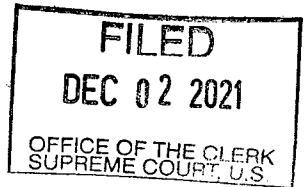


ORIGINAL

No. 21-927

In The  
Supreme Court of the United States



Donald Clinton Crabtree,

*Petitioner,*

v.

Christine Renee Crabtree,

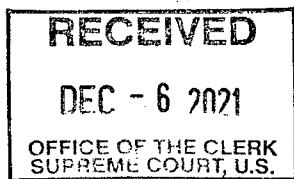
*Respondent.*

*On Petition For A Writ of Certiorari To  
The South Carolina Supreme Court*

**PETITION FOR A WRIT OF CERTIORARI**

Donald "Clint" Crabtree  
8804 Berthusen Rd.  
Lynden, WA 98264  
360-471-1904  
clint.crabtree@hotmail.com

*Petitioner*



## **QUESTIONS PRESENTED**

- I. Did Judge Monet Pincus violate the 1st Amendment protection of freedom of expression and generally condemn religious expression of men?
- II. Did the South Carolina Trial Court err in facilitating divorce of Washington State residents?
- III. Did the Judge George McFadden ignore substantial exonerating evidence in support of Husband at the beginning of litigation and fail to render him due process?
- IV. Did the Court ignore its own psychological reports and expert testimony and wrongly assign credibility to the Wife?
- V. Did the Court convert issues, conflate mischaracterizations, minimize salient facts and construct findings in order to inappropriately assign credibility to the Wife?
- VI. Do the findings of Judge Monet Pincus demonstrate mischaracterization, religious persecution, abuse of power in order to exercise prejudice and ignore torts against partnership obligations?
- VII. Does Judge Monet Pincus bring discredit to the judiciary by manifest gender prejudice and malfeasance?
  1. Does Judge Monet Pincus substitute hearsay regarding Husband's childhood in order to mischaracterize findings regarding pornography?

2. Does Judge Monet Pincus substitute hearsay regarding Husband's childhood in order to mischaracterize findings regarding objectification of women?

3. Does Judge Monet Pincus mischaracterize findings regarding Husband's use of religion?

VIII. Did the Court Facilitate the Wife's Construction of Desertion of the Husband?

IX. Did Judge Monet Pincus violate 14<sup>th</sup> Amendment equal application of the law?

X. Did the Guardian Ad Litem, James Stoddard, manifest bias, and do his actions and assignment by Judge George McFaddin indicate collusion?

XI. Did the Court err in awarding custody of the children to the Mother?

## **PARTIES TO THE PROCEEDINGS**

Donald Crabtree as defendants-appellants below

Christine Crabtree as plaintiff-appellee below

James Stoddard as Guardian-ad-Litem for:  
[NAME REDACTED] (14)  
[NAME REDACTED] (12)  
[NAME REDACTED] (10)  
[NAME REDACTED] (8)

## **CORPORATE DISCLOSURE STATEMENT**

Not Applicable

## **RELATED PROCEEDINGS**

Supreme Court of South Carolina

*Christine Crabtree v. Donald Crabtree*, No. 2021-000088 (SC. Jul 06, 2021)

Supreme Court of Washington

*Christine Crabtree v. Donald Crabtree*, No. 98576-6 (WA. Oct 07, 2020)

Appellate Court of South Carolina

*Christine Crabtree v. Donald Crabtree*, No. 2018-0000269 (SC. Dec 21, 2020)

*Christine Crabtree v. Donald Crabtree*, No. 2018-0001571 (SC. 29 Apr, 2021)

*Crabtree v. Crabtree*, Op. No. 2017-UP-461 (SC 13 Dec, 2017).

Appellate Court of Washington

*Christine Crabtree v. Donald Crabtree*, No. 80165-1-I (WA. Apr 20, 2020)

*Christine Crabtree v. Donald Crabtree*, No. 81164-9-I (WA. Aug 02, 2021)

Superior Court of Whatcom County, Washington

*Christine Crabtree v. Donald Crabtree*, No. 19-3-00167-37 (WA. ongoing)

Family Court of Sumter County, South Carolina

*Christine Crabtree v. Donald Crabtree*, No. 2015-DR-43-1428 (SC. Jan 26, 2018)

## TABLE OF CONTENTS

QUESTIONS PRESENTED .....	i
PARTIES TO THE PROCEEDINGS .....	iii
CORPORATE DISCLOSURE STATEMENT .....	iii
RELATED PROCEEDINGS .....	iii
TABLE OF CONTENTS .....	v
INTRODUCTION .....	1
OPINIONS AND ORDERS BELOW .....	2
JURISDICTION .....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	3
STATEMENT OF THE CASE .....	3
REASONS FOR GRANTING THE WRIT .....	7
I. Did Judge Monet Pincus violate the 1st Amendment protection of freedom of expression and generally condemn religious expression of men? .....	7
II. Did the South Carolina Trial Court err in facilitating divorce of Washington State residents? ..	8
III. Did the Judge George McFadden ignore substantial exonerating evidence in support of Husband at the beginning of litigation and fail to render him due process? .....	10
IV. Did the Court ignore its own psychological reports and expert testimony and wrongly assign credibility to the Wife? .....	13
V. Did the Court convert issues, conflate mischaracterizations, minimize salient facts and	

construct findings in order to inappropriately assign credibility to the Wife?.....	17
VI. Do the findings of Judge Monet Pincus demonstrate mischaracterization, religious persecution, abuse of power in order to exercise prejudice and ignore torts against partnership obligations?.....	24
VII. Does Judge Monet Pincus bring discredit to the judiciary by manifest gender prejudice and malfeasance? .....	30
1. Does Judge Monet Pincus substitute hearsay regarding Husband's childhood in order to mischaracterize findings regarding pornography?.....	30
2. Does Judge Monet Pincus substitute hearsay regarding Husband's childhood in order to mischaracterize findings regarding objectification of women?.....	32
3. Does Judge Monet Pincus mischaracterize findings regarding Husband's use of religion? ....	33
VIII. Did the Court Facilitate the Wife's Construction of Desertion of the Husband? .....	36
IX. Did Judge Monet Pincus violate 14 <sup>th</sup> Amendment equal application of the law? .....	39
X. Did the Guardian Ad Litem, James Stoddard, manifest bias, and do his actions and assignment by Judge George McFaddin indicate collusion?.....	40
XI. Did the Court err in awarding custody of the children to the Mother?.....	40
CONCLUSION.....	44

APPENDIX A, Order of the South Carolina Supreme Court, July 6, 2021.....	1a
APPENDIX B, Order of the South Carolina Appellate Court, December 21, 2020.....	3a
APPENDIX C, Order of Sumter County, South Carolina Family Court, January 26, 2018.....	17a

**TABLE OF AUTHORITIES****Cases**

<i>Barstow v. Barstow</i> , 74 SE 2d 541 (SC 1953) .....	12
<i>Emery v. Smith</i> , 603 SE 2d 598 (SC 2004).....	29
<i>LD Oswald, Jr. v. Oswald</i> , 95 SE 2d 493 (SC 1956).....	29
<i>Lindsey v. Lindsey</i> , 143 SE 2d 524 (SC 1965).....	12
<i>Precision Co. v. Automotive Co.</i> , 324 US 806 (1945).....	29
<i>Vickers v. Vickers</i> , 176 SE 2d 561 (SC 1970).....	12
<i>Wilson v. Landstrom</i> , 315 SE 2d 130 (SC 1984) .....	29
<i>Wolfe v. Wolfe</i> , 68 SE 2d 348 (SC 1951).....	29

**Constitutional Provisions**

S.C. Const. art. I, § 2.....	8
U.S. Const. art. I, § 10, cl. 1.....	2, 3
U.S. Const. art. VI, cl. 2.....	3, 28
U.S. Const., amend. I.....	3, 8
U.S. Const., amend. XIV § 1 .....	3

**Other Authorities**

S.C. Code Ann. § 20-3-10 .....	29
S.C. Const., Art 1 § 4.....	28

## INTRODUCTION <sup>1</sup>

This is a custody case for a Washington State family formerly in military service divorced by the Courts of South Carolina. The lower courts are unjustly adjudicating divorce and custody cases. This case exemplifies the how family law attorneys, including family law judges, are able to practice malfeasance brazenly. In this case, the court targeted "biblical roles" as a straw-man for ignoring statute torts and faults committed by the Wife. This case ignores facts and evidence in order to achieve a predetermined outcome. This case reflects a proxy war of feminism v. coverture and a preferential treatment for influential attorneys.

The lower Court ignores the U.S. Constitution to facilitate a favorable outcome to the mother. Additionally, the court ignores substantial psychological evidence and testimony favorable to the father. The lower court violated the U.S. Constitution's 1<sup>st</sup> Amendment when it ruled that the husband caused the demise of the marriage due to his religious expression. The Court mischaracterizes the husband as using his faith offensively, when the evidence shows his religious dialogue was defensive in nature. The lower Court also improperly establishes causation by citing evidence anachronistically.

---

<sup>1</sup> View online for activated footnotes to record on appeal:  
<http://digitalcourt.us/us/scotus/crabtree/?code=20211203>

The lower court ignores U.S. Const. art. I, § 10, cl. 1: "No...law impairing the obligation of contracts...shall be passed." The lower court renders partnership commitments irrelevant by equating commitment obligations to "biblical roles." And by this prejudice the court ignored relevant state statutes that show tort by the mother against the father.

The lower courts outlandish one-sided departure from evidence, and testimony manifest "unequal application of the law," violating provisions of the 14<sup>th</sup> Amendment of the U.S. Constitution.

#### **OPINIONS AND ORDERS BELOW**

1. Local Court Final Order Appendix C
2. SC Appellate Court Opinion Appendix B
3. SC Supreme Court Denial Appendix A

#### **JURISDICTION**

The South Carolina Supreme Court issued its decision on 6 July, 2021. Pet. App. 2a. This petition is timely under this Court's March 19, 2020 order extending the deadline to petition for a writ of certiorari to 150 days. This Court has jurisdiction under 28 U.S.C. § 1257(a).

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. art. I, § 10, cl. 1:  
No...law impairing the obligation of  
contracts...shall be passed.

U.S. Const., amend. I:  
Congress shall make no law respecting an  
establishment of religion, or prohibiting the  
free exercise thereof...

U.S. Const. art. VI, cl. 2:  
This Constitution, and the Laws of the United  
States which shall be made in Pursuance  
thereof; and all Treaties made, or which shall  
be made, under the Authority of the United  
States, shall be the supreme Law of the Land;  
and the Judges in every State shall be bound  
thereby, any Thing in the Constitution or  
Laws of any State to the Contrary  
notwithstanding.

U.S. Const., amend. XIV § 1:  
nor shall any State deprive any person of life,  
liberty, or property, without due process of  
law; nor deny to any person within its  
jurisdiction the equal protection of the laws.

## STATEMENT OF THE CASE

On 9 Nov, 2015 Christine Crabtree departed  
the marital home with the couple's 4 children:

[NAME REDACTED] (14), [NAME REDACTED] (12) [NAME REDACTED] (10), [NAME REDACTED] (8) to stay at an emergency shelter. The following day she filed for emergency relief describing a family forced into a shelter in fear for their lives and upon filing relocated into an unoccupied home of a military man on deployment. The Father was served the following day, 11 November, for an emergency hearing in two days on Friday the 13<sup>th</sup>.

The Couple was married in Lynden WA on August 12<sup>th</sup> 2000 and the Husband entered U.S. Air Force service in July of 2001. The Couple moved every 2-3 years living in Dover DE, Azores Portugal, Dayton OH, Spokane WA, Osan South Korea, and Sumter SC. The Couple accepted an incentive severance from the Air Force in June 2014 so that he could start a business.

The Wife became anxious in Oct of 2014 about the transition and began insisting the Husband pursue traditional employment. The Husband insisted on pursuing this passion and the Wife withdrew intimacy from the Husband thereafter. The Husband was separated from active duty on 31 December 2014. Marital acrimony had manifested as the Husband was to begin his efforts. The Husband pleaded with the Wife that they move home to Washington state, rent out their homes, and conserve funds, but the Wife refused.

The Wife ceased intimate relations beginning in October of 2014 without intent to resume. On 30 March 2015 the Husband departed the marital

bedroom against the Wife's express wishes. The email in evidence on this date notes the Husband's efforts to reassure the Wife regarding her concerns but notes her ultimatum not to resume relationship.

The Husband entered Air Force Reserve service in June, 2015 at Colorado Springs, CO and served in August and September 2015. When he returned home, the Wife's parents were visiting in the marital home. When the Husband's parents visited shortly after, the Wife told them they were unwelcome. When the Husband attempted to take children to see his parents nearby, the Wife and his father-in-law tried to stop the Father.

The Father emailed his in-laws that they should not interfere, demanded an apology, or else he would ask the police to remove them from the marital home. The father-in-law refused, the police refused to remove the father-in-law, and the in-laws departed a few days later on a schedule not shared with the Father.

The Father made plans to move the family back to Washington state. He informed the Wife on 6 November 2015 that he had disenrolled the children from school for the following year.

The Court ruled following the 13 November 2015 hearing to temporarily remove Husband from the marital home and granted restricted supervised visitation of the children. A Guardian-ad-litem was assigned (by name in ruling) and a psychological evaluation of the parents was also ordered.

Financial support was imputed to the Husband based on his former active duty military pay which were followed by multiple enforcement actions finding him in contempt for failure to pay.

The psychological evaluations were completed in September, 2016 and showed that the Wife exaggerated, had questionable credibility, and undermined her justification for fleeing the marital home. The testing found the Husband to be high functioning and candid.

The final trial lasted from 2-4 October 2017. The lower court found the Wife to be credible and concluded that the Husband's religious beliefs caused his Wife's withdrawal and destroyed their marriage.

The Wife and Husband motioned for reconsideration. The Husband disputed his Wife's credibility and custody arrangements for their children. The Wife requested more alimony and child support. The Wife's motion was granted and the Husband's was denied.

The Husband appealed to the South Carolina Appellate Court which affirmed the lower court ruling. The Husband then motioned for reconsideration which was denied and subsequently petitioned the South Carolina Supreme Court which was denied on 6 July, 2021.

## REASONS FOR GRANTING THE WRIT

The following issues discuss multiple violations of the U.S. Constitution and malfeasance of the lower courts leading to an unjust child custody outcome.

### I. **Did Judge Monet Pincus violate the 1st Amendment protection of freedom of expression and generally condemn religious expression of men?**

The Final Order grants alimony to the Wife on the basis of determining that the marriage failed because of the Husband's religious beliefs:

... Father refused to acknowledge, validate or lend credence to Mother's repeated concerns over the years regarding the parties' relationship. Father's repeated use of the bible in general and specific scriptures in particular ... Pet. App. 23c 4.A.4

...but the father's use of his Christian faith toward Mother in this regard was the main cause of the demise of the marriage. Pet. App. 27c 4.A.13

Husband made it impossible for Wife to remain in the marriage and she needs alimony.<sup>2</sup>

---

<sup>2</sup> ROA Vol 4 Page 207 Line 16

Judge Monet Pincus mischaracterized the Husband's "use of faith," as part of the court's basis for awarding alimony, and determined that the Husband's religion were undesirable. The 1<sup>st</sup> Amendment of the U.S. Constitution states, in part:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof... <sup>3</sup>

The State of South Carolina Constitution also states, in part:

The General Assembly shall make no law respecting an establishment of religion or prohibiting the free exercise thereof... <sup>4</sup>

Judge Monet Pincus's basis for awarding alimony infringes upon the Husband's constitutional right to freedom of speech and freedom of religion guaranteed in the 1<sup>st</sup> Amendment of the Constitution of the United States<sup>5</sup> and by the Constitution of the State of South Carolina.

## II. Did the South Carolina Trial Court err in facilitating divorce of Washington State residents?

---

<sup>3</sup> U.S. Const., amend. I

<sup>4</sup> S.C. Const. art. I, § 2

<sup>5</sup> U.S. Const., amend. I

In accordance with Service Member's Civil Relief Act (SCRA) <sup>6</sup> of 2003 the State of Legal Residence or Domicile is and was the state of Washington. The Husband and Wife were both Washington State residents evidenced in voter registration, driver's licenses, primary residence, and the Husband's military W-2. The Husband's Air Force active duty service terminated on 31 December 2014. The Husband demonstrated his intent to utilize the Air Force's relocation entitlement on 6 November 2015 and return the family to Washington state, in response the Wife fled the marital home to begin litigation.

The couple lived in South Carolina as a function of the Husband's active duty service for which never intended or attempted to change his Legal State of Residence (SLR). The South Carolina laws implied jurisdiction due to a one year residency establishment period. The Husband's filings were given under duress with a 1.5 day response period. The South Carolina law allowed for the couple to become residents, but they never established residency nor intended to. The Court being familiar with military community could/should have identified the discrepancy and allowed the Husband to relocate the family to their legal state of residence and jurisdiction.

---

<sup>6</sup> 50 U.S.C. app. §§ 501 et seq

**III. Did the Judge George McFadden ignore substantial exonerating evidence in support of Husband at the beginning of litigation and fail to render him due process?**

The Husband provided a digital audio file on 13 November 2015 <sup>7</sup> which undermined the Wife's allegations about the Husband's alleged instability, and further demonstrated the allegations of instability were likely projections of her own inconstancies. The audio was transcribed in the Husband's Motion for Reconsideration dated 19 January, 2016. <sup>8</sup> An excerpt appears below:

Christy Crabtree:

Your going to do the same thing you've done our entire lives (saying) 'well I'm supporting the family, without money we couldn't survive; therefore, I am more important, what I do is more important, what I do is worth more!'

Clint Crabtree:

I've never said that.

Christy Crabtree:

No, Yeah, you've never said that. You're too subtle, That's the only way you can get away with lying to yourself. I think if you were overt like my Dad...by yelling and calling

---

<sup>7</sup> ROA Vol 1 Page 33

<sup>8</sup> ROA Vol 1 Page 109

people things or whatever then I think you would stop, but I think you have found a way to continue in a subtle, subtle, subtle manner that frankly I do believe you have no idea what you're doing.

This is the primary example of how the Court ignored the Husband and his exculpatory evidence against allegations by the Wife. Additionally, although the Husband had only approximately 36 hours to prepare for the emergency hearing, he obtained supporting affidavits that were supplied during the 13 November 2015 hearing:

Several friends, church members, and neighbors, including Ms. Christina Kinley, Mr. Adrian Bradley, Mr. Cary Belmear, Dr. Condyl Richardson, and Mr. Randy St. Cyr provided supportive affidavits in which they described Mr. Crabtree as a good father and man of moral character.<sup>9</sup>

The court ordered psychological evaluations contained the following synopsis of the emails submitted by the Wife:

Pertaining to the mails from Mr. Crabtree, seven examples were provided. Two were from March/April 2015 and five were from October/November 2015. In the earlier emails Mr. Crabtree appeared to outline issues related to their sexual relationship and respecting each other's time. In the latter

---

<sup>9</sup> ROA Vol 2 Page 194 Para 3

emails, one of which was addressed to Ms. Crabtree's parents, he incorporated religious language and philosophical opinions. A patriarchal perspective is evident in his statements. For example, he remarked 'I am the pastor and spiritual leader of my house' and 'You are simply following in the curse of the woman, trying to unbalance my leadership. Coveting my authority and attacking me.' Notably, he typically ended his emails by expressing his love for Ms. Crabtree. In the final email, dated 11/6/15, Mr. Crabtree mentions that he is considering taking action to initiate divorce given her anger and misery in the relationship. He emphasized, however, that he is not doing so to punish her.<sup>10</sup>

The Court did not take the couple as it found them. The Wife exited the home, made false allegations to generate a false pretense to force the Husband out of the marital home. The Wife's allegations had no statutory grounds: "the reason for withdrawal by the complaining spouse must be in itself sufficient ground for a divorce."<sup>11</sup> According to South Carolina law, "The only form of cruelty recognized in South Carolina as a ground for divorce is physical cruelty."<sup>12</sup> <sup>13</sup> The Wife's allegations were not of this nature.

---

<sup>10</sup> ROA Vol 2 Page 210 Para 3

<sup>11</sup> *Vickers v. Vickers*, 176 SE 2d 561 (SC 1970).

<sup>12</sup> *Barstow v. Barstow*, 74 SE 2d 541 (SC 1953).

<sup>13</sup> *Lindsey v. Lindsey*, 143 SE 2d 524 (SC 1965).

This failure to adhere to statute violate both "due process" and "equal application of the law."<sup>14</sup>

**IV. Did the Court ignore its own psychological reports and expert testimony and wrongly assign credibility to the Wife?**

The court ordered psychological evaluations undermine the Wife's credibility. Yet the Court faulted the Husband for failing to validate his Wife's complaints.

**Dr. Harari Regarding the Husband:**

in my opinion, Mr. Crabtree was somewhat defensive and also a tendency to externalize responsibility and minimize his role in the conflict; however, he did produce collateral information that was supportive of his perspective.<sup>15</sup>

**Dr. Harari Regarding the Wife:**

Reviewing the validity data on the psychological inventory between Mr. Crabtree and Mrs. Crabtree the accumulation of findings suggest that he is generally responded in a more candid manner.<sup>16</sup>

**Dr. Harari Regarding the Husband:**

---

<sup>14</sup> U.S. Const., amend XIV § 1

<sup>15</sup> ROA Vol 3 Page 358 Line 2.

<sup>16</sup> ROA Vol 3 Page 358 Line 21.

from the accumulation of data, I did not see overt personality dysfunction or psychological dysfunction. One of the allegations was you're highly aggressive, violent, narcissistic, and the test data that I acquired didn't support those qualities that I saw.<sup>17</sup>

Dr. Harari making a contrast:

I measure faking good or defensiveness. On two of them, she had elevations where – that were high on social desirability. And on yours, your evaluation, your responses presented as candid and reasonable, meaning they weren't elevated. So it's just one way of comparing one aspect of your presentation comparing one aspect of your presentation compared to hers was that I found your test data more, you know, reasonably interpretable, where I found that I needed some caution interpreting her test data due to possible symptom minimization.<sup>18</sup>

Dr. Harari discussing Wife:

Mrs. Crabtree presented as a woman that can be passive and submissive in her relationships, she tends to – or endorse where she doesn't assert herself appropriately and maybe engage in withdrawal tendencies rather than face conflict. That's how she kind of views herself, according to the MMPI

---

<sup>17</sup> ROA Vol 3 Page 359 Line 7.

<sup>18</sup> ROA Vol 3 Page 352 Line 16.

results. There's also a tendency to be overly dependent on others.<sup>19</sup>

The Wife presents herself as submissive, but the evaluation shows that she is likely to "fake goodness," for social desirability and she must be interpreted with caution. The Husband cross-examined Gina Smith, the Wife's therapist to discover if the Wife was grooming the therapist for validation:

Cross-examination of Gina Smith by Husband. <sup>20</sup>

**Q:** Is it possible for a client to mislead you?

**A:** Well, I don't really know that I'd call it misleading, Mr. Crabtree. I mean, you know, a patient might not be truthful, but I don't base my therapy on whether or not the person is necessarily giving me a factual presentation.

**Q:** Is it possible that Christy has been misleading you about her feelings?

**A:** - - I don't know how to describe this. I'm not a - - I'm not a lawyer, you know, who's seeking truth with a capital T....., its not up to me to prove to them that there's a justification for them being sad or for them being angry or for them being nervous or anxious or fearful.

---

<sup>19</sup> ROA Vol 3 Page 354, lines 2-8.

<sup>20</sup> ROA Vol 3 Pages 31 - 32, line 7.

**Q:** So it's possible that Christy came to you acting like she was afraid for a hidden purpose?

**A:** I don't really think so. But I don't see it that way either, Mr. Crabtree.

The salient evidence indicates the Wife presents a false-self and paid a social worker for emotional validation<sup>21</sup>:

1. Audio recordings show forceful, demanding, condemning verbal Wife, neither submissive nor passive.
2. Psychological results find:
  - a. Wife could not provide collaborative evidence or examples for her claims of fearing the Husband.
  - b. The Husband had none of the negative characteristics described by the Wife
  - c. The Wife presents herself falsely to others for social acceptance
3. Her therapist is not concerned about the truth, nor helping her client discover or operate with valid/credible/justifiable emotional response.

---

<sup>21</sup> Quality Friends are hard to cultivate when seeking sympathy for baseless feelings; however, Gina Smith may satisfy this sense of feeling validated by listening without challenge, for a price.

Judge Monet Pincus findings in the following section indicate the mother was took responsibility and make positive behavior changes and as being credible contract what has been discussed thus far:

**V. Did the Court convert issues, conflate mischaracterizations, minimize salient facts and construct findings in order to inappropriately assign credibility to the Wife?**

Despite the substantial evidence supporting the Father, the final order ignores the findings of the court ordered psychological reports.

Judge Monet Pincus:

Father refused to take responsibility for the demise of the marriage or refused to acknowledge his conduct may have been inappropriate. Father refused to acknowledge he may be in need of counseling or could benefit from counseling. Pet. App. 23c 4.A.4

**1) Finding the Wife to be credible**

Judge Monet Pincus:

The Court finds that the Mother's willingness to address concerns, including her part in the demise of the marriage, and her willingness to make behavior changes that positively impact her, give the Court confidence that

Mother is better suited to have custody of the children. Pet App. 25c 4.A.6

The Court finds that Mother's testimony is credible. Pet App. 25c 4.A.7.

Court Psychological Report:

Ms. Crabtree alleged that Mr. Crabtree's 'erratic' behavior has been directed at the children and that he undermined her authority.<sup>22</sup>

Court Psychological Report:

He did not appear to have memory problems, as he was able to remember past events in vivid detail. Mr. Crabtree was oriented to person, place, time, and situation and presented as in full contact with reality.<sup>23</sup>

Court Psychological Report:

...Specifically, there was not sufficient evidence from the psychological test findings to support Ms. Crabtree's allegations of highly controlling or aggressive tendencies. Rather the test findings appeared valid and did not reveal obsessive-compulsive, narcissistic, or violent tendencies.<sup>24</sup>

2) Finding that the Husband refused counselling:

Judge Monet Pincus:

---

<sup>22</sup> ROA Vol 2 Page 192 Para 3

<sup>23</sup> ROA Vol 2 Page 206 Para 1

<sup>24</sup> ROA Vol 2 Page 217 Para 6

Mother has grown and effected positive change from her counseling. Father has not attended counseling, nor shown a genuine interest in doing so. Pet. App. 22c 4.A.2

**Court Psychological Report:**

He and Ms. Crabtree first sought couples therapy during a previous separation in 2001. Mr. Crabtree recalled that they each attended individually for several months before participating in conjoint sessions. These reportedly aided in their reconciliation. Mr. Crabtree further described brief periods of pastoral counseling. The next formal marital therapy occurred in 2015 with Randy Hyatt. He stated that the counseling sessions toward the end of his marriage did not resolve their differences.<sup>25</sup>

- 3) That the Wife encouraged the relationship of the children with the other parent

**Judge Monet Pincus:**

The Mother endorses the Father as a parent more so than the Father does the Mother. Pet App. 25c 4.A.5

**Court Psychological Report:**

Ms. Crabtree also filed a Summary of Relief Requested (undated) in which she reiterated her request for the following: Supervised visitation for Mr. Crabtree; a Restraining Order against Mr. Crabtree; child support,

---

<sup>25</sup> ROA Vol 2 Page 213 Para 1

insurance, and other financial support; and for the use of the marital home and family vehicle. She submitted a Proposed Parenting Plan, requesting sole custody and supervised, daytime visitation for Mr. Crabtree.<sup>26</sup>

**Court Psychological Report:**

Mr. Crabtree concluded that the totality of the evidence suggests he should be awarded primary custody of and final decision-making authority regarding the children in a joint custody arrangement.<sup>27</sup>

**4) That the Wife is the more well-adjusted parent**

**Judge Monet Pincus:**

The Court finds that the Mother will most likely bring about better-adjusted, mature individuals if she is awarded custody. Pet App 26c 4.A.10

**Court Psychological Report:**

When reviewing the validity data on the psychological inventories between Mr. Crabtree and Ms. Crabtree, the accumulation of findings suggest that he generally responded in a more candid manner. Mr. Crabtree did not produce any significant elevations on the social desirability validity indices contained within his testing battery. In contrast, Ms. Crabtree exhibited social desirability and defensiveness on two of the

---

<sup>26</sup> ROA Vol 2 Page 192 Para 5

<sup>27</sup> ROA Vol 2 Page 192 Para 1

four inventories containing validity indices including the PDS-IM scale and CAPI. Importantly both parties produced MMPI-2-RF profiles that were fully interpretable. Overall, Mr. Crabtree's test findings can be interpreted within a reasonable degree of psychological certainty. In contrast, some caution is necessary regarding the interpretation of Ms. Crabtree's test data <sup>28</sup>

- 5) Ana-chronological use of evidence to assign cause: Judge Monet Pincus reverses the timeline of events. Specifically, the Husband's emails which contain complaints occurred after the Wife's provocations.

Judge Monet Pincus:

... Father refused to acknowledge, validate or lend credence to Mother's repeated concerns over the years regarding the parties' relationship. Father's repeated use of the bible in general and specific scriptures in particular ... Pet. App. 23c 4.A.4

Court Psychological Report:  
[aforementioned item 3]

Court Psychological Report:

Ms. Crabtree filed an affidavit on November 10<sup>th</sup>, 2015. In this document she claimed that Mr. Crabtree has been emotionally and

---

<sup>28</sup> ROA Vol 2 Page 201 Para 2

psychologically abusive in the form of intimidating and controlling behaviors... <sup>29</sup>

**Court Psychological Report:**

Mr. Crabtree provided a timeline with regard to his perception of marital dissatisfaction based on email communication between him and Ms. Crabtree. He noted that a marked change occurred in 2014 and continuing through 2015. He described this period as associated with her request he seek formal employment, calling him "insane," yet requesting he watch the children, and with her decision to withdraw from engaging in physical intimacy with him. <sup>30</sup>

**Court Psychological Report:**

Overall, the acquired psychological data do not indicate any obvious physically abusive tendencies on Mr. Crabtree's part. The CAPI findings were interpretable and did not indicate interpersonal characteristics of abusive parents. Additionally, the MMPI2-RF findings are not indicative of an individual who engages in unprovoked aggression or has substantial problems related to emotional regulation. <sup>31</sup>

These pivotal findings manifest prejudice.  
For item (1) The credibility of the Wife is unsupported by the evidence and the findings of the

---

<sup>29</sup> ROA Vol 2 Page 192 Para 3

<sup>30</sup> ROA Vol 2 Page 194 Para 6

<sup>31</sup> ROA Vol 2 Page 219 Para 1

final order. For item (2) the finding that the Husband refused counselling is not supported by the evidence. For item (3) the finding that the Wife would be more supportive of the Father to the children is undermined by contradictory requests: Specifically, Husband asked for joint-custody and Wife asked that Husband have restricted supervised visitation. For item (4) the finding that the Mother is more likely to raise more well-adjusted children is not supported by evidence comparing the two parties.

**Dr. Harari Report:**

He maintained that the primary impetus for the current separation was the ongoing disagreement pertaining to finances. Mr. Crabtree explained that he and his estranged wife agreed that should voluntary discharge from the Air Force in order to obtain a larger severance package. They also reportedly agreed that he would use the money to start a business. Mr. Crabtree noted that he had been developing a data processing software system that he believed he could commercialize and sell to the Air Force bases. However, he stated that Ms. Crabtree eventually changed her mind and insisted that he obtain standard employment. Therefore, they began experiencing intensified conflict in October 2014 <sup>32</sup>

For item (5) the conflict leading to litigation a year later began in October of 2014 regarding wife's

---

<sup>32</sup> ROA Vol 2 Page 213 Para 5

demand for Husband not to start the business that previously she agreed to. When the Husband was reluctant, the Wife began withdrawing and accusing. The Husband endured this for a year and formally rebuked his wife for her attacks starting in November 2015. His rebuke comes after a year of enduring his wife's acrimony.

**VI. Do the findings of Judge Monet Pincus demonstrate mischaracterization, religious persecution, abuse of power in order to exercise prejudice and ignore torts against partnership obligations?**

This argument addresses how the findings of Judge Monet Pincus objectified the Appellant by (1) applying false stereotypes which (2) undermine partnership obligations.

In her ruling, Judge Monet Pincus mischaracterized testimony of the Husband in order to create a narrative that she felt comfortable to attack: which appears to be “patriarchy.” Judge Pincus seems to exhibit a proxy battle of feminism v. coverture.<sup>33</sup>

In this case, Judge Monet Pincus clearly personally disapproved of the Husband’s expectation of faithfulness in the context of the couple’s

---

<sup>33</sup> This is a difficult matter for feminism due to the merits of equality enabling the agency of men and women to freely obligate themselves and enter into roles based commitments.

Christian oriented obligations. Judge Monet Pincus articulated this in the aforementioned question I that the Father's exercise of his faith caused hardship. Additionally, Judge Monet Pincus found:

Husband does not believe that Wife should be awarded alimony because she betrayed and broke faith in the relationship between the parties and she did not live up to her biblical role. The Court finds there is no statutory fault ground for divorce applicable to this case. Pet. App. 37c 12.H

These findings are very troubling. First, Judge Monet Pincus mischaracterized the testimony of the Husband: His testimony complained of the dishonesty of the Wife in her claims and efforts to betray him (by false accusations) and take from him as a breach in faith (or contract). In contrast, Judge Monet Pincus mischaracterized that the Husband's complaint as that the Wife did not fulfill her biblical role in the marriage. Second, Judge Monet Pincus treats the religious context in a way that ignores the parallels of marital commitment clearly represented by state law.

Clearly South Carolina statute regarding marriage imposes expectations of faithfulness or commitment regardless of the couple's originating religious context:

The essentials of desertion are (1) cessation from cohabitation, (2) intent on the absent party not to resume it, (3) absence of the

opposite party's consent, and (4) absence of justification.<sup>34</sup> <sup>35</sup>

As the following testimony clearly demonstrates, the Husband was not disputing whether or not his wife was fulfilling her Biblical roles, but rather he was clearly hurt that the wife had become dissatisfied with how he intended to fulfill his role and he was being attacked and vilified by the Wife:

Clint Crabtree Testimony:

I was accused of not loving her, and it just didn't stop unless I did what she wanted.<sup>36</sup>

Clint Crabtree Testimony:

I felt like I was being a stalwart of loving her while she's talking to me, telling me I don't love her, not reacting, not accusing her back, ... And it went on for a year until the point...

<sup>37</sup>

Clint Crabtree Testimony:

I do think that it is my duty to love and to lead and we are in a relationship that is traditional, where she's agreed to follow me and support her, and that we work together in that way...in the Bible it talks about those roles, but it's not like this that that I want to

---

<sup>34</sup> *LD Oswald, Jr. v. Oswald*, 95 SE 2d 493.

<sup>35</sup> S.C. Code Ann. § 20-3-10 (United States South Carolina) (6) Deserion.

<sup>36</sup> ROA Vol 3 Page 434 line 16

<sup>37</sup> ROA Vol 3 Page 435 line 7

use it for coercion or manipulation or – it's just like I feel a duty and a responsibility to lead, and she's attacking me for thinking I'm the leader, and yet that's, me thinking I'm the leader is what gives me this drive to try and make these things work. So it is difficult for me. She's attacking my role, telling me, you think your role is this, and I'm like, well fine, yeah, I do that that role is – true, that's right, and that's what motivates me to do these things that she reads in a book about narcissists or whatever and they think those are their roles and they completely misapply them.

And so I feel like she just misaligns and stereotypes because a person might think a certain thing and say this is therefore, because there's – you think in biblical terms, therefore you are a person who lords authority over others. And that's just – it's not me. But she's trying to convince me at this point it is, and then she's telling me I don't have remorse for it. She's telling me that I don't care about her. And then it goes on.<sup>38</sup>

The Husband's complaint is that the Wife's narrative is not truthful and her actions to divorce him and bear false witness against him betrayed their relational commitment. Her decision to attack and demonize his role during the previous year also

---

<sup>38</sup> ROA Vol 3 Page 435 line 18

served as a breach in faith from the partnership they had entered into and she enjoyed for 15 years.

Third, Judge Monet Pincus finds that obligations made between marriage partners carries no private contract. U.S. Constitution and South Carolina Constitution provide that "no...law impairing the obligation of contracts."<sup>39</sup> <sup>40</sup>

Judge Pincus fallaciously renders the Husband's claims of broken contract mute by substituting the word "biblical" as a distraction from statute. Judge Pincus ignores the obligations formed between the couple and ignores her duty that "...the Judges in every State shall be bound thereby, any Thing in the Constitution..." <sup>41</sup>

When Judge Monet Pincus says she can find no statutory grounds for an at fault divorce regarding the Wife's failure to fulfill "biblical roles" she is diverting attention from applicable law and failing to acknowledge the appropriate correlations according to South Carolina Statute S.C. Code Ann. § 20-3-10

The Husband's complaint regards a Tort identified as "Desertion" according to S.C. Code Ann. § 20-3-10. As stated at the end of Question V, the Wife withdrew from the relationship over a year prior to litigation. Additionally, the Wife admitted that she did not allow the Husband to move the

---

<sup>39</sup> U.S. Const., Art 1 § 10, cl 1

<sup>40</sup> S.C. Const., Art 1 § 4.

<sup>41</sup> U.S. Const. art. VI, cl. 2

family to Washington State which is also grounds for desertion: "The husband has the right, acting reasonably, to choose where the family shall reside, and when the wife refuses to go with him she is guilty of desertion." <sup>42</sup> <sup>43</sup> <sup>44</sup>

Wife withdrew from the relationship for over a year with no intent to resume relationship (See item 1 of Question VII) prior to litigation. Another form of desertion is how the Wife created relational absence as a constructed desertion by impacts of the temporary order brought about by her false allegations. Judge Monet Pincus should have recognized the behavior as a desertion according to statute. As such, the Wife should not be entitled to alimony because of her false statements and lack of commitment. "[O]ne who comes to the court seeking equity must come with clean hands." <sup>45</sup> <sup>46</sup>

He who comes into equity must come with clean hands. It is far more than a mere banality. It is a self-imposed ordinance that closes the door of the court of equity to one tainted with inequitableness or bad faith relative to the matter which he seeks relief. <sup>47</sup>

The doctrine of unclean hands precludes a plaintiff from recovering in equity if he acted

---

<sup>42</sup> *Wolfe v. Wolfe*, 68 SE 2d 348 (SC 1951).

<sup>43</sup> *LD Oswald, Jr. v. Oswald*, 95 SE 2d 493 (SC 1956).

<sup>44</sup> S.C. Code Ann. § 20-3-10 (United States South Carolina) (6) Deserion.

<sup>45</sup> *Emery v. Smith*, 603 SE 2d 598 (SC 2004).

<sup>46</sup> *Precision Co. v. Automotive Co.*, 324 US 806 (1945).

<sup>47</sup> *Wilson v. Landstrom*, 315 SE 2d 130 (SC 1984).

unfairly in the matter that is the subject of the litigation to the prejudice of the defendant.

**VII. Does Judge Monet Pincus bring discredit to the judiciary by manifest gender prejudice and malfeasance?**

When Judge Pincus ruled that the Husband acknowledged pornography and concluded "Husband admits to objectifying women," Judge Pincus made the Husband a target for feminist derision. The context implies correlation and characterization:

- Pornography = Male sexual deviance
- Objectification = Inhumane mistreatment
- Religious Roles = Male Patriarchal Justification of Aforesaid
- Used Religion/Used Faith against = Hypocrisy in context

This is a condemning fabrication to paint the Husband as a hypocrite in his Christianity regarding his sexuality.

**1. Does Judge Monet Pincus substitute hearsay regarding Husband's childhood in order to mischaracterize findings regarding pornography?**

The subject of pornography usage arose during spousal emails starting 30 March 2015;

Clint Crabtree:

Christy, I know that pornography in my life has hurt you. You have chided me to it on serval occasions as you exit conversations. But I'm not sleeping downstairs to that effect. I'm down here to keep your boundaries generated by your ultimatum for our relationship where you swore "we will never be close again, so you can protect your heart."

<sup>48</sup>

The Wife testified about her husband's pornography use as a minor:

Christy Crabtree:

Clint did admit in counselling to the pastor that he had grown up objectifying women and that's why he had an addiction to pornography. There was other times that he told me that if he couldn't get his needs met, then he'd have to turn elsewhere <sup>49</sup>

The Husband testified at trial:

Clint Crabtree:

So it was on March 30<sup>th</sup>, that was when I had moved downstairs to a different bedroom based on the accusations Christy had started making about me, and I just -- it was stated to the Court that I used pornography as a way to hurt her, but I was just wanted to point out that, in that exhibit I was trying to reassure her that my move had nothing to do with the

---

<sup>48</sup> ROA Vol 1 Page 68

<sup>49</sup> ROA Vol 3 Pages 104 line 16.

desire to pursue what I would consider something that's been a weakness in my life. And something that I - I'm not proud of. And so I - even during all this conflict, I was trying to reassure her whereas she makes it look like I'm trying to threaten her.<sup>50</sup>

The point is that the Husband did not threaten his wife despite her refusal to have sexual intimacy. The Wife refused intimate relations while simultaneously wanting her husband to remain in the same bed and maintain control of his sexual desires.

By this time, the Wife had withheld intimacy for five months due to control the relationship. The evidence does not support Judge Monet Pincus's narrative of a patriarchal male who feels entitled to sexual deviance. Instead, it shows a Husband acknowledging his wife's concerns during an impossible situation created by his wife.

**2. Does Judge Monet Pincus substitute hearsay regarding Husband's childhood in order to mischaracterize findings regarding objectification of women?**

Continuing from the previous, there is not appropriate evidence for Judge Monet Pincus to say that the "Husband admits to objectifying women" as a basis for findings. This misrepresents the past

---

<sup>50</sup> ROA Vol 3 Page 494 line 14

tense nature and the hearsay nature conflating the matter as relevant and significant.

It is noteworthy that both the Husband and the Wife claimed to be virgins when they married after a 2.5 year dating period. This implies a man who does not discard or use women sexually, but rather a man who sought and desired a faithful and monogamous relationship with his wife.

Additionally, the Wife did not allege any non-traditional, bizarre, or fetishes during the couples' sexual encounters. Her greatest testified sexual complaints were that she found it necessary to cease sexual relations with the Husband:

I had to firmly tell you no in order for you to take your hands off of me, and I felt very threatened by that.<sup>51</sup>

### **3. Does Judge Monet Pincus mischaracterize findings regarding Husband's use of religion?**

In the final order Judge Pincus states:

Father refused to acknowledge, validate or lend credence to Mother's repeated concerns over the years regarding the parties' relationship. Father's repeated use of the bible in general and specific scriptures in particular Pet. App. 23c 4.A.4

---

<sup>51</sup> ROA Vol 3 Pages 180 - 183.

...but the fathers use of his Christian faith toward Mother in this regard was the main cause of the demise of the marriage. Pet. App. 27c 4.A.13

As previously shown in Argument III, the dialogue between the couple clearly demonstrates Wife accusing Husband of asserting himself in a dominant manner, allegedly because he regards his role as more important because he makes the money. The Husband noted that he never asserted this, which his Wife conceded, but she nevertheless reiterated her accusations in a very nebulous manner:

Clearly the Wife is accusing the Husband of "thinking" that his role is more important than hers, but that he never says it. This does not fit the stereotype of a controlling man.

In addition to this recorded proof, there is also item (1) of question V of the Psychological findings showing insufficient evidence to support Wife's allegations of highly controlling or aggressive tendencies. Rather that valid test findings did not reveal obsessive-compulsive, narcissistic, or violent tendencies in the Husband.

Furthermore, the discussion in question VI notes that the Husband's complaints regarding his wife are due to her attacks upon his perceptions of his role in the marriage.

The Wife targeted the Husband's role of providing due to her anxiety over how he intends to make a living. Strategically, if she can erode his confidence she can exercise greater influence.<sup>52</sup>

Notably, the assertive emails come at the end of the year of acrimony and just days prior to the Wife fleeing from the home with the children. In these emails the Husband faults the Wife for her cessation of the relationship and her attacks against his character over the previous year. He asserted that the Wife manipulated him with negative emotions which was being disobedient to God. He also asserted, unapologetically, his role as pastor or head of household. He opined that her efforts to undermine him were not appropriate and noted he is considering divorce as the only viable non-retaliatory option as noted in the Dr. Harari's psychological report:

For example, he remarked 'I am the pastor and spiritual leader of my house' and 'You are simply following in the curse of the woman, trying to unbalance my leadership. Coveting my authority and attacking me.' Notably, he typically ended his emails by expressing his love for Ms. Crabtree. In the final email, dated 11/6/15, Mr. Crabtree mentions that he is considering acting to initiate divorce given her anger and misery in the relationship. He

---

<sup>52</sup> Egalitarian feminism would have the Wife seek work, But the Wife's approach has no merit in demanding equal say over the Husbands form of employment.

emphasized, however, that he is not doing so to punish her.<sup>53</sup>

When the Wife realized on 6 November 2015 that her designs to control her husband were unravelling and that he may act for relief, she preemptively fled the home with the children just 3 days later on 9 November 2015.

In short, Judge Monet Pincus completely misrepresents the facts of the case by describing the Husband as using religion against the Wife over the years.

In addition, Judge Monet Pincus erroneously determined "who started it." Judge Pincus ruled that the Husband's use of his faith during his marriage caused its demise. But as presented thus far the Husband did not use religion or roles in the relationship as depicted by the wife or the ruling. In Contrast, The Wife used the couple's religion against Husband with relational cessation and attacked his role.

#### **VIII. Did the Court Facilitate the Wife's Construction of Desertion of the Husband?**

Based on the aforementioned questions the Court failed in the following:

---

<sup>53</sup> ROA Vol 2 Page 210 Para 3

1. Failed to respond to exonerating evidence favorable to the Husband.
2. Failed to heed the findings of the court ordered psychological results were favorable to the Husband and unfavorable to the Wife.
3. Erred in finding the Wife to be credible.
4. Failed to identify multiple desertion scenarios by the Wife.
  - Relational withdraw without intent to resume
  - Refusal to relocate in with Husband
  - False accusations accomplished constructive desertion
5. Failed to acknowledge expert testimony warning against the Wife's false self-presentation.
6. Erred by constructing a false narrative regarding Husband's use of religion

In addition to these failures, the Court failed to hold the Wife responsible for initiating immediate proceedings with the false pretext of an emergency situation. When the Husband cross-examined the Wife at trial she confessed to a planned departure, not an emergency departure:

Clint Crabtree: Can you Describe the day of our Separation?

Christy Crabtree: I packed up the kids, and we drove to the shelter.

Clint Crabtree: At what Time?

Christy Crabtree: Four o'clock

Clint Crabtree: When did you decide to make the decision?

Christy Crabtree: Probably a week before, a few days before.

Clint Crabtree: Did you take any actions to prepare it?

Christy Crabtree: I did.<sup>54</sup>

The lack of emergency nature is also corroborated by Dr. Harari who noted that the initial pleadings of fear for life and safety may not be valid:

Dr. Marc Harari:

Ms. Crabtree's presentation during the clinical interview appeared somewhat guarded. Although she admitted to some problematic behavior on her part in the past, she primarily exhibited a tendency to externalize responsibility to Mr. Crabtree for their difficulties. Specifically, Ms. Crabtree generally described Mr. Crabtree as the controlling and psychologically abusive individual in their marriage. Moreover, her statements to this examiner were somewhat inconsistent with her Complaints and Affidavits, in that during the clinical interview she did not indicate fear for her children's lives and she did in the Court documents. Additionally, Ms. Crabtree had

---

<sup>54</sup> ROA Vol 3 Pages 176 - 177 Line 19.

difficulty articulating specific examples of concerning parenting behavior on the part of her estranged husband. Overall, some caution appears necessary regarding the accuracy of her self-report data.<sup>55</sup>

Therefore; the Court also errored by:

7. Evicting Husband from his home without cause.
8. Failing to hold Wife responsible for the charade she constructed to evict the Husband from the home.

**IX. Did Judge Monet Pincus violate 14<sup>th</sup> Amendment equal application of the law?**

Continuing from previous questions, Judge Monet Pincus did not afford the Husband "equal application of the law" <sup>56</sup>. She did not weigh the credibility of his testimony equally with his wife. She did not properly consider Dr. Harari's findings and expert testimony. She did not account for the numerous witnesses that testified in support of the Husband. She ignored the audio recordings that demonstrated the Wife to be controlling and manipulative. She faulted the Husband for religious expression.

---

<sup>55</sup> ROA Vol 2 Page 189 Para 2

<sup>56</sup> U.S. Const., amend XIV § 1

**X. Did the Guardian Ad Litem, James Stoddard, manifest bias, and do his actions and assignment by Judge George McFaddin indicate collusion?**

Judge George McFadden ruled "This case screams for a good, seasoned GAL. If James A. Stoddard, Esq., is available I suggest his appointment."<sup>57</sup> Two years later at final trial when cross examined, James Stoddard confessed he found the Father's recording the Mother "repugnant" regardless of facts it evidenced.<sup>58</sup> Suggesting that James Stoddard who should have recused himself by that sentiment alone, he was a mole to sustain the trajectory of the case and faithful to his appointer who also ignored the exonerating nature of the recording. Additional examples include asking Mother's witness if Father showed favoritism, but not asking the same of Father's witnesses. Finally, James Stoddard expressed the Mother's demand for validation and Fathers refusal is key to custody.<sup>59</sup>

**XI. Did the Court err in awarding custody of the children to the Mother?**

All previous questions cascade to the significance of these propositions:

- 1) If it is true that the Mother used stereotypes to mischaracterize the Father,

---

<sup>57</sup> ROA Vol 1 Page 33

<sup>58</sup> ROA Vol 4 Page 59 Line 18

<sup>59</sup> ROA Vol 4 Page 64 Line 23

- 2) And if it is true that the Mother falsely alleged that she and children feared for their lives due to abusive characterizations,
- 3) And if it is true that the Mother was found to be exaggerating against the Father by the Court ordered psychologist,
- 4) And if it is true that psychological evaluations show the Father has no signs of the abusive and controlling characteristics described by the Mother,
- 5) And if it is true that the audio recordings prove both that the Mother was aggressive in her communication, and also that by her own descriptions of the Father contradict her descriptions of him to the Court,
- 6) And if it is true that many witnesses observed the children with the Father and testified that healthy father-child relationships were present,
- 7) And if it is true that the psychological findings regarding the Mother showed that caution must be taken due to the Mother's likelihood for false presentation,
- 8) And if it is true that the Mother requested that Father can have only limited supervised visitation with the Children without valid cause.
- 9) And if it is true that the Mother attacked the Father's role in the relationship and ceased relations in order to gain power over his employment choices,
- 10) And if it is true that the psychological results show that the Mother does not handle conflict in a healthy manner.

... then the logical consequences are:

- 1) The Mother will role model for the children to mischaracterize others.
- 2) The Mother will role model for the children to develop false narratives or make excuses whenever they are afraid and not take responsibility for their emotions.
- 3) The Mother will role model for the children to exaggerate or minimize when in conflict or when convenient.
- 4) That the Father will be a healthy role model due to his candor and stability.
- 5) The Mother will role model to bear false witness against others.
- 6) That the Father's role and bond with the children should not be encumbered by the court.
- 7) That the Mother will role model to the children to have a two-faced compartmentalized way of life to conceal insecurities instead of facing conflict in a healthy manner.
- 8) That the Mother will not hesitate to alienate the children and the Father, and will also externalize responsibility (leverage excuses) against the children or the Father for her choices.
- 9) That the Mother will be unconcerned about supporting the dreams or capabilities of the children, and will impose her insecurities and fears upon the likelihood of their success.
- 10) That the Mother is not competent to role model for the children regarding how to resolve conflict in a healthy manner.

These 10 items are not comprehensive, but show discernable character flaws in the Mother. Character flaws are highly likely to be nurtured into the children according to Gina Constance Smith<sup>60</sup>, Mrs. Smith acknowledged during cross examination that Ms. Crabtree began therapy due to her family of origin issues. Mrs. Smith also validated Father's concerns during cross examination that character flaws in parents are highly likely to be adopted in the development of the children.

Clint Crabtree: When Christy came to you, was she struggling with family of origin issues?

Gina Smith: Yes, she did - - ...

Clint Crabtree: Do you contribute her lack of self-confidence to her family of origin issues?

Gina Smith: Well, I believe we're all affected by our family of origin issues....

Clint Crabtree: Do you believe that unaddressed family of origin issues tend to be passed on to the next generation?

Gina Smith: Um-hmm. I think so. We take the energy from that, forward. I really think so. <sup>61</sup>

---

<sup>60</sup> Wife of Pastor Clay Smith, a complicating issue for marital counseling.

<sup>61</sup> ROA Vol 3 Pages 31 - 33.

According to this testimony from the Respondent's therapist, a licensed social worker, there is then much reason for concern that the Mother's inability to resolve conflict in a healthy manner will also affect the children's ability to resolve conflict in a healthy manner.

In earlier arguments the Mother described her father as a bully who resorted to name calling and put downs. This indicates that generational dysfunction of the Wife is an ongoing reality that overshadows the healthy development of Zackary Crabtree (14), Trenton Crabtree (12), Dylan Crabtree (10), and Ashley Crabtree (8).

## CONCLUSION

The family courts are manipulated for predetermined outcomes. Attorneys make a name for themselves by how much injustice they can bring about.<sup>62</sup> The family law judges know who can fund elections, promote, or demote them in these societies. It has become a business for results/performance v. a practice for principled/integrity. This makes sport of justice. This case exemplifies the brazen malfeasance in family court.

Divided households are no new phenomena. Men can be victims of undermining women. Women can be victims of overbearing men. And there can be warring parties who seem to deserve each other.

---

<sup>62</sup> by this measure "a good lawyer" is synonymous with an evil lawyer.

Justice rules by facts, but corruption is evident in mischaracterizations.

This case promotes a female victim narrative while technically finding a no-fault divorce, yet with one sided custody ruling. The inability for the couple to have joint custody is based on the Father's invalidation of the Mother's concerns. But the facts show that the Mother is false, that her effort to be painted as a victim are meritless and her psychological evaluation indicates this is her nature. Evidence shows her character is compromised and that she is the unreasonable partner and less likely to rear emotionally healthy children.

The law is written to be applied equally. Marital relationship affords a synergy of inequities by leveraging differences of gender and preference.<sup>63</sup> The great equalizer for men and women is ability to enter partnership<sup>64</sup> willingly. And according to the constitution the ability to form and maintain contract is a fundamental matter that a person keep their word. A woman is treated equally to a man when she is expected to be faithful to her contracts, partnerships, or obligations.

If a person enter partnership willingly, they cannot rightfully claim to be a victim of its design unless they claim incompetence. Here the lower court ignored that the Wife entered a traditional

---

<sup>63</sup> Mammals partner and have unique roles

<sup>64</sup> Partnerships are typically sought due to unique resources of the other

contract and emancipated the Wife from her commitments and indebted the Husband.

The Court ignored how successfully this Father represented his family. Admittedly, a citizen succeeding against a highly ranked family-lawyer is bad for business. But the facts of the case demand a different outcome, and the facts reveal maleficence.

This case is ideal for sending a message to the lower courts that malfeasance is abhorred. The case is useful to emphasize the need for legislation to disincentivize the financial gain of nullifying partnerships. And to stop the trend of demonizing the partner who enters a relationship of natural roles.<sup>65</sup>

The ease of nullifying partnership via fabrications is affecting every american and erodes the fabric of society by minimizing the significance of contract. When fabricated perceptions are validated as means to break contract we have gone back to the witch hunt days.<sup>66</sup> But worse is the judiciary who indulges it.

Normalizing no fault divorce, or worse yet fallacious fault divorce means normalizing easily breaking commitment. As this case shows, the lower court condemns expectation of traditional

---

<sup>65</sup> Reproductive roles of mammals despite human sophistication

<sup>66</sup> Where one person fabricates their perceptions, points at their target as the spectral cause of their torment charade; such that the targeted person is put to death by a dull mob as the culprit manipulates them. The true witch being the fabricator.

commitment. Then the children are handed over to those who shirk commitment. Then across America children are raised by those who take lightly commitments and obligations.

I pray the Court take this case on and make opportunity of the veracity of these matters. That the Court utilize the legal state of residency discrepancy of this case. That the Court condemn the behaviors of those who make sport of truth and justice. And that the Court make precedent and admonish legislators to extinguish the incentive for injustice in marital partnerships.

Respectfully submitted,  
Donald "Clint" Crabtree  
8804 Berthusen Rd.  
Lynden, WA 98264  
360-471-1904  
[clint.crabtree@hotmail.com](mailto:clint.crabtree@hotmail.com)