

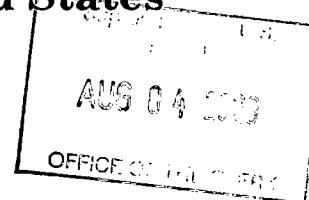
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ORIGINAL

Docket No.

In the Supreme Court of the United States

◆—————  
PAUL W. NUSBAUM, JR.,



*Petitioner,*

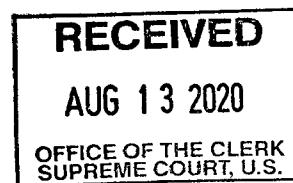
v.

MARSHA R. NUSBAUM AND  
CARROLL COUNTY CHILD SUPPORT ADMINISTRATION,

◆—————  
*Respondents.*

◆—————  
**PETITION FOR A WRIT OF CERTIORARI TO THE  
COURT OF SPECIAL APPEALS OF MARYLAND**

◆—————  
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Petitioner Pro Se  
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## **QUESTIONS PRESENTED**

1. Whether, where the obligee of child support payments is not receiving, and has not received, public assistance, the federal and state governments have a direct interest in how such payments are applied.
2. Whether federal regulations require that allocation of support funds paid to a former spouse should be first paid to current child support and child support arrears, prior to any payment of funds toward spousal support, a matter that is subject to conflicting decisions of the state courts.
3. Whether Federal regulations require prioritization of current spousal support obligations over child support arrearages.
4. Whether an agency determination that erroneously finds that Federal regulations compel prioritization of current support is beyond judicial review on separation of powers grounds.

## **LIST OF PARTIES**

All parties appear in the caption of the case on the cover page.

## **LIST OF ALL PROCEEDINGS**

Court: Circuit Court for Carroll County - Family

Case Number: 06-C-039838

Title: Paul W Nusbaum Jr vs Marsha R Nusbaum

Judgment Entered: May 25, 2018

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**IN THE  
SUPREME COURT OF THE UNITED STATES  
PETITION FOR WRIT OF CERTIORARI**

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

The Opinion of the Court of Special Appeals appears in the Appendix at A1 and is reported at *Nusbaum v. Nusbaum*, 243 Md.App. 653, 221 A.3d 1107 (2019). The order of the Court of Appeals denying certiorari has not yet been officially reported and may be found in the Appendix at A25.

**JURISDICTION**

The Court of Special Appeals issued its decision on December 20, 2019. A timely petition for certiorari was filed and denied by the Maryland Court of Appeals on March 27, 2020.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257..

**CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

U.S. Const., Amendment X:

The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people.

45 CFR § 301.1 - General definitions

Past-due support means the amount of support determined under a court order or an order of an administrative process established under State law for

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support and maintenance of a child, or of a child and the parent with whom the child is living, which has not been paid.

Spousal support means a legally enforceable obligation assessed against an individual for the support of a spouse or former spouse who is living with a child or children for whom the individual also owes support.

**45 CFR § 302.51 Distribution of support collections.**

The State plan shall provide as follows:

(a)(1) For purposes of distribution in a IV-D case, amounts collected . . . as payment on the required support obligation for the month in which the support was collected and if any amounts are collected which are in excess of such amount, these excess amounts shall be treated as amounts which represent payment on the required support obligation for previous months.

**SOCIAL SECURITY PROGRAM MANUAL GN 02410.215**

**How Garnishment Withholding Is Calculated**

**4. Multiple Orders**

Garnishment orders for child support are no longer paid on a 'first come, first served" basis. 5 CFR 581.303(a) and 5 CFR 581.305(d) require that some money be paid on each order for current child support if there is more than one withholding order. Current child support takes priority over child support arrearages.

Garnishment for alimony is not included in the prorating. It will be considered after child support payments (both current and arrearages) are calculated.

**(<https://secure.ssa.gov/apps10/poms.nsf/lnx/0202410215>)**

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**Code of Maryland Administrative Regulations {“COMAR”}**

**07.07.07.05 Distribution and Disbursement of Support Payment Collections.**

**A. The amount of child support collected and due shall be distributed and disbursed as required by the court order and the Social Security Act and regulations issued under the Social Security Act.**

**STATEMENT OF THE CASE**

Paul Nusbaum (Mr. Nusbaum) and Marsha Nusbaum (Ms. Nusbaum) were married on June 4, 1988. (E. 1)\*. During the marriage, the parties had four children, namely Josiah Nusbaum (born August 20, 1992), Hannah Nusbaum (born August 8, 1995), Bethany Nusbaum (born June 1, 1997), and Jonathan Nusbaum (born August 23, 2000). (E. 1-2).

The parties separated on January 23, 2003. (E. 1). The parties were granted a Judgment for Absolute Divorce entered on January 26, 2005. (E. 14), which incorporated the Separation Agreement executed by the parties on August 23, 2003. (E. 14, 16).

Pursuant to the Judgment of Absolute Divorce, Mr. Nusbaum was obligated to pay \$1,422.00 per month for child support by an Earnings Withholding Order. (E. 14). Mr. Nusbaum was additionally obligated to pay \$3,250 per month for alimony by an Earnings Withholding Order. (E. 14, 15-16).

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\* “E” refers to the Record Extracts in the Court of Special Appeals.

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After the divorce, Mr. Nusbaum moved his place of residence to Georgia. (E. 17, 20). The Earnings Withholding Order was registered in Georgia in 2008. (E. 183, 184). As a result of Mr. Nusbaum's residence in Georgia, the Georgia Support Administration withheld funds from Mr. Nusbaum's income pursuant to the Carroll County Circuit Court Earnings Withholding Order, then forwarded those funds to the Maryland BOSE. (E. 183, 184; E. 197, 198; E. 208, 253).

On December 15, 2010, the Magistrate, on behalf of the Court, held a hearing on Appellant's Motion to Modify Child Support and Alimony. (E. 17). On January 25, 2011, the Circuit Court for Carroll County ruled that Mr. Nusbaum "shall pay current child support to [Ms. Nusbaum] at the reduced sum of \$941.00 per month from January 1, 2010-August 31, 2010; at the reduced sum of \$835.00 per month for the month of September 2010 and \$929.00 per month in current support, accounting from October 1, 2010, beginning January 1, 2011." (E. 180). The Court also ordered the Maryland Bureau of Support Enforcement (BOSE) to calculate the child support arrearage, which was to be paid at \$21.00 per month until paid in full. (E. 180).

In 2016, while Mr. Nusbaum was making payments through the Georgia Support Administration to be paid to Ms. Nusbaum, the Georgia Support Administration informed Mr. Nusbaum that the child support arrearage they had calculated was significantly lower than what Maryland had calculated as the child support arrearage. (E. 183, 184).

Specifically, the Georgia Support Administration calculated that the child support arrearage for Mr. Nusbaum was approximately \$30,000.00 as of March

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2016. (E. 183, 184; E. 208, 233). Maryland BOSE, however, calculated Mr. Nusbaum's child support arrearage to be \$80,905.25 as of March 2016. (E. 183, 184; E. 312). Mr. Nusbaum argued that his child support arrearage should be calculated by allocating his payments first to the current monthly child support obligation, with any excess amount being paid towards the child support arrearage. (E. 208, 224-225).

Maryland calculated the child support arrearage by allocating funds towards both the monthly alimony obligation, and the monthly child support obligation. (E. 312). Mr. Nusbaum then filed a Motion to Establish Arrearage for Child Support and Alimony Payments and to Modify Support on April 6, 2016 (E. 183), to which Ms. Nusbaum filed an Answer on June 7, 2016. (E. 193).

Mr. Nusbaum filed an Amended Motion to Establish Arrearage for Child Support and Alimony Payments on August 4, 2016 (E. 197), to which Ms. Nusbaum filed an Answer on August 22, 2016 (E. 203). The Circuit Court, with a Magistrate presiding, held a hearing on this Motion on November 30. 2016. (E. 208). During this hearing, Mr. Nusbaum, through counsel, argued that all payments made to Ms. Nusbaum, through BOSE, should have been distributed first to the current child support obligation, with any excess amounts allocated to the child support arrears. (E. 208, 224-225). Mr. Nusbaum also argued that a full audit of these payments should be performed by BOSE, and that the payments should be reallocated. (E. 208. 225: E. 208, 234).

Ms. Nusbaum argued that the payments were appropriately allocated. (E.

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208, 279-81). The Magistrate granted Mr. Nusbaum's motion in part on April 10, 2017. (E. 320, 322). The Magistrate recommended that Mr. Nusbaum's child support obligation be reduced to \$481.00 per month, plus \$120.25 per month towards child support arrearages. (E. 320, 322). The Magistrate further stated that she did not believe that the Court had the authority to order BOSE to do a full audit of Mr. Nusbaum's payment or order BOSE to retroactively reallocate the payments already made by Mr. Nusbaum. (E. 320, 323). However, the Magistrate indicated in the Report and Recommendations that "upon the entry of this Order, that child support current and arrearage payments should be given priority over the alimony obligation, as it is in the best interest of parties' minor children." (E. 320, 323).

Mr. Nusbaum filed Exceptions to the Magistrate's Report and Recommendations and Order on April 19, 2017. (E. 327). BOSE filed an Answer to Mr. Nusbaum's Exceptions, on behalf of Ms. Nusbaum, on May 5, 2017. (E. 335).

On September 21, 2017, the Circuit Court ordered that the Court did have the authority to order BOSE to perform a full audit of Mr. Nusbaum's previous payments and to have BOSE reallocate the funds. (E. 403). The Court also ordered BOSE to perform such an audit and to reallocate Mr. Nusbaum's payments first toward the current monthly child support payments during the months that each payment was made, then towards child support arrearages, and with any excess amount of the payment be allocated toward spousal support. (E. 403).

On October 2, 2017, Ms. Nusbaum then filed a Motion to Alter or Amend the Court's September 21, 2017 Order, Consider Additional Evidence, or, in the

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Alternative, Order a New Trial. (E. 407). In this Motion, Ms. Nusbaum submitted as an exhibit Mr. Nusbaum's 1040 tax return forms from 2006 to 2009. (E. 407, 425). Ms. Nusbaum claimed these tax return forms were originally submitted by Mr. Nusbaum in the 2010 Magistrate's Hearing on a Motion to Modify Child Support and Alimony Payments. (E.407, 410).

Each 1040 form indicated an amount for which Mr. Nusbaum received a tax deduction for "alimony paid." (E. 407. 425-432). Separately, Maryland Bureau of Support Enforcement filed a Motion to Reconsider the Court Order on October 2, 2017. (E. 444).

Mr. Nusbaum filed a Response to each of these motions on October 19, 2017. (E. 456; E. 467). A hearing was held on these Motions on December 21, 2017. (E. 589). The Court entered an Opinion and Order on these Motions on February 26, 2018. (E. 687). The Court ordered that because Mr. Nusbaum filed his tax returns in his Motions to Modify Child Support Payments in this same case, which asserted the amounts that were allocated as alimony payments, that Mr. Nusbaum was judicially estopped from claiming that those payments should have been allocated towards child support. (E. 687, 694).

The Court then ordered that the allocation issue was not before the Court because of the judicial estoppel ruling, (E. 687, 695). In reaching its decision, however, the Court stated "the Court remains unconvinced that the Administration's method of payment allocation is consistent with Maryland's best interests of the child standard. Resolution of that issue will have to wait another

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day." (E. 687, 695).

In doing so, the Court modified its September 21, 2017 Order, and overruled the Exceptions. (E. 687, 695). Mr. Nusbaum filed a Motion to Alter or Amend the Judgment on March 7, 2018 (E. 700), to which Ms. Nusbaum filed a Motion to Dismiss on March 26, 2018. (E. 710).

On April 2, 2018, the Court entered an Order, which among other things, revised the February 26, 2018 Order and determined that the Court did not have the authority to Order BOSE to perform an accounting and reallocation of the support payments, and denied the Motion to Alter or Amend, essentially taking the case back to the recommended Order submitted by the Magistrate a year earlier, on April 10, 2017. (E. 716, 718).

The Court of Special Appeals affirmed, albeit on a different ground. That Court rejected the estoppel basis for the Circuit Court decision, but found that separation of powers precluded the courts from setting aside the BOSE method of allocation. It also concluded, on the basis of its construction of federal social security regulations, that the allocation method was correct.

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## REASONS FOR GRANTING THE PETITION

### **WHEN NEITHER PARTY IS RECEIVING PUBLIC ASSISTANCE THE FEDERAL GOVERNMENT HAS NO INTEREST IN THE ALLOCATION OF SUPPORT PAYMENTS AS HELD BY THE BETTER REASONED DECISIONS: A CONTRARY RULE WOULD VIOLATE THE TENTH AMENDMENT**

There currently is a split of authority concerning whether Federal regulations specify a method of allocation of child support and spousal support payments when neither party is receiving public assistance.

Maryland, as demonstrated by the decision below, holds that Federal regulations require that the allocation of support payments be made first to prorated amounts between Child Support and Spousal Support. If there is any payment remaining, it is to be applied to Child Support and Spousal Support arrearages using the same proration percentages. The Maryland Court believed this was required by 45 C.F.R. § 302.51. It rejected Petitioner's argument to the contrary, namely, his payments should be paid first to current child support, then to child support arrearages, followed by current alimony, and then finally to alimony arrearages.

Other courts hold "when . . .the obligee is not receiving, and has not received, public assistance, the state does not have a direct interest in how such payments are applied" and the common law rule permitting the debtor to make the allocation applies. *Matter of Marriage of Gayer*, 326 Or. 436, 445, 952 P.2d 1030, 1035 (1998). In this context, the "term 'public assistance' is defined as 'government aid to needy,

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blind, aged, or disabled persons and to dependent children.” *In re James*, 406 F.3d 1340, 1345 (11th Cir. 2005) (quoting Merriam-Webster Online Dictionary).

The authorities on both sides of the issue are collected in *Hornbeck v. Caplinger*, 227 W.Va. 611, 617, 712 S.E.2d 779, 782 (2011).

The Oregon Supreme Court’s analysis is correct. There is no governmental interest in these circumstances where neither party is receiving public assistance. The Federal regulations at issue do not provide for support allocation in that instance, and, if they did, it would violate the Tenth Amendment. See *Bond v. United States*, 564 U.S. 211 (2011). This is because the whole subject of domestic relations “belongs to the laws of the State, and not to the laws of the United States.” *Simms v. Simms*, 175 U.S. 162, 167 (1899).

The Constitutional issue need not be reached because the Federal regulations do not purport to operate in these instances. “[P]rivate parties may contract as they choose, provided that no law is violated thereby . . . .” *Mallinckrodt, Inc. v. Medipart, Inc.*, 976 F.2d 700, 703 (Fed. Cir. 1992). This is such a case.

The relevant regulation is 45 CFR § 302.51(a)(1), which provides:

For purposes of distribution in a IV-D case, amounts collected . . . as payment on the required support obligation for the month in which the support was collected and if any amounts are collected which are in excess of such amount, these excess amounts shall be treated as amounts which represent payment on the required support obligation for previous months.

The text of the regulation seems rather straightforward. It applies only in an IV-D case, i.e. where the custodial parent is receiving public assistance from the

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state's Office of Child Support Enforcement. It should not apply in a bootstrap, where a matter becomes an IV-D case simply because payments are made through the child support enforcement unit.

Moreover, the regulation appears in the section of CFR concerning child support and does not, in any sense, refer to alimony. Indeed, the term "spousal support" is explicitly defined in 45 CFR § 301.1. Yet the term is conspicuously absent from 45 CFR § 302.51(a)(1).

The reason for the exclusion seems rather clear. Unlike child support, which are governed nationally by the child support guidelines, the rules governing alimony or "spousal support" are not. Moreover, state and federal courts recognize "the best interest of the child is an inseparable element of the child's 'support,'" *In re Jones*, 9 F.3d 878, 881 (10th Cir. 1993). Reading the regulation in the fashion as did the Maryland court is inconsistent with this policy.

It is also significant that federal tax law mandates that child support obligations are a priority, with regard to the payments and funds collected or paid from a former spouse, 26 U.S.C §71(c)(3). Federal tax provides that when a former spouse pays less than the full amount of the child and spousal support sum for a given month, pursuant to a divorce or separation instrument, the payment is applied first to the current child support and the child support arrears. *Id.*

The United States Tax Court has consistently found that when payments are made which are less than the total sum of the child support and spousal support obligation, the "payment which is made shall, to the extent of the sum payable for

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the support of the minor child, be considered as payment for such support.” *Blyth v. Commissioner*, 21 T.C. 275, 279 (1953).

This rationale has been consistently followed to ensure that payments, which are less than the total sum owed per month, are distributed first to the current child support obligation and then to the child support arrears before being allocated to spousal support. *Proctor v. Commissioner*, 129 T.C. 92 (2007) (holding that a lump sum payment made by the former husband, which was less than the total amount owed in child support and alimony (including arrearage) was allocated first to the balance of the child support obligation, and then to alimony). See also *Hazam v. Commissioner*, 79 T.C. 1579 (2000) (holding that when a former husband was ordered to pay \$200,000 a year in support to his former spouse, plus \$30,000 specifically designated for child support, but only paid \$200,000 a year, that \$30,000 from each \$200,000 payment “shall be considered, pursuant to 26 U.S.C. §71(c)(3), a payment for child support”).

The Maryland Court of Special Appeals stated that Child Support and Spousal Support are Equal, which is not following the Federal Policy. (E. 693) The Code of Maryland Administrative Regulations (“COMAR”) 07.07.07.05 states, “The amount of child support collected and due shall be distributed and disbursed as required by the court order and the Social Security Act and regulations issued under the Social Security Act.” The Social Security Act, Policy GN 02410.215 states, “Current child support takes priority over child support arrearages. Garnishment for alimony is not included in the prorating. It will be considered after

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child support payments (both current and arrearages) are calculated.”

The Maryland Court of Special Appeals state, “We hold OCSE's allocation of support payments, first to current child support, second to current alimony support, and third to arrearages of both alimony and child support, to be legally correct.” (E. 679) However, Mr. Nusbaum's payments have always been prorated. Due to the current percentage split between Child Support and Spousal Support, less than twenty percent of every payment is being applied to Child Support.

In addition to not following the Federal Guidelines, OCSE is not following their own policy manual. Section C.704 of their Policy manual provides a matrix and defines how payments are to be distributed. (Appendix A24) The manual states, “Regular payments are prorated by CSES at the CASE LEVEL using the account/accounts support obligation amounts (SOA) to prorate the payment to the case/cases.” The manual then lists acronyms indicating all of the account codes that are to be prorated together as Priority 1. The OCSE points to the acronym “SC”, which is included in the Priority 1 codes, and tells the court it represents “Spousal Support.” Since it is listed as a Priority 1 account, it should be Prorated with Child Support. However, according to their manual, “SC” is defined as, “SPOUSAL SUPPORT ONLY(N-IV-D).” (Appendix A25) According to their manual, the only time Spousal Support is to be considered Priority 1, is when it is the only account, and, only in Non-IV-D Cases. Their manual goes on, in C.706. which states, “The following policy guidelines shall be used when processing distribution exceptions to the federal and state distribution payment hierarchy, which requires child support

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payments be applied to current support before satisfying other obligations.”

(Appendix A25)

The OCSE is required to follow their plan. 42 U.S. Code 666.(a) (8)(A)(B)(iv) states, “Withholding from income of amounts payable as support must be carried out in full compliance with all procedural due process requirements of the State.”

The Maryland Court of Special Appeals stated that President Clinton’s Executive order placed Child Support at the same level as Spousal Support. However, the executive order states, “Children need and deserve the emotional and financial support of both their parents.” “The Federal Government, through its civilian employees and Uniformed Services members, is the Nation’s largest single employer and as such should set an example of leadership and encouragement in ensuring that all children are properly supported.” Exec. Order No. 12,953 “Requires each Federal agency, including the Uniformed Services, to provide information to its employees and members about actions that they should take and services that are available to ensure that their children are provided the support to which they are legally entitled.” Exec. Order No. 12,953 Section 101(C). Failure to follow the federal guidelines will result in Children not receiving the support they deserve.

If the Maryland Court of Special Appeals precedent is followed, every non-custodial parent that owes both child and spousal support, and has an income withholding order is at risk of accumulating large Child Support arrears and suffer consequences, should they not be able to pay both obligations. Additionally, if a non-

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custodial parent has multiple Child Support orders with multiple families, and a Spousal Support order, the Family that is only receiving Child Support will suffer greatly. Especially during this Covid crisis. If the non-custodial parent is only able to make their Child Support payment, that payment will be drastically reduced as it will be prorated with the Spousal Support. How is this in the Children's Best Interest? This will cause Child Support Payments to fall below Child Support Guidelines.

According to the National Conference of State Legislatures:

<https://www.ncsl.org/research/human-services/state-data-on-child-support-collections.aspx>

In 2018, Maryland had:

Total Amount of Arrearages: **\$ 1,350,708,171**

Total Support Due: **\$ 630,343,599**

Total Caseload: **198,241**

If Maryland fails to give Child Support priority, these numbers will continue to climb. Additionally, non-custodial parents, if they are only able to pay Child Support, may face punishment such as losing their driver's license, which may cause them to lose their jobs. Correct distribution of collected funds is a matter that must be addressed by this Court.

Finally, insofar as this Court is concerned, separation of powers has nothing to do with this case. Whether a regulation is applicable is a judicial issue and when, as here, the regulation is clear and unambiguous, no deference is accorded to the

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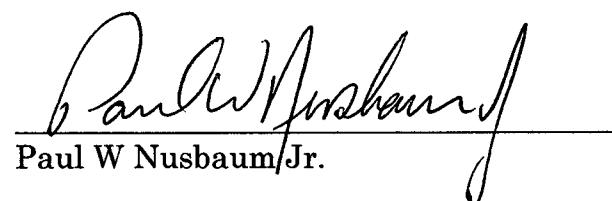
agency. See *Kisor v. Wilkie*, 139 S. Ct. 2400 (2019). Maryland erroneously believed that it was constrained by Federal regulation to require prioritization of current spousal support obligations over child support arrearages even though neither party was receiving public assistance.

## CONCLUSION

Certiorari should be granted to resolve the conflicting decisions. Federal regulations do not require prioritization of current spousal support obligations over child support arrearages where neither party is receiving public assistance. This petition presents important issues of public policy that warrant review. The precedential opinion of the Maryland Court of Special Appeals will cause irreparable damage to the fabric of the law if left to stand.

Respectfully submitted,

Dated: August 3<sup>rd</sup>, 2020



Paul W Nusbaum/Jr.

# **A P P E N D I X**