

1 B. Custody Evaluation

2 The Custody Evaluation raises serious concerns about the fitness of Devin to
3 maintain joint physical custody and the safety of the children in his care. The
4 Evaluation cites numerous instances of domestic violence by Devin against
5 Amanda, many of which were caught on audio or video recording. Each time Dr.
6 Paglini attempted to play such recordings for Devin, Devin would refuse to listen,
7 insisting that Dr. Paglini turn it off and subsequently refusing to acknowledge that
8 any abuse occurred.
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11 Dr. Paglini expressed the importance of the domestic violence history in his
12 Recommendations: **"I have serious concerns about Mr. Devin Reed.** Domestic
13 Violence was evident in their relationship. Mr. Reed appeared abusive, threatened
14 her with a gun and he was degrading." *See Custody Evaluation at pg. 56. Emphasis*
15 *Added.* Dr. Paglini noted that the only reason he did not make a recommendation
16 related to physical custody based on these concerns was because he did not know if
17 the Court would consider previous domestic violence as a benchmark to change
18 custody.
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22 Dr. Paglini then made three (3) very specific recommendations:

- 23 1. It is recommended that Ms. Reed is allowed sole legal custody **due to the**
24 **historic abuse patterns by Mr. Reed.** It is hard to coparent with a
25 person who has resorted to violent patterns and is verbally degrading. If
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1 the courts implement sole legal custody for Ms. Amanda Reed, Mr. Devin
2 Reed should be constantly informed of educational, medical, and
3 recreational activities....It is difficult to coparent with an individual who
4 was previously abusive, **demonstrates poor insight, and projects blame**
5 **onto the victim.”**
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8 2. Mr. Reed should complete minimally 20 sessions of anger management.

9 Mr. Reed also should complete extensive parenting courses. Prognosis
10 for Mr. Reed is guarded.

11 3. It is advisable that Abigail should remain in therapy with Dr. Lisa Shaffer
12 as Abigail has **witnessed domestic violence between her parents** and
13 has been emotionally affected. Therapy allows her a safe setting to
14 process her feelings.
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17 *See Custody Evaluation at pg. 56. Emphasis Added.*

18 C. Violations of Orders

19 1. Overnights with Jacob
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21 As noted above, the parties stipulated on August 14, 2018, that Devin’s son,
22 Jacob, would not have overnight visitation during Devin’s custodial time with the
23 minor children. This Order has always remained in effect. The parties agreed to
24 this provision because, during the parties’ marriage, Jacob exhibited concerning
25 behavior that caused the parties to agree that he would not spend the night at their
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1 house, be unattended with the minor children, or ever be in a room with a closed
2 door. That behavior included harming and killing animals, writing about raping
3 women, and writing about killing Amanda and Devin. However, Devin continues
4 to have Jacob in his home overnight during his custodial time; Jacob stayed at
5 Devin's home the entirety of the summer of 2019.

7
8 During the time Jacob was living with Devin, and when he spends the night,
9 the children have to share a bed with Devin. They have told Amanda that if they
10 kick their dad while they are sleeping, he screams at them and tells them that if they
11 don't stay still, he is going to make them sleep with Jacob. Abby has told Amanda
12 that Shawn sucks on and licks Jacob's arm and neither Devin nor Jacob discourage
13 this behavior. On February 10, 2020, Shawn told Amanda that he was alone with
14 Jacob overnight, and that Jacob pinched Shawn and tried to bite him. When Shawn
15 tried to find Devin to help him, he was nowhere to be found.

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18 Devin has shown his complete lack of respect for this Court's Order by not
19 only allowing Jacob to have overnights during his custodial time, but by admitting
20 the same in his Opposition to Motion for Order to Show Cause filed August 19,
21 2019, in which he specifically stated on page 5, "This year Dad received visitation
22 with Jacob for the first two weeks of June. Thus, **Jacob stayed at Dad's house for**
23 **those two weeks.**"

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1 2. Communication Outside of Our Family Wizard

2 Pursuant to the Order from the August 14, 2018, hearing, all communication
3 between the parties is to be through Our Family Wizard only, except for
4 emergencies related to the minor children. This Order is reiterated in the Decree of
5 Divorce. Devin continues to communicate with Amanda via text message in
6 violation of that order, as follows:
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- 8
- 9 a. September 14, 2019: "I miss you. I miss your voice. I miss your smile. I
10 miss your smell. I miss your hug. I miss your jokes. I miss how you
11 made me feel¹."
- 12
- 13 b. September 15, 2019: "I get lonely. It goes away²."
- 14 c. April 1, 2020: "You suck at life. Ugly a**³."

15 3. Mutual Behavior Order

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17 Devin has also violated the Mutual Behavior Order as well as the order
18 regarding transporting the minor children to extra-curricular activities. Regarding
19 the Mutual Behavior Order, Devin has violated the following provisions:

- 20
- 21 2. You shall avoid unnecessary contact with the other party's family, friends,
22 associates, neighbors, co-workers, "significant other," etc., and you shall not
23 initiate conflicts with them.

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25 ¹ A copy of the communication is attached as **Exhibit "A"** in the Exhibits in Support of
26 Defendant's Motion and is hereby fully incorporated herein by reference.

27 ² A copy of the communication is attached as **Exhibit "B"** in the Exhibits in Support of
28 Defendant's Motion and is hereby fully incorporated herein by reference.

³ A copy of the communication is attached as **Exhibit "C"** in the Exhibits in Support of
Defendant's Motion and is hereby fully incorporated herein by reference.

1 4. You shall not contact any person associated with the other party...for
2 purposes of discussing court proceedings or making negative/disparaging
3 allegations about the other party.

4 9. You shall not provide, either directly or through third parties, copies of any
5 unsolicited documents (personal letters, court pleadings, etc.) to anyone
6 associated with a party (family members, neighbors, employers, etc.) for the
intended purpose of casting the other party in a negative light.

7 On or about March 9, 2019, Amanda learned that her cousin, Laurlyn, who
8 has been the babysitter for the minor children, had recently separated from her
9 husband due to an act of domestic violence perpetrated by her husband. She also
10 learned that her cousin's immediate family believes that she has a drug addiction.
11 As a result, Amanda sent a message to Devin on Our Family Wizard stating that she
12 does not want Laurlyn to babysit the children anymore as she is concerned for their
13 safety due to these recent events. Devin then forwarded Amanda's Our Family
14 Wizard to Laurlyn, in direct violation of the provisions noted above⁴.

17 The Mutual Behavior Order also provides that neither party shall "engage in
18 any abusive contact (foul language, name calling, etc.) with the other party of
19 child(ren), including telephone calls, letters, email, etc." Devin continues to violate
20 this provision with volatile, abusive communications on Our Family Wizard and via
21 text message. The following are a small example of this behavior:
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24 a. September 10, 2019: "Stop recording me like an a**hole. You suck⁵."

26 ⁴ A copy of the communication is attached as **Exhibit "D"** in the Exhibits in Support of
27 Defendant's Motion and is hereby fully incorporated herein by reference.

28 ⁵ A copy of the communication is attached as **Exhibit "E"** in the Exhibits in Support of
Defendant's Motion and is hereby fully incorporated herein by reference.

- 1 b. November 28, 2019: “You are an a**hole... Yes I’m calling you an
2 a**hole. Let it go a**hole⁶.”
3
4 c. December 15, 2019: “You are super weird⁷.”
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6 d. January 25 2020: “You think I’m joking a**hole? Never again b*tch.
7 This is your fault. Pay me⁸.”
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9 e. January 26, 2020: “It’s in your best interest to back down. Don’t make
10 this worse than it already is....back down a**hole. I’m serious. You
11 won’t like what happens if this goes in your favor⁹.”
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13 f. March 5, 2020: “GTFO you can post that sh*t to your Facebook
14 groups to believe your lies but it is all bullsh*t lies¹⁰.”
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16 g. March 6, 2020: “Why are you such a liar?...You are so weird to hide
17 like that today, you have mental issues Amanda...get a life. You are
18 super weird¹¹.”
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20 h. March 7, 2020: “...you stay stuck on being an entitled b*tch...You
21 mom wrong you suck at it¹².”
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23 ⁶ A copy of the communication is attached as **Exhibit “F”** in the Exhibits in Support of
24 Defendant’s Motion and is hereby fully incorporated herein by reference.

25 ⁷ A copy of the communication is attached as **Exhibit “G”** in the Exhibits in Support of
26 Defendant’s Motion and is hereby fully incorporated herein by reference.

27 ⁸ A copy of the communication is attached as **Exhibit “H”** in the Exhibits in Support of
28 Defendant’s Motion and is hereby fully incorporated herein by reference.

⁹ A copy of the communication is attached as **Exhibit “I”** in the Exhibits in Support of
 Defendant’s Motion and is hereby fully incorporated herein by reference.

¹⁰ A copy of the communication is attached as **Exhibit “J”** in the Exhibits in Support of
 Defendant’s Motion and is hereby fully incorporated herein by reference.

¹¹ A copy of the communication is attached as **Exhibit “K”** in the Exhibits in Support of
 Defendant’s Motion and is hereby fully incorporated herein by reference.

- 1 i. March 7, 2020: At a custodial exchange, in front of the children, Devin
2 calls Amanda's dad and old a** man, tells him to shut the f*ck up, and
3 challenges him to a fight. A video of this exchange is available for the
4 Court's review.
5
6 j. March 9, 2020: "Stop being the weirdo parent...I have joint and I am
7 thinking about getting more time and I will get it...Have that
8 [douchebag] husband/dad of yours step the H*ll off. I know he is your
9 lapdog b*tch does all your bidding and probably more, its sickening.
10 What a loser¹³."
11
12 k. March 26, 2020: "Please just stop with the f*cking harassment of my
13 93 year old grandmother!!! Jeezus just f*cking stop!!...She doesn't
14 need you sending any of your f*cking drama to her...You are
15 immature and throwing a tantrum like a child all of our whole divorce
16 was you throwing a giant tantrum¹⁴."
17
18 l. April 3, 2020: At a custodial exchange, in front of the children, Devin
19 yelled to Amanda's dad, "Shut the f*ck up old man. What you f*cking
20 dick? Shut the f*ck up. Do you guys jerk off to these videos? You
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24 ¹² A copy of the communication is attached as **Exhibit "L"** in the Exhibits in Support of
25 Defendant's Motion and is hereby fully incorporated herein by reference.

26 ¹³ A copy of the communication is attached as **Exhibit "M"** in the Exhibits in Support of
27 Defendant's Motion and is hereby fully incorporated herein by reference.

28 ¹⁴ Devin alleges that Amanda is "harassing" his grandmother but his grandmother continues to
communicate and be on good terms with Amanda, sending her cards and money often, as recently
as February, 2020. A copy of the communication is attached as **Exhibit "N"** in the Exhibits in
Support of Defendant's Motion and is hereby fully incorporated herein by reference.