder however; she does not currently exhibit any signs or meet the criteria for Bipolar Disorder.

Relative to parenting, Ms. McAdams is reporting that both she and her daughter's father share in providing food, clothing, and shelter during the times that they have custody. Ms. McAdams reports feeling confident in her ability to parent her daughter. Overall, her status is in normal range and there are no safety concerns pertaining to the care, welfare, and security of her child. Ms. McAdams's mental status does not preclude her ability to comprehension or maintain behavioral stability. The results of the evaluation indicated that there were slight impairments in errors in thinking, judgement and insight impacted by anxiety. These symptoms may be magnified by stressors related to interactions and court proceedings with her daughter's father surrounding custody. Ms. McAdams did not display abnormalities of thought process or content; nor was there any disorganization of thought that was deemed questionable. Ms. McAdams did not present with any cognitive delays nor did he present with an impaired level of consciousness. She was oriented to time, place, person and situation. Ms. McAdams difficulties are impacted by her current situation. Client was given a witnessed drug test and tested negative for marijuana, opiates, meth, BZO's and cocaine.

Special Note:

Please be advised, that if additional evidence upon completion of this evaluation surfaces (i.e.) police reports, medical records, or other documentation indicating physical abuse, threat to harm, or child endangerment was initiated or caused by Ms. McAdams; Then he will have to be re-evaluated for additional recommendations based on new information and presenting problems.

Assessment Completed By: (Not Valid Without Signature)		
Print Name: Dr. Sherri B. Ashbee, Ph.D., LPES	Title: Licensed Psychoeducational Specialist	Date:
Signature: <i>Dr. Sherri B. Ashbee, Ph.D.</i>	Licensed Psychoeducational Specialist #4324	2-8-2020

South Carolina Legislature

Ex 14

met% found 4 times. 

H 4584

Session 114 (2001-2002)

H 4584 General Bill, By Easterday, Sinclair, Wilkins, Harrison, Govan, G.M. Smith, Altman, Kelley, Limehouse, McGee, Scarborough and J.E. Smith

Similar(S 322)

A BILL TO AMEND THE CODE OF LAWS OF SOUTH CAROLINA, 1976, RELATING TO SPECIAL VISITATION PROVISIONS, BY ADDING SECTIONS 20-7-1545, 20-7-1547, 20-7-1549, 20-7-1551, 20-7-1553, AND 20-7-1555 SO AS TO ENACT THE "SOUTH CAROLINA PRIVATE GUARDIAN AD LITEM REFORM ACT" TO ESTABLISH CRITERIA FOR APPOINTMENT OF A GUARDIAN AD LITEM IN A PRIVATE ACTION BEFORE THE FAMILY COURT, TO AUTHORIZE THE APPOINTMENT OF ATTORNEYS AND NONATTORNEYS AND TO ESTABLISH CONTINUING EDUCATION REQUIREMENTS AS A PREREQUISITE TO APPOINTMENT AS A GUARDIAN AD LITEM, TO AUTHORIZE THE APPOINTMENT OF AN ATTORNEY FOR A GUARDIAN AD LITEM, TO PROVIDE FOR THE RESPONSIBILITIES AND DUTIES OF A GUARDIAN AD LITEM, TO REQUIRE THE COURT TO ESTABLISH THE ~~METHOD~~ AND RATE OF COMPENSATION FOR A GUARDIAN AD LITEM, AND TO REQUIRE A GUARDIAN AD LITEM TO DISCLOSE ANY CONFLICTS OF INTEREST; TO REDESIGNATE SECTION 20-7-1555 AS SECTION 20-7-1525 AND SECTION 20-7-1557 AS SECTION 20-7-1535; TO RENAME SUBARTICLE 1, ARTICLE 11, CHAPTER 7, TITLE 20 AS "SPECIAL CUSTODY AND VISITATION PROVISIONS; AND TO RENAME SUBARTICLE 2, ARTICLE 11, CHAPTER 7, TITLE 20 AS "PRIVATE GUARDIANS AD LITEM".

01/24/02 House Introduced and read first time HJ-16

01/24/02 House Referred to Committee on Judiciary HJ-17

A BILL

TO AMEND THE CODE OF LAWS OF SOUTH CAROLINA, 1976, RELATING TO SPECIAL VISITATION PROVISIONS, BY ADDING SECTIONS 20-7-1545, 20-7-1547, 20-7-1549, 20-7-1551, 20-7-1553, AND 20-7-1555 SO AS TO ENACT THE "SOUTH CAROLINA PRIVATE GUARDIAN AD LITEM REFORM ACT" TO ESTABLISH CRITERIA FOR APPOINTMENT OF A GUARDIAN AD LITEM IN A PRIVATE ACTION BEFORE THE FAMILY COURT, TO AUTHORIZE THE APPOINTMENT OF ATTORNEYS AND NONATTORNEYS AND TO ESTABLISH CONTINUING EDUCATION REQUIREMENTS AS A PREREQUISITE TO APPOINTMENT AS A GUARDIAN AD LITEM, TO AUTHORIZE THE APPOINTMENT OF AN ATTORNEY FOR A GUARDIAN AD LITEM, TO PROVIDE FOR THE RESPONSIBILITIES AND DUTIES OF A GUARDIAN AD LITEM, TO REQUIRE THE COURT TO ESTABLISH THE ~~METHOD~~ AND RATE OF COMPENSATION FOR A GUARDIAN AD LITEM, AND TO REQUIRE A GUARDIAN AD LITEM TO DISCLOSE ANY CONFLICTS OF INTEREST; TO REDESIGNATE SECTION 20-7-1555 AS SECTION 20-7-1525 AND SECTION 20-7-1557 AS SECTION 20-7-1535; TO RENAME SUBARTICLE 1, ARTICLE 11, CHAPTER 7, TITLE 20 AS "SPECIAL CUSTODY AND VISITATION PROVISIONS; AND TO RENAME SUBARTICLE 2, ARTICLE 11, CHAPTER 7, TITLE 20 AS "PRIVATE GUARDIANS AD LITEM".

Be it enacted by the General Assembly of the State of South Carolina:

SECTION 1. This act may be cited as the "South Carolina Private Guardian Ad Litem Reform Act".

SECTION 2. Subarticle 2, Article 11, Chapter 7, Title 20 of the 1976 Code is amended by adding:

"Section 20-7-1545. (A) In a private action before the family court in which custody or visitation of a minor child is an issue, the court may appoint a guardian ad litem when it determines that:

- (1) without a guardian ad litem, the court will likely not be fully informed about the facts of the case;
- (2) there is a substantial dispute which necessitates a guardian ad litem; or
- (3) both parties consent to the appointment of a guardian ad litem who is approved by the court.

(B) A guardian ad litem appointed pursuant to this section may be removed by the court upon good cause shown.

Section 20-7-1547. (A) A person may not be appointed a guardian ad litem in a private action involving custody or visitation unless qualified pursuant to this section. The court may appoint an attorney or a nonattorney, qualified pursuant to this section, to be a guardian ad litem.

(B) An attorney must complete a minimum of six hours of family law continuing legal education in the areas of custody and visitation to be qualified to serve as a guardian ad litem. This requirement does not increase the total number of continuing legal education credits required annually of attorneys for licensure.

(C) A nonattorney must complete a minimum of nine hours of family law continuing legal or nonlegal education in the areas of custody and visitation and an additional three hours related to substantive law and procedure in family court to be qualified to serve as a guardian ad litem. A nonattorney also shall observe three contested custody merits hearings to be qualified to serve as a guardian ad litem. The continuing legal and nonlegal education courses provided to nonattorneys must be approved by the South Carolina Supreme Court Commission on Continuing Legal Education and Specialization.

(D) An attorney or a nonattorney guardian ad litem appointed pursuant to this section must complete, annually, the continuing legal and nonlegal education hours as required in subsections (B) and (C), respectively, in order to remain qualified to serve as a guardian ad litem.

(E) A person may not be appointed as a guardian ad litem pursuant to this section who has been convicted of any crime listed in Chapter 3 of Title 16, Offenses Against the Person, in Chapter 15 of Title 16, Offenses Against Morality and Decency, in Chapter 25 of Title 16, Criminal Domestic Violence, in Article 3 of Chapter 53 of Title 44, Narcotics and Controlled Substances, or for the crime of contributing to the delinquency of a minor, provided for in Section 16-17-490.

(F) A guardian ad litem, upon appointment, must provide an affidavit to the parties stating that the guardian ad litem has complied with the requirements of this section, including a statement that the person has not been convicted of a crime enumerated in subsection (E).

Section 20-7-1549. Upon its own motion or upon the motion of a party or the guardian ad litem, the court may appoint an attorney for the guardian ad litem. If the appointment is by consent order, the order must set forth the reasons for the appointment and establish a ~~method~~ and rate for compensating the attorney. *What are the reasons?*

Section 20-7-1551. (A) The responsibilities and duties of a guardian ad litem include, but are not limited to:

(1) representing the best interests of the child;

(2) conducting an independent, balanced, and impartial investigation to determine the facts relevant to the situation of the child and the family, which must include:

(a) reviewing relevant documents and records. The guardian ad litem shall have access to the child's school records and medical records. The guardian ad litem may petition the family court for the medical records of the parties;

(b) meeting with and observing the child in the home-setting and considering the wishes of the child, if appropriate; and *She has not considered the wishes with Nicky, racing and that Rosalyn does not want to live with her mom instead.*

(c) interviewing parents, caregivers, school officials, law enforcement, and others with knowledge relevant to the case. *try to prove*

(3) advocating for the child's best interests, including making clear, specific recommendations and referrals for evaluations, services, and treatment for the child and the child's family; however, if any recommendation or referral is for a psychiatric or psychological evaluation, service, or treatment, the recommendation or referral first must be presented to the court for approval; *Did this happen? For my evaluation?*

(4) attending all court hearings and providing accurate, current information directly to the court; and

(5) maintaining a complete file with notes rather than relying upon court files.

(B) A guardian ad litem also is responsible for presenting to the court and all other parties clear, comprehensive written reports including, but not limited to, a final written report regarding the child's best interests, which must include conclusions and recommendations and the facts upon which the reports are based. A final written report must be submitted to the court and all other parties no later than fifteen days before the merits hearing, unless the time frame is modified by the court. The final written report may not include a recommendation for awarding custody, and the guardian ad litem may not make recommendations concerning custody at the merits hearing unless requested by the court for reasons specifically set forth in the record. The written report must include the names of all persons interviewed by the guardian ad litem during the investigation and, if available, their addresses and telephone numbers.

Section 20-7-1553. (A) At the time of appointment, the family court judge shall set forth the method and rate of compensation for the guardian ad litem, who must submit a monthly itemized billing to include a statement of hours, expenses, costs, and fees to the parties and their attorneys. *HAVE RECEIVED*

(B) A party may petition the court to review the reasonableness of the fees and costs of the guardian ad litem and the attorney for the guardian ad litem at any time during the action.

(C) A guardian ad litem appointed by the court is entitled to reasonable compensation, subject to review and approval by the court. In determining the reasonableness of the fees and costs, the court shall take into account the complexity of the issues before the court, the contentiousness of the litigation, the time expended, the expenses reasonably incurred by the guardian ad litem and any other factors the court considers necessary.

Section 20-7-1555. A guardian ad litem appointed by the family court in a custody or visitation action must, upon notice of the appointment, provide written disclosure to each party:

(1) of the nature, duration, and extent of any relationship the guardian ad litem or any member of the guardian's immediate family residing in the guardian's household has with any party;

(2) of any interest adverse to any party or attorney which might cause the impartiality of the guardian ad litem to be challenged;

(3) any membership or participation in any organization related to child abuse, domestic violence, or drug and alcohol abuse."

SECTION 3. (A) Section 20-7-1555 of the 1976 Code is redesignated as Section 20-7-1525, and Section 20-7-1557 is redesignated Section 20-7-1535, both of which are to be placed within Subarticle 1, Article 11, Chapter 7, Title 20 of the 1976 Code.

(B) Subarticle 1, Article 11, Chapter 7, Title 20 of the 1976 Code is renamed "Special Custody and Visitation Provisions".

(C) Subarticle 2, Article 11, Chapter 7, Title 20 of the 1976 Code is renamed "Private Guardians ad Litem".

SECTION 4. This act takes effect July 1, 2002.

----XX----

Ex15

From: Sharon Lovette <sharonlovette06@gmail.com>
Date: Saturday, March 7, 2020 at 12:35 PM
To: "William S. Hammett III" <whammett@cdhlfarm.com>, Bill Hopkins <bill@hopkinsfirm.com>, Ashley Holland <aholland@cdhlfarm.com>
Subject: Walker -v- McAdams - Carlton Walker

[THIS MESSAGE IS FROM AN EXTERNAL SOURCE]

Will and Bill,

I have received notice from Carlton that he has changed therapists from Dr. Alexander to Kathleen Stringer and that he does not intend to go forward with the Mental Status Assessment facilitated by True Heart, that has been scheduled since January. This is confirmed as Dr. Stringer has been copied on text messages and emails from Carlton as well as she has contacted Will and I. I am not in agreement with the change in therapist or not going forward with the assessment and I have serious concerns about the current status of Carlton's mental health.

To provide background, I suggested Carlton see a therapist last year in approximately August/September. He indicated that he had not previously seen a therapist and asked that I make a referral and subsequently, was very aggressive at pursing this referral from me, although, I had informed him he could select his own therapist. After I referred Carlton to Dr. Alexander, there was significant delay in getting started and his first appointment was on October 17, 2019. Since that time I have numerous emails from Carlton in which he states how well his therapy is going and positive comments about Dr. Alexander. In December, 2019 Carlton rescinded authorization for Dr. Alexander to communicate with or provide me with his medical records. I brought this to Will's attention and he was able to encourage Carlton to sign necessary releases granting me access. Carlton continued in therapy with Dr. Alexander. Carlton also did not disclose to Dr. Alexander or I that he had previously been treated for mental health issues with Dr. Stringer until last week.

In January, I recommended and we agreed that both parties would submit to the Mental Status Assessment with True Heart Counseling and both parties were scheduled for the next available dates early in February. Ashley submitted to her assessment as scheduled and the results are pending. Carlton re-scheduled his appointment to March 5 based on cost issues and Dr. Alexander's request for a few more sessions prior to the assessment. Subsequently, there were emails where Carlton requested that Dr. Alexander facilitate his assessment and not Dr. Ashby as we previously agreed would facilitate both assessments. This issue went back and forth and Carlton appeared to believe that he could select who would facilitate the assessment. On March 5, Carlton made notification that he was switching therapists and not going forward with the assessment that was scheduled for the same day. This pattern of behavior is quite disturbing. It also appears that Carlton has initiated his own assessment/evaluation with Dr. Stringer. I object to Dr. Stringer facilitating psychological evaluations as a replacement for Dr. Ashby. As we are all aware treating therapists do not typically facilitate psychological evaluations that are to be used in family court

litigation and that is why both parties were scheduled with Dr. Ashby as she has no prior history with either party.

In addition, based on the large volume of disturbing emails and text messages from Carlton and conversations that I have had with him in person or by phone, I have grave concerns about his current mental state and his current ability to properly parent the minor child. As you both are aware an emergency meeting was held with the minor child, Karen Tarpey and myself this past week after receiving concerning information from Karen Tarpey that the child disclosed in a session a few days earlier.

It is my recommendation that Carlton continue in therapy with Dr. Alexander, following all recommendations and that he be seen immediately on an emergency basis for evaluation on Dr. Alexander's next available appointment. He will also needs to immediately submit to the previously agreed upon Mental Status Assessment on their next available date and stop all mental health therapy with Dr. Stinger or any other mental health therapist for the pendency of this action.

I am in hope that this issue can be resolved via Consent Order, without the assistance of the Court, however, I am prepared to file a motion for emergency/expedited relief if necessary.

I will also be filing a Motion to have E. Lindsay Blanks, Esquire appointed to represent me, commencing on April 3, 2020 for the duration of this action, if mediation is not successful.

Please contact me if you have any questions,

Sharon Lovette
Guardian ad Litem
P.O. Box 2282
Summerville, S.C. 29484
(843) 806-9078

DISCLAIMER: The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or legally privileged material. Any review, retransmission, dissemination or other use of this information, directly or indirectly, by persons or entities other than the intended recipient is prohibited. If you are not the intended recipient please contact the sender and delete the material from all computers in which it resides. Internet communications cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late, incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this message, or any attachments, that have arisen as a result of e-mail transmission. If verification is required, please request a hard-copy version or contact us by phone. Any views or opinions presented are solely those of the author and do not necessarily represent those of the firm. **CIRCULAR 230 DISCLOSURE:** To comply with Treasury Department regulations, we inform you that, unless otherwise expressly indicated, any tax advice contained in this communication (including any attachments or enclosures) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the Internal Revenue Code or any

Walker v. McAdams

William S. Hammett III <whammett@cdhlf.com>

Mon 3/9/2020 12:49 PM

To: Sharon Lovette <sharonlovette06@gmail.com>

Cc: Bill Hopkins <bill@hopkinsfirm.com>; Ashley Holland <aholland@cdhlf.com>

Sharon,

Per the attached text message, Mr. Walker has requested to resume with Dr. Alexander per your recommendation. I was not clear from your email re: which doctor you wanted to do the evaluation because you mentioned both Alexander and Ashby, but I'm assuming Dr. Alexander because of the end of the email.

As you and I have discussed, the idea that Carlton was seeing Dr. Stringer and failed to disclose it is not my understanding. My understanding was the he made an appointment with Dr. Stringer to have another therapist to speak with (now), who had treated him years earlier, but your email reads to me as though he was seeing Dr. Stringer all along and lied to everyone about that fact. I also understand that the referenced session with Karen Tarpey resulted in confirming the child was fine. Without agreeing to those referenced two points, my client agrees to follow your recommendation and has contacted Dr. Alexander to communicate with you directly and asked for an appointment asap, both to have a regular session and for the Mental Health Assessment. Please coordinate with Dr. Alexander if any of this needs to change (assuming he and not Ashby is who you want Carlton to see).

Also, please draft the referenced / requested consent order and shoot to me at your convenience.

Sincerely,

Will

<https://www.drpobox.com/s/nxm3g6povwm437a/CD%26H%20square%20copy%202.jpeg?raw=1>

William S. Hammett III

Partner / Attorney

Cobb Dill & Hammett, LLC

p: 843.936.6675 m: 864.426.8293

f: 843.353.2529

a: 222 W Coleman Blvd.

Mount Pleasant, SC 29464

w:www.cdhlf.com e:whammett@cdhlf.com

evaluation, it would have been filed in the current rule to show cause filed on Jan 31, 2020. I am certain there are numerous emails from my attorney even suggesting evaluation doctors Ashley could see and emailing Bill Hopkins, Ashley's attorney, saying we were going to file this in the court if her mental evaluation was not done.

I met with Dr. Alexander and he set my schedule of counseling and wanted 8 appointments completed before doing my evaluation. So my schedule was set by him. Then Sharon called me in the middle of the workday and rudely accused me of being difficult with my therapist scheduler and then she stated that I was purposely moving my appointment when Dr. Alexander wanted 8 visits before making my evaluation. The scheduler had scheduled appointments on my weekend time with my daughter, which we already had plans for her activities, so I informed them I would let Dr. Alexander set the schedule, which is what happened. At first I was a little confused because the original set schedule was for me to see Dr. Ashby and for Ashley to have Dr. Alexander to do Ashley's evaluation. This made no sense to because how could someone in 1 hour give a correct assessment that could determine if the Child stayed with that parent. I thought it was best that Dr. Alexander see me because we had been working together before this evaluation was ordered on me by Sharon the guardian and not Dr. Ashby because she did not know any of the case whatsoever.

I am also confused how a 1 hour evaluation can trump the 7 days being committed to MUSC that we are still not allowed to see the records with my own eyes and for myself and my attorney to be able to question the MUSC treating doctors and nurses to give the court all of the relevant information.

I was told by Dr. Alexander to go see my former counselor Dr. Stringer and I scheduled the first appointment she could fit me into on March 4th at 3-4:30pm. I was also asked to get her advice. Dr. Stringer decided she would do my counseling and my evaluation because of the fact that I have trusted her and I have not trusted the guardian for good reason and I have become untrusting of Dr. Alexander because he was recommended by Sharon the guardian and seems to be working with her to say what Sharon believes about me. Just like in this email she says and believes about my behavior is, "The pattern of behavior is quite disturbing", "I have grave concerns about his current mental state and his current ability to properly parent the minor child."

My decisions are for the best interest of my child even when the guardian recommendation was wrong concerning the orthodontist, and my not following her advice was the whole catalyst for me having to do a mental evaluation.

My only question is: If Sharon wants Dr. Alexander to do my mental evaluation then she is contradicting herself because Dr. Alexander has been working with as a treating therapist and as she stated I should not work with Dr. Stringer because of this reason. Her words are, "As we are all aware treating therapist do not typically facilitate psychological evaluations that are to be used in family court litigation and that is why both parties were scheduled with Dr. Ashby as she has no prior history with either party"

WRONG: I was scheduled with Dr. Ashby and Ashley was scheduled with Dr. Alexander and that is a fact. LOOK IT UP. Ask Dr Alexander not that were both scheduled with Dr. Ashby.

"Why did Sharon want a mental evaluation in me?"

E. LINDSAY BLANKS, P.A.
(A Limited Liability Corporation)
Attorney and Counselor at Law

Ex 16

9217 University Boulevard
Suite 2-A
North Charleston, South Carolina 29406

Telephone: (843) 863-1800
Fax: (843) 863-1809
e-mail: lindsay@blankslawfirm.com

October 6, 2020

William E. Hopkins Jr., Esquire
PO Box 1885
12019 Ocean Highway
Pawleys Island, SC 29585

Sent by Email and US Mail to:
bill@hopkinsfirm.com and
whammett@cdhlfirrm.com

William Sylvester Hammett III
222 W. Coleman Blvd.
Mt. Pleasant, SC 29464

Re: Lee Carlton Walker vs. Sylvia Ashley McAdams
Case No: 2019-DR-10-1147
Ref: 2010-DR-10-2126

Return to Motion and Motion and Affidavit of Sharon Lovette
Notice of Representation

Dear Bill and Will:

Please find attached a Return to Motion and Motion with Affidavit of Sharon Lovette. Also enclosed is my Notice of Representation. Please be aware that Mr. Walker has paid his retainer as ordered by the Court. Ms. McAdams has not yet paid. Bill, If you could discuss this issue with your client I would be most appreciative. I look forward to working with you both.

With kind regards, I remain

Sincerely

E. Lindsay Blanks

Elb
Enclosures
cc: Sharon Lovette (w/encl)

Ex 17

Re: C. Walker

true heart Counseling <trueheartcounseling@gmail.com>

Fri 10/30/2020 2:52 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Hello Mr. Walker,

You are correct. Dr. Alexander confirmed with me today that you have successfully completed your services with our agency.

I will be processing your discharge by Wednesday November 4th, 2020. Congratulations on your successful completion and I wish you and your family well.

Stay Safe,

Ms. Pace

Office Manager

True Heart Counseling**Phone: 877-761(TRUE) 8783****Fax: 843-761-2595**

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If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

On Thu, Oct 29, 2020 at 8:19 AM Carlton Walker <lcarltonwalker@hotmail.com> wrote:

It is my understanding that yesterday was my last appointment and I have completed your services. Dr. Alexander's affidavit said a few weeks ago that I had 2 more appointments to complete and since then I have completed 2 more appointments. Based on his new recommendation I am starting with a new mental health provider on this Friday which is tomorrow. Please tell Dr. Alexander, I thank him for his services and this email is confirming we are ending services with True Heart Counseling. I wish him well with his Grandmother situation and I'm sending my prays for this tough time with him.

Thank you,
Carlton

Ex 18

appt tomorrow at 10

Kathleen Stringer <counselnchas@gmail.com>

Fri 10/30/2020 5:03 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Put this in your address bar:

<https://counselnchas.theranest.com/virtualrooms?token=9d99bf56-be9b-9611-bb64-cfc386587761>

Kathleen B. Stringer, PhD, LPC/S, MAC, CHT, BC-TMH, NCC

Ph: 843-323-2190 F:855-786-6596

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Ex 19



Holly Kozanias-Cohen
October 25, 2013

98

Like

Comment

Share

View 14 more comments



L. Carlton Walker Awesome pic!

110

Like

238

Jeromy Cochran Canyon, appreciate a good man I'm so proud of you in my estate career I look the exact type and failed but keeping at it. I hope to restart again in 2014 and pass I see you example. Also your daughter is amazing and her racing is inspiring. Go Go Go Your support as a father is swicng and rare. She is a lucky girl to have you for a daddy. Miss you

Like 16m

L. Carlton Walker Jeanne-Coolart
Love you too Brother. You can pass him. Thank you. You're awesome to my family!!!

Like 16m

Beth-Glady Bergen Beautiful family

Like 145

Jeremy Cohen replied 1 Reply 1m

Jordan & Sam Beautiful family brother

Like 145

(3)

FILED

2021 JAN 19 AM 8:30

JULIE J. ARMSTRONG
CLERK OF COURT
JK

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
 COUNTY OF CHARLESTON) NINTH JUDICIAL CIRCUIT
 LEE CARLTON WALKER,) Case No.: 2019-DR-10-1147
 Plaintiff,)
 v.)
 SYLVIA ASHLEY McADAMS,)
 Defendant,)

**AFFIDAVIT OF
LEE CARLTON WALKER**

After being duly cautioned regarding certification, Lee Carlton Walker, does depose and states as follows:

This entire case was filed in Nov 2018 over extra-curriculars and then the change in custody in April 2019 over Ashley staying a week at MUSC IOP. We have been through 2 mediations and we are currently waiting on a final 1-week trial for this case for a judge to make a final ruling on viewing all of the facts. The GAL in this case has requested parental evaluations going back 10 years which I am in favor of and I believe we should each pay for our own evaluations because the last one I paid for Ashley, she did not supply all her court ordered medical records. I was told by Dr. Alexander that without all the MUSC IOP records a true evaluation could not be done, so the evaluation we have is not 100% accurate and my money was wasted. I would also ask that our daughter be examined too by someone who has no association with anyone in this case to get the true picture. The allegations from 10/30/20 are amazingly simple to void, all one has to do is look at the fact that I was very open, and I supplied all of the emails to the GAL within hours of receiving them during our daughter's runaway. (SEE EX:1) All one must look at is the police report that states I was the reason for getting our daughter back safely in the report. (SEE EX:2) Ashley and the GAL claim I said to our daughter in a phone call, "They are going to get our emails" as if I had something to hide. I have had the call transcribed by a court reporter and I said quote, "Well, they're checking your email, the, the email that me and you had." (SEE EX:3) All emails were provided to the GAL on 10/20/20 starting around 11:00am. (SEE EX:1) My recorded call with our daughter happened on 10/23/20, after knowingly giving all emails, passwords to email accounts and offering my phone to be downloaded, if Ashley's was too. I would have no reason or motivation to say what they claim since all emails were provided. The GAL's attorney at that point used "saving money" as his excuse for not needing my phone at that

time. (SEE EX:4) I would have absolutely no reason or motive to say such a thing to our daughter when all the emails and passwords were given to the GAL days prior. I do not understand how the GAL can say she supports the defendant's statements when she knows that I gave her all the emails on 10/20/20. I also do not believe that it is appropriate for the GAL to be "supporting" either one of us.

I did not directly talk litigation with our daughter in the phone call nor indirectly. (SEE EX:3) Our daughter ran away on Tuesday morning during her mother's custody time. I wanted to go see her at school, but I was told by the GAL in a phone call not to go to the school because it was Ashley's custody week. I wanted to talk to my daughter that night, but I was told not to talk to her. Later Leslie Armstrong, even echoed some of my concerns in her summary of the Emergency session (Exhibit 5).

As far as the claims of parental alienation, this has never been an issue in our lives until therapists who make a living off alienation came into the picture. I purchased 2 books listed from Leslie Armstrong's website. Page 5 Chapter 1 "rejects a relationship with the "target" parent without legitimate justification." Also, on this page it looks like the GAL used the word for word in her affidavit to use against me. I have had struggles with Ashley, but we have coparented in this manner since my daughter was born. This is not indicative of an "alienator."

The GAL claims on page 5 of her ex parte affidavit that the counselors had nothing negative about Ashley. Leslie's email contradicts this. The facts stand that Ashley has not supported our daughter in her extra-curricular and I am not talking about money. Never once has she been to a race and our daughter has 230 wins racing. This may seem trivial to the therapist, the GAL, and her Mother, but it has been a very important part of her childhood. Its astonishing to me that they do not realize that her not getting to do it any longer would have negatively affected her, and instead blamed *me* for her acting out.

During these 83 days apart from our daughter I voluntarily had a parental assessment done and the court can see these facts. (SEE Affidavit and Report from JWS) Based on this false accusation presented to the court our daughter has lost 83 days with her father with no communications except a 30-minute call with me for Christmas, which I have had transcribed for the court to read. (SEE EX:6). It is disappointing that a GAL appointed by

this court, would recommend that there continue to be no contact, but not even share with the court that our conversation was appropriate and positive.

These major holidays, and time, can never be restored for our daughter. She missed me taking her to Charlotte NC for a Halloween weekend with NASCAR CHAMPIONS, Thanksgiving 2020, Christmas 2020, and New Year's 2021 all missed. I have never lost my custody ever for any reason and this is the first time. All one must do to see how this has negatively affected our daughter is to look at her grades during this time. (SEE EX: 7). I am happy to see that my daughter is now doing better, in spite of what she has been through, but I am disheartened to see Ms. Lovette look to blame me for the slip, and give no consideration to the fact that my daughter lost racing, and then her Father, in the span of a few weeks.

My attorney at the time suggested we file a Motion to protect my daughter's ability to race. Even though this may sound odd to the court, She has been very competitive in this sport for years and now her Mother was refusing to let her leave school early for a race. I had the school principal's permission to do so without it counting against our daughter's attendance. (SEE EX:8) The judge denied the request and because of the nature of the sport, partial participation is simply not an option.

I asked for Leslie Armstrong to help me explain before I would have to explain it to our daughter that weekend that we could not race anymore. Leslie's reply was to wait until her next regular appointment which would put me in a situation of having to explain it with no professional help or advice. My attorney at the time told me to tell our daughter that I was not going to fight any more for racing and that we were done. Our daughter knew from Sharon that Sharon was brought in because of racing.

Her mother and Mrs. Sharon took Rosalyn to look at the safety equipment in Charlotte with a racing team "Stillwell Racing" and when they got back Rosalyn's mother and the GAL said Rosalyn could race with this team and this team only, when Rosalyn had already been with a team AK Performance for 7 months and did not want to switch. This is mentioned in Leslie's affidavit. I am concerned about the involvement between the GAL and Ashley and recommending the "team" my daughter participates on does not seem to fall in with her duties.

Ashley tries to control everything including activities during my time and has put on a show for this court with lies and throwing false allegations and even daily attacks like this

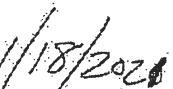
recent text she sent during the 83 days. She asked me a demeaning comment of when I started writing in complete sentences. And even rubbing it in that she would have our daughter for NEW YEAR's (SEE EX:9) I beg this honorable court to be fair and restore my custody fully because our daughter needing both parents. These false allegations have cost me \$18,000 to find and obtain an attorney to defend this and I believe I should be reimbursed and not have to pay for Ashley's attorney. I believe it is fair that any other decisions should be left for the judge at the final weeklong trial to decide, but disturbing our current FINAL ORDER so drastically when trial is pending does not seem like the appropriate response.

My state issues ID is attached herein.



L. Carlton Walker

Date



1/18/2021
2021
Jan

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:43 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlfawfirm.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 8:44 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

Why are you on your iPad this morning?

Get [Outlook for Android](#)

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 8:43:04 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

Hi

Get [Outlook for Android](#)

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 8:42:22 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

Hi



Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:44 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlfawfirm.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 8:45 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

What?

Get [Outlook for Android](#)

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 8:44:58 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

I ran away

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:45 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlfawfirm.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 8:51 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

Rosalyn you cannot run away, where are you?

Get [Outlook for Android](#)

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 8:47:42 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

Mommy dropped me out on the side walk and I ran away and the night before she would not let me go to k1 speed so I got the spare key

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:46 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlf.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:06 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

Where are you I'm on the phone with the police. I'm sending them to find you. Where are you?

[Get Outlook for Android](#)

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 8:59:21 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

I am on Daniel island and I can run away if I am not happy and I think my mom is poisoning me

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:47 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlfawfirm.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:24 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

The police are looking for you

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:18 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

What

Fw: Fw:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:49 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlfarm.com>

Below is the Police officer's email who was on the phone with me the entire time while I was on the computer emailing trying to find Rosalyn.

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:43 AM

To: cammarataa@bcsdschools.net <cammarataa@bcsdschools.net>

Subject: Fw:

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 8:42 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

Hi

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:50 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlf.com>

The Police officer advised me to say she was not in trouble and to let me come pick her up.

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:50 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Fw: Re:

you are not in trouble can I come pick you up. please tell me where you are.

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:49 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject: Re: Re:

Daddy I do not want to live with my mom

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:24 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

The police are looking for you

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:18 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

What

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:51 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlf.com>

Here is where the officer had me forward my communication

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:51 AM

To: cammarataa@bcsdschools.net <cammarataa@bcsdschools.net>

Subject: Fw: Re:

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:50 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Fw: Re:

you are not in trouble can I come pick you up. please tell me where you are.

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:49 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject: Re: Re:

Daddy I do not want to live with my mom

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:24 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re:

The police are looking for you

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:18 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject:

What

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:54 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlf.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:58 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Re: Re:

Rosalyn we can talk about this later. Where are you? The police are looking for you?

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:55 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject: Re: Re:

You and mommy will agree to let me race my bandolier with an peformance and my go kart and k1 speed and let me do the league there?

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:54 AM

To: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Subject: Fw: Re:

Rosalyn ok please tell me where you are ?

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:51 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject: Re: Re:

Why if I tell you I do not want to live with my mom you just say tell your coslers

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>

Sent: Tuesday, October 20, 2020 9:49 AM

To: Carlton Walker <lcarltonwalker@hotmail.com>

Subject: Re: Re:

Daddy I do not want to live with my mom

From: Carlton Walker <lcarltonwalker@hotmail.com>

Sent: Tuesday, October 20, 2020 9:24 AM

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:55 PM

To: William S. Hammett III <whammett@cdhlf.com>; Sharon Lovette <sharonlovette06@gmail.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 10:04 AM
To: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Subject: Re: Re:

I'm at my house on the phone with the police. Please tell me where you are so they can find you.

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Sent: Tuesday, October 20, 2020 10:02 AM
To: Carlton Walker <lcarltonwalker@hotmail.com>
Subject: Re: Re:

I am not telling you in till I can race all 3 things and are you on Daniel inland

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 10:01 AM
To: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Subject: Re: Re:

I'm not making any deals with you. This is serious!!! I am on the phone with the police. We can meet with Sharon and your mom and talk about it. Everyone is looking for you where are you?

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Sent: Tuesday, October 20, 2020 9:59 AM
To: Carlton Walker <lcarltonwalker@hotmail.com>
Subject: Re: Re:

Is that a deal

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 9:58 AM
To: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Subject: Re: Re:

Rosalyn we can talk about this later. Where are you? The police are looking for you?

Fw: Re:

Carlton Walker <lcarltonwalker@hotmail.com>

Tue 10/20/2020 12:56 PM

To: Sharon Lovette <sharonlovette06@gmail.com>; William S. Hammett III <whammett@cdhlf.com>

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 10:08 AM
To: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Subject: Re: Re:

Rosalyn please tell me where you are. Please booger

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Sent: Tuesday, October 20, 2020 10:06 AM
To: Carlton Walker <lcarltonwalker@hotmail.com>
Subject: Re: Re:

I am also not telling you I till I can not live with my mom because she posing me

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Sent: Tuesday, October 20, 2020 10:05 AM
To: Carlton Walker <lcarltonwalker@hotmail.com>
Subject: Re: Re:

Why I am not telling you I till I can race all 3 things

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 10:04 AM
To: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Subject: Re: Re:

I'm at my house on the phone with the police. Please tell me where you are so they can find you.

From: Racin' Rosalyn <rosalyn@racinrosalyn.com>
Sent: Tuesday, October 20, 2020 10:02 AM
To: Carlton Walker <lcarltonwalker@hotmail.com>
Subject: Re: Re:

I am not telling you in till I can race all 3 things and are you on Daniel indland

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Tuesday, October 20, 2020 10:01 AM

Runaway Report 10/20/2020

INCIDENT DATA		INCIDENT/INVESTIGATION REPORT						Case# 20-13176		
Agency Name <i>Charleston Police Department</i>	ORI <i>SC0100100</i>							Date / Time Reported <i>10/20/2020 11:30 Tue</i>		
Location of Incident <i>2365 Daniel Island Dr, Charleston SC 29492-948</i>		Premise Type <i>School-elementary/second</i>		Zone/Tract <i>521</i>		Last Known Secure <i>10/20/2020 07:20 Tue</i>				
#1	Crime Incident(s) <i>General Information</i>	(Com)	Weapon / Tools				At Found <i>10/20/2020 10:30 Tue</i>			
#2	Crime Incident	()	Entry	Exit	Security			Activity		
#3	Crime Incident	()	Weapon / Tools				Activity			
Entry		Exit	Security							
MO										
VICTIM	# of Victims <i>0</i>	Type: <i>V1</i>	Injury:							
	Victim/Business Name (Last, First, Middle) <i>WALKER, CARLTON LEE</i>			Victim of Crime #	DOB	Race	Sex	Relationship To Offender	Resident Status	Military Branch/Status
	Age									
	Home Address						Home Phone			
INVOLVED	Employer Name/Address			Business Phone			Mobile Phone			
	VYR	Make	Model	Style	Color	Lic/Lis	VIN			
	CODES: V=Victim (Denote V2, V3) O=Owner (if other than victim) R=Reporting Person (if other than victim)									
	Type: INDIVIDUAL/ NOT LAW ENFORCEMENT Injury:									
OTHERS	Code <i>OT</i>	Name (Last, First, Middle) <i>MCADAMS, ASHLEY DIANE</i>			Victim of Crime #	DOB	Race	Sex	Relationship To Offender	Resident Status
	Age									Military Branch/Status
	Home Address						Home Phone			
	Employer Name/Address						Business Phone			Mobile Phone
Type: INDIVIDUAL/ NOT LAW ENFORCEMENT Injury:										
PROPERTY	Code <i>OT</i>	Name (Last, First, Middle) <i>CAMMARATA, A. J. (SPEC, TM6P) (1362)</i>			Victim of Crime #	DOB	Race	Sex	Relationship To Offender	Resident Status
	Age									Military Branch/Status
	Home Address						Home Phone			
	Employer Name/Address						Business Phone			Mobile Phone
1 = None 2 = Burned 3 = Counterfeit / Forged 4 = Damaged / Vandalized 5 = Recovered 6 = Seized 7 = Stolen 8 = Unknown (<i>OJ</i> = Recovered for Other Jurisdiction)										
PROPERTY	VI #	Code	Status Pm/Tc	Value	OJ	QTY	Property Description		Make/Model	Serial Number
Officer/ID# <i>CAMMARATA, A. J. (SPEC, TM6P) (1362)</i>										
Invest ID# <i>(0)</i>								Supervisor <i>KOEGLER, C. G. (SPEC, TM6P) (1391)</i>		
Status	Complainant Signature		Case Status <i>Pending Inactive</i>		10/21/2020		Case Disposition:		Page 1	
R_CS11BR		Printed By: FAILEYD, <i>FAILEYD</i>						Sys#: 236568		

10/27/2020 08:32

EXHIBIT
2

Incident Report Additional Name List

Charleston Police Department

OCA: 20-13/76

Additional Name List

Name Code/#	Name (Last, First, Middle)	Victim of Crime #	DOB	Age	Race	Sex
1) OT	3 Juvenile					
Restricted	Address			H:	-	-
	Empl/Addr			B:	-	-
				Mobile #:	-	-

INCIDENT/INVESTIGATION REPORT

Charleston Police Department

Case # 20-13176

Suspect Hate / Bias Motivated:

INCIDENT/INVESTIGATION REPORT

Narr. (cont.) OCA: 20-13176

Charleston Police Department

NARRATIVE

On 10-20-2020 at 0910 hrs. R/O was working on duty in full police uniform as a school resource officer at Daniel Island School at 2365 Daniel Island Drive when notified about a student who was supposed to be in school but was not. Other officers were already in the area and the student was located safely at a public establishment and returned to school.

CASE SUPPLEMENTAL REPORT

Printed: 10/22/2020 08:32

Charleston Police Department

OCA: 2013176

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: PENDING INACTIVE

Case Mng Status: PENDING INACTIVE

Occurred: 10/20/2020

Offense: GENERAL INFORMATION

Investigator: CAMMARATA, A. J. (1362)

Date / Time: 10/20/2020 12:18:09, Tuesday

Supervisor: KOEGLER, C. G. (1391)

Supervisor Review Date / Time: 10/20/2020 13:11:51, Tuesday

Contact:

Reference: Supplemental Report

In reference to this case, the student in question, OT 3 is a ten year old fifth grade student at Daniel Island School. The student does not have any known disabilities or illnesses and is not currently taking medication. She has not been a flight risk in the past and is not known to be a danger to self or others.

OT 1 and OT 2, father and mother respectively have never been married or lived together but co-parent and the student stays with each parent every other week. Father had the student last week and dropped the student off at the school yesterday, 10/19/2020 in the morning for the school day and the student went home with mother that night. On this day, 10/20/2020 at 0720 mother dropped the student off on Barfield Street in front of the public library next to school grounds. It should be noted that students are supposed to be dropped off in the front of the school and school exterior cameras do not cover the area of Barfield Street near the public library.

Father called the school upset at 0910 hours stating that he first received an e-mail message from his daughter on this date at 0842 hours in which the daughter stated that she was not at school and upset because she could no longer do go-cart racing which she does on the weekends with her father. R/O confirmed with the school front office that the student had not checked in for school for the day and was not presently in class.

It should be noted that mother and father both state that there are a lot of contentious family court issues related to the student and that one of them is that father frequently checks the daughter out of school early for weekend go-cart trips.

As Sgt. Koegler and Lt. Harrison were already at the school, R/O got on the phone with father who was actively communicating with the daughter by e-mail and kept active communication with the father while SSRT and Team 5 officers put out a description of the student, disseminated pictures and immediately began checking the local area. Mother was contacted as well and Team 5 officers met her at her apartment on Seven Farms Drive where mother confirmed that the daughter's bicycle was gone.

The father stated that the daughter did not have a cell phone with her but was communicating via e-mail on an I-Pad brought for the daughter by his mother/grandmother Helen Walker. For future reference, the I-Pad is listed under the grandmother's Verizon account and linked to the phone number 843-730-4726.

The father stated that the daughter was using the e-mail account rosalyn@racinrosalyn.com. Father's e-mail account is lcarltonwalker@hotmail.com.

As R/O was continually on the phone with the father, Lt. Harrison and Sgt. Koegler directed the scene relaying information and attempting to find the I-Pad location through Verizon. The father was communicating intermittently with the daughter who eventually revealed that she was at the Re-Fuel Gas Station on Daniel Island. T5 officers located the daughter and returned her to school.

Investigator Signature

Supervisor Signature

CASE SUPPLEMENTAL REPORT

Printed: 10/22/2020 08:32

Charleston Police Department

OCA: 2013176

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Once returned to school, R/O met with mother and daughter along with counselor Ms. Aarons. The daughter stated that she was upset because she could not do her go-cart racing as much as she used to and instead of going to school when dropped off she walked home, got her bicycle and rode around and got something to eat at the gas station. R/O and mother let the student speak with Ms. Aarons alone and the student decided to stay at school for the rest of the day.

The student was counseled on the severity of the situation and R/O cleared.

If needed in the future, the Guardian Ad Litem assigned to the family court case for the parties is Ms. Sharon Lovette, phone number 843-806-9078.

-End of Supplement-

*This completely
contradicts
the Leslie
Armstrong I
was pushing
racing*

Investigator Signature

Supervisor Signature

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EXHIBIT

3

1 00:01
2 CARLTON: Hello. Hello. Hello.
3 ROSALYN: Hold on one second. Yeah?
4 CARLTON: Hey, booger, how you doing?
5 ROSALYN: Good.
6 CARLTON: Are you in your room? Where are
7 you?
8 ROSALYN: Well, well, I just got in my
9 room.
10 CARLTON: Oh, you did?
11 ROSALYN: What are you doing?
12 CARLTON: Watching baseball.
13 ROSALYN: Who's winning?
14 CARLTON: It just started. LA Dodgers. So
15 has your week gotten better?
16 ROSALYN: A little bit.
17 CARLTON: A little bit? What do you mean?
18 ROSALYN: Like, you know.
19 CARLTON: Where's your iPad?
20 ROSALYN: I don't know. Mrs. Sharon wanted
21 the password, so -- and then somehow, she got it.
22 And then --
23 CARLTON: How did she get your password?
24 ROSALYN: She asked me.
25 CARLTON: You gave her your password?

1 ROSALYN: Yeah.
2 CARLTON: Okay.
3 ROSALYN: But I don't really know why she
4 would want to do that.

5 CARLTON: Well, they're checking your
6 email, the, the email that me and you had.

7 ROSALYN: Oh (INDISTINCT).

8 CARLTON: So. Have you talked to anybody
9 since you talked to Mrs. Leslie on Tuesday?

10 ROSALYN: Oh, I talked to Mrs. Sharon,
11 like, twice.

12 CARLTON: When did you talk to Mrs. Sharon?

13 ROSALYN: Well, I actually saw her in
14 person, like, once, and then I called her, I think,
15 twice.

16 CARLTON: You called her yourself?

17 ROSALYN: No, Mommy gave me the phone.

18 CARLTON: Did you want to speak to her?

19 ROSALYN: Not really.

20 CARLTON: Well, that's up to you if you
21 want to or not, Ros. Do you think Mrs. Sharon's
22 helping you now?

23 ROSALYN: No.

24 CARLTON: No?

25 ROSALYN: (INDISTINCT)

1 CARLTON: Well, if you don't think she's
2 helping you, then what about Mrs. Davidson?

3 ROSALYN: She's been sick.

4 CARLTON: She's been sick?

5 ROSALYN: Yeah.

6 CARLTON: Did they listen to you this time?

7 ROSALYN: I don't think so.

8 CARLTON: No? Well, I'm going to talk to
9 Dr. Alexander tomorrow. Hey, you want to hang up and
10 call me right back on Mommy's phone?

11 ROSALYN: Yeah.

12 CARLTON: Can you do that? Ros?

13 ROSALYN: Yeah.

14 4:53

15 (END OF AUDIO FILE)

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CERTIFICATE OF TRANSCRIPTIONIST

I, Susan K. von Keller, do hereby certify:

That the foregoing audio file entitled

"63e81417-73be-4745-98a9-388804684b8e.mp3" was transcribed; that the foregoing transcript as typed is a true, accurate and complete record of the audio file to the best of my ability under the prevailing circumstances.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof

Witness my hand, I have hereunto affixed my official seal this 13th day of November, 2020, at Columbia, Richland County, South Carolina.

Susan K. von Keller

Susan K. von Keller

Notary Public

State of South Carolina at Large

My Commission expires.

March 8, 2026

From: Ervin Blanks <lindsay@blankslawfirm.com>
Sent: Wednesday, October 21, 2020 4:50 PM
To: William S. Hammett III <whammett@cdhlfawfirm.com>; Bill Hopkins <bill@hopkinsfirm.com>
Cc: Ashley Holland <aholland@cdhlfawfirm.com>
Subject: RE: Lee Carlton Walker vs. Sylvia Ashley McAdams NOTICE OF PRESERVATION

[THIS MESSAGE IS FROM AN EXTERNAL SOURCE]

Will:

Your proposal is fine. After speaking with my client we would like to have the child's IPAD forensically copied by Steve Abrams. We will hold off on the other devices to try to save the parties some money.

My understanding is that the IPAD is presently in the possession of the Mother. I would like to have the mother or Sharon turn the child's IPAD over to Mr. Abrams. I believe Steve will need a passcode to access the IPAD. Will could you please ask Mr. Walker to provide the passcode to Mr. Abrams?

Let me know. Thanks Lindsay



----- Forwarded message -----

From: Leslie Armstrong <leslie@armstronglawllc.com>
Date: Tue, Oct 20, 2020, 5:19 PM
Subject: Rosalyn Walker: Synopsis from Emergency Session 10/20/2020
To: Sharon Lovette <sharonlovette06@gmail.com>

Sharon,

Below is a synopsis of today's emergency session with Rosalyn. The session concluded with Rosalyn's agreement that she would not run away from school again tomorrow, but I would still recommend that additional precautions be taken to ensure her safety when she returns to school going forward.

Rosalyn indicated that she ran away because she is no longer allowed to race any type of car at any track at all. She reported that Dad told her cannot race anymore at all and that she believes Mom and Ms. Sharon are against her being able to race at all.

She reported that she does not understand why she can miss school to come to counseling but that she cannot miss school to attend racing.

She reported that there is no reason to attend school or to get good grades if she cannot race.

She reported experiencing distress because she is aware of parental conflict which feels like it is her fault because it is about racing.

She reported being worried about Dad because he has "not been himself lately," since telling her she cannot race at all anymore.

When further queried as to why she believes she can not race anymore, she reported as part of that discussion that Dad told her he was "done fighting with" Mom and with Ms. Sharon.

She reported that she believes that a parent who loves his/her child would let their child race. She reported that she knows this because other children's parents allow them to play soccer and that more people die playing soccer than die racing. She could not initially explain how she knows this, and ultimately indicated that she knows this because of a discussion with Dad.

She reported that she was crying today and that a person she did not know asked her why she was crying. She reported that Mom told the person she was upset because she wanted to be a racecar driver and that she perceived this comment as Mom making fun of her.

She reported she did not think that Ms. Sharon and I had talked about her reports about Nicky. She could not explain why she thought this to be the case.

She reported that she believes her Mother has poisoned her again because she had a stomach ache and a headache again recently even though she had eaten dinner the night before.

I am concerned about Rosalyn's perception of events at this time and her belief that she can run away from school in order to coerce adults into conforming to her wishes. I am further concerned that she



appeared unable to provide a rational explanation for several of her reported beliefs, her apparent concern with adult issues, and that she appears to feel responsible for her parents' conflict about racing and for father's emotional wellbeing.

Regarding school attendance, I believe it will be critical at this time for both parents to ensure that they are implementing appropriate consequences for the behavior today and to make it clear that this is not an appropriate avenue to attempt to have her needs met going forward. I also recommend both parents ensure she understands the importance of school, independent of racing.

—
Thank you,

Leslie A. Armstrong, Esquire
Armstrong Family Law, LLC
27 Gamecock Avenue Suite 202
Charleston, South Carolina 29407
(843) 670-3577
leslie@armstrongfamilylawllc.com

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- Beginning March 23, 2020, client meetings will take place by telephone.
- Documents that need to be delivered should be sent electronically or placed in the mailbox outside the front door of the office suite.
- If you must come in the office to prepare for a hearing, we will make special accommodations in advance.
- If you need to schedule an appointment, a special accommodation, or have any questions, please call (843) 670-3577 for further information.

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December 25, 2020

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1 00:00:01
2 MR. WALKER: Hello.
3 MS. LOVETTE: Hey, Carlton. Hang on while I
4 get Rosalyn.
5 FEMALE SPEAKER: It's good to hear from
6 Rosalyn.
7 MS. LOVETTE: Carlton, are you on?
8 MR. WALKER: Yes.
9 MS. LOVETTE: Ashley, are you on?
10 MS. McADAMS: Yes.
11 MS. LOVETTE: Okay. We're ready for
12 Rosalyn.
13 MS. McADAMS: Okay. All right. So I'm just
14 going to hand her the phone.
15 MS. LOVETTE: Okay.
16 MS. McADAMS: All right. Bye.
17 ROSALYN: Hello.
18 MR. WALKER: Hello.
19 ROSALYN: Hi.
20 MR. WALKER: What you doing?
21 ROSALYN: I don't know. I was just watching
22 TV.
23 MR. WALKER: Well, that's good. What'd you
24 get for Christmas?
25 ROSALYN: I got like clothes and things.

1 MR. WALKER: Clothes and things?

2 ROSALYN: Uh-huh.

3 MR. WALKER: Where -- where'd you wake up

4 for Santa Claus?

5 ROSALYN: Nicky's (phonetic) house.

6 MR. WALKER: Oh, okay. So how have you

7 been? I haven't talked to you in a couple months.

8 ROSALYN: Yep. I've been okay.

9 MR. WALKER: Hanging in there, huh?

10 ROSALYN: Uh-huh.

11 MR. WALKER: So you just got clothes and

12 stuff?

13 ROSALYN: Yeah. What did you get for

14 Christmas?

15 MR. WALKER: Santa Claus brought me an Evel

16 Knievel motorcycle guy.

17 ROSALYN: What?

18 MR. WALKER: When I was a little boy, there

19 was this guy named Evel Knievel that used to jump

20 ramps and everything, and they started remaking his

21 motorcycle, and I had one when I was like six or

22 seven.

23 And it's this little thing. You crank it

24 up, and then you hit a button, and a motorcycle --

25 he's riding a motorcycle, and he -- and he shoots

1 across the driveway, and you can build ramps and make
2 him jump ramps and all kind of silly stuff.

3 ROSALYN: Oh.

4 MR. WALKER: So what's --

5 ROSALYN: I got -- oh.

6 MR. WALKER: Uh-huh?

7 ROSALYN: Mommy sent me pictures, and she --
8 like I saw a remote-control car.

9 MR. WALKER: You saw what?

10 ROSALYN: A remote-control car. It's like
11 there was these tricksters that Mommy showed me.

12 MR. WALKER: Oh, so I guess Gammie
13 (phonetic) said she sent some photos.

14 ROSALYN: Yep.

15 MR. WALKER: Yep. Yeah, I didn't know you
16 wanted a remote-control car.

17 ROSALYN: Yeah, I was looking at a Ford GT
18 one, but they're always like -- I don't really want to
19 like -- 'cause I was thinking like I want to take one
20 to GoPro 'cause it can like -- I picked out Grave
21 Digger, the monster truck.

22 MR. WALKER: Yeah, I know. I saw that. I
23 was like, You got a Grave Digger, what?

24 ROSALYN: Yeah. So I make it like jump over
25 things.

1 MR. WALKER: When do you think we'll go back
2 to GoPro?

3 ROSALYN: I don't know.

4 MR. WALKER: You know they've got the -- the
5 Bandolero Winter Nationals in January, and your
6 friend -- what's her name? Drives the 02.

7 ROSALYN: Yeah, um...

8 MR. WALKER: Julianne (phonetic)?

9 ROSALYN: Diana (phonetic)?

10 MR. WALKER: Yeah.

11 ROSALYN: Yeah, Diana.

12 MR. WALKER: You -- well, you know her
13 little brother, he's got a car too, so her daddy
14 posted they got this thing on -- on -- made for their
15 trailer, 'cause remember --

16 ROSALYN: Uh-huh.

17 MR. WALKER: -- they had two Bandoleros in
18 their trailer?

19 ROSALYN: Sure.

20 MR. WALKER: And now they have three, but it
21 won't -- it will only fit two.

22 ROSALYN: Yeah.

23 MR. WALKER: So they got a lift inside the
24 trailer now where you drive a Bandolero on it, and
25 you -- and it lifts it up, and then you drive the

1 other Bandolero underneath that one.

2 ROSALYN: Oh, yeah, like the thing at...

3 MR. WALKER: AK Performance.

4 ROSALYN: AK Performance.

5 MR. WALKER: Yeah. So now -- except they --

6 they have a little -- it's still the same little
7 trailer, but, yeah, they're -- her two brothers and
8 her -- and she's going to the Winter Nationals.

9 ROSALYN: Cool.

10 MR. WALKER: And I don't -- I think they got
11 a new -- new paint scheme on her car. I'm not sure
12 what it is. Hey, Ros, do you remember coming up with
13 that handyman service?

14 ROSALYN: Wait, what do you mean?

15 MR. WALKER: Remember, we were thinking
16 about names for a handyman service?

17 ROSALYN: Oh, yeah.

18 MR. WALKER: Do you remember the name?

19 Remember, it -- it was --

20 ROSALYN: No.

21 MR. WALKER: You came up with Hurry Up
22 Handyman.

23 ROSALYN: Oh, yeah.

24 MR. WALKER: Well, I drew --

25 ROSALYN: Yeah.

1 MR. WALKER: I drew a cartoon of Hurry Up
2 Handyman, and I bought the website
3 HurryUpHandyman.com.

4 ROSALYN: Yeah.

5 MR. WALKER: And you know what's funny?
6 Everybody thinks he's really, really funny. Maybe I
7 can get Gammie to send a picture to Mommy so you can
8 see it. But you want to hear the --

9 ROSALYN: Yeah.

10 MR. WALKER: -- voice I came up with for a
11 radio commercial?

12 ROSALYN: What?

13 MR. WALKER: It's really funny.

14 ROSALYN: What?

15 MR. WALKER: Let's see, which -- which one
16 is it? Hurry Up Handyman, da-da-da-da.

17 ROSALYN: You made a cartoon, Daddy?

18 MR. WALKER: Yeah, it's a cartoon of this
19 little guy running, and he's got a hammer and his bag,
20 and he's got a big nose. And everybody I've shown
21 that to, they're like, Oh, my gosh, that's going to
22 sell so much business.

23 ROSALYN: Yeah. You have to make -- make
24 like my racecar in there.

25 MR. WALKER: Make your racecar Hurry Up

1 Handyman?

2 ROSALYN: Yeah.

3 MR. WALKER: Hurry Up Handyman, da-da-da-da.

4 Hey, listen to this. I did some other ones:

5 Would you rather watch the game instead of doing stuff

6 around the house? Then call Hurry Up Handyman,

7 da-da-da-da.

8 Or how about this for -- you know -- you

9 know what a spouse is, right? Like if you're married,

10 your spouse is the other person.

11 ROSALYN: The man, yeah.

12 MR. WALKER: How about this one? Do you

13 have a spouse that's supposed to do stuff around the

14 house, but they haven't done it yet? Well, then call

15 Hurry Up Handyman, da-da-da-da.

16 Is that funny?

17 ROSALYN: Yeah.

18 MR. WALKER: Yeah. I did -- and then, well,

19 I did some other ones that are funny. Let's see. At

20 Hurry Up Handyman, do we paint your whole house? No,

21 but we do paint parts of your house. At Hurry Up

22 Handyman, do we paint the inside of your house? No,

23 but we'll paint a few rooms. At Hurry Up Handyman, do

24 we fix things that your spouse has tried to fix?

25 Absolutely.

1 Is it -- is that pretty funny?

2 ROSALYN: Uh-huh.

3 MR. WALKER: Yeah.

4 ROSALYN: So how are the dogs doing?

5 MR. WALKER: Pretty good. And then the
6 kitty cat has been trying to knock the Christmas tree
7 down.

8 ROSALYN: Oh, yeah, yeah.

9 MR. WALKER: Like Birdy (phonetic) thinks --
10 she knocked the bottom part -- the bottom lights out.

11 ROSALYN: Oh, my gosh. Yeah, I can see her
12 doing that.

13 MR. WALKER: And I'm -- I'll be watching TV,
14 and I'll be like, Hey, get off the tree. And she's
15 like smacking at the candy canes.

16 ROSALYN: And she just gives you stares
17 like, Oh, no. And she runs.

18 MR. WALKER: And then she keeps trying to
19 get outside.

20 ROSALYN: Oh, yep.

21 MR. WALKER: And you've got to shake the
22 treats since she comes back in. And let's see, what
23 else? Let's see. Oh, did -- I don't know if
24 Gammie -- did Gammie have a chance to show you about
25 Dan (phonetic), his birthday party?

1 ROSALYN: Wait, Dan at GoPro?

2 MR. WALKER: Yeah.

3 ROSALYN: No.

4 MR. WALKER: She didn't show you the video?

5 ROSALYN: Uh-uh.

6 MR. WALKER: Guess -- guess who gave --

7 well, he got a new go-kart. Guess what kind of kart

8 he got?

9 ROSALYN: What?

10 MR. WALKER: A Will Power kart.

11 ROSALYN: Huh.

12 MR. WALKER: So -- so they had a birthday

13 party at GoPro, and guess who gave him his go-kart?

14 ROSALYN: Who, Will Power?

15 MR. WALKER: Yeah. Can you believe it?

16 ROSALYN: Oh, my gosh, that's so cool.

17 MR. WALKER: Right? And so, yeah, there's a

18 video, and Brady (phonetic) was at the party, and Will

19 Power actually put it on his Facebook page and I think

20 his -- or his website or something for Will Power

21 Karts.

22 And then let's see, what else?

23 Na-na-na-na-na. I'm trying to think. Any other --

24 oh, Mr. Jeff (phonetic) is back at the race shop now.

25 ROSALYN: Oh, yeah, Gammie told me.

1 MR. WALKER: Which that's good. And let me
2 think. Oh, yeah, and QRC, they sent you a check.

3 ROSALYN: Yep, she told me that too. So how
4 much money is in my bank account?

5 MR. WALKER: I don't know. You've still got
6 to get some money from one of your other sponsors. I
7 think it's over 3,000, something like that. What are
8 you going to do with the money?

9 ROSALYN: Get a go-kart.

10 MR. WALKER: You -- you want to get a
11 go-kart? What about a simulator first?

12 ROSALYN: Okay.

13 MR. WALKER: Well, I mean, it's up to you.
14 You think if you get a go --

15 ROSALYN: I mean, I (indistinct) --

16 MR. WALKER: -- go-kart or a simulator,
17 because actually, I looked into simulators, and they
18 have one that moves and everything. And I think we
19 could probably get one for under three grand.

20 ROSALYN: Cool.

21 MR. WALKER: I don't know. What -- you
22 think -- I don't know. We'll figure it out.

23 But, yeah, Hurry Up Handyman, I think it's
24 going to take off, and -- well, it already has. I
25 mean, people are calling. I'm making money for it.

1 What do you -- Ros, what do you think about the -- the
2 slogan? Is that funny?

3 ROSALYN: Yep.

4 MR. WALKER: What -- what does it sound like
5 when -- when you hear the slogan? Does it sound --

6 ROSALYN: Like a superhero.

7 MR. WALKER: It sounds like a superhero?

8 ROSALYN: Yeah.

9 MR. WALKER: It does?

10 ROSALYN: Uh-huh.

11 MR. WALKER: When you need something done
12 around your house, call Hurry Up Handyman,
13 da-da-da-da.

14 Or how about this?

15 ROSALYN: (Indistinct.)

16 MR. WALKER: How -- how about this? You
17 ready? This one's really funny: Have you had a
18 bom-bom-bom at your house? Then call Hurry Up
19 Handyman, da-da-da-da.

20 Is that --

21 ROSALYN: How did you write those, though?

22 MR. WALKER: I just made them up. I -- Ros,
23 I was in -- remember, I was in screenwriting and
24 theater and everything. You know, you -- well, it's
25 called marketing. You've got to come up with

1 something really funny.

2 ROSALYN: Yeah, I know.

3 MR. WALKER: And I don't --

4 ROSALYN: You should like --

5 MR. WALKER: Well, I don't want to do
6 full -- well, first of all, COVID, you remember COVID
7 like killed full renovations. Like everybody didn't
8 want to do any kitchens or any of this stuff.

9 ROSALYN: Yeah.

10 MR. WALKER: So -- but they've still been
11 calling me to like do little stuff and like --

12 ROSALYN: Yeah.

13 MR. WALKER: And so --

14 ROSALYN: Like --

15 MR. WALKER: And plus I want to do real
16 estate more than renovations, so just doing handyman
17 stuff, usually to get somebody's house ready to be
18 sold, they go hand-in-hand, so...

19 And then -- I don't know. It was kind of
20 goofy. I came -- well, me and you came up with Hurry
21 Up Handyman when we were -- I think we were going to,
22 what, GoPro, or where were we going?

23 ROSALYN: I don't know.

24 MR. WALKER: Huh?

25 ROSALYN: I think it was GoPro.

1 MR. WALKER: Yeah. We were talking about
2 that in the truck. And so Hurry Up Handyman -- oh,
3 and then another slogan is, Keeping your house on the
4 uppity up.

5 ROSALYN: Yeah.

6 MR. WALKER: But...

7 And so if you're on Mommy's phone, maybe I
8 could text the picture to Mommy or have Gammie send
9 it.

10 ROSALYN: Yep.

11 MR. WALKER: But it's really, really funny.

12 The -- the cartoon guy, he's got a really big nose,
13 and he's running as fast as he can, and he looks like
14 he's like -- I don't know. Matter of fact, everybody
15 I've shown it to, they laugh when they see it.

16 But it -- you ever watch some of those
17 commercials on TV, like -- what is it -- GEICO or
18 Progressive where they're really weird, funny
19 commercials?

20 ROSALYN: Uh-huh.

21 MR. WALKER: Well, you've got to do
22 something like that to get people to remember your
23 company.

24 ROSALYN: Yeah. But -- yeah.

25 MR. WALKER: And for Golden Property

1 Renovations, we were never really doing any stuff like
2 that. When I had my business We Come to You Carwash,
3 I had a -- you remember. You've seen the cartoon on
4 that shirt I have.

5 ROSALYN: Yeah, but like is there like Pink
6 Panther -- like ones that break in stuff?

7 MR. WALKER: Yeah, the Pink Panther, that's
8 for insulation.

9 ROSALYN: Yeah, but like there's a cartoon
10 about that, isn't there?

11 MR. WALKER: Yeah, it's a real cartoon, the
12 Pink Panther, but the company for insulation, they
13 paid the Pink Panther for -- money to use it.

14 Are you still there?

15 ROSALYN: Yeah. I was just saying you could
16 do like something like that.

17 MR. WALKER: No, no. I don't know. Let's
18 see. I'll try to send it to you. I don't know if you
19 can see the picture. Hold on a second. Hope --
20 hopefully --

21 ROSALYN: So --

22 MR. WALKER: Hopefully, it doesn't hang up.
23 Hold on.

24 ROSALYN: Well, Gammie can just send it to
25 me.

1 MR. WALKER: Let's see.

2 ROSALYN: Or send it to Mommy, and I'll look
3 at it.

4 MR. WALKER: And matter of fact, I had
5 coffee cups made. It's really funny.

6 ROSALYN: Wow, nice.

7 MR. WALKER: Well, I went to order cards,
8 and they had where they could -- they were like, Would
9 you like a coffee cup? I was like, Sure. And then I
10 was thinking maybe we could give those away to people
11 if they...

12 Let's see.

13 ROSALYN: But (indistinct) --

14 MR. WALKER: If they get a big -- do a big
15 job.

16 ROSALYN: So Gammie told me that you're like
17 working on the kitchen thing.

18 MR. WALKER: Yeah, we've done a lot around
19 the house. Let's see.

20 All right, so I had all the vents in the
21 whole entire house, all the ductwork, pulled out of
22 the whole house, and so every room got a new vent and
23 new ductwork.

24 ROSALYN: Wow.

25 MR. WALKER: And then the garage, I pulled

1 everything out of the garage, took the ceiling down,
2 all the insulation and all the sheetrock off the
3 walls, and we're putting the garage back together
4 first and getting can lights put in the garage, new
5 insulation, new sheetrock, a new garage door, a new
6 window, and then I can put all my tools in there and
7 probably bring your racecar and the go-kart to our
8 house.

9 And then let's see. We've done a bunch of
10 stuff over there. See if you can -- can you see a
11 text message? I just sent you the picture -- the
12 cartoon to Mommy's phone. And maybe not hang up.

13 ROSALYN: Oh, I like it. Yeah, it's funny,

14 MR. WALKER: You see it?

15 ROSALYN: Uh-huh.

16 MR. WALKER: Which one -- do you see the
17 coffee cup?

18 ROSALYN: Yeah.

19 MR. WALKER: Is he funny-looking or what?
20 Can you hear me?

21 ROSALYN: Yep.

22 MR. WALKER: Is he funny-looking?

23 ROSALYN: Yeah. He kind of looks like --
24 his nose is like the size of (indistinct).

25 MR. WALKER: His nose is the size of his

1 what?

2 ROSALYN: Of Squidward.

3 MR. WALKER: I can't hear you. You've got
4 to speak in the phone.

5 ROSALYN: I said his nose is like the size
6 of Squidward.

7 MR. WALKER: Squidward's nose?

8 ROSALYN: Yeah.

9 MR. WALKER: He -- he's not really --
10 Squidward has a -- a -- a -- his nose doesn't look
11 like that. I thought Squidward had --

12 ROSALYN: Well, this is (indistinct).

13 MR. WALKER: -- has a hook nose.

14 ROSALYN: No, he has a big nose like that.

15 MR. WALKER: What do you think about what --
16 do you see the picture of when he's standing up
17 straight and he's not running?

18 ROSALYN: Yep.

19 MR. WALKER: Yeah?

20 ROSALYN: Uh-huh.

21 MR. WALKER: And do you see the little logo?
22 It's a house, and it says "up" underneath it. Do you
23 see it on his hat?

24 ROSALYN: Yeah.

25 MR. WALKER: Yeah? I don't know. Would

1 you -- you think he looks like Squidward?

2 ROSALYN: A little bit. His nose does.

3 MR. WALKER: Squidward. I don't -- I don't

4 think he looks like Squidward. But I bet you --

5 ROSALYN: He has a --

6 MR. WALKER: I bet -- I bet he could be

7 on -- he could probably go fix up SpongeBob's house.

8 What you think?

9 ROSALYN: Yeah.

10 MR. WALKER: Hey, and you know what -- you

11 know what we named him?

12 ROSALYN: What?

13 MR. WALKER: His name's Heyward (phonetic),

14 Heyward the Hurry Up Handyman. You think Heyward's a

15 good name?

16 ROSALYN: Yeah.

17 MR. WALKER: What -- so maybe we -- maybe

18 I'll let you contact SpongeBob and see if he'll let --

19 let -- let Heyward fix up his house.

20 And you know what? I'm mad.

21 ROSALYN: Why?

22 MR. WALKER: Because Santa Claus left a

23 bunch of slime at my house.

24 ROSALYN: Yeah.

25 MR. WALKER: What do you mean, yeah?

1 ROSALYN: Yeah, I was like -- when Mommy
2 showed me those pictures, I was like, I'm going to
3 have to get -- like get -- like go and put those at
4 Gammie's house, at Granddad's and Gammie's house,
5 because Daddy just did a thing where you can't put
6 slime.

7 MR. WALKER: Well, that's 'cause you make a
8 mess.

9 ROSALYN: Yeah, well --

10 MR. WALKER: And -- and you --

11 ROSALYN: Well, Mommy says that too.

12 MR. WALKER: And you start clapping -- what
13 is that -- glitter everywhere.

14 ROSALYN: I mean, the cat looks pretty when
15 I do that.

16 MR. WALKER: The cat looks pretty with
17 glitter?

18 ROSALYN: Yeah.

19 FEMALE SPEAKER: It shows up on a black cat.

20 MR. WALKER: Do you think it would show up
21 on Charlie (phonetic)? Maybe you could test it out on
22 Charlie. What do you think?

23 ROSALYN: Maybe I could.

24 MR. WALKER: Yeah. You think Papa
25 (phonetic) and Gammie would like that, clapping

1 glitter in their house?

2 ROSALYN: Probably not.

3 MR. WALKER: Probably not. Is my house the
4 only house you've done that?

5 ROSALYN: Yeah. I mean (indistinct) --

6 MR. WALKER: Yeah. I mean a handful of
7 glitter and you clap your hands together.

8 ROSALYN: No, one time I (indistinct) --

9 MR. WALKER: What?

10 ROSALYN: Dad, this one time I put Sharpie
11 (indistinct) --

12 MR. WALKER: I can't hear you. You put
13 what?

14 ROSALYN: Sharpie in my (indistinct). Like
15 I drew the marker on the side, and then I like played
16 with it on my white desk, and now my desk is pink. It
17 has a spot where it's like pink.

18 MR. WALKER: I got you. So have you been to
19 any go-kart tracks?

20 ROSALYN: What do you mean?

21 MR. WALKER: Have you been to like Frankie's
22 Fun Park or anywhere?

23 ROSALYN: No.

24 MR. WALKER: No. Oh, guess who went to
25 Miami.

1 ROSALYN: Who?

2 MR. WALKER: Remember when we were in Miami

3 and you met a little boy and --

4 ROSALYN: (Indistinct) yeah.

5 MR. WALKER: And what did the little boy's

6 daddy say they do in Miami? Do you remember?

7 ROSALYN: Race go-karts?

8 MR. WALKER: Yeah. So guess who went down

9 there and raced.

10 ROSALYN: Who?

11 MR. WALKER: And won a trophy.

12 ROSALYN: Who?

13 MR. WALKER: Well, take a guess.

14 ROSALYN: The little boy?

15 MR. WALKER: If somebody went down to Miami

16 -- that little boy's already there. If somebody went

17 down to Miami and won first place, guess who it was.

18 ROSALYN: (Indistinct.)

19 MR. WALKER: Nope. Guess again.

20 ROSALYN: I don't know.

21 MR. WALKER: What do you mean? I'll give

22 you a hint. His daddy's worth 90 million.

23 ROSALYN: Oh, Kevin Harvick. Keelan.

24 MR. WALKER: Yep. Keelan and his daddy went

25 down to Miami and raced down there with all those

1 kids, and they won.

2 ROSALYN: Uh-huh.

3 MR. WALKER: You always figure --

4 ROSALYN: So who's in the lead for the

5 NASCAR championship?

6 MR. WALKER: Well, it's -- it's over. It
7 doesn't start till February. But the Number 9 car,
8 Chase Elliott, won the championship.

9 ROSALYN: For 2020?

10 MR. WALKER: Yep, for 2020, Chase Elliott,
11 the Number 9 car. And guess what? He's from a little
12 town in Georgia. Guess what the little town let him
13 do?

14 ROSALYN: What?

15 MR. WALKER: Drive his NASCAR on the street,
16 all over the town.

17 ROSALYN: Oh, my gosh.

18 MR. WALKER: And then when he got to the
19 center of the town, guess what he did?

20 ROSALYN: What, doughnuts?

21 MR. WALKER: Yep, he sure did. And the
22 police were like -- like escorting him in front and in
23 back, and then the cop car would get way out front,
24 and then he would go vroom and haul butt on the road
25 in his racecar. That's pretty crazy. But --

1 ROSALYN: Yeah.

2 MR. WALKER: But, yeah, he won the

3 championship. Yeah, and guess who -- you know he

4 races for Rick Hendrick.

5 ROSALYN: Uh-huh. So if I got --

6 MR. WALKER: Jimmie Johnson --

7 ROSALYN: Yeah.

8 MR. WALKER: -- retired. You

9 (indistinct) --

10 ROSALYN: But he's going to get -- is he

11 going to go back in February?

12 MR. WALKER: No, he's not. He's going to

13 race Indy cars for fun. And he's -- he's racing, I

14 think, for -- I think it might be Chip Ganassi or

15 Penske, one of the two. And then you know who Tony

16 Stewart is?

17 ROSALYN: Yeah.

18 MR. WALKER: Yeah. Guess what he's racing

19 now for fun?

20 ROSALYN: What?

21 MR. WALKER: His girlfriend races drag --

22 drag cars, like the really big ones with the big tires

23 and the long nose.

24 ROSALYN: Oh, yeah, those ones, yeah.

25 MR. WALKER: Yeah, well, Tony Stewart has

1 got his drag racing license now. That's crazy, huh?

2 ROSALYN: Yeah.

3 MR. WALKER: All right. I think we've got
4 one more minute.

5 ROSALYN: Um...

6 MR. WALKER: So anything else you want to
7 talk about?

8 ROSALYN: So like Sharon was saying I might
9 see you again sometime in January.

10 MR. WALKER: That you will see me in
11 January?

12 ROSALYN: Yeah. She said that she wasn't
13 like really sure, but it'll be like sometime in
14 January.

15 MR. WALKER: I have no idea. I haven't
16 heard anything, Ros. I don't know when you will see
17 me.

18 ROSALYN: Uh-huh.

19 MR. WALKER: No idea. No idea. I would
20 like to see you, and I'd like things to go back to the
21 way they were, but we'll have to see.

22 ROSALYN: Uh-huh.

23 MR. WALKER: So I've got -- I think we've
24 got like 15 seconds. Well, I love you, booger-boo,
25 and I miss you.

1 ROSALYN: I miss you too.

2 MR. WALKER: And I guess we'll figure it

3 out. But when I see you, you've got all those

4 presents to open at my house.

5 ROSALYN: Yep.

6 MR. WALKER: All right. Well, I love you

7 ROSALYN: Bye.

8 MR. WALKER: And talk to later. I'm not

9 sure when, but okay, bye.

0 ROSALYN: Okay, bye. I love you.

1 MR. WALKER: I love you too. Bye.

00:30:15

13 (End of video file.)

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1 CERTIFICATE OF TRANSCRIPTIONIST

2

3

I, Stacey L. Wilson, do hereby certify:

4

5

6

That the foregoing video file entitled
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was transcribed; that the foregoing transcript as
typed is a true, accurate and complete record of the
video file to the best of my ability under the
prevailing circumstances.

7

8

I further certify that I am neither related
to nor counsel for any party to the cause pending or
interested in the events thereof.

9

10

Witness my hand, I have hereunto affixed my
official seal this 31st day of December, 2020, at
Columbia, Richland County, South Carolina.

11

12

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Stacey L. Wilson

21

Stacey L. Wilson, CET

Notary Public

State of South Carolina at Large

My Commission expires:

October 31, 2028

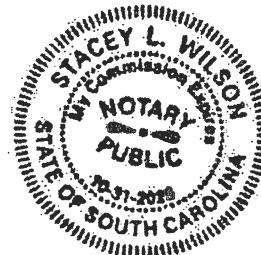
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Jessica Partain <jessica@shannonjoneslaw.com>

Fw: Progress Report From Daniel Island School

1 message

Carlton Walker <carltonwalker@hotmail.com>
 To: Jessica Partain <jessica@shannonjoneslaw.com>

Tue, Dec 8, 2020 at 8:08 AM

From: donotreply@bcsdschools.net <donotreply@bcsdschools.net>
Sent: Tuesday, December 8, 2020 1:24 AM
Subject: Progress Report From Daniel Island School

Progress Report For Rosalyn W. as of 12/08/2020

Summary Report

PERIOD M1(A) M1(B) M1(C) M1(D) M1(E) M3(A) M3(B) M3(C) M3(D) M3(E): LANGARTSRD5 (Teachers: Wang, Chia-ni J)

Current Grade: 35 Absences: 6 Tardies: 2

PERIOD M2(A) M2(B) M2(C) M2(D): COMPUTERLIT5 (Teachers: Beauford, Tawana)

Current Grade: S+ Absences: 0 Tardies: 0

PERIOD M2(E): PEHEALTH5 (Teachers: Heintzleman, Mark)

Current Grade: S+ Absences: 0 Tardies: 0

PERIOD M4(A) M4(B) M4(C) M4(D) M4(E): LANGARTSWE5 (Teachers: Wang, Chia-ni J)

Current Grade: 8 Absences: 3 Tardies: 0

PERIOD M5(A) M5(B) M5(C) M5(D) M5(E): SOCIALSTUDIES5 (Teachers: Wang, Chia-ni J)

Current Grade: 100 Absences: 3 Tardies: 0

PERIOD M6(A) M6(B) M6(C) M6(D) M6(E) M7(A) M7(B) M7(C) M7(D) M7(E) M8(A) M8(B) M8(C) M8(D) M8(E): MATH5 (Teachers: Hardy, Jill)

Current Grade: 9 Absences: 6 Tardies: 1

PERIOD M9(A) M9(B) M9(C) M9(D) M9(E): SCIHLTH5 (Teachers: Hardy, Jill)

Current Grade: 52 Absences: 2 Tardies: 0

PERIOD HRM(A) HRM(B) HRM(C) HRM(D) HRM(E): HOMEROOM5 (Teachers: Wang, Chia-ni J)

Current Grade: Absences: 0 Tardies: 0

For up-to-date information on your student 24 hours a day see the school web site at
<https://nam05.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpschool.bcsdschools.net%2Fpublic%2F&data=04%7C01%7C%7Cd58b46d38fef4d40ea8d08d89b41f7a3%7C84df9e7fe9f640afb435aaaaaaaaaaa%7C1%7C0%7C637430054906729887%7CUnknown%7CTWFpbGzs3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBtil6Ik1haWwiLCJXCVI6Mn0%3D%7C1000&sdata=wIvcT6nCPuqQtIRGhWTDI%2BsMOOGAyZdp%2FAiWS0XBWF0%3D&reserved=0>

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 be an official report.**

[48-Q2-Q2-48-19]

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EXHIBIT

7

From: Nancy Leigh <Leighn@bcschools.net>
Sent: Tuesday, October 6, 2020 1:36 PM
To: Carlton Walker <carltonwalker@hotmail.com>
Cc: samcadams@gmail.com <samcadams@gmail.com>; Adalia Porcher <PorcherA@bcschools.net>
Subject: RE: Rosalyn Walker

Hello Mr. Walker, please see the responses below that we discussed on our call. Ms. Porcher can answer any additional attendance questions you have. Please also see the attached attendance policy. Thank you.

From: Carlton Walker <carltonwalker@hotmail.com>
Sent: Monday, October 5, 2020 3:17 PM
To: Nancy Leigh <Leighn@bcschools.net>
Subject: Rosalyn Walker

WARNING: This email originated from outside of the BCSD organization. Do not click on links or open any attachments unless you recognize the sender.

Ms. Leigh,

Hi, it's Carlton, Rosalyn Walker's Father. Thank you for the call today it was fun talking to you. Especially that you too drove go-karts when you were younger. Please confirm if my understanding regarding Rosalyn's extracurricular activity of racing is accurate:

1. If she is signed out of school 15 minutes early to attend a race in Charlotte later that afternoon, it will not count against her attendance?
2. If she is signed out at 1:00 p.m. to be able to practice before she actually races, she will simply be considered signed out early, again, not counting against her? The 15 mins will be documented in power school. She will be counted present for the day.
3. As far as Winter National goes (the week-long event), if Rosalyn participates, it would be considered an unexcused absence, but because she has ample time, Rosalyn could get with teachers in advance, and she would or could be transitioned to blended/virtual learning for that week, so all her assignments would be completed? Also, this would not create any attendance issues as Rosalyn has up to 10 unexcused absences per year?
4. Fun Question: Is this one of your favorite extracurricular activities or your favorite since you



drove karts? I love seeing girls participate in non-traditional activities/sports!

Rosalyn will be unexcused for the 5 days and we will hold the attendance conference if any additional days occur as she will then be truant. She can participate in blended learning during this time out. Please remind the teachers in advance of the dates and be aware that it is her responsibility to log in to the google meets as scheduled.

Thank you.



Jessica Partain <jessica@shannonjoneslaw.com>

Ex

Carlton Walker <carltonwalker@hotmail.com>
To: Jessica Partain <jessica@shannonjoneslaw.com>

Mon, Jan 18, 2021 at 3:55 PM

3:52

LTE 94%

< Sharon Lovette, Ashley McAdams :
11:45 AM, Dec 31

(No subject)

Bills are paid. In fact, there's a credit on the account. I have dental insurance on Rosalyn. We will sort out who is primary in court. For now, I'm not stressing it and enjoying the holiday with my happy girl. Happy New Year, I think 2021 is going to be a year of major change and positivity. Things are rough right now, but I think there is always struggle before things align properly. Don't text me anymore unless you have something vitally necessary to say. Review and question anything that you communicate to me and ask yourself if you could go without saying or challenge yourself to convey your message in as few words as possible. I'm trying to better myself in shortening my texts as well. 1-2 words if possible and cut out any nonsense. It's hard to do when you have a lot to say, but I think v

EXHIBIT

9

can both master it with practice. I was told to pretend you're on a stranded island trying to get a message out to plane above. How would you shorten it? 🤔



Copy text



Share



3:52

LTE 94%

Sharon Lovette, Ashley ... (2)

2 recipients



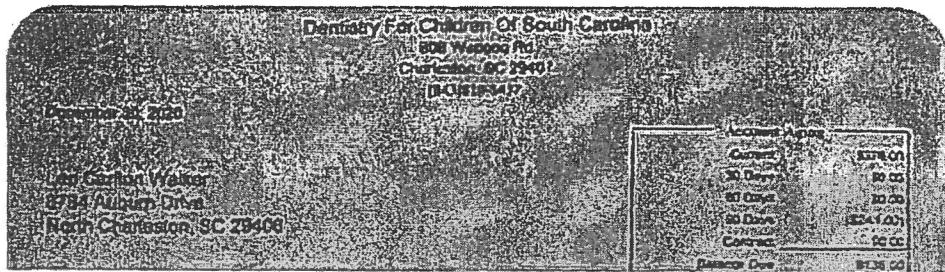
Ashley McAdams

Bills are paid. In fact,

there's a credit on the account. I have dental insurance on Rosalyn. We will sort out who is primary in court. For now, I'm not stressing it and enjoying the holiday with my happy girl. Happy New Year, I think 2021 is going to be a year of major change and positivity. Things

 View all

>





3:53 •

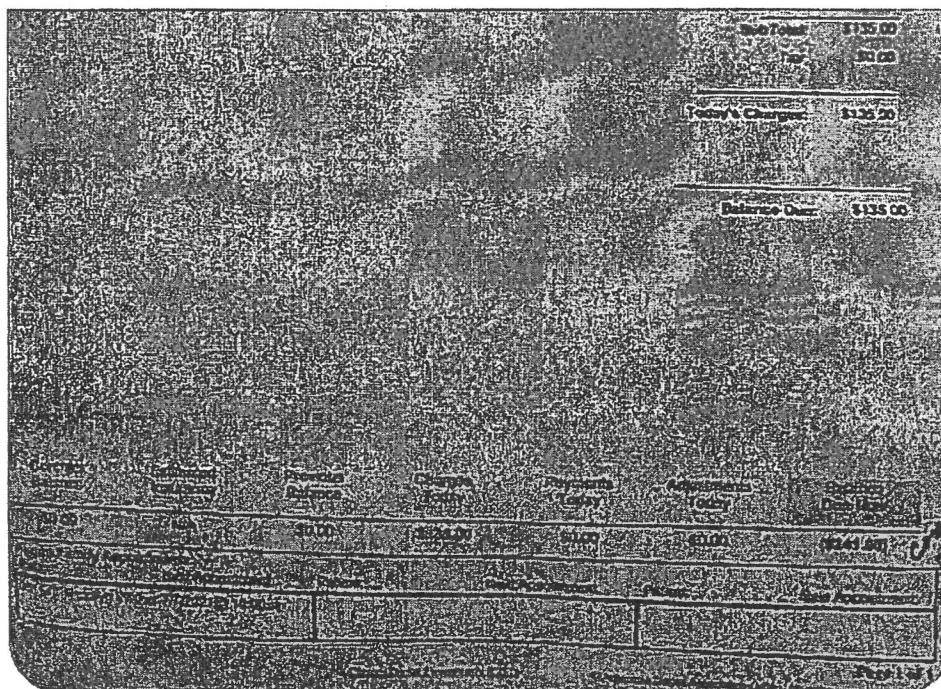
LTE 94%



Sharon Lovette, Ashley ... (2)



2 recipients



11:45 AM

Looks like you did
not use any of what

you were taught
about the island and
rubbing it in that you
have Rosalyn and
I don't, is cruel and
demeaning.

11:52 AM

I find it very hard to
believe Rosalyn is
happy in her current
situation. We will



3:51 •

LTE 94%



Sharon Lovette, Ashley ... (2)

2 recipients



**in your car and bring them
to me because Rosalyn
wants to see ALL of her
animals right now.**

**When will you bring the
animals over?**

I can't do that. The German
Shepard 100lbs and Max
Dog and the two cats do
not get along in a confined
space. Only Carlton can
control Yiya the
G.Sherpherd. Assure Rozie
that all her animals are well.
It is so ridiculous that Rozie
is being kept from her
Dogs and cats.

**End this stupid
restriction and
Rosalyn can see her
animals. I cannot
wait until court.**

1:28 PM



Ashley McAdams

When did you start

When you start

using complete
sentences?

1:26 ✓



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STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
COUNTY OF CHARLESTON) 2021 AUG 19 AM 8:35 NINTH JUDICIAL CIRCUIT
CASE NO.: 2019-DR-10-1147
Sylvia J. McAdams, Clerk of Court
LEE CARLTON WALKER, Plaintiff,)
v.)
SYLVIA ASHLEY McADAMS, Defendant.)
BY)
) ORDER DENYING THE PLAINTIFF'S
) MOTION TO RECONSIDER THE
) JULY 29, 2021 ORDER ON DEFENDANT'S
) MOTION FOR SUIT MONEY
) [ISSUED WITHOUT HEARING]
)

THIS MATTER comes before the Court upon a motion for reconsideration of the order on Defendant's motion for suit money which was issued on July 29, 2021, by the Hon. Michele P. Forsythe, and filed on August 3, 2021. Judge Forsythe carefully considered the Defendant's motion for suit money and set forth her findings in the order. The order granted the Defendant's motion and awarded her temporary attorney fee. Subsequently, the herein case was assigned to the undersigned judge. Because the July 29, 2021 order was not a final order and because the judge who issued the order is no longer the judge assigned to the case, Judge Daniel E. Martin, Jr., denies the Plaintiff any relief in said motion as the motion is not properly before him. The Plaintiff's motion may be reserved but shall not be heard by the undersigned judge.

AND IT IS SO ORDERED!

DANIEL E. MARTIN, JR.
Family Court Judge
Ninth Judicial Circuit

Dated at Charleston, South Carolina

this 18th day of August, 2021

(5)

FILED

2021 FEB 12 AM 11:53

JULIE J. ARMSTRONG
CLERK OF COURTBY 

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
) NINTH JUDICIAL CIRCUIT
 COUNTY OF CHARLESTON)
 Lee Carlton Walker,) C/A No.: 2019-DR-10-01147
)
 Plaintiff,)
)
 vs.)
) ORDER ON MOTION FOR EXPEDITED
 Sylvia Ashley McAdams,) TEMPORARY RELIEF
) (Does Not End Case)
 Defendant.)

This matter was before the Court pursuant to Defendant's Motion for Expedited Temporary Relief for the purpose of conducting an emergency temporary hearing pursuant to Family Court Judge Richter's *Ex Parte* Order dated October 30, 2020, which was filed in the Charleston County Family Court Clerk's office on the same date.¹ Appearng before the Court was the Plaintiff with his counsel Jessica L. Partain; Defendant with her counsel William E. Hopkins, Jr., and the Guardian *ad Litem* with her counsel E. Lindsay Blanks.

After examination of the affidavits, exhibits and other evidence presented by the parties and the Guardian *ad Litem* for the Motion for Expedited Temporary Relief in this matter held by WebEx on January 20, 2021, the Court makes the following ruling:

1. The Court finds that there is a substantial change of circumstances effecting the best interests of the minor child requiring a temporary custody and visitation modification. Mother has made a *prima facie* showing that Father has disturbingly and willfully alienated the minor child from the Mother for his own personal benefit, and to the detriment of the minor child. The Court is hereby granting temporary

¹ The temporary emergency hearing was originally scheduled for November 3, 2020; however, a Bench Order of Continuance was signed by Family Court Judge FitzLee H. McEachin which rescheduled the temporary emergency hearing for November 17, 2020; however, an Order of Continuance was signed by Family Court Judge James G. McGee, III which rescheduled the hearing January 20, 2021.



primary physical and legal custody of the minor child to Mother. Mother shall have temporary final decision making authority regarding the minor child.

2. Father's visitation shall temporarily be supervised until further order of the Court. Father shall have supervised visitation every other weekend Saturday and Sunday from 10:00 a.m. until 5:00 p.m., and every Wednesday from 6:00 p.m. until 8:00 p.m. for dinner, so long as the agreed upon supervisor is available. Supervised visitation means the supervisor shall at all times be within sight and sound range of the minor child. No whispering, note passing or other means of private communication between Father and the minor child shall be allowed. ~~Any additional visitor and/or family member shall abide by the same restrictions as Father.~~ Any supervisor must be agreed upon by both the Guardian *ad Litem* and Mother. Pre-authorized supervisors include the Paternal Aunt Deborah Pace, the Guardian *ad Litem*, or professional agency recommended by the Guardian *ad Litem*. Prior to supervising visitation, the supervisor shall sign an acknowledgment that the supervisor has read and understands the restraints in provisions 7, 10, and 11 herein to ensure Father complies with said provisions during supervised visitation. A copy of the Acknowledgement is attached hereto as Exhibit C. Any expenses for supervised visitation shall be at Father's sole expense, subject to reallocation at the Final Hearing. *(SS)*
3. Father shall pay child support to Mother pursuant to the South Carolina Child Support Guidelines in the amount of Three hundred sixty-four and 37/100 (\$364.37) dollars per month. Child support shall be due on the fifteenth day of each month beginning February 15, 2021 and continuing on the 15th day of each subsequent month. Mother may file an affidavit for the costs to be collected through the South Carolina Distribution Unit together with fees if payment is ever more than five (5) days late.
4. Mother shall pay the first \$250.00 of uninsured medical expenses for the minor child per year. Reasonable and necessary unreimbursed medical expenses in excess of this \$250.00 shall be divided pro-rata with Mother paying her pro-rata share (as calculated in the child support guidelines spreadsheet) and Father paying his pro-rata share (as calculated in the child support guidelines spreadsheet) of said costs. Father shall provide Mother with payment of his pro rata share within five (5) days of being provided a copy of the paid receipt or invoice due.
5. Father shall have reasonable Zoom video calls with the minor child as agreed upon by the parties Monday through Thursday on days the minor child is not with Father. If the parties cannot agree in advance through their attorneys on a reasonable schedule, the Guardian *ad Litem* shall set a reasonable schedule. If either party believes the Guardian *ad Litem*'s schedule is not reasonable, either party may petition to the Court to set a more definite schedule. The Zoom video calls shall be initiated by Mother on her electronic device and shall be recorded by Mother while Father has supervised visitation.

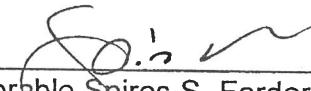
If the minor child or Father obstruct the recording of said calls in any way, the calls will be suspended pending further Court order. Other than recording (and later reviewing) the Zoom video call during supervised visitation, Mother shall provide complete privacy to the minor child while she is communicating with Father. Mother shall forward any concerning communications to the Guardian *ad Litem*. Mother shall save all phone recordings in the event they are requested or required in the future. Once Father's supervised visitation requirement ceases, Father will no longer be restricted to Zoom video calls or calls being recorded.

6. The minor child shall continue therapy with Karen Lynn Tarpey and Leslie Armstrong. Any and all releases shall be immediately signed by the custodians for the Guardian *ad Litem* to freely communicate with the minor child's therapists. Either custodian may participate in therapy sessions with the minor child so long as the minor child's therapist agrees and believes that it is therapeutically in the best interests of the minor child.
7. Upon the minor child's therapist, Karen Lynn Tarpey, recommending in writing that it is her professional opinion (after consulting with therapist Leslie Armstrong) that supervised visitation between the minor child and Father is therapeutically not necessary for the mental well-being of the minor child, Father's visitation shall be temporarily unsupervised as set forth in Exhibit A attached hereto. This provision does not prohibit the parties or Guardian *ad Litem* from filing subsequent motions regarding custody and visitation as may be allowed by law.
8. Both parties are strictly restrained from discussing this litigation in any way whatsoever with the minor child or allowing any other person to do so, unless the minor child's therapist deems such discussion therapeutically appropriate for the minor child and such discussion occurs in a therapeutic setting as determined by the therapist.
9. Father shall complete a custodial/parental fitness evaluation with Dr. Marc Harari to assess concerns regarding potential enmeshment between the minor and Father, the potential for alienation of the minor from Mother, and any other concerns that the evaluator may see fit to examine in his/her professional judgement regarding the aforementioned issues. If Dr. Harari is not available, then the aforementioned evaluation shall be done with Dr. Allison Foster. Father shall contact the evaluator within three (3) business days to schedule his initial appointment and shall further comply with all requirements for the evaluation and its prompt completion. Father shall promptly sign any and all releases necessary for the Guardian *ad Litem* to communicate directly with the evaluator regarding the aforementioned evaluation. The Guardian *ad Litem* shall provide all documents that she deems relevant to the evaluator regarding this matter so the evaluator can make a complete assessment.

10. As Father's counseling with Dr. Darren Alexander has concluded and Dr. Alexander recommends that Father receive individual mental health and medication assessment, Father shall immediately schedule an assessment for such services as recommended by Dr. Alexander (if Father is not already engaged in such treatment) as a prerequisite for unsupervised visitation. Father shall sign any and all releases for the Guardian *ad Litem* to communicate with his counselor.
11. Both parties are strictly restrained from asking the minor child questions about her therapy sessions or telling the minor child what to talk about in her therapy sessions or allowing any other person to do so.
12. Unless agreed upon in writing by the parties and the Guardian *ad Litem*, both parties are strictly restrained from discussing the matter of the minor child participating in racing activities with the minor child or allowing any other person to do so, unless the child's therapist believes that it is therapeutically appropriate to do so. Such conversation shall be in a therapeutic setting only as deemed appropriate by the minor child's therapist.
13. The parties shall cooperate with mediation with Sean Keefer regarding the issue of racing as soon as the mediator and the parties are available, but no later than ninety (90) days from the hearing date. This includes mediating whether the parties can agree on the details of what type of racing the minor may participate in (if any at all), what time the minor child has to be in bed each night if traveling or participating in a racing event, what may be discussed with the minor child regarding her racing, etc. The parties are strictly forbidden from informing the minor child of the mediation, anything discussed at the mediation, or that the mediation is going to/has taken place regarding this matter. If the parties reach an agreement, they may present a detailed consent order to the Court for consideration. The parties shall equally divide the mediator's fees and costs and timely pay said fees and costs.
14. Until further order of the Court or written agreement of the parties, Father's contact with the minor child shall strictly be limited as set forth herein.
15. The allocation of attorney's fees and costs shall be held in abeyance.
16. The requests for forensic analysis of Father's electronic devices are hereby held in abeyance until formal discovery may be completed. All parties are under an affirmative order of this Court to not delete, tamper, modify, or obstruct any communications on any electronic device between either party and the minor child, any communications between the parties, and/or any communications regarding the minor child.
17. All other issues not addressed in this Order shall be held in abeyance.

18. All prior orders to remain in full force and effect except as specifically modified herein.
19. The provisions of this order are temporary and shall not bind the Court at the Final Hearing in any way whatsoever. All support and fee awards are subjected to re-allocation at the Final Hearing.

AND IT IS SO ORDERED.



Honorable Spiros S. Ferderigos
Charleston County Family Court Judge

Charleston, South Carolina

February 11, 2020

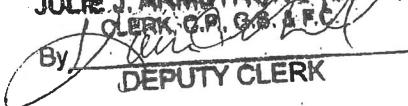
ALSO IS A TRUE COPY
JULIE J. ARMSTRONG (SEAL)
CLERK C.P. C.S. & F.C.
By 
DEPUTY CLERK

EXHIBIT A

GUIDELINES AND RESTRAINING ORDERS

Exhibit A – Father's visitation schedule once Father's supervised visitation ceases.

I. VISITATION:

- A. Weekend/Midweek Visitation:** The visiting parent shall have alternating weekends from Friday at six o'clock (6:00) p.m. until Sunday at six o'clock (6:00) p.m. Each Thursday evening prior to the weekend not having the child/children, the visiting parent shall have the child/children from five-thirty (5:30) p.m. until seven-thirty (7:30) p.m. Regular weekends are superseded by the other specific visitation set forth herein; the party not having the specific visitation set forth in B (1), (2), (3), (5) (6) and C shall have the weekend following that specific visitation and the alternate weekend cycle shall recommence.
- B. Holiday Visitation:**
 - 1. Spring School Break/Easter Weekend:** The visiting parent shall have spring school break (Easter weekend) on even-numbered years starting at six o'clock (6:00) p.m. the last day of school and ending at six o'clock (6:00) p.m. the evening prior to the child/children returning to school. The custodial parent shall have spring school break (Easter weekend) on odd-numbered years starting at six o'clock (6:00) p.m. the last day of school and ending at six o'clock (6:00) p.m. the evening prior to the child/children returning to school.
 - 2. Thanksgiving Visitation:** The visiting parent shall have Thanksgiving vacation on odd-numbered years, and the custodial parent shall have Thanksgiving vacation on even-numbered years. Thanksgiving shall commence at six o'clock (6:00) p.m. on the last day the child/children are in school or would be in school if they were attending school, and shall end at six o'clock (6:00) p.m. on the following Sunday.
 - 3. Christmas Visitation:** The custodial parent shall have the child/children during the first half of Christmas break on odd-numbered years starting at six o'clock (6:00) p.m. the day school lets out and ending two o'clock (2:00) p.m. Christmas Day and shall have the second half of Christmas break on even-numbered years starting at two o'clock (2:00) p.m. Christmas Day and ending at six o'clock (6:00) p.m. the evening prior to school starting back. On the alternating years the visiting parent shall have the same Christmas holiday with the children.
 - 4. Mother's Day/Father's Day:** The child/children shall be with the mother on Mother's Day and with the father on Father's Day from nine o'clock (9:00) a.m. until nine (9:00) p.m. (Regardless of whose weekend upon which it may fall.)
 - 5. Monday/Friday Holidays:** As to any other holiday which is celebrated on a Monday or a Friday and which is recognized by the state or the county in which the child/children reside(s) and the school in which the child/children is/are enrolled, while school is in session, the parent having the child/children for that weekend as a normal part of their alternating weekends or selected summer visitations shall have the child/children on the Monday the holiday is celebrated until six o'clock (6:00) p.m. or starting at six o'clock (6:00) p.m. the Thursday night before the Friday the holiday is celebrated.
 - 6. Religious Holidays:** If the child/children is/are being raised in a particular faith which has a major religious holiday not otherwise included in the above time frames, the parties shall alternate possession of the child/children from six o'clock (6:00) p.m. the day prior to the

event until six o'clock (6:00) p.m. the day after the event or from two (2) hours after the child/children is/are released from school the last day of required school attendance until after the religious holiday at six o'clock (6:00) p.m. the day prior to required school attendance. However, if the child is required to travel and the holiday starts for example at sundown the child may be picked up as soon as school is out as might be reasonably necessary to allow for the child to arrive at the visiting parents home prior to the required commencement time for the holiday.

- C. Summer * Visitation:** The visiting parent shall have one (1) two (2) week period and two (2) one week periods (with at least one (1) week in between each visitation period) of visitation during the summer. He/She shall pick the weeks in writing on or before May 1st of each odd-numbered year and on or before May 15th of each even-numbered year. Visiting parent's failure to give notice as required will result in the custodial parent choosing the weeks of summer visitation by the visiting parent, but not denial of visitation. The custodial parent shall have two (2) full weeks during the summer. He/She shall pick the weeks in writing on or before May 1st of each even-numbered year and on or before May 15th of each odd-numbered year. The weeks shall start on a Friday at six (6:00 p.m.) and end on a Friday at six (6:00 p.m.)
- D. Birthday Visitation:** On each parent's birthday, the child/children shall be with that parent from eight o'clock (8:00) a.m. until nine o'clock (9:00) p.m. except for school days when the child shall be with that parent from five-thirty (5:30) p.m. until eight-thirty (8:30) p.m. (This does not allow for the child to be taken out of school; neither does this require the parent to take time off from work.) The party not having the child on that child's birthday shall have three (3) hours on a non-school day and two (2) hours on a school day, independent of any activity of the party with whom the child is placed on that day. This visitation shall be at a reasonable time but not to conflict with any activity the primary party having the child on that day may be having for the child. All the children shall be together on any of their brother's/sister's birthdays.

*Summer is defined as the period of time the school district in which the child lives is closed for summer vacation. If a child is being home schooled or for some reason not attending school, the scheduling shall be as if the child is enrolled in the school district in which the child primarily resides.

NOTE !!

This Order applies to custodians and visiting parents alike. A violation of any of this Order could subject the violating party to contempt sanctions which include up to one (1) year in jail to coerce compliance or six (6) months in jail to punish, up to a One Thousand Five Hundred (\$1,500.00) Dollar fine and up to three hundred (300) hours community service. One may also be required to pay the attorney's fees and costs of the party who brings the action to enforce this Order.

EXHIBIT B



(/)

NOTICES

- COVID-19 Information (</covid-19-information/>)
- Current Closings / Information (<http://scemd.org/closings>)
- SC DSS Role in Emergency Response (</about/disaster-response/>)
- Contract/Grant Opportunities (</about/procurement/>)
- Report Abuse/Neglect Online (<https://benefitsportal.dss.sc.gov/#/ran/home>)

Calculator

We provide this calculator so that you can obtain an estimate of how much child support may be ordered in your case.

Complete as much information as possible for **both** parents.

Based on the information you provided below, the South Carolina Child Support Guidelines suggest that the parent(s) should be ordered to pay the following for child support each month.

Father
\$364.37

How many children are to be supported in this action? *

1

Who has custody of the child(ren)? *

Mother

If someone other than the mother or father has custody of the child(ren), such as a non-related third party or a grandmother, then select Another Person. If there is more than one (1) child to be supported by this action and each parent has custody of at least one child, then select Split Custody. If there is a shared custody agreement, then select Shared Custody.

If there is a Split Custody arrangement, how many children live with each parent?

Mother

Father

If there is a Shared Custody agreement, how many overnight visits are spent with each parent per year?

Mother

Father

Monthly Gross Income

Father

3990

Mother

5000

If either parent is in the military, please see Section 3.1.3 of the South Carolina Child Support Guidelines (/child-support/parents-families/establishing-or-modifying-a-child-support-order/) regarding income. You may download military pay charts by clicking here (<http://www.dfas.mil/militarymembers/payentitlements/military-pay-charts.html>).

Monthly Alimony(between these parents only)

To Be Received

Father

0

Mother

0

To Be Paid

Father

0

Mother

0

Other Monthly Alimony or Child Support Paid

(only if having priority over this action)

Father

Mother



A parent can claim this credit only for natural or adopted children living in their home. A parent cannot claim step-children, unless there is a court order establishing a legal responsibility.

Additional Expenses Paid By Each Parent

Health Insurance Premium

(portion covering these children only)

Father	Mother
--------	--------

126	0
-----	---

Child(ren)'s Extraordinary Medical Expenses

Father	Mother
--------	--------

0	0
---	---

Work-related Child Care Costs

(portion covering these children only)

Actual monthly child care paid

Father	Mother
--------	--------

163	163
-----	-----

Number of Children in Child Care

Father	Mother
--------	--------

1	1
---	---

Child Care Tax Credit

(actual amount claimed on State and Federal Return for these children only divided by 12)

Father	Mother
--------	--------

Submit

EXHIBIT C

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT FOR THE
) NINTH JUDICIAL CIRCUIT
)
COUNTY OF CHARLESTON) CASE NUMBER: 2019-DR-10-1147
)
LEE CARLTON WALKER,)
)
Plaintiff,)
)
vs.)
)
SYLVIA ASHLEY MCADAMS,)
)

SIGHT AND SOUND GUIDELINES AND COURT ORDERED RESTRAINTS

General Guidelines for Sight and Sound Supervision:

1. The Supervisor will be within sight and sound range of the child at all times.
2. No whispering, note passing or other means of private communication between the parent and child shall be allowed.
3. *The Supervisor* ~~Any additional visitor/family member~~ shall abide by the same restrictions as the visiting parent.

Court Ordered Restraints:

1. Both parties are strictly restrained from discussing this litigation in any way, whatsoever, with the minor child (or within hearing distance of the minor child), unless the minor child's therapist deems such discussion therapeutically appropriate for the minor child and such discussion occurs in a therapeutic setting as determined by the therapist.

2. Both parties are strictly restrained from asking the minor child questions about her therapy sessions or telling the minor child what to talk about in her therapy sessions.
3. Unless agreed upon in writing by the parties, and the Guardian ad Litem, both parties are strictly restricted from discussing the matter of the minor child participating in racing activities with the minor child (or within hearing distance of the minor child) unless the child's therapist deems it therapeutically appropriate to do so. Such conversations shall be in a therapeutic setting only as deemed appropriate by the minor child's therapist.
4. Failure to follow the above restraints will result in the Supervisor terminating the visitation. Supervisor agrees to report any violations immediately to the Guardian ad Litem, Sharon Lovette.

I Debra Pace, agree to act as the Visitation Supervisor for L. Carlton Walker. I have read the above restraints, understand them, and agree to supervise visits within these restraints. I agree that if a violation occurs that I will terminate the visitation, separating the visiting parent from the child, and immediately contact Sharon Lovette, Guardian ad Litem to report the violation. (843) 806-9078

Debra Pace

Date

19-1147

Ferderigos, Spiros S. Secretary (Scarlet Bott)

FILED

From: Ferderigos, Spiros S. Secretary (Scarlet Bott)
Sent: Thursday, February 25, 2021 11:53 AM
To: 'Carlton Walker'; Bill Hopkins; Ervin Blanks (Other); sean keefer
Subject: RE: Walker vs. McAdams mediation scheduling

2021 FEB 25 PM 2:4

JULIE J. ARMSTRONG
CLERK OF COURT

BY lcr

Good morning,

Thank you everyone for your emails. Please direct any and all motions or other proper filings to the Clerk of Court. The parties and other individuals involved in this matter are not to contact the Court directly.

Thank you,

Scarlet F. Bott
Office of Judge Spiros S. Ferderigos
Charleston County Family Court
100 Broad Street Suite 243
Charleston, SC
29401

From: Carlton Walker [mailto:lcarltonwalker@hotmail.com]
Sent: Thursday, February 25, 2021 10:50 AM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott) <sferderigosc@sccourts.org>; Bill Hopkins <bill@hopkinsfirm.com>; Ervin Blanks (Other) <lindsay@blankslawfirm.com>; sean keefer <scmediation@yahoo.com>
Subject: Fw: Walker vs. McAdams mediation scheduling

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***
Your Honor please read.

I am sorry but you were misled by these 2 attorneys in this case. I am Pro Se and I do not know all the rules. I am trying to have the truth heard. Please see the attached previous Order by Hon. Michèle Patrão Forsythe and confirm with Attorney.Mediator Mr. Anthony B. O'Neil, Sr. and you will see I am telling the truth about this case and that Racing has already been mediated and we are waiting on the final trial because of Covid. I know the Court wants to do the right thing and make the fair and just decision, but it is not the Court's fault when it was so grossly misled by Mr. Hopkins, Mr. Blanks, Ms. McAdams, Mrs. Lovette and Mrs. Armstrong.

Thank you for your consideration.

Sincerely,

Lee Carlton Walker

Ferderigos, Spiros S. Secretary (Scarlet Bott)

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Thursday, February 25, 2021 10:50 AM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott); Bill Hopkins; Ervin Blanks (Other); sean keefer
Subject: Fw: Walker vs. McAdams mediation scheduling
Attachments: Order Granting P's Rule 60 Motion - Walker v. McAdams.docx

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Your Honor please read.

I am sorry but you were misled by these 2 attorneys in this case. I am Pro Se and I do not know all the rules. I am trying to have the truth heard. Please see the attached previous Order by Hon. Michèle Patrão Forsythe and confirm with Attorney Mediator Mr. Anthony B. O'Neil, Sr. and you will see I am telling the truth about this case and that Racing has already been mediated and we are waiting on the final trial because of Covid. I know the Court wants to do the right thing and make the fair and just decision, but it is not the Court's fault when it was so grossly misled by Mr. Hopkins, Mr. Blanks, Ms. McAdams, Mrs. Lovette and Mrs. Armstrong.

Thank you for your consideration.

Sincerely,

Lee Carlton Walker

WeLoveCharleston.com Owner
RE/MAX Coast and Island
HurryUpHandyman.com

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Thursday, February 25, 2021 10:24 AM
To: Ervin Blanks <lindsay@blankslawfirm.com>; sean keefer <scmediation@yahoo.com>; Bill Hopkins <bill@hopkinsfirm.com> <bill@hopkinsfirm.com>; Ashley Mcadams <samcadams@gmail.com>; Sharon Lovette <sharonlovette06@gmail.com>; Kathleen Stringer <counselnchas@gmail.com>; Helen Walker <gammywalker47@gmail.com>; Aunt Deb <debbiepace1953@gmail.com>; Josh Whitley <jwhitley@smythwhitley.com>; Brian Johnson <brian.johnson@hoodlaw.com>
Subject: Re: Walker vs. McAdams mediation scheduling

To ALL:

I am filing an appeal on this that will be filed next week along with a Supersedeas and we have already had a mediation concerning racing and this is another example of RULE 3.3 Candor Towards the Tribunal that neither Ervin Blanks nor Bill Hopkins informed the court that we have already mediated on racing and by the

rules you are not to mediate twice on the same subject twice. I have attached the Order and we completed mediation with Anthony B. O'Neil, Sr on the topic of racing and you can call him, and his records will show the topic was about racing and racing only. I can show any Judge that Judge Federicos made a grievous mistake because of Mr. Blanks and Mr. Hopkins of not using Candor Towards the Tribunal. Mr. Blanks admitted he did not use Candor with the Tribunal yesterday, and he still has not come forward and explained all his false and misleading comments towards the court for the court to make this misleading mistake with a second mediation on the same subject. If you would like to file a motion on this topic then go ahead and I will be glad to show the next Judge of the grievous mistake made by Judge Ferderigos due to the outright hoax that was portrayed on the court by Mr. Hopkins and Mr. Blanks. I am filing formal complaints with the Bar association on Mr. Blanks and Mr. Hopkins with the Office of Disciplinary Counsel. I am not going to mediate the same subject of racing twice when we have already had a mediation with this case by The Honorable Judge Michèle Patrão Forsythe per the Rule 60 Motion that was filed, and we are waiting on the final trial to take place due to Covid. You all will be notified of the appeal with the SC Supreme Court. Please contact Attorney Mediator Anthony B. O'Neil, Sr to confirm that the mediation was already completed on the topic of racing, and you know we are not required to mediate twice on the same subject.

Thank you,

Lee Carlton Walker
WeLoveCharleston.com Owner
RE/MAX Coast and Island
HurryUpHandyman.com

From: Ervin Blanks <lindsay@blankslawfirm.com>
Sent: Thursday, February 25, 2021 9:53 AM
To: sean keefer <scmediation@yahoo.com>; Bill Hopkins (bill@hopkinsfirm.com) <bill@hopkinsfirm.com>; lcarltonwalker@hotmail.com <lcarltonwalker@hotmail.com>
Subject: Walker vs. McAdams mediation scheduling

Sean Keefer, Esquire

Re: Walker vs. McAdams
mediation scheduling

Dear Sean:

I represent the Guardian Ad Litem, Sharon Lovette, in the above matter. Bill Hopkins represents the mother, Ashley McAdams. Mr. Walker is pro se. We have been ordered by Judge Spiros S. Ferderigos to mediate the issue of racing within 90 days. I am copying opposing counsel and Mr. Walker on this email. I am attaching a copy of the Order. Could you please respond with your available dates so that we can get this scheduled?

Thanks Lindsay

Lindsay
E. Lindsay Blanks
E. Lindsay Blanks, P.A.
9217 University Blvd., Suite 2-A
N. Charleston, SC 29406
Phone: (843) 863-1800
Facsimile: (843) 863-1809
Email: lindsay@blankslawfirm.com
<http://www.charleston-lawyer.com>
Smart, Experienced, Determined

Confidentiality Notice:

The information in this message is subject to the attorney-client privilege and/or attorney work product privilege, and is confidential information intended for the use of the individual(s) or entity named herein. If the receiver/reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or reproduction by any means is strictly prohibited. If you have received this email in error, please notify us immediately, by telephone, and return the original message to us at lindsay@blankslawfirm.com. Thank you.

Ferderigos, Spiros S. Secretary (Scarlet Bott)

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Wednesday, February 24, 2021 4:58 PM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott); Jessica Partain (jessica@shannonjoneslaw.com); Bill Hopkins; famctfilings@charlestoncounty.org; Ervin Blanks (Other); Sharon Lovette; Josh Whitley; Helen Walker; Sharon Lovette; Ashley Mcadams; Leslie Armstrong; Leslie Armstrong; Kathleen Stringer; Karen Tarpey; karentarpey27@therapysecure.com; Brian Johnson; Shannon Jones; Aunt Deb; William S. Hammett III; Hal E. Cobb
Subject: Re: Duty of candor to the tribunal
Attachments: Case538.jpg

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

To ALL:

After reviewing Mr. Blanks' letter again after getting home from work, which was sent to the Judge after the Judge denied my request to reconsider. I can show Mr. Blanks has misled the Court in October, November and in January. I can show this exact same example in other court transcripts. I can show the Court a pattern of deception purposely done to alienate, slander and demean me to the Court and that this was deliberate unlike what he wrote in the letter to the court. This is not a sincere letter of regret from Mr. Blanks, because it is after the fact that he got called out. On multiple occasions if given my day in court to show the court, I can prove that this was intentional by Mr. Blanks and there are more intentions. This was a letter that he wrote because now he knows that he could lose his license to practice law because there are victims to his deception, and this is the only reason he has sent this letter out today. I am going to be drafting a package for the Office of Disciplinary Counsel to File in Columbia on Ervin Blanks, Bill Hopkins and there is no body to complain to for LAY Guardians such as Sharon Lovette. Also, I will be filing the same on Intern/Associate Counselor Leslie Armstrong with SC LLR. Once these are filed it will not give the others a chance to correct their mistakes as Mr. Blanks is attempting to do today. I beg the court to use its power and right this wrong. I did not show all the lies presented to the court for this exact reason for one to cover one's lies. If given the opportunity in Court which I deserve a hearing based on this new information presented today, if given the chance to present the truth, I know the court will reverse this grievous Order. I will also be Appealing this grievous Order with the Supreme Court Of South Carolina before March 10, 2021 if not given a chance for a rehearing.

This is all for now.

Thank you,

Lee Carlton Walker
WeLoveCharleston.com Owner
RE/MAX Coast and Island
HurryUpHandyman.com

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Wednesday, February 24, 2021 4:15 PM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott) <sferderigosc@sccourts.org>; Jessica Partain (jessica@shannonjoneslaw.com) <jessica@shannonjoneslaw.com>; Bill Hopkins <bill@hopkinsfirm.com>; famctfilings@charlestoncounty.org <famctfilings@charlestoncounty.org>; Ervin Blanks (Other) <lindsay@blankslawfirm.com>; Sharon Lovette <sharonlovette06@gmail.com>; Josh Whitley <jwhitley@smythwhitley.com>; Helen Walker <gammywalker47@gmail.com>; Sharon Lovette <sharonlovette06@gmail.com>; Ashley Mcadams <samcadams@gmail.com>; Leslie Armstrong <leslie@armstronglawllc.com>; Leslie Armstrong <leslie@armstrongfamilylawllc.com>; Kathleen Stringer <counselnchas@gmail.com>; Karen Tarpey <karentarpey27@gmail.com>; karentarpey27@therapysecure.com <karentarpey27@therapysecure.com>; Brian Johnson <brian.johnson@hoodlaw.com>; Shannon Jones <shannon@shannonjoneslaw.com>; Aunt Deb <debbiepace1953@gmail.com>; William S. Hammett III <whammett@cdhlfawfirm.com>; Hal E. Cobb <hcobb@cdhlfawfirm.com>
Subject: Fw: Duty of candor to the tribunal

Your Honor,

Here is Feb 2nd email showing I told them to correct their lies to the court. Now Mr. Blanks only informs the court after it is too late and after the Honorable Court has made their ruling and the irreparable damage is done. Bill Hopkins, Ervin Blanks and the GAL Sharon Lovette were all told and did nothing to inform the court of this grievous misrepresentation. I believe based on this new information the court needs to consult with the Chief Justice and reopen this hearing to hear the facts. I have attached a letter from Dr. Stringer for you all to read and please respond to me that the court is going to give rehearing for this case. The court was lied to and I can prove it beyond any doubt.

Thank you,
Lee Carlton Walker

WeLoveCharleston.com Owner
RE/MAX Coast and Island

HurryUpHandyman.com

From: Carlton Walker
Sent: Tuesday, February 2, 2021 7:59 PM
To: Bill Hopkins <bill@hopkinsfirm.com>; Ervin Blanks <lindsay@blankslawfirm.com>; Sharon Lovette (Other) <sharonlovette06@gmail.com>
Subject: Duty of candor to the tribunal

Bill, Ervin and Sharon,

You have a duty of candor to the tribunal. You need to correct your statements to the court. Like what was written and in the transcripts from in the Oct 23, 2020 and December 25, 2020 call. You misrepresented the facts that were presented by the court report in the transcripts. Please inform the court of your mistakes. This needs to happen before the judge signs the temporary order because the judge is making his ruling based on your misrepresenting the facts. I will be filing this in Columbia if you do not correct this.

Thank you,
Carlton

Ferderigos, Spiros S. Secretary (Scarlet Bott)

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Wednesday, February 24, 2021 4:16 PM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott); Jessica Partain (jessica@shannonjoneslaw.com); Bill Hopkins; famctfilings@charlestoncounty.org; Ervin Blanks (Other); Sharon Lovette; Josh Whitley; Helen Walker; Sharon Lovette; Ashley Mcadams; Leslie Armstrong; Leslie Armstrong; Kathleen Stringer; Karen Tarpey; karentarpey27@therapysecure.com; Brian Johnson; Shannon Jones; Aunt Deb; William S. Hammett III; Hal E. Cobb
Subject: Fw: Duty of candor to the tribunal
Attachments: Case510.jpg; Case511.jpg; Case512.jpg; Case514.jpg; Case515.jpg

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

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Carlton

Ferderigos, Spiros S. Secretary (Scarlet Bott)

From: Carlton Walker <lcarltonwalker@hotmail.com>
Sent: Wednesday, February 24, 2021 2:59 PM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott); Jessica Partain (jessica@shannonjoneslaw.com); Bill Hopkins (bill@hopkinsfirm.com); famctfilings@charlestoncounty.org; Ervin Blanks; Sharon Lovette; Josh Whitley; Helen Walker; Sharon Lovette; Ashley Mcadams; Leslie Armstrong; Leslie Armstrong; Kathleen Stringer; Karen Tarpey; karentarpey27@therapysecure.com; Brian Johnson
Cc:
Subject: Re: Walker vs. McAdams Case No.: 2019-DR-10-1147

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Mr. BLANKS you are too late. You are only sending this because you know you broke the law and you are trying to cover your butt now.. I can show the court where I emailed you multiple times informing you to inform the honorable Judge before he made his final ruling Feb 11 and filed Feb12 and you ignored my emails about rule 3.3 and let the court make this ruling based on multiple lies which mislead the court in its decision. There were more lies than just this one and it was deliberately done Mr Blanks and I can show multiple misstatements and the entire case was built on all lies and I can show all of them. This apology is too late. This case needs to be rehead asap.. This was not the first time you lied to the court to misrepresent me you also did it on November 17, 2020. Also Bill Hopkins lied too. Leslie Armstrong lied and including Ashley Mcadams and GAL Sharon Lovette. All I want is my day in court to show the court the truth and not to have my voice silenced. This is a case of malpractice you will see. I guess I need to get the media involved. The Judge just denied my request to reconsider and this letter proves I was correct. This apology does not fix the irreparable harm the Judge has caused to my family based on all not using Candor with the court. Jessica did get one thing right and the Judge based his decision on deception and this order is a Hoax. I will not stop until justice is served for the best interests of our daughter. Judge please look at our Daughter's website and see how your ruling and the previous Judge was lied to by these lawyers and GAL and Defendant. Matter of fact Karen Tarpey has hired a malpractice defense attorney. Its coming on how you all have destroyed our daughter.

RacinRosalyn.com

Look at her website and the whole racing world is watching this case and you will see and I have been the only one standing up for our daughter's best interests and I will not stop. Multiple people have told me to get Rick Hendricks involved. Rosalyn has 230 wins racing and you all mislead the court and have caused irreparable damage.

Per our 2012 court order we have multiple Rules to Show Causes against the defendant that cannot be heard. We still do not have the MUSC medical records of her being committed for telling multiple people that people were poisoning her and this Judge is where our daughter got this from and not me. I have a CWP license and I am not the crazy nor unstable one. You were lied to on multiple levels and I can prove it. I just need my day in court. The worst is they attacked me because they covered up a sexual act that happened in front of our daughter in her mother's care. Please based on this reconsider hearing the case now that Mr Blanks admits misleading the court. This is just one example of many from the January 20, 2021 transcript. Please you must act and do the right thing. As a 4th generation veteran who honorably risked my life in Samalia fighting for freedom and justice please show me what I risked my life for of freedom and just is alive in the United States Courts.

PS Josh please forward this to the Berkeley County Staff.

Thank you,
Lee Carlton Walker

Owner
WeLoveCharleston.com
RE/MAX Coast and Island
HurryUpHandyman.com

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From: Ervin Blanks <lindsay@blankslawfirm.com>
Sent: Wednesday, February 24, 2021 2:19:13 PM
To: Ferderigos, Spiros S. Secretary (Scarlet Bott) <sferderigosc@sccourts.org>; Jessica Partain (jessica@shannonjoneslaw.com) <jessica@shannonjoneslaw.com>; Bill Hopkins (bill@hopkinsfirm.com) <bill@hopkinsfirm.com>; lcarltonwalker@hotmail.com <lcarltonwalker@hotmail.com>; famctfilings@charlestoncounty.org <famctfilings@charlestoncounty.org>
Subject: Walker vs. McAdams Case No.: 2019-DR-10-1147

The Honorable Spiros S. Ferderigos

Re: Walker vs. McAdams Case No.: 2019-DR-10-1147

Dear Judge Ferderigos:

Please find the attached correspondence in the above matter. I am copying all opposing counsel on this email.

Thanks Lindsay

Lindsay
E. Lindsay Blanks
E. Lindsay Blanks, P.A.
9217 University Blvd., Suite 2-A
N. Charleston, SC 29406
Phone: (843) 863-1800
Facsimile: (843) 863-1809
Email: lindsay@blankslawfirm.com
<http://www.charleston-lawyer.com>
Smart, Experienced, Determined

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December 25, 2020

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1
2 MR. WALKER: Hello.
3 MS. LOVETTE: Hey, Carlton. Hang on while I
4 get Rosalyn.
5 FEMALE SPEAKER: It's good to hear from
6 Rosalyn.
7 MS. LOVETTE: Carlton, are you on?
8 MR. WALKER: Yes.
9 MS. LOVETTE: Ashley, are you on?
10 MS. McADAMS: Yes.
11 MS. LOVETTE: Okay. We're ready for
12 Rosalyn.
13 MS. McADAMS: Okay. All right. So I'm just
14 going to hand her the phone.
15 MS. LOVETTE: Okay.
16 MS. McADAMS: All right. Bye.
17 ROSALYN: Hello.
18 MR. WALKER: Hello.
19 ROSALYN: Hi.
20 MR. WALKER: What you doing?
21 ROSALYN: I don't know. I was just watching
22 TV.
23 MR. WALKER: Well, that's good. What'd you
24 get for Christmas?
25 ROSALYN: I got like clothes and things.

1 MR. WALKER: Clothes and things?

2 ROSALYN: Uh-huh.

3 MR. WALKER: Where -- where'd you wake up

4 for Santa Claus?

5 ROSALYN: Nicky's (phonetic) house.

6 MR. WALKER: Oh, okay. So how have you

7 been? I haven't talked to you in a couple months.

8 ROSALYN: Yep. I've been okay.

9 MR. WALKER: Hanging in there, huh?

10 ROSALYN: Uh-huh.

11 MR. WALKER: So you just got clothes and

12 stuff?

13 ROSALYN: Yeah. What did you get for

14 Christmas?

15 MR. WALKER: Santa Claus brought me an Evel

16 Knievel motorcycle guy.

17 ROSALYN: What?

18 MR. WALKER: When I was a little boy, there

19 was this guy named Evel Knievel that used to jump

20 ramps and everything, and they started remaking his

21 motorcycle, and I had one when I was like six or

22 seven.

23 And it's this little thing. You crank it

24 up, and then you hit a button, and a motorcycle --

25 he's riding a motorcycle, and he -- and he shoots

1 across the driveway, and you can build ramps and make
2 him jump ramps and all kind of silly stuff.

3 ROSALYN: Oh.

4 MR. WALKER: So what's --

5 ROSALYN: I got -- oh.

6 MR. WALKER: Uh-huh?

7 ROSALYN: Mommy sent me pictures, and she --
8 like I saw a remote-control car.

9 MR. WALKER: You saw what?

10 ROSALYN: A remote-control car. It's like
11 there was these tricksters that Mommy showed me.

12 MR. WALKER: Oh, so I guess Gammie
13 (phonetic) said she sent some photos.

14 ROSALYN: Yep.

15 MR. WALKER: Yep. Yeah, I didn't know you
16 wanted a remote-control car.

17 ROSALYN: Yeah, I was looking at a Ford GT
18 one, but they're always like -- I don't really want to
19 like -- 'cause I was thinking like I want to take one
20 to GoPro 'cause it can like -- I picked out Grave
21 Digger, the monster truck.

22 MR. WALKER: Yeah, I know. I saw that. I
23 was like, You got a Grave Digger, what?

24 ROSALYN: Yeah. So I make it like jump over
25 things.

1 MR. WALKER: When do you think we'll go back
2 to GoPro?

3 ROSALYN: I don't know.

4 MR. WALKER: You know they've got the -- the
5 Bandolero Winter Nationals in January, and your
6 friend -- what's her name? Drives the 02.

7 ROSALYN: Yeah, um...

8 MR. WALKER: Julianne (phonetic)?

9 ROSALYN: Diana (phonetic)?

10 MR. WALKER: Yeah.

11 ROSALYN: Yeah, Diana.

12 MR. WALKER: You -- well, you know her
13 little brother, he's got a car too, so her daddy
14 posted they got this thing on -- on -- made for their
15 trailer, 'cause remember --

16 ROSALYN: Uh-huh.

17 MR. WALKER: -- they had two Bandoleros in
18 their trailer?

19 ROSALYN: Sure.

20 MR. WALKER: And now they have three, but it
21 won't -- it will only fit two.

22 ROSALYN: Yeah.

23 MR. WALKER: So they got a lift inside the
24 trailer now where you drive a Bandolero on it, and
25 you -- and it lifts it up, and then you drive the

1 other Bandolero underneath that one.

2 ROSALYN: Oh, yeah, like the thing at...

3 MR. WALKER: AK Performance.

4 ROSALYN: AK Performance.

5 MR. WALKER: Yeah. So now -- except they --

6 they have a little -- it's still the same little

7 trailer, but, yeah, they're -- her two brothers and

8 her -- and she's going to the Winter Nationals.

9 ROSALYN: Cool.

10 MR. WALKER: And I don't -- I think they got

11 a new -- new paint scheme on her car. I'm not sure

12 what it is. Hey, Ros, do you remember coming up with

13 that handyman service?

14 ROSALYN: Wait, what do you mean?

15 MR. WALKER: Remember, we were thinking

16 about names for a handyman service?

17 ROSALYN: Oh, yeah.

18 MR. WALKER: Do you remember the name?

19 Remember, it -- it was --

20 ROSALYN: No.

21 MR. WALKER: You came up with Hurry Up

22 Handyman.

23 ROSALYN: Oh, yeah.

24 MR. WALKER: Well, I drew --

25 ROSALYN: Yeah.

1 MR. WALKER: I drew a cartoon of Hurry Up
2 Handyman, and I bought the website
3 HurryUpHandyman.com.

4 ROSALYN: Yeah.

5 MR. WALKER: And you know what's funny?
6 Everybody thinks he's really, really funny. Maybe I
7 can get Gammie to send a picture to Mommy so you can
8 see it. But you want to hear the --

9 ROSALYN: Yeah.

10 MR. WALKER: -- voice I came up with for a
11 radio commercial?

12 ROSALYN: What?

13 MR. WALKER: It's really funny.

14 ROSALYN: What?

15 MR. WALKER: Let's see, which -- which one
16 is it? Hurry Up Handyman, da-da-da-da.

17 ROSALYN: You made a cartoon, Daddy?

18 MR. WALKER: Yeah, it's a cartoon of this
19 little guy running, and he's got a hammer and his bag,
20 and he's got a big nose. And everybody I've shown
21 that to, they're like, Oh, my gosh, that's going to
22 sell so much business.

23 ROSALYN: Yeah. You have to make -- make
24 like my racecar in there.

25 MR. WALKER: Make your racecar Hurry Up

1 Handyman?

2 ROSALYN: Yeah.

3 MR. WALKER: Hurry Up Handyman, da-da-da-da.

4 Hey, listen to this. I did some other ones:

5 Would you rather watch the game instead of doing stuff
6 around the house? Then call Hurry Up Handyman,
7 da-da-da-da.

8 Or how about this for -- you know -- you
9 know what a spouse is, right? Like if you're married,
10 your spouse is the other person.

11 ROSALYN: The man, yeah.

12 MR. WALKER: How about this one? Do you
13 have a spouse that's supposed to do stuff around the
14 house, but they haven't done it yet? Well, then call
15 Hurry Up Handyman, da-da-da-da.

16 Is that funny?

17 ROSALYN: Yeah.

18 MR. WALKER: Yeah. I did -- and then, well,
19 I did some other ones that are funny. Let's see. At
20 Hurry Up Handyman, do we paint your whole house? No,
21 but we do paint parts of your house. At Hurry Up
22 Handyman, do we paint the inside of your house? No,
23 but we'll paint a few rooms. At Hurry Up Handyman, do
24 we fix things that your spouse has tried to fix?
25 Absolutely.

1 Is it -- is that pretty funny?

2 ROSALYN: Uh-huh.

3 MR. WALKER: Yeah.

4 ROSALYN: So how are the dogs doing?

5 MR. WALKER: Pretty good. And then the

6 kitty cat has been trying to knock the Christmas tree

7 down.

8 ROSALYN: Oh, yeah, yeah.

9 MR. WALKER: Like Birdy (phonetic) thinks --

10 she knocked the bottom part -- the bottom lights out.

11 ROSALYN: Oh, my gosh. Yeah, I can see her

12 doing that.

13 MR. WALKER: And I'm -- I'll be watching TV,

14 and I'll be like, Hey, get off the tree. And she's

15 like smacking at the candy canes.

16 ROSALYN: And she just gives you stares

17 like, Oh, no. And she runs.

18 MR. WALKER: And then she keeps trying to

19 get outside.

20 ROSALYN: Oh, yep.

21 MR. WALKER: And you've got to shake the

22 treats since she comes back in. And let's see, what

23 else? Let's see. Oh, did -- I don't know if

24 Gammie -- did Gammie have a chance to show you about

25 Dan (phonetic), his birthday party?

1 ROSALYN: Wait, Dan at GoPro?

2 MR. WALKER: Yeah.

3 ROSALYN: No.

4 MR. WALKER: She didn't show you the video?

5 ROSALYN: Uh-uh.

6 MR. WALKER: Guess -- guess who gave --

7 well, he got a new go-kart. Guess what kind of kart

8 he got?

9 ROSALYN: What?

10 MR. WALKER: A Will Power kart.

11 ROSALYN: Huh.

12 MR. WALKER: So -- so they had a birthday

13 party at GoPro, and guess who gave him his go-kart?

14 ROSALYN: Who, Will Power?

15 MR. WALKER: Yeah. Can you believe it?

16 ROSALYN: Oh, my gosh, that's so cool.

17 MR. WALKER: Right? And so, yeah, there's a

18 video, and Brady (phonetic) was at the party, and Will

19 Power actually put it on his Facebook page and I think

20 his -- or his website or something for Will Power

21 Karts.

22 And then let's see, what else?

23 Na-na-na-na-na. I'm trying to think. Any other --

24 oh, Mr. Jeff (phonetic) is back at the race shop now.

25 ROSALYN: Oh, yeah, Gammie told me.

1 MR. WALKER: Which that's good. And let me
2 think. Oh, yeah, and QRC, they sent you a check.

3 ROSALYN: Yep, she told me that too. So how
4 much money is in my bank account?

5 MR. WALKER: I don't know. You've still got
6 to get some money from one of your other sponsors. I
7 think it's over 3,000, something like that. What are
8 you going to do with the money?

9 ROSALYN: Get a go-kart.

10 MR. WALKER: You -- you want to get a
11 go-kart? What about a simulator first?

12 ROSALYN: Okay.

13 MR. WALKER: Well, I mean, it's up to you.
14 You think if you get a go --

15 ROSALYN: I mean, I (indistinct) --

16 MR. WALKER: -- go-kart or a simulator,
17 because actually, I looked into simulators, and they
18 have one that moves and everything. And I think we
19 could probably get one for under three grand.

20 ROSALYN: Cool.

21 MR. WALKER: I don't know. What -- you
22 think -- I don't know. We'll figure it out.

23 But, yeah, Hurry Up Handyman, I think it's
24 going to take off, and -- well, it already has. I
25 mean, people are calling. I'm making money for it.

1 What do you -- Ros, what do you think about the -- the
2 slogan? Is that funny?

3 ROSALYN: Yep.

4 MR. WALKER: What -- what does it sound like
5 when -- when you hear the slogan? Does it sound --

6 ROSALYN: Like a superhero.

7 MR. WALKER: It sounds like a superhero?

8 ROSALYN: Yeah.

9 MR. WALKER: It does?

10 ROSALYN: Uh-huh.

11 MR. WALKER: When you need something done
12 around your house, call Hurry Up Handyman,
13 da-da-da-da.

14 Or how about this?

15 ROSALYN: (Indistinct.)

16 MR. WALKER: How -- how about this? You
17 ready? This one's really funny: Have you had a
18 bom-bom-bom at your house? Then call Hurry Up
19 Handyman, da-da-da-da.

20 Is that --

21 ROSALYN: How did you write those, though?

22 MR. WALKER: I just made them up. I -- Ros,
23 I was in -- remember, I was in screenwriting and
24 theater and everything. You know, you -- well, it's
25 called marketing. You've got to come up with

1 something really funny.

2 ROSALYN: Yeah, I know.

3 MR. WALKER: And I don't --

4 ROSALYN: You should like --

5 MR. WALKER: Well, I don't want to do
6 full -- well, first of all, COVID, you remember COVID
7 like killed full renovations. Like everybody didn't
8 want to do any kitchens or any of this stuff.

9 ROSALYN: Yeah.

10 MR. WALKER: So -- but they've still been
11 calling me to like do little stuff and like --

12 ROSALYN: Yeah.

13 MR. WALKER: And so --

14 ROSALYN: Like --

15 MR. WALKER: And plus I want to do real
16 estate more than renovations, so just doing handyman
17 stuff, usually to get somebody's house ready to be
18 sold, they go hand-in-hand, so...

19 And then -- I don't know. It was kind of
20 goofy. I came -- well, me and you came up with Hurry
21 Up Handyman when we were -- I think we were going to,
22 what, GoPro, or where were we going?

23 ROSALYN: I don't know.

24 MR. WALKER: Huh?

25 ROSALYN: I think it was GoPro.

1 MR. WALKER: Yeah. We were talking about
2 that in the truck. And so Hurry Up Handyman -- oh,
3 and then another slogan is, Keeping your house on the
4 uppity up.

5 ROSALYN: Yeah.

6 MR. WALKER: But...

7 And so if you're on Mommy's phone, maybe I
8 could text the picture to Mommy or have Gammie send
9 it.

10 ROSALYN: Yep.

11 MR. WALKER: But it's really, really funny.
12 The -- the cartoon guy, he's got a really big nose,
13 and he's running as fast as he can, and he looks like
14 he's like -- I don't know. Matter of fact, everybody
15 I've shown it to, they laugh when they see it.

16 But it -- you ever watch some of those
17 commercials on TV, like -- what is it -- GEICO or
18 Progressive where they're really weird, funny
19 commercials?

20 ROSALYN: Uh-huh.

21 MR. WALKER: Well, you've got to do
22 something like that to get people to remember your
23 company.

24 ROSALYN: Yeah. But -- yeah.

25 MR. WALKER: And for Golden Property

1 Renovations, we were never really doing any stuff like
2 that. When I had my business We Come to You Carwash,
3 I had a -- you remember. You've seen the cartoon on
4 that shirt I have.

5 ROSALYN: Yeah, but like is there like Pink
6 Panther -- like ones that break in stuff?

7 MR. WALKER: Yeah, the Pink Panther, that's
8 for insulation.

9 ROSALYN: Yeah, but like there's a cartoon
10 about that, isn't there?

11 MR. WALKER: Yeah, it's a real cartoon, the
12 Pink Panther, but the company for insulation, they
13 paid the Pink Panther for -- money to use it.

14 Are you still there?

15 ROSALYN: Yeah. I was just saying you could
16 do like something like that.

17 MR. WALKER: No, no. I don't know. Let's
18 see. I'll try to send it to you. I don't know if you
19 can see the picture. Hold on a second. Hope --
20 hopefully --

21 ROSALYN: So --

22 MR. WALKER: Hopefully, it doesn't hang up.
23 Hold on.

24 ROSALYN: Well, Gammie can just send it to
25 me.

1 MR. WALKER: Let's see.

2 ROSALYN: Or send it to Mommy, and I'll look
3 at it.

4 MR. WALKER: And matter of fact, I had
5 coffee cups made. It's really funny.

6 ROSALYN: Wow, nice.

7 MR. WALKER: Well, I went to order cards,
8 and they had where they could -- they were like, Would
9 you like a coffee cup? I was like, Sure. And then I
10 was thinking maybe we could give those away to people
11 if they...

12 Let's see.

13 ROSALYN: But (indistinct) --

14 MR. WALKER: If they get a big -- do a big
15 job.

16 ROSALYN: So Gammie told me that you're like
17 working on the kitchen thing.

18 MR. WALKER: Yeah, we've done a lot around
19 the house. Let's see.

20 All right, so I had all the vents in the
21 whole entire house, all the ductwork, pulled out of
22 the whole house, and so every room got a new vent and
23 new ductwork.

24 ROSALYN: Wow.

25 MR. WALKER: And then the garage, I pulled

1 everything out of the garage, took the ceiling down,
2 all the insulation and all the sheetrock off the
3 walls, and we're putting the garage back together
4 first and getting can lights put in the garage, new
5 insulation, new sheetrock, a new garage door, a new
6 window, and then I can put all my tools in there and
7 probably bring your racecar and the go-kart to our
8 house.

9 And then let's see. We've done a bunch of
10 stuff over there. See if you can -- can you see a
11 text message? I just sent you the picture -- the
12 cartoon to Mommy's phone. And maybe not hang up.

13 ROSALYN: Oh, I like it. Yeah, it's funny.

14 MR. WALKER: You see it?

15 ROSALYN: Uh-huh.

16 MR. WALKER: Which one -- do you see the
17 coffee cup?

18 ROSALYN: Yeah.

19 MR. WALKER: Is he funny-looking or what?

20 Can you hear me?

21 ROSALYN: Yep.

22 MR. WALKER: Is he funny-looking?

23 ROSALYN: Yeah. He kind of looks like --
24 his nose is like the size of (indistinct).

25 MR. WALKER: His nose is the size of his

1 what?

2 ROSALYN: Of Squidward.

3 MR. WALKER: I can't hear you. You've got
4 to speak in the phone.

5 ROSALYN: I said his nose is like the size
6 of Squidward.

7 MR. WALKER: Squidward's nose?

8 ROSALYN: Yeah.

9 MR. WALKER: He -- he's not really --
10 Squidward has a -- a -- a -- his nose doesn't look
11 like that. I thought Squidward had --

12 ROSALYN: Well, this is (indistinct).

13 MR. WALKER: -- has a hook nose.

14 ROSALYN: No, he has a big nose like that.

15 MR. WALKER: What do you think about what --
16 do you see the picture of when he's standing up
17 straight and he's not running?

18 ROSALYN: Yep.

19 MR. WALKER: Yeah?

20 ROSALYN: Uh-huh.

21 MR. WALKER: And do you see the little logo?
22 It's a house, and it says "up" underneath it. Do you
23 see it on his hat?

24 ROSALYN: Yeah.

25 MR. WALKER: Yeah? I don't know. Would

1 you -- you think he looks like Squidward?

2 ROSALYN: A little bit. His nose does.

3 MR. WALKER: Squidward. I don't -- I don't
4 think he looks like Squidward. But I bet you --

5 ROSALYN: He has a --

6 MR. WALKER: I bet -- I bet he could be
7 on -- he could probably go fix up SpongeBob's house.
8 What you think?

9 ROSALYN: Yeah.

10 MR. WALKER: Hey, and you know what -- you
11 know what we named him?

12 ROSALYN: What?

13 MR. WALKER: His name's Heyward (phonetic),
14 Heyward the Hurry Up Handyman. You think Heyward's a
15 good name?

16 ROSALYN: Yeah.

17 MR. WALKER: What -- so maybe we -- maybe
18 I'll let you contact SpongeBob and see if he'll let --
19 let -- let Heyward fix up his house.

20 And you know what? I'm mad.

21 ROSALYN: Why?

22 MR. WALKER: Because Santa Claus left a
23 bunch of slime at my house.

24 ROSALYN: Yeah.

25 MR. WALKER: What do you mean, yeah?

1 ROSALYN: Yeah, I was like -- when Mommy
2 showed me those pictures, I was like, I'm going to
3 have to get -- like get -- like go and put those at
4 Gammie's house, at Granddad's and Gammie's house,
5 because Daddy just did a thing where you can't put
6 slime.

7 MR. WALKER: Well, that's 'cause you make a
8 mess.

9 ROSALYN: Yeah, well --

10 MR. WALKER: And -- and you --

11 ROSALYN: Well, Mommy says that too.

12 MR. WALKER: And you start clapping -- what
13 is that -- glitter everywhere.

14 ROSALYN: I mean, the cat looks pretty when
15 I do that.

16 MR. WALKER: The cat looks pretty with
17 glitter?

18 ROSALYN: Yeah.

19 FEMALE SPEAKER: It shows up on a black cat.

20 MR. WALKER: Do you think it would show up
21 on Charlie (phonetic)? Maybe you could test it out on
22 Charlie. What do you think?

23 ROSALYN: Maybe I could.

24 MR. WALKER: Yeah. You think Papa
25 (phonetic) and Gammie would like that, clapping

1 glitter in their house?

2 ROSALYN: Probably not.

3 MR. WALKER: Probably not. Is my house the
4 only house you've done that?

5 ROSALYN: Yeah. I mean (indistinct) --

6 MR. WALKER: Yeah. I mean a handful of
7 glitter and you clap your hands together.

8 ROSALYN: No, one time I (indistinct) --

9 MR. WALKER: What?

10 ROSALYN: Dad, this one time I put Sharpie
11 (indistinct) --

12 MR. WALKER: I can't hear you. You put
13 what?

14 ROSALYN: Sharpie in my (indistinct). Like
15 I drew the marker on the side, and then I like played
16 with it on my white desk, and now my desk is pink. It
17 has a spot where it's like pink.

18 MR. WALKER: I got you. So have you been to
19 any go-kart tracks?

20 ROSALYN: What do you mean?

21 MR. WALKER: Have you been to like Frankie's
22 Fun Park or anywhere?

23 ROSALYN: No.

24 MR. WALKER: No. Oh, guess who went to
25 Miami.

1 ROSALYN: Who?

2 MR. WALKER: Remember when we were in Miami

3 and you met a little boy and --

4 ROSALYN: (Indistinct) yeah.

5 MR. WALKER: And what did the little boy's

6 daddy say they do in Miami? Do you remember?

7 ROSALYN: Race go-karts?

8 MR. WALKER: Yeah. So guess who went down

9 there and raced.

10 ROSALYN: Who?

11 MR. WALKER: And won a trophy.

12 ROSALYN: Who?

13 MR. WALKER: Well, take a guess.

14 ROSALYN: The little boy?

15 MR. WALKER: If somebody went down to Miami

16 -- that little boy's already there. If somebody went

17 down to Miami and won first place, guess who it was.

18 ROSALYN: (Indistinct.)

19 MR. WALKER: Nope. Guess again.

20 ROSALYN: I don't know.

21 MR. WALKER: What do you mean? I'll give

22 you a hint. His daddy's worth 90 million.

23 ROSALYN: Oh, Kevin Harvick. Keelan.

24 MR. WALKER: Yep. Keelan and his daddy went

25 down to Miami and raced down there with all those

1 kids, and they won.

2 ROSALYN: Uh-huh.

3 MR. WALKER: You always figure --

4 ROSALYN: So who's in the lead for the
5 NASCAR championship?

6 MR. WALKER: Well, it's -- it's over. It
7 doesn't start till February. But the Number 9 car,
8 Chase Elliott, won the championship.

9 ROSALYN: For 2020?

10 MR. WALKER: Yep, for 2020, Chase Elliott,
11 the Number 9 car. And guess what? He's from a little
12 town in Georgia. Guess what the little town let him
13 do?

14 ROSALYN: What?

15 MR. WALKER: Drive his NASCAR on the street,
16 all over the town.

17 ROSALYN: Oh, my gosh.

18 MR. WALKER: And then when he got to the
19 center of the town, guess what he did?

20 ROSALYN: What, doughnuts?

21 MR. WALKER: Yep, he sure did. And the
22 police were like -- like escorting him in front and in
23 back, and then the cop car would get way out front,
24 and then he would go vroom and haul butt on the road
25 in his racecar. That's pretty crazy. But --

1 ROSALYN: Yeah.

2 MR. WALKER: But, yeah, he won the
3 championship. Yeah, and guess who -- you know he
4 races for Rick Hendrick.

5 ROSALYN: Uh-huh. So if I got --

6 MR. WALKER: Jimmie Johnson --

7 ROSALYN: Yeah.

8 MR. WALKER: -- retired. You
9 (indistinct) --

10 ROSALYN: But he's going to get -- is he
11 going to go back in February?

12 MR. WALKER: No, he's not. He's going to
13 race Indy cars for fun. And he's -- he's racing, I
14 think, for -- I think it might be Chip Ganassi or
15 Penske, one of the two. And then you know who Tony
16 Stewart is?

17 ROSALYN: Yeah.

18 MR. WALKER: Yeah. Guess what he's racing
19 now for fun?

20 ROSALYN: What?

21 MR. WALKER: His girlfriend races drag --
22 drag cars, like the really big ones with the big tires
23 and the long nose.

24 ROSALYN: Oh, yeah, those ones, yeah.

25 MR. WALKER: Yeah, well, Tony Stewart has

1 got his drag racing license now. That's crazy, huh?

2 ROSALYN: Yeah.

3 MR. WALKER: All right. I think we've got
4 one more minute.

5 ROSALYN: Um...

6 MR. WALKER: So anything else you want to
7 talk about?

8 ROSALYN: So like Sharon was saying I might
9 see you again sometime in January.

10 MR. WALKER: That you will see me in
11 January?

12 ROSALYN: Yeah. She said that she wasn't
13 like really sure, but it'll be like sometime in
14 January.

15 MR. WALKER: I have no idea. I haven't
16 heard anything, Ros. I don't know when you will see
17 me.

18 ROSALYN: Uh-huh.

19 MR. WALKER: No idea. No idea. I would
20 like to see you, and I'd like things to go back to the
21 way they were, but we'll have to see.

22 ROSALYN: Uh-huh.

23 MR. WALKER: So I've got -- I think we've
24 got like 15 seconds. Well, I love you, booger-boo,
25 and I miss you.

1 ROSALYN: I miss you too.

2 MR. WALKER: And I guess we'll figure it
3 out. But when I see you, you've got all those
4 presents to open at my house.

5 ROSALYN: Yep.

6 MR. WALKER: All right. Well, I love you.

7 ROSALYN: Bye.

8 MR. WALKER: And talk to later. I'm not
9 sure when, but okay, bye.

10 ROSALYN: Okay, bye. I love you.

11 MR. WALKER: I love you too. Bye.

12 00:30:15

13 (End of video file.)

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1 CERTIFICATE OF TRANSCRIPTIONIST

2

3 I, Stacey L. Wilson, do hereby certify:

4 That the foregoing video file entitled
5 "10000000_939855756545214_9213608067325995663_n.mp4"
6 was transcribed; that the foregoing transcript as
7 typed is a true, accurate and complete record of the
8 video file to the best of my ability under the
9 prevailing circumstances.10 I further certify that I am neither related
11 to nor counsel for any party to the cause pending or
12 interested in the events thereof.13 Witness my hand, I have hereunto affixed my
14 official seal this 31st day of December, 2020, at
15 Columbia, Richland County, South Carolina.

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Stacey L Wilson

Stacey L. Wilson, CET
Notary Public
State of South Carolina at Large
My Commission expires:
October 31, 2028



(7)

FILED
STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
COUNTY OF CHARLESTON) ~~AN~~ NINTH JUDICIAL CIRCUIT
2020 DEC 29

Lee Carlton Walker,

Plaintiff,

vs.

Sylvia Ashley McAdams,

Defendant.

JULIE L. ARMSTRONG
CLERK OF COURT

SD BY (CLL)

C/A No.: 2019-DR-10-01147

ORDER OF CONTINUANCE
(Does Not End Case)

This matter was before the Court pursuant to Defendant's Motion for *Ex Parte* Order and Expedited Temporary Relief for the purpose of conducting an emergency temporary hearing pursuant to Family Court Judge Richter's *Ex Parte* Order dated October 30, 2020, which was filed in the Charleston County Family Court Clerk's office on the same date.¹ Appearng before the Court was the Plaintiff who appeared *pro se*, Defendant with her counsel William E. Hopkins, Jr., and the Guardian *ad Litem* with her counsel E. Lindsay Blanks..

At the call of the case, Plaintiff requested a continuance of the hearing. Specifically, informed the Court that despite due diligence since the last hearing, he has been unable to retain counsel. Plaintiff provided the Court with his efforts to secure representation since the last hearing. In light of the short period of time since Plaintiff's counsel was relieved and the hearing, the Court finds Plaintiff should be allowed additional time to retain counsel. This hearing shall be rescheduled forty-five (45) days from the date of this

¹ The temporary emergency hearing was originally scheduled for November 3, 2020, beginning at 9:30 a.m.; however, a Bench Order of Continuance was signed by Family Court Judge FitzLee H. McEachin which rescheduled the temporary emergency hearing for 2:00 p.m. on November 17, 2020.

hearing, at which time the hearing shall proceed and no more continuances shall be granted to Plaintiff.

The *Ex Parte* Order of Judge Richter and the Bench Order of Judge McEachin shall remain in full force and effect until such time as the hearing is held and further Order of the Court, and the Court reiterated that Plaintiff is to have no communication with the minor child until further Order of the Court.

Plaintiff shall be entitled to a supervised telephone call with the minor child on Thanksgiving Day and on Christmas Day, to be supervised by a professional chosen by the Guardian *ad Litem*.

NOW, THEREFORE, by reason of the foregoing findings of fact and conclusions of law,

IT IS ORDERED, ADJUDGED AND DECREED:

A. This matter shall be continued for forty-five (45) days to allow Plaintiff time to retain counsel, at which time the matter shall proceed and Plaintiff shall not be entitled to any further continuances;

B. The *Ex Parte* Order dated October 30, 2020 and the Bench Order dated November 3, 2020 shall remain in full force and effect until the hearing is held and further Order of the Court; and

C. Plaintiff shall have no contact or communication with the minor child before any hearing and further Order, except for one phone call on Thanksgiving Day and on phone call on Christmas Day, each to be supervised by a professional chosen by the Guardian *ad Litem*;

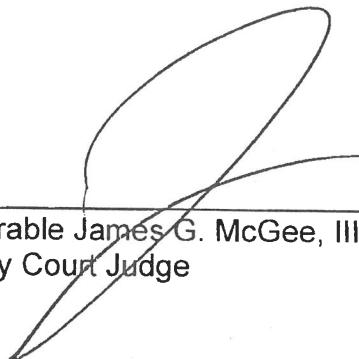
AND IT IS SO ORDERED.

NOTICE OF HEARING

A HEARING IS SCHEDULED
ON THE 20th DAY OF Jan. 2021
AT 9:30 AMPM
IN THE FAMILY COURT OF CHARLESTON COUNTY
By WebEx

Flora, South Carolina

December 21, 2020


Honorable James G. McGee, III
Family Court Judge

(8)

FILED

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT FOR
COUNTY OF CHARLESTON 2020 OCT 30) PM 4:11 THE NINTH JUDICIAL CIRCUIT
LEE CARLTON WALKER,) CASE NO. 2019-DR-10-1147
JULIE J. ARMSTRONG) CLERK OF COURT REF: 2010-DR-10-2126
Plaintiff, BY) AFFIDAVIT OF SHARON LOVETTE,
vs.) GUARDIAN AD LITEM
SYLVIA ASHLEY MCADAMS,)
Defendant.)

Personally, appeared before me, Sharon Lovette, who being duly sworn does depose and say that she has personal knowledge of the items set forth herein, except those items which are stated to be upon information and belief, which the affiant believes to be true. Sharon Lovette, states as follows:

1. On June 17, 2019, upon agreement of the parties, by Consent Order, I was appointed as the Guardian ad Litem.
2. The minor child in this action is a ten (10) year old girl.
3. I have grave concerns for the safety and well-being of the minor child based on recent events involving the minor child and Plaintiff-Father.
4. The parties share joint custody of the minor child with alternating weeks of parenting time.
5. Upon appointment, I was asked to investigate issues relating to the child participating in youth race car driving as Plaintiff-Father was seeking sole decision-making authority in regard to the child's participation in racing cars. The court has previously ruled that the minor child would be restricted from racing cars greater than go-karts.

6. Subsequently, beginning in the fall of 2019 and continuing this year, Father has removed the minor child from school, approximately, 1 hour and 45 minutes early, to attend go-kart racing in Concord, North Carolina which results in round trip travel time of approximately 7 hours - 460 miles. Upon information and belief, the minor child arrives back home after racing, late at night, between the hours of 11:30 pm – 12:00 midnight. The minor child's normal bedtime is 8:30pm. In addition, Father and the minor child spend most of their weekends together practice racing go-karts in Concord, North Carolina.
7. Defendant-Mother withdrew her consent, after learning of the child getting home extremely late on school nights with concerns of the possible negative impact on school performance the following day. Father indicates that the child sleeps on the way home and there is no negative impact on the child's performance or grades.
8. On October 12, 2020, the Plaintiff-Father petitioned the Court for relief on this issue and relief was denied. He subsequently contacted the child's therapist and requested her assistance in informing the child of the court's decision. The child had a previously scheduled appointment for October 20, 2020 and the therapist indicated that she would discuss the issue with the minor child at that time. Upon information and belief, on or about Sunday, October 18, 2020, Plaintiff-Father informed the minor child of the court's decision and of his decision to stop her from ALL racing. This was done in lieu of the child learning the court's ruling from her therapist as previously requested and on the last day of his parenting time with the child returning to her Mother the next day after school.
9. On October 20, 2020, the minor child ran away from school, after being dropped off by

Mother. She contacted her Father via email and informed him that she had run away and would not disclose her location until both parents agreed to her demands concerning racing. Several hours later with assistance of law enforcement the minor child was returned to her Mother's custody. That afternoon Ms. Armstrong and I talked with the minor child and she indicated that she had run away because ALL racing had been stopped and that she had been informed by her Father that he was "tired of fighting her Mother and the Guardian about racing". The child indicated that she planned to run away and stay gone until her demands were met. She expressed that she intended to run away again and would not do her schoolwork because she only got good grades to be able to race. She also indicated that she did not agree with her Mother that racing was not safe and that more people get killed in playing soccer than racing. She further indicated that she learned that from her Father.

10. The child has also indicated that she was told to talk with school counselors by her Father and that her therapist and I were "on mother's team". Plaintiff-Father by and through his Attorney, informed me that he would not be talking with the minor child by phone during Mother's week.
11. Upon information and belief Plaintiff-Father's first contact with the minor child after her running away was on Friday, October 23, 2020. The call was recorded by Defendant – Mother as previously recommended by the child's former therapist. The content of the call is quite disturbing as Plaintiff-Father discussed the litigation with the minor child and the forensic data retrieval taking place on her iPad. He also indicated that it was also "up to her if she wanted to speak with this Guardian" and inquired as to if I was "helping her". He also directed to her to talk with her Guidance Counselor for

help. After approximately 4 minutes, Plaintiff-Father directed the minor child to hang up and call him back. This action appears to have been taken to stop the recording as the app has to be re-set to record at the beginning of each call. The minor child followed his instructions and the second call continued for 23 additional minutes, unrecorded. In addition, two additional calls took place between the Plaintiff-Father and the minor child that are disturbing, and he requested that she screenshot Mother's phone and send him the photo that showed a "recording app". Subsequently, these recording were provided to Counsel and by and through Counsel an agreement was made via email that Plaintiff-Father would forgo his visitation week starting on October 26, 2020 in lieu of seeking emergency relief from the Court. Plaintiff-Father had picked up the minor child from school and agreed to return her to her Mother after taking her to dinner with his parents. Upon and information and belief the minor child was informed by her Father on the drive to Mother's house that she would be staying with her. Child has indicated that he gave her no explanation and directed her to talk with me. The minor child was dropped off at Mother's house and was extremely upset and confused. I spoke with the minor child that evening and it appears that Plaintiff-Father took no action to ensure that the transition back to Mother's care would go smoothly and that she was provided enough information to upset her just prior to arriving at Mother's home. Plaintiff-Father subsequently changed his mind and picked the child up from school on Thursday, October 29, 2020. Plaintiff-Father then sent a text message to Mother notifying her of his intent to take the minor child to Mooresville, NC for a racing weekend starting after school the next day. On October 30, 2020 I was contacted by school staff that Plaintiff-Father has kept the minor child

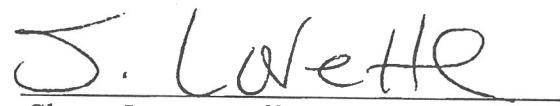
from school and that she would be doing schoolwork all day to get caught up.

12. During the last few months, this Guardian has observed a significant change in the Mother-Daughter relationship. Previously, the minor child had a close and loving relationship with her Mother. The minor child indicated that she wanted her Mother to consent to her racing all types of race cars, however, they maintained their close relationship. Recently, after Mother objected to the minor child participating in out of state racing, during the school week, there has been a dramatic change in their relationship. Upon information and belief, the minor child began visiting with school Counselors, making allegations against Mother and her close friends including that she has been poisoned by her Mother and/or her Mother's friend Nikki, to prevent her from racing. Even though the Plaintiff-Father was aware of these allegations they were not shared with the child's therapist or this Guardian. I learned of these allegations after the Defendant-Mother was contacted by school staff and contacted me. This Guardian has met with the minor child on several occasions to discuss these allegations. The minor child struggled to give explanations or even a basis for these allegations and her responses appeared to be practiced and consistently lead back to her wanting to race. Her demeanor has been observed to be very calm with no indicators that she is scared of her Mother or anyone. The minor child has not been sick or required medical attention during periods of where she has alleged that she has been poisoned by Mother. These allegations have been investigated and have found to be without merit. The minor child has indicated that her Father directed her to make reports to the Counselors at school.
13. I have grave concerns about the Plaintiff-Father's conversations with the minor child,

his erratic behavior and the possible negative impact that it is having on the minor child.

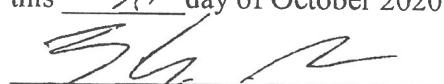
14. I believe it is in the best interest of the minor child that this Honorable Court grant the Defendant's requested relief.
15. And such other and further relief as this Court deems just and proper.

FURTHER AFFIANT SAYETH NOT!



Sharon Lovette, Affiant

Sworn and subscribed to before me
this 30 day of October 2020



Notary Public of South Carolina
My commission expires: 6-3-29

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

LEE CARLTON WALKER,

Plaintiff,

vs.

SYLVIA ASHLEY MCADAMS,

Defendant.

FILED
2021 OCT 21

JULIE J. ARMSTRONG
CLERK OF COURT

IN THE FAMILY COURT
OF THE NINTH JUDICIAL CIRCUIT
AM 11: 53 CASE NO.: 2019-DR-10-1147
REF: 2010-DR-10-2126

ORDER

THIS MATTER COMES BEFORE ME on Plaintiff's *Application for a Writ of Supersedeas* (May 17, 2021 Order). Plaintiff (hereinafter "Father") is represented by Gil Gatch, Esquire. Defendant (hereinafter "Mother") is represented by J. Clay Hopkins, Esquire. The Guardian *ad Litem*, Sharon Lovette, is represented by E. Lindsay Blanks, Esquire.

The *Application* was sent to the Honorable Daniel E. Martin, Jr., who then directed this *Application* to this Court. Unfortunately, this Court has recused itself from hearing any further matters with regard to the above-captioned action, and therefore, it is not appropriate to issue any ruling on the *Application*.

WHEREFORE, IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT

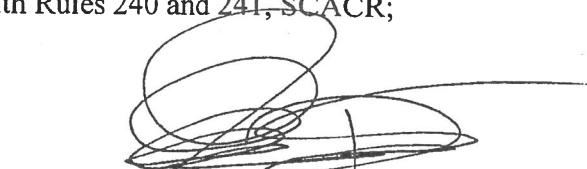
- A. That undersigned is recused from all proceedings regarding Lee Carlton Walker; and
- B. Ruling on the *Application* is not appropriate; and


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11/21/2021

C. In light of the recusal, the *Application* could be heard more appropriately by another court, in accordance with Rules 240 and 241, SCACR;

AND IT IS SO ORDERED!



Honorable Michèle Patrão Forsythe
Judge of the Family Court of South Carolina
Ninth Judicial Circuit

October 20, 2021
Charleston, South Carolina

**A PERSON WHO VIOLATES, NEGLECTS, OR REFUSES TO OBEY OR PERFORM A
FAMILY COURT ORDER, SUCH AS THIS ONE, MAY BE PROCEEDED AGAINST
FOR CONTEMPT OF COURT AND MAY BE PUNISHED BY A FINE OF UP TO
\$1,500, A PUBLIC WORK SENTENCE OF UP TO 300 HOURS, AND/OR A TERM OF
IMPRISONMENT OF UP TO ONE YEAR.**

10

FILED

STATE OF SOUTH CAROLINA)
2021 JUL 30 PM 12:31)
COUNTY OF CHARLESTON)
CLERK OF COURT)
BY)
LEE CARLTON WALKER,)

IN THE FAMILY COURT FOR THE
NINTH JUDICIAL CIRCUIT
CASE NO. 2019-DR-10-1147

Plaintiff,)

EX PARTE ORDER

-vs-

SYLVIA ASHLEY MCADAMS,)

Defendant.)

TO: **DEFENDANT ABOVE-NAMED AND HER ATTORNEY, JOHN CLAY HOPKINS, ESQUIRE**

A motion for *ex parte* order and emergency/expedited relief was filed by the Plaintiff on _____. This motion sought for an Order requiring the minor child to remain in the Tri-County area until further Order from the Court and requiring the Defendant to provide a safe housing for the minor child immediately, in light of the allegations in Defendant's own affidavit that they have a neighbor who openly talks about selling drugs and is monitoring the minor child.

IT IS THEREFORE ORDERED that Lee Carlton Walker and Sylvia Ashley McAdams shall appear in the Family Court of the Ninth Judicial Circuit at the Charleston County Courthouse, Charleston, South Carolina, on the _____ day of _____, 2021, at _____ .m.; at which time they should be prepared to show any cause they may have why the Plaintiff should not be granted any further relief in the attached motion;

IT IS FURTHER ORDERED THAT the minor child RW shall remain in the Tri-County area until further Order from this Court;

IT IS FURTHER ORDERED THAT Defendant shall provide a safe housing for the minor child within the Tri-county area immediately and not wait for the end of her lease in August 2021.

1C
GG(p)
2021.07.30

IT IS FURTHER ORDERED THAT temporary sole custody shall be granted to the Plaintiff should the Defendant fail to provide a safe housing for the minor child within the Tri-county area in the next twenty-four (24) hours; or in the alternative, that physical custody be granted to the minor child's paternal grandmother, Helen Walker; and

IT IS FURTHER ORDERED THAT based on the Affidavits submitted by the Plaintiff, the five (5)-day notice requirement shall be waived and an emergency hearing be held as soon as possible.

AND IT IS SO ORDERED.

Presiding Judge, Family Court
Ninth Judicial Circuit

_____, South Carolina
This ____ day of _____, 2021

Plaintiff's request for Ex Parte Order
is denied. Plaintiff's request for relief shall be
scheduled to be heard with Defendant's motion
filed July 16, 2021. Counsel for both parties
shall contact the Clerk of Court to provide their
respective unavailable dates for scheduling and for
the proper amount of time requested for the matter(s) to be
heard.



7-30-2021

(11)

FILED

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
 COUNTY OF CHARLESTON) 2021 AUG 17 PM 3:59 NINTH JUDICIAL CIRCUIT
 CASE NO.: 2019-DR-10-1147

LEE CARLTON WALKER, CLERK OF COURT
 J. Armstrong
 Clerk of Court

v.

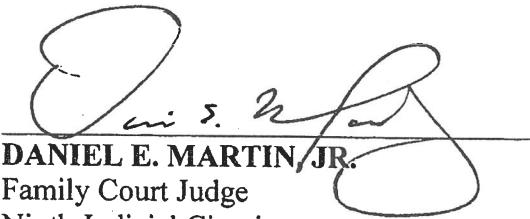
SYLVIA ASHLEY McADAMS,

Defendant.

) ORDER DENYING THE PLAINTIFF'S
 MOTION TO RECONSIDER
 JUNE 16, 2021 ORDER
 [ISSUED WITHOUT HEARING]

THIS MATTER comes before the Court upon a motion for reconsideration of the order issued from a review hearing held on June 16, 2021. The June 16, 2021, hearing was held before the Hon. Michele P. Forsythe and she issued the order. The order that she issued was not a final order. Subsequently, the herein case was assigned to the undersigned judge. Because the June 16, 2021, order was not a final order and because the judge who issued the order is no longer the judge assigned to the case, Judge Daniel E. Martin, Jr., denies the Plaintiff any relief in said motion as the motion is not properly before him. The Plaintiff's motion may be reserved but shall not be heard by the undersigned judge.

AND IT IS SO ORDERED!



DANIEL E. MARTIN, JR.
 Family Court Judge
 Ninth Judicial Circuit

Dated at Charleston, South Carolina

this 16th day of August, 2021

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 8-18-21 g

(12)

STATE OF SOUTH CAROLINA)
IN THE FAMILY COURT
COUNTY OF CHARLESTON) 201 FEB 22 PM 4:38
NINTH JUDICIAL CIRCUIT
LEE CARLTON WALKER, JUDGE ARMSTRONG CASE NO.: 2019-DR-10-1147
CLERK OF COURT REF NO.: 2010-DR-10-2126

v.

Plaintiff,

BY)
JUDGE ARMSTRONG

SYLVIA ASHLEY McADAMS,
Defendant,

PLAINTIFF'S MOTION
TO RECONSIDER
PER RULE 59
AMENDMENT OF JUDGMENTS

TO THE RESPONDENT ABOVE-NAMED:

COMES NOW THE ABOVE-CAPTIONED DEFENDANT, Lee Carlton Walker ("Petitioner") Pro Se will ask that the Order heard on January 20, 2021 and signed February 11, 2021 and filed with the Clerk of Court on February 12, 2021 before the Presiding Judge Ferderigos in the Family Court in Charleston County reconsider this order.

FACTS

1. Unconstitutional restraint on Speech, First Amendment of the United States Constitution. Paragraph 8, 11, 12 and 13.
2. Paragraph 13 we have already had a mediation in this case on racing and Rules only require 1 mediation and not 2. The mediation was done per the Rule 60 request in November of 2018 and done in 2019 and we are waiting a final hearing per the Rule 60.
3. Per Rule 3.3 Candor Towards the Tribunal, both the Defendant's Attorney William Hopkins and the GAL's Attorney Ervin Blanks broke this rule. I can show you this in the transcription on page 26 of the Jan 20, 2021 Hearing Transcript. Mr. Ervin line 1-7 is in complete contraction of the actual transcript that was given before the court hearing January 20, 2021 of the December 25, 2020 call

on page 1 line 20, page 3 lines 6-10, page 25 line 23-25 and page 26 line 1-11. This is a clear violation. of Rule 3.3. (SEE EXHIBIT 1 and 2)

RULE 3.3: CANDOR TOWARD THE TRIBUNAL

(a) A lawyer shall not knowingly:

(1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;

(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or

(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness called by the lawyer, has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter, that the lawyer reasonably believes is false.

(b) A lawyer who represents a client in an adjudicative proceeding and who knows that a person intends to engage, is engaging or has engaged in criminal or fraudulent conduct related to the proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.

(c) The duties stated in paragraphs (a) and (b) apply when the lawyer is representing a client before a tribunal as well as in an ancillary proceeding conducted pursuant to the tribunal's adjudicative authority, such as a deposition. These duties continue to the conclusion of the proceeding, and apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.

(d) In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.

Comment

[1] This Rule governs the conduct of a lawyer who is representing a client in the proceedings of a tribunal. See Rule 1.0(q) for the definition of "tribunal." It also applies when the lawyer is representing a client in an ancillary proceeding conducted pursuant to the tribunal's adjudicative authority, such as a deposition. Thus, for example, paragraph (a)(3) requires a lawyer to

take reasonable remedial measures if the lawyer comes to know that a client who is testifying in a deposition has offered evidence that is false.

[2] This Rule sets forth the special duties of lawyers as officers of the court to avoid conduct that undermines the integrity of the adjudicative process. A lawyer acting as an advocate in an adjudicative proceeding has an obligation to present the client's case with persuasive force. Performance of that duty while maintaining confidences of the client, however, is qualified by the advocate's duty of candor to the tribunal. Consequently, although a lawyer in an adversary proceeding is not required to present an impartial exposition of the law or to vouch for the evidence submitted in a cause, the lawyer must not allow the tribunal to be misled by false statements of law or fact or evidence that the lawyer knows to be false.

Representations by a Lawyer

[3] An advocate is responsible for pleadings and other documents prepared for litigation, but is usually not required to have personal knowledge of matters asserted therein, for litigation documents ordinarily present assertions by the client, or by someone on the client's behalf, and not assertions by the lawyer. Compare Rule 3.1. However, an assertion purporting to be on the lawyer's own knowledge, as in an affidavit by the lawyer or in a statement in open court, may properly be made only when the lawyer knows the assertion is true or believes it to be true on the basis of a reasonably diligent inquiry. There are circumstances where failure to make a disclosure is the equivalent of an affirmative misrepresentation. The obligation prescribed in Rule 1.2(d) not to counsel a client to commit or assist the client in committing a fraud applies in litigation. Regarding compliance with Rule 1.2(d), see the Comment to that Rule. See also the Comment to Rule 8.4(b).

Legal Argument

[4] Legal argument based on a knowingly false representation of law constitutes dishonesty toward the tribunal. A lawyer is not required to make a disinterested exposition of the law, but must recognize the existence of pertinent legal authorities. Furthermore, as stated in paragraph (a)(2), an advocate has a duty to disclose directly adverse authority in the controlling jurisdiction that has not been disclosed by the opposing party. The underlying concept is that legal argument is a discussion seeking to determine the legal premises properly applicable to the case.

Offering Evidence

[5] Paragraph (a)(3) requires that the lawyer refuse to offer evidence that the lawyer knows to be false, regardless of the client's wishes. This duty is premised on the lawyer's obligation as an officer of the court to prevent the trier of fact from being misled by false evidence. A lawyer does not violate this Rule if the lawyer offers the evidence for the purpose of establishing its falsity.

[6] If a lawyer knows that the client intends to testify falsely or wants the lawyer to introduce false evidence, the lawyer should seek to persuade the client that the evidence should not be offered. If the persuasion is ineffective and the lawyer continues to represent the client, the lawyer must refuse to offer the false evidence. If only a portion of a witness's testimony will be false the lawyer may call the witness to testify but may not elicit or otherwise permit the witness to present the testimony that the lawyer knows is false.

[7] The duties stated in paragraphs (a) and (b) apply to all lawyers, including defense counsel in criminal cases. Counsel, however, may allow the accused to give a narrative statement if the accused so desires, even if counsel knows that the testimony or statement will be false. See also Comment [9]. When a narrative statement is offered under these circumstances, the lawyer may not examine the witness or use the false testimony in the closing argument.

[8] The prohibition against offering false evidence only applies if the lawyer knows that the evidence is false. A lawyer's reasonable belief that evidence is false does not preclude its presentation to the trier of fact. A lawyer's knowledge that evidence is false, however, can be inferred from the circumstances. See Rule 1.0(h). Thus, although a lawyer should resolve doubts about the veracity of testimony or other evidence in favor of the client, the lawyer cannot ignore an obvious falsehood.

[9] Although (a)(3) only prohibits a lawyer from offering evidence the lawyer knows to be false, it permits the lawyer to refuse to offer testimony or other proof that the lawyer reasonably believes is false. Offering such proof may reflect adversely on the lawyer's ability to discriminate in the quality of evidence and thus impair the lawyer's effectiveness as an advocate. Because of the special protections historically provided criminal defendants, however, this Rule does not permit a lawyer to refuse to offer the testimony of such a client where the lawyer reasonably believes but does not know that the testimony will be false. Unless the lawyer knows the testimony will be false, the lawyer must honor the client's decision to testify. See also Comment [7].

Remedial Measures

[10] Having offered material evidence in the belief that it was true, a lawyer may subsequently come to know that the evidence is false. Or, a lawyer may be surprised when the lawyer's client, or another witness called by the lawyer, offers testimony the lawyer knows to be false, either during the lawyer's direct examination or in response to cross examination by the opposing lawyer. In such situations or if the lawyer knows of the falsity of testimony elicited from the client during a deposition, the lawyer must take reasonable remedial measures. In such situations, the advocate's proper course is to remonstrate with the client confidentially, advise the client of the lawyer's duty of candor to the tribunal and seek the client's cooperation with respect to the withdrawal or correction of the false statements or evidence. If that fails, the advocate must take further remedial action. If withdrawal from the representation is not permitted or will not undo the effect of the false evidence, the advocate must make disclosure to the tribunal. It is for the tribunal then to determine what should be done making a statement about the matter to the trier of fact, ordering a mistrial or perhaps nothing.

[11] The disclosure of a client's false testimony can result in grave consequences to the client, including not only a sense of betrayal but also loss of the case and perhaps a prosecution for perjury. But the alternative is that the lawyer cooperate in deceiving the court, thereby subverting the truth finding process which the adversary system is designed to implement. See Rule 1.2(d). Furthermore, unless it is clearly understood that the lawyer will act upon the duty to disclose the existence of false evidence, the client can simply reject the lawyer's advice to reveal the false evidence and insist that the lawyer keep silent. Thus the client could in effect coerce the lawyer into being a party to fraud on the court.

Preserving Integrity of The Adjudicative Process

[12] Lawyers have a special obligation to protect a tribunal against criminal or fraudulent conduct that undermines the integrity of the adjudicative process, such as bribing, intimidating or otherwise unlawfully communicating with a witness, juror, court official or other participant in the proceeding, unlawfully destroying or concealing documents or other evidence or failing to disclose information to the tribunal when required by law to do so. Thus, paragraph (b) requires a lawyer to take reasonable remedial measures, including disclosure if necessary, whenever the lawyer knows that a person, including the lawyer's client, intends to engage, is engaging or has engaged in criminal or fraudulent conduct related to the proceeding.

Duration of Obligation

[13] A practical time limit on the obligation to rectify false evidence or false statements of law and fact has to be established. The conclusion of the proceeding is a reasonably definite point for the termination of the obligation. A proceeding has concluded within the meaning of this Rule when a final judgment in the proceeding has been affirmed on appeal or the time for review has passed.

Ex Parte Proceedings

[14] Ordinarily an advocate has the limited responsibility of presenting one side of the matters that a tribunal should consider in reaching a decision; the conflicting position is expected to be presented by the opposing party. However, in any ex parte proceeding, such as an application for a temporary restraining order, there is no balance of presentation by opposing advocates. The object of an ex parte proceeding is nevertheless to yield a substantially just result. The judge has an affirmative responsibility to accord the absent party just consideration. The lawyer for the represented party has the correlative duty to make disclosures of material facts known to the lawyer and that the lawyer reasonably believes are necessary to an informed decision.

Withdrawal

[15] Normally, a lawyer's compliance with the duty of candor imposed by this Rule does not require that the lawyer withdraw from the representation of a client whose interests will be or have been adversely affected by the lawyer's disclosure. The lawyer may, however, be required by Rule 1.16(a) to seek permission of the tribunal to withdraw if the lawyer's compliance with this Rule's duty of candor results in such an extreme deterioration of the client-lawyer relationship that the lawyer can no longer competently represent the client. Also see Rule 1.16(b) for the circumstances in which a lawyer will be permitted to seek a tribunal's permission to withdraw. In connection with a request for permission to withdraw that is premised on a client's misconduct, a lawyer may reveal information relating to the representation only to the extent reasonably necessary to comply with this Rule or as otherwise permitted by Rule 1.6.

Last amended by Order dated April 15, 2015.

4. Also there has been new evidence that was adverse to the Defendant's and the GAL's case that was not brought before the court when asked for all parties to have a hearing to use Candor with the Honorable Court. This new information that was discovered between January 20, 2021 and February

11, 2021 the honorable court needs to hear to make the righteous and informed decision for the best interest of the minor child.

5. Also, Karen Tarpey is not and has not been the child's counselor since the Summer of 2020. She is not a current member of this case with seeing the minor child.
6. Under these laws and rules, I respectfully ask the court to reconsider this decision and ask that all parties are present to inform the court of this information and a new hearing is held to hear this information and the correction of the court being mislead and misrepresented. The Court has the power per Rule 59 (A) 1, 2.
7. As the Plaintiff I am serving all parties of this Request to Reconsider and beg and plead the Court to hear and find the Just. Also that the court schedule a new hearing and whatsoever the court finds just and proper.

RESPECTFULLY,



LEE CARLTON WALKER, Plaintiff PRO SE

SCDL 008736555

enp 4/7/20



M47m 2/22/21

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

LEE CARLTON WALKER,

JULIE L. /
CLERKAGE COURT

Plaintiff,

BY

IN THE FAMILY COURT FOR
THE NINTH JUDICIAL CIRCUIT
CASE NO. 2019-DR-10-1147
REF: 2010-DR-10-2126SUPPLEMENTAL AFFIDAVIT
OF SHARON LOVETTE,
GUARDIAN AD LITEM

vs.

SYLVIA ASHLEY MCADAMS,

Defendant.

Personally, appeared before me, Sharon Lovette, who being duly sworn does depose and say that she has personal knowledge of the items set forth herein, except those items which are stated to be upon information and belief, which the affiant believes to be true. Sharon Lovette, states as follows:

1. On November 17, 2020, an Emergency Hearing was held before the Honorable, James G. McGee, III where the Plaintiff-Father requested and was granted an Order of Continuance of 45 days, to allow time for him to retain new counsel. Plaintiff-Father was to have no contact with the minor child until the matter was heard except for a professionally supervised phone call on Thanksgiving and Christmas Day.
2. On November 18, 2020, an investigation commenced by the S.C.D.S.S., after receiving a report of allegations against the Defendant-Mother of physical neglect and mental injury of the minor child. Upon information and belief, the allegations were consistent with allegations previously made by the minor child to her Guidance Counselor, Kim Davidson and subsequently to her therapist, Leslie Armstrong and this Guardian. The Defendant-Mother was the sole subject of the investigation. On December 4, 2020, after completing their investigation, the Department closed the case as "Category II Unfounded". (Exhibit A)
3. On October 20, 2020, the minor child ran away from school after being informed by her Plaintiff-Father that he was stopping her from racing a few days earlier. Subsequently, the minor child refused to do any schoolwork for approximately 6 weeks resulting in

receiving failing grades. After numerous meetings with the Guardian, and daily meetings with school staff, on December 2, 2020, the minor child resumed completing her schoolwork and has worked diligently to complete missed assignments. Based on her progress report of January 4, 2021 she achieved, 2 - A's, 2 - B's, 1 - C and 2 - S+. (Exhibit B) School staff indicates that the minor child presents as happy, fully engaged and committed to doing her best to participate and achieve high grades.

4. Plaintiff-Father has had no known contact with the minor child since October 30, 2020, except for a phone call supervised by this Guardian on December 25, 2020. Arrangements were made with Family Ties to supervise Plaintiff-Father's call on Thanksgiving Day, however, the call did not take place. Family Ties requested that Plaintiff-Father not inform the minor child that her grandfather had been recently diagnosed with cancer and question her about schoolwork/grades in an attempt to ensure that the call go smoothly. Their policy is to stop the call if the child becomes upset. Plaintiff-Father would not agree to their terms and sent concerning emails that contained bible scriptures that reflect violence against those that harm children. Upon information and belief, Family Ties viewed these emails to be threatening in nature. Subsequently, Family Ties cancelled the call and will no longer offer services to Plaintiff-Father. This Guardian personally supervised the call on Christmas Day to ensure that the minor child was able to speak with her Father.
5. During the period where Plaintiff-Father has had no unsupervised contact with the minor child, she has made dramatic improvements. She has stopped making allegations against her Mother, and their relationship appears to have improved greatly. She has resumed her schoolwork and is earning good grades. She is showing interest in activities other than racing and has ceased talking about racing. Previously, she struggled to have a conversation where racing was not discussed.
6. This Guardian continues to be concerned about Plaintiff-Father's judgment and ongoing erratic behavior. The Guardian requests that the current arrangement continue until the parties can be assessed as recommended in the Guardian's Return to Motion and Motion.

FURTHER AFFIANT SAYETH NOT!

S. Lovette

Sharon Lovette, Affiant

Sworn and subscribed to before me
this 15 day of January, 2021

S. Lovette
Notary Public of South Carolina
My commission expires: 06-18-29

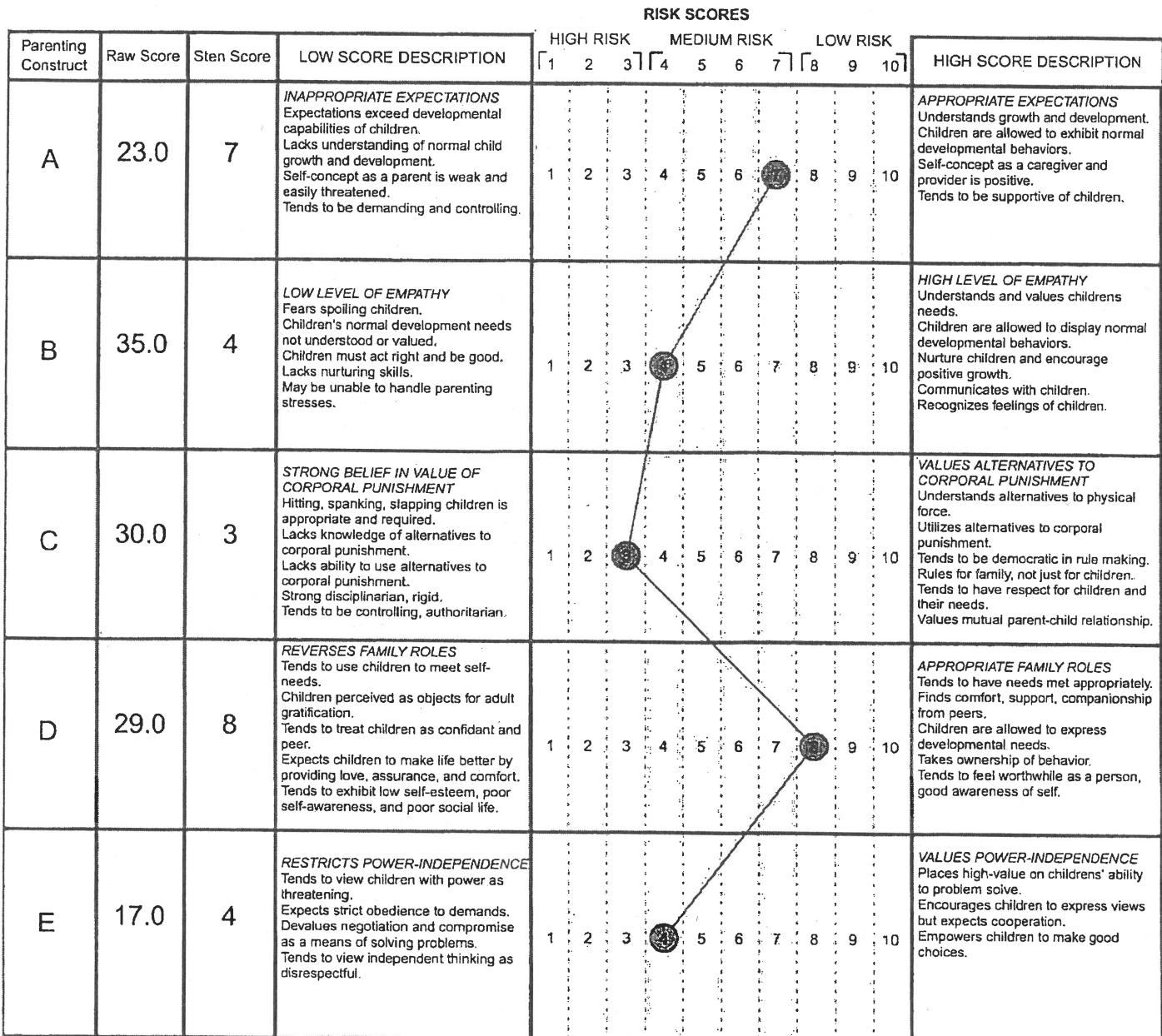
Adult-Adolescent Parenting Inventory - 2.1

Stephen J. Bavolek, PhD and Richard G. Keene, PhD

Parenting Profile – PROFESSIONAL Version

www.assessingparenting.com

Name: Lee C Walker Agency Client ID (optional): _____ Date: 12/30/2020
 City: Charleston State/Province: SC Country: US
 Sex: Male Norm table used: ADULT Assessment ID: 1889691
 Notes: Program "South Carolina Nurturing Skills"
 Form A completed 12/30/2020



A sten of 1 2 3 4 5 6 7 8 9 10 is obtained by about 2.3 4.4 9.2 15 19.1 19.1 15 9.2 4.4 2.3 percent of the population.
A sten of 1 2 3 4 5 6 7 8 9 10 or less is obtained by about 2.3 6.7 15.9 30.9 50 69.1 84.1 93.3 97.7 100 percent of the population.

January 12, 2021

STATEMENT OF HELEN R. WALKER, PATERNAL GRANDMOTHER OF ROSALYN WALKER

I have been involved in my Granddaughter's life since her birth on February 24, 2010. Rosalyn and I have a very close loving relationship. She calls me Gammy. We love shopping together, having lunch with my Sister and her Granddaughter who is 17 days older than Rosalyn and just really hanging out together. My Son, Carlton, who is my oldest Child and the Father of my only Grandchild has had shared custody of Rosalyn with her Mother, Ashley, since her birth.

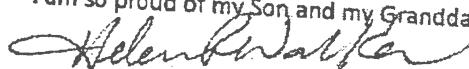
Carlton and I have a close Mother/Son relationship and I have been an instrumental part of his support system. I am always available to help in any way that I can. From the moment Rosalyn was born, my Son's heart was filled with such love as a Daddy. He is a hands-on Daddy too. When she was an infant he bathed her, fed her, changed her diapers, played with her, put her down for naps and to bed, took her to Doctor's appointments and in every way he was a Mr. MOM! It made my heart jump with joy. As Rosalyn grew he became much involved with her being in kindergarten and every grade since. Rosalyn is now in 5th grade. He impresses upon her the importance of making good grades and as long as she is with him, her grades reflect it. They share a love of animals too. Rosalyn and Daddy has a German Shepard named Yiya, a Chihuahua named Max Dog, two black cats named Boo and Miss Birdie and a fish named Lucky. Rosalyn takes very good care of her animals and they love.

Carlton disciplines her with a loving hand. The few spankings she has received has been with his hand and on her buttocks. Rosalyn is a very sweet considerate loving child. She is and always has been a Daddy's girl. She has been, up until last October 30, 2020 until his custody was taken away, a very talented Racecar Driver. She loves racing and Carlton loves being her Spotter! No safer Spotter than her Daddy. She has her own website, RACIN ROSALYN MARKETING, INC. Carlton thought it very important to teach her business skills which include how to raise money, advertising skills, how to run your own company and how to gain sponsors. She has talent in being a little business lady!

My Son was given some disastrous advice from his previous Attorney. The worst one I thought was he advised Carlton to stop Rosalyn from racing completely after losing the court case with the ability to leave school early to make her league. Carlton had been trying to keep Rosalyn's Status Quo of attending her once per month racing league with K1 Speed and enforce his 2012 Court Order that Ashley, her Mother, be accommodating for Rosalyn's extra-curricular activities. Rosalyn's Mother never once attended a race and never supported Rosalyn's racing. It seemed to me that her Mother and the Guardian Ad Litem were dead set on taking everything good in her life away from her. My darling Rosalyn was so distressed.

Until 10/30/20 Carlton had never lost his custody of Rosalyn. The Mother however has lost hers on more than one occasion. Once when Rosalyn was 4 months old when Ashley committed Criminal Domestic Violence against Carlton and then again in 2019 when she had a mental breakdown and was in MUSC IOP Hospital for a week with a diagnosis of Bi Polar I and II. I watched with heartbreak Carlton lose his custody over deceitful lies by a very biased GAL and Rosalyn's Mother. He has a new Attorney and has proof of the lies and we feel positive his custody will be reinstated when he goes back to Court this month.

I am so proud of my Son and my Granddaughter.



Colleen Lhotsky Sullivan LPC

From: Debbie Pace <debbiepace1953@gmail.com>
Sent: Tuesday, January 12, 2021 5:05 PM
To: Colleen Lhotsky Sullivan LPC

Hello, Mrs. Sullivan. My name is Deborah Pace (Carlton's Aunt Deb). Carlton Walker is my sister's son. We are a very close knit family and share all of our ups and downs. Rozi is a wonderful little girl that has spent a lot of time with my part of the family. She is best friends with my granddaughter, Ava. Over the course of Rozi's young life, I have had many, many occasions to see her relationship with her Daddy and her Mom. With Carlton, she is loving, funny, joyful, enthusiastic. With Ashley, she is very reserved and quiet. I have witnessed a wonderful father/daughter bond between Rozi and Carlton. I have never seen Ashley show any affection towards Rozi and vice versa and it breaks my heart. I offer this in the hope of a better future for Rozi.

Sincerely,

Deborah Pace

Colleen Lhotsky Sullivan LPC

From: jay68walker@aol.com
Sent: Tuesday, January 12, 2021 5:49 PM
To: Colleen Lhotsky Sullivan LPC
Subject: Carlton Walker parenting

To whom it may concern

Rosilyn is my granddaughter. I have witnessed the relationship between her Father (Carlton) for the last 10 (almost 11) years. He has been a very strong and protective father. He has seen to all her medical (and other) needs and proactive on her school work. Her grades always came before extracurricular activities (racing). I have taken care of her sometimes. Helped her with homework and taught her swimming.

She really enjoys racing. The research I have done shows its safer than horseback riding and soccer.

Carlton has been a very good parent and shown much restraint through all of this.

Thank you
James Walker

Colleen Lhotsky Sullivan LPC

From: Tina R. Green <tina10270@aol.com>
Sent: Tuesday, January 12, 2021 6:39 PM
To: Colleen Lhotsky Sullivan LPC
Subject: RE: Walker, Rosalyn and Carlton

Good evening Ms. Sullivan

My name is Christina Green, Carlton Walker and I are cousins - our mothers Helen Walker and Deborah Pace are sisters. Although Carlton and I do not get a chance to spend a lot of time with one another, we have been constants in each other's lives. And, by extension, I have been in Rosalyn's life since her birth.

In that time I have known Carlton to be a present, supportive force in her life. Rosalyn and Carlton have a strong, pure love for one another. His time and conversations revolve around her. When she is away from him, she is excited to return. I have personally witnessed her distress at having to return to her mother. She is never as happy as when she is with Daddy and Gammy.

In addition to the strong parent/child bond that they have, Rosalyn has a very large family that loves her and wants all the best for her. From summer days with my Mama and niece to having her and my niece at my home for sleepovers and fun at the pool.

Last year Aunt Helen, my Mama, Carlton and myself took Rosalyn, my son, and my niece and nephew to Disney World for a week. It was a joy spending time with them and watching their dynamic.

In my heart I believe that the best for Rosalyn would be to stay in her home she shares with her Daddy. I fear that to go with her mother would mean complete isolation from Carlton and his family.

I hope this testimony will help with the decisions ahead. I will be more than happy to speak on his behalf again.

Kind regards,
Christina Green
843-469-4381

Colleen Lhotsky Sullivan LPC

From: Beckie DeMary <copidosta@gmail.com>
Sent: Wednesday, January 13, 2021 11:02 AM
To: Colleen Lhotsky Sullivan LPC
Subject: Rosalyn Walker

Good morning Ms. Sullivan,

I am writing on behalf of Carlton Walker. I met Mr. Walker at K1 Speed in Concord, NC in February 2020, and our children raced together on five separate occasions. While I do not know Mr. Walker very well, I can speak to what I observed during those visits to K1. I saw a passion for racing, a love of his daughter, pride for how well she did on the track, excitement for participating in something they love together, interest in other children's well being, and an all around friendly individual. Rosalyn is an incredible go kart driver, she was very competitive in all her races with excellent finishes. She and my son became friends, they even practiced together, she won some and he won some. Mr. Walker always made sure to have Rosalyn at the track early so that she could practice with the other racers. From my perspective, Mr. Walker was very supportive of his daughter's love of racing, she is good at it, and we miss seeing them at K1.

Thank you,
Beckie DeMary

Colleen Lhotsky Sullivan LPC

From: Larry Downie <lawrencedownie13@gmail.com>
Sent: Wednesday, January 13, 2021 12:33 PM
To: Colleen Lhotsky Sullivan LPC
Subject: Carlton and Rosalyn Walker

My name is Yvonne Downie. My husband and I met Carlton Walker two years ago at a Home Show. We hired Carlton to renovate our home and he has become a good friend. Carlton is very knowledgeable about his work and strives to do a good job and please his clients.

On many occasions Carlton and his daughter Rosalyn have come for a visit. We have spent time talking and sharing a meal together. I am a retired DHEC nurse and worked with children for 23 years. From what I have observed, Carlton and Rosalyn appear to have fun together and get along quite well. I haven't found Carlton to make impulsive decisions or to be an over-bearing parent. Rosalyn is well-behaved and seems to love her dad dearly.

Carlton does stress over the fact that he and Rosalyn's mother can't get along. He knows this is upsetting to Rosalyn and wants her to have a more stable childhood. Rosalyn's safety and well being are priorities. Carlton loves his daughter and would do anything to protect her.

Colleen Lhotsky Sullivan LPC

From: Sarah K <ksarahsyrah@gmail.com>
Sent: Thursday, January 14, 2021 7:44 PM
To: Colleen Lhotsky Sullivan LPC
Cc: Carlton Walker
Subject: Carlton Walker

Hello Colleen Lhotsky Sullivan,

I know you're busy so I'm just going to jump right into the point.

I have known Carlton for at least 6 years. We met when I hired him as a contractor to work on a home improvement project for my home. We now work together on contracting work for my home, as well as Business Coaching to support him reaching his goals as an entrepreneur, and over time we've also developed a friendship.

I want to share this story with you -

Last year Carlton sent me a text and asked when he and Rosalyn could stop by so that Rosalyn could show me her racing information and ask for support. We set up a time. When Carlton and Rosalyn appeared on my doorstep (with masks) I came outside to hear her pitch (with a mask). We exchanged hellos and Carlton prompted Rosalyn to get started. She took the three ring binder from Carlton and started her pitch. With a little prompting here and there from Carlton she hit it out of park. She was nervous but spoke clearly, looked me in the eye, and at one point found her flow.

I understand that racing a point of contention with these proceedings so I hope that the topic doesn't reduce the point of this story. Teaching your child the importance of money, of savings, of work, of passion projects is something that has been lost over the generations. Or quite frankly - maybe we never had it as a society I'm not sure. But I notice when parents supportively coach their children to stretch into responsibilities. This sets such a wonderful foundation for their future. It could be teaching them sales techniques and helping them truly understand the value of money with behaviors or it could be practicing soccer kicking in the backyard until the street lights come on - supporting and encouraging the interests of the child while teaching them life skills is invaluable. Carlton is one of the parents who does this with Rosalyn.

Thank you for your time and attention,
Sarah

Sarah Kellerman

Colleen Lhotsky Sullivan LPC

From: Leah Rust <leahmrust@gmail.com>
Sent: Saturday, January 16, 2021 6:56 PM
To: Colleen Lhotsky Sullivan LPC
Subject: Rosalyn Walker

Colleen

Carlton Walker has asked me to send you a quick email regarding my opinion and or my observations of his parenting skills towards his daughter Rosalyn Walker. Carlton and I have known each other for 6+ years, we dated on and off for about two years when Rosalyn was around 5 or 6 years old. Carlton and I have remained friends and speak on occasion as we are both Realtors and I refer his services to several of my clients that are in need of home remodeling or handyman services. He is very thorough and delivers quality workmanship to every job.

I don't know, nor have I ever met Rosalyn's mother, Ashley. I'm not here to comment on her as I'm old enough to know there are always two sides to every story. I can tell you that in the two years that Carlton and I dated I spent plenty of time with Carlton and his daughter. He always put his daughter first and he always made it clear to me that his daughter was and still is his first priority. Since, Carlton grew up in Charleston he and Rosalyn have a wonderful support system locally with grandparents, aunts and uncles. It is clear that Carlton's mother Helen and her husband love and adore Rosalyn and are important influences in her life.

I don't know the specific details of how or why Ashley was able to get temporary full custody, but I think it's tragic and wrong as Carlton misses his daughter tremendously as I'm sure Rosalyn misses her Daddy. I do think a child needs the love and guidance from both parents as they grow up as long as both parents have the child's best interests at heart. With that said, it is my opinion that the court should re-instate Carlton Walkers custody of Rosalyn.

Warmest Regard

Leah Rust
The Boulevard Company
Leahmrust@gmail.com
843-709-9211

Sent from my iPad

100% Money Back Guarantee



Colleen Lhotsky Sullivan
Supervisor
Clinical Supervisor

EXHIBIT A

**South Carolina Department of Social Services
DETERMINATION FACT SHEET**

Case Name: McAdams, Sylvia Case Number: Berkeley County-0001303100

Address: 305 Seven Farms Dr #414

Daniel Island, SC 29492

As of 12/4/2020 Case Determination Date, it is the decision of the department that the investigation/assessment initiated on 11/18/2020 Intake Date has been Unfounded Case Determination for the following forms of maltreatment: Physical Neglect/ Mental Injury Maltreatment as supported by the facts and observations recorded below and in the county investigative/assessment file.

Facts/Observations	Supporting Documentation/Evidence
There is not a preponderance of evidence that the minor children were abused or neglected.	Case Manager (CM) Investigation
Case Manager (CM) conducted a walk through of the home with no concerns.	CM Investigation and observations
Minor child had no visible signs of child abuse or neglect.	CM Observations
Minor child is suggested to be coerced by biological father.	Armstrong Law Therapist and Karen Tarpey Counselor Statement

For indicated investigations/assessments, check all that apply:

- You have been identified as the person responsible for harm to a child. (See attached DSS Form 3089.)
- A child with whom you are involved has been identified as being abused and/or neglected by state statute. You have not been identified as being responsible for the maltreatment. This information is being provided to you solely because of your legal relationship to the child.
- A child for whom you are the caretaker has been determined to be abused and/or neglected.
 - Day Care Facility:** The matter will be referred to your employer and the DSS Division of Child Day Care Licensing and Regulatory Services for action. (See attached DSS Ltr. 3061.)
 - Foster Homes, Group Homes and Residential Facilities:** See the attached letter for additional information regarding appeal of this decision. (See attached DSS Ltr. 3061.)
- A child has been determined to have been harmed while at your child care facility. The DSS Division of Child Day Care Licensing and Regulatory Services will contact you regarding a corrective action plan and/or any other actions needed to insure the safety of children.

For unfounded investigations/assessments:

- See attached DSS Form 3065.

Worker's Signature

Date

Supervisor's Signature

Date

South Carolina Department of Social Services
NOTICE OF UNFOUNDED INVESTIGATIONS/ASSESSMENTS

Date: 12/10/2020

To: Sylvia McAdams

Address: 305 Seven Farms Dr #414

Daniel Island, SC 29492

Re: 0001303100

Dear: Ms. McAdams

This is to inform you that the child protective services investigation/assessment involving you and the above referenced children initiated on 11/18/2020, was determined unfounded on 12/4/2020 and classified as a:

Category I Unfounded Report – Abuse and neglect was ruled out by the investigation/assessment.
 Category II Unfounded Report – The investigation/assessment did not produce a preponderance of evidence that the child is an abused or neglected child.
 Category III Unfounded Report – An investigation/assessment could not be completed because the department was unable to locate the child or family or for some other compelling reason.

If classified as Category I or II, this means that the investigation/assessment has been concluded. Category III cases may be reopened if additional information is received which allows DSS to complete the investigation/assessment. The DSS investigative/assessment file will be destroyed not less than five years from the date of the case decision and information will be kept confidential pursuant to S.C. Code Section 63-7-930.

If you have any questions regarding this notice or the completed investigation/assessment, please contact the worker or supervisor listed below during normal working hours, Monday through Friday.

Latanya M. Daniels
Investigator

Jamie Daniels
Supervisor

843-925-9028
Telephone

CC: _____

EXHIBIT B

Berkeley County Schools
Second Quarter Progress Report 2020-2021

Daniel Island School
2365 Daniel Island Drive
Charleston, SC 29492
843-471-2301

Berkeley County School District Vision:
Create a future we dare to imagine and make a positive difference.

Student: **Walker, Rosalyn Charlise**

Grade: 5

Student Number: 46519

305 Seven Farms Dr, Apt 414
Daniel Island, SC 29492-8396

A - 90-100 | S+ - Excellent
B - 80-89 | S - Good
C - 70-79 | S- - Satisfactory
D - 60-69 | N - Needs Improvement
F - Below 60 | U - Unsatisfactory

Course/Class	1st Qtr	2nd Prog	Teacher	Comment	Abs	Tdy
LANGARTSRD5	61	81	Wang, Chia-ni J		5	1
BAND5	S+	—	Phillips, Julianna		2	0
COMPUTERLIT5		S+	Beauford, Tawana		2	0
PEHEALTH5		—	Heintzelman, Mark		0	0
COMPUTERLIT5		—	Rison, Jennifer		0	0
MUSIC5		—	Lawrence, Kimberly		0	0
PEHEALTH5		—	Heintzelman, Mark		0	0
PEHEALTH5	S+	—	Heintzelman, Mark		1	0
PEHEALTH5		S+	Heintzelman, Mark		1	0
LANGARTSWE5	61	75	Wang, Chia-ni J		5	0
SOCIALSTUDIES5	75	100	Wang, Chia-ni J		6	0
MATH5	67	92	Hardy, Jill		4	1
SCIHLTH5	53	80	Hardy, Jill		4	0
HOMEROOM5		—	Wang, Chia-ni J		2	0

Parent's Signature _____

December 23-January 3: Winter Break- No School
January 4-8: Virtual Learning Week
January 11: Students Return
January 18: Martin Luther King Jr Day-No Students (Schools Closed)

E. LINDSAY BLANKS, P.A.
(A Limited Liability Corporation)
Attorney and Counselor at Law

9217 University Boulevard
Suite 2-A
North Charleston, South Carolina 29406

Telephone: (843) 863-1800
Fax: (843) 863-1809
e-mail: lindsay@blankslawfirm.com

January 15, 2021

Clerk of Court
Charleston County Family Court
100 Broad Street, Suite 143
Charleston, SC 29401

RE: Lee Carlton Walker vs. Sylvia Ashley McAdams
Case No: 2019-DR-10-1147

Dear Sir/Madam:

Please find enclosed the original and three (3) copies of the following documents to be filed with your office:

<input type="checkbox"/> Notice of Representation	<input type="checkbox"/> Request for Hearing
<input type="checkbox"/> Summons and Complaint	<input type="checkbox"/> Acceptance of Service
<input type="checkbox"/> Filing Fee of \$ _____	<input type="checkbox"/> Financial Declaration
<input type="checkbox"/> Final Order	<input type="checkbox"/> Temporary Order
<input type="checkbox"/> Affidavit of Service	<input type="checkbox"/> Answer
<input type="checkbox"/> Answer and Counterclaim	<input type="checkbox"/> Reply to Counterclaim
<input type="checkbox"/> Certificate of Service	<input type="checkbox"/> Domestic Return Receipt
<input type="checkbox"/> Please Obtain Judge's Signature Before Filing	
<input checked="" type="checkbox"/> Other: <u>Second Supplemental Affidavit of Guardian ad Litem for submission for hearing on 1-20-21 before Judge Ferderigos</u>	

Please return the filed copies to me in the enclosed, self-addressed stamped envelope.

Thank you for your assistance in this matter and should you have any questions, please give me a call.


Sincerely,
E. Lindsay Blanks

Enclosures

cc: William E. Hopkins, Esq. (w/encl)
Jessica Partain, Esq. (w/encl)
Sharon Lovette (w/encl)

STATE OF SOUTH CAROLINA

) IN THE FAMILY COURT
NINTH JUDICIAL CIRCUIT

2021 JUN 19 AM 8:29

COUNTY OF CHARLESTON

) Case No.: 2019-DR-10-1147

CLERK OF COURT
W

LEE CARLTON WALKER,
Plaintiff,

)
v.
)
AFFIDAVIT OF
COLLEEN LHOTSKY SULLIVAN

SYLVIA ASHLEY McADAMS,
Defendant,

) (By Certification)

)

I, Colleen Lhotsky Sullivan, after being cautioned as to certification, duly swears and states
the following:

I am employed by Justice Works Behavioral Care.

We completed the attached assessments on Lee Carlton Walker as his request, and verify
the authenticity of the same. (Exhibits 1 & 2).

My state issued ID is attached for identification purposes.



1/18/2021

Sign

Date



Family and Parenting Diagnostic Assessment

JusticeWorks

Name: Walker, Lee (#2051329) **DOB:** 04/07/1970 (50 years)

Ethnicity: Hispanic or Latino: Unknown **Gender:** Male

Region: South Carolina

Division: Charleston

Date: 12/30/2020 9:00 AM - 12/30/2020 12:00 PM

Duration: 3 Hours, 00 Minutes

Program: Family and Parenting Assessment

Location: Telehealth (02)

Worker: Lhotsky Sullivan, Colleen

Billing Information

Services

Service	Billable Units	Duration	Procedure Code	Ordering Provider
Family Parenting Assessment	1.000 units			

Billing Outcome

Outcome: Completed

Client Demographics

Preferred Language: English

Marital Status: Single/NA

Religion: None

Sexual Orientation: Heterosexual

Reason for Referral

Parenting Assessment Date:

12/30/2020

Referral Source Statement: Self Referred.

Client's understanding of reason for referral: Client self-referred for assessment due to court coming up and the GAL recommended a Parental Evaluation. Client reports his 10 year old daughter, Rosalyn, ran away from her 5th grade class at Daniel Island School 10/20/2020. Per the police report it is noted that client released custody the day prior from his week to the child's biological mother, Ashley McAdams (client's ex paramour). Per the report, the ex paramour dropped the child off for school near the school on 10/20/2020 at 7:20am but failed to drop the child off in the front of the school per school policy. Client was said to call the school at 9:10am reporting he received an email from the child at 8:45am stating she was not at school and upset. Client reports there has since been an emergency court order resulting from Leslie Armstrong, the child's therapist's affidavit stating "father/daughter relationship/interactions concerns and client has not seen his child since October.

Presenting Concerns

Presenting Concerns:

There were several presenting issues related to the referral for a FPA. These include:

Trauma Screenings

Trauma History Screening(s) Administered: Adult Adolescent Parenting Inventory (AAPI-2.1)

Initial Assessment Responses

Initial AAPI Scores: Construct A Risk Score: Medium	Construct A Raw Score: 23	Construct B Risk Score: Medium
Construct B Raw Score: 35	Construct C Risk Score: High	Construct C Raw Score: 30
Construct D Risk Score: Low	Construct D Raw Score: 29	Construct E Risk Score: Medium
Construct E Raw Score: 17		

Initial Response to the AAPI Inventory Details: Response to the AAPI Inventory: Client was administered the Adult-Adolescent Parenting Inventory (AAPI-2.1) form A. Scores on this assessment fall between High Risk - Medium Risk- Low Risk. Any score outside of the Low Risk area will be noted as an area of concern for further exploration.

Construct A: Inappropriate Parental Expectations: This score could indicate concerns in the development and expectations of child based on developmental level and a weak and easily threatened self-concept as a parent. Other areas of concern in this construct include presenting as demanding and controlling in the parental role.
-Client scored medium to low risk in this area showing some concern of self-concept as a parent in terms of more of a peer interaction with child at times and slight lack of understanding of child development to which some conversations or situations with child might not be completely understood from the child's perspective (i.e. business or adult situations).

Construct B: Parental Lack of an Empathic Awareness of Children's Needs: This score could indicate concerns in the areas of managing parental stress appropriately and lacking empathy or nurturing skills. Client may lack the ability to understand a child's normal developmental needs, lack nurturing skills, and lack the ability to handle parenting stresses.

-Client scored medium to high risk in this area possibly lacking empathy and nurturing due to parental/custody stressors causing deficit to the child's needs emotionally. Client's ability to comfort the child appropriately without causing family division. Also relating to construct A lacking some understanding of normal child understanding/expression.

Construct C: Strong Belief in the Use and Value of Corporal Punishment: This score could indicate concerns in lacking education and understanding of alternate methods of discipline. This score could also indicate a controlling rigid disciplinarian.

-Client scored high risk in this area which can relate to construct A and the self-concept as a parent.

Construct D: Parent-Child Role Reversal: This score could indicate a reverse in family roles in which client may expect children to meet their own needs, treat the child as a peer and confidant, and expects child to make life better by offering love and affection. This score could also indicate poor self-esteem, poor social skills, and poor self-awareness.

-Client scored low to medium risk in this area. It is not indicated that the client uses the child to meet self-need (i.e. racing) but that racing is a bonding experience both enjoy and it is evident client has a strong support system having his needs met through other adults/peers rather than the child although self-concept as a parent with the child might cause this to be over-stepped at times, especially with high stress situations.

Construct E: Oppressing Children's Power and Independence: This score could indicate that client expects strict obedience and devalues negotiation and compromise in the parental role, devalues negotiation and compromise as a means of solving problems, and may view independent thinking by the child as disrespectful.

-Client scored medium to high risk where as client might value child's thoughts and opinions this relates to construct B nurturing and tuning into the child's emotional needs and construct A of some interactions not being completely understood from the child's perspective.

How has the reason for referral affected the family?: Client reports a great deal of stress this has had on the family but became tearful when speaking how grateful the support of his mother and step father has been throughout it all.

Discuss the client's extended family and their relationship to identified client.: See attached.

Describe the home environment.: Client reports a clean and safe home environment. Assessment was done via HIPAA compliant zoom and client offered to tour the house.

Mental Health Service & Agency Involvement and History

Does the client have any historical mental health diagnoses?: Client reports he believes he had been diagnosed with "components of PTSD" in the past and reported to have gone through trauma therapy. Client reports to have received therapy on his own from Dr. Stringer along with GAL's recommendation Dr. Alexander.

Assessor received a release to speak with Dr. Stringer reporting client received services from her since 2017 but has not seen him in about a year with the exception of once in October 2020. Dr. Stringer reports client is diagnosed with PTSD due to childhood trauma and the treatment goals were surrounded around client's childhood trauma and relationship with his mother and step father. Dr. Stringer reports successful outcomes of his treatment with her that the family support and relationship healing was successful. Dr. Stringer notes client is a good person, a good father, means well and has no concerns with his ability to parent. Dr. Stringer agrees that PTSD symptoms are still displayed and can explain client's over protection of daughter, living vicariously through her at times, impulsivity at times and victim mindset displayed at times which can come from his childhood trauma. Dr. Stringer reiterates that client is focused on his daughter and loves her very much and does not believe there is a viable reason to hold the child from client.

Dr. Stringer recommends client continue long term mental health care regularly, as she is winding her profession but she is willing to recommend client to an appropriate therapist to continue long term mental health care.

Assessor received a release to speak with Dr. Alexander but was not contacted back by Dr. Alexander to confirm any information.

History of Suicidal / self-harm / homicidal thoughts or behavior.: None reported.

Substance Use

Substances use: None reported

Legal Involvement

Legal involvement: Client is in a legal battle with ex paramour.

Current Diagnosis - Full

Date	Evaluation Type	Event	Clinical Professional	Next Due Date
12/30/2020			Dr. Stringer	

DSM 5

Diagnosis: F43.10 - Post-traumatic stress disorder, unspecified

Health Care Summary

Type of Visit	Date of Visit	Next Due Date	Author	Clinical Professional
Treatment Recommendations	12/30/2020		Lhotsky Sullivan, Colleen	Colleen Lhotsky Sullivan

Health Care Visits - Detailed - By Date



Family and Parenting Diagnostic Assessment

JusticeWorks

Addendums

Date: 01/06/2021 8:00AM

Type: Follow-Up

Worker: Lewandowski, Nadine

Notes: Clinician is still working on this document

Date: 01/12/2021 6:00PM

Type: Follow-Up

Worker: Lewandowski, Nadine

Notes: checking with Therapist on completion

A handwritten signature in black ink that reads "Colleen Lhotsky Sullivan, MA, LPC".

Colleen Lhotsky Sullivan, MA, LPC/Therapist

01/18/2021

Date