

## Executive Summary

The Guardian ad Litem (GAL) is entrusted with a critical responsibility: to evaluate all evidence impartially and provide a balanced assessment that prioritizes the children's best interests. This requires engaging critically with the facts, challenging assumptions, and ensuring all perspectives are thoroughly considered. In this case, the evaluation falls far short of these responsibilities. By systematically ignoring critical evidence, selectively validating one-sided claims, and relying on unsubstantiated allegations, the report fails to present a reliable foundation for decision-making.

Key evidence—such as documented court order violations, exculpatory video footage, and professional recommendations supporting increased father-child contact—was disregarded or minimized. For example, hospital security footage that directly refuted a domestic violence allegation was ignored, while unverified claims from a single source were presented as fact. The evaluator also overlooked behaviors like gatekeeping and alienation, which directly harm the children and undermine co-parenting relationships. This selective approach distorts the narrative, substituting bias for the comprehensive analysis the GAL's role demands.

The report's recommendations reflect these same methodological failures. Restrictive measures like prolonged sobriety testing, supervised visitation, and delayed reconciliation are based on presumed risk rather than demonstrated harm. Such measures perpetuate conflict, entrench alienation, and deny the children the stability they need to thrive. The long-term consequences of alienation are profound—undermining trust, fracturing familial bonds, and causing lasting emotional harm. By prioritizing allegations over reconciliation, the evaluation sacrifices the very stability and healing it should promote.

A GAL is not a stenographer for one party's narrative. Their role is to think critically, engage with evidence, and challenge assertions to uncover the truth. The evaluator's failure to do so represents a missed opportunity to provide a roadmap for healing and stability. Instead, this evaluation risks setting a dangerous precedent, normalizing decisions based on unsubstantiated claims rather than evidence. This is not just a disservice to this family—it is a failure of the system's integrity.

This evaluation fails to meet the fundamental requirements of impartiality, completeness, and focus on the children's best interests. Its omissions and biases render it unfit as a foundation for decisions that will shape this family's future. The sections that follow systematically address the omitted evidence, offering a comprehensive rebuttal to the report's selective and biased portrayal. A balanced, evidence-based approach is essential to ensure decisions genuinely serve the children's well-being.

## Ignored: Court Order Violation Unmentioned

**Overview:** In reviewing Connor's report, there is a glaring and critical omission that undermines the validity of the evaluation: **Christine's violation of the May 2024 court order**. This order required both parents to follow **Jennifer Keilin's recommendations** for reunification counseling and a structured parenting plan.

### Court Order for Reunification Counseling:

- The **May 2024 order** required Christine and Robert to follow **Jennifer Keilin's recommendations** for reunification counseling. This was a legally binding agreement (Notes to respond to Nat...).
- **Connor's Report:** Connor does not mention or emphasize this critical court order violation. Instead, the report focuses on other aspects of the conflict, missing this critical legal breach entirely(Connors Report).

### Christine's Actions and Impact on Reunification:

- By ignoring this court-mandated plan, Christine effectively disrupted the reunification process, further alienating Robert from his children.
- **Connor's Report:** There is no substantial focus on Christine's refusal to comply with the court order, which would have been crucial in assessing her fitness as a co-parent.

### Professional Recommendations:

- Following Keilin's recommendations was critical for Adrian's well-being, providing a structured approach to repairing his relationship with his father(Connors Report).
- **Connor's Report:** The report fails to address Christine's violation of this recommendation, even though it was pivotal to Adrian's emotional recovery and reconciliation with Robert.

The absence of any mention of Christine's violation of a court order in Connor's report is a severe oversight. It raises questions about the **completeness and impartiality** of the evaluation, as the evaluator omitted a critical legal violation that directly impacts the co-parenting relationship and the children's best interests. This omission alone could be grounds for dismissing the report, as it calls into question Connor's ability to provide a balanced and thorough assessment.

## Ignored: Children's Hospital DV Accusation

**Overview:** The Children's Hospital DV Accusation artifact captures a critical instance where Christine accused Robert of domestic violence during a medical emergency. Both parents recognized the incident's importance, agreeing to subpoena hospital security footage to verify the account. The footage revealed "nothing abnormal," directly contradicting Christine's claims and offering rare objective evidence that should have been crucial to the report's fairness. Connor's failure to adequately acknowledge this footage fits a concerning pattern of omitting evidence contradicting Christine's narrative.

### Key Issues:

- **Pattern of Unsubstantiated Accusations:**

- **Children's Hospital Incident:** After reviewing the security footage, hospital staff found no concerning behavior directly contradicting Christine's account. This **objective evidence offers a rare, unbiased look into their relationship dynamics, starkly contrasting Christine's baseless accusations**. Over the years, Christine's claims have consistently lacked police reports, CPS findings, or third-party witness verification. In this context, the footage is proof of one accusation and a significant indicator of a broader pattern of baseless claims.
- **Connor's Report:** Rather than acknowledging the footage's implications, Connor's report downplays its significance, presenting the Children's Hospital incident as a standalone event rather than a critical example of unsubstantiated accusations. This omission lends undue credibility to Christine's narrative, subtly bolstering her claims without substantiation and skewing the evaluation's overall narrative. In overlooking this critical evidence, **Connor compromises the report's balance, raising serious questions about the report's objectivity and reliability**.

- **Selective Omission of Evidence:**

- **Security Footage as Key Evidence:** The footage provided a unique opportunity for objective assessment, especially in a custody dispute context where such verification is rare and valuable. This footage should have served as a critical measure of Christine's credibility.
- **Connor's Report:** Instead of acknowledging the security footage's findings, Connor's report perpetuates an unwarranted concern about Robert's behavior, omitting this clear exculpatory evidence and creating a potentially biased portrayal.

- **Failure to Address Pattern:**

- **Litmus Test of Objectivity:** The security footage is a rare, objective assessment tool, offering a fact-based counterpoint to Christine's claims. Its omission from Connor's report diminishes its objectivity and obscures a clear pattern of unsubstantiated accusations.

- **Connor's Report:** By neglecting to emphasize this critical, verified evidence, the report fails to address a turning point that could substantiate a history of baseless claims, undermining its fairness and accuracy.

Connor's omission of the security footage's findings skews the report, reinforcing unsubstantiated accusations and favoring subjective claims over verifiable facts, raising questions about the report's impartiality.

## Ignored: Digital DV\_ Resist Refuse

**Overview:** The **Digital DV: Resist/Refuse** artifact explains the Blink camera reconnection as a simple Wi-Fi issue. While Robert repeatedly tried to clarify and resolve the misunderstanding, Christine escalated it into a legal matter, threatening a domestic violence protective order (DVPO). Connor's report downplays these technical explanations, giving undue weight to Christine's interpretation while missing the pattern of technological misunderstandings.

### Key Issues:

#### Misrepresentation of the Incident:

- **Digital DV Artifact:** The Blink cameras reconnected due to a Wi-Fi signal refresh, not monitoring. Robert apologized and offered technical expertise to prove it was a glitch.
- **Connor's Report:** Frames the reconnection primarily as surveillance, aligning with Christine's accusations while ignoring Robert's technical explanations.

#### Failure to Recognize the Broader Pattern:

- **Digital DV Artifact:** Shows this incident as part of a **recurring pattern** of misunderstandings across multiple technologies (Xfinity, ATT, Alexa), which Christine repeatedly escalated to legal actions.
- **Connor's Report:** Views the Blink camera incident in isolation, missing Christine's pattern of using technological misunderstandings to build a surveillance narrative.

#### Minimization of Robert's Efforts:

- **Digital DV Artifact:** Documents Robert's multiple attempts to resolve the misunderstanding, including offers for independent expert verification.
- **Connor's Report:** Overlooks Robert's proactive efforts, focusing on Christine's fear and legal response, creating a biased narrative.

Connor's report needs to address the technical realities and context. Emphasizing Christine's interpretation while ignoring the pattern of technological misunderstandings creates an unbalanced portrayal of Robert, undermining the report's credibility.

## Ignored: Comprehensive Parental Fitness Document

**Overview:** The Parent Questionnaire - 2024 documents Robert's significant role as a father, dedication to sobriety, and positive relationship with Max and Adrian before Christine ended their marriage in July 2023. This evidence establishes Robert's proven parenting capabilities, contrasting with accusations based on decades-old events. Connor's report needs to weigh this recent history adequately, focusing instead on outdated issues.

### Key Issues:

#### Robert's Positive Parenting Role:

- **Questionnaire:** Shows consistent engagement in children's education, health, activities, and emotional well-being, plus successful sobriety journey(CL- GAL - Parent Questi...).
- **Connor's Report:** Focuses disproportionately on past issues, downplaying recent successful father-son relationships.

#### Abrupt Family Dynamic Change:

- **Questionnaire:** Documents how Christine's unexplained July 2023 separation damaged a previously happy family unit, leading to children's alienation despite strong prior bonds(CL- GAL - Parent Questi...).
- **Connor's Report:** Ignores the sudden nature of Christine's actions and their impact, instead blaming Robert for current tensions.

#### Recent vs. Historical Focus:

- **Questionnaire:** Details Robert's sobriety (1,000+ days) and consistent positive parenting efforts.
- **Connor's Report:** Emphasizes decades-old issues over documented recent improvements.

#### Biased Narrative:

- **Questionnaire:** This shows how Christine's unilateral decisions and gatekeeping harmed the children's relationship with their father despite Robert's attempts at resolution through multiple parenting plans.
- **Connor's Report:** Minimizes Christine's gatekeeping and rejection of professional advice, failing to acknowledge alienation's impact.

Connor's report ignores comprehensive evidence of Robert's recent positive parenting and favors outdated issues. This creates a distorted evaluation that fails to reflect Robert's current parental fitness and the fundamental dynamics affecting the children's well-being.

## Ignored: Dr. Brown's Recommended Parenting Plan

**Overview:** Dr. Brown's Final Parenting Plan recommends a 60/40 or 50/50 custody split based on Robert's consistent sobriety and strong relationship with his children. The plan provides a structured pathway to increased parenting time. Connor's report should have addressed this expert-backed recommendation, undermining its significance for the children's well-being.

### Key Issues:

#### 1. Dr. Brown's Recommendation of 60/40 or 50/50 Custody:

- Recommended phased-in schedule leading to balanced custody, based on Robert's demonstrated commitment and consistent sobriety
- Plan supported by documented positive interactions and therapeutic progress
- Connor's report favors Christine's protective stance over this professional recommendation, ignoring substantial evidence

#### 2. Christine's Unilateral Decision:

- In March 2024, Christine disregarded Dr. Brown's plan without professional justification, contradicting advice from Dr. Brown and Kari
- No legitimate safety concerns were raised to justify deviation from the plan
- Connor's report inadequately addresses this unilateral decision and its impact on co-parenting

#### 3. Phased-In Approach:

- Plan outlined step-by-step process accounting for children's needs and Robert's sobriety
- Included specific milestones and progress checkpoints to ensure stability
- Connor overlooks the importance of this structured pathway for the family's future

#### 4. Professional Oversight:

- Multiple professionals supported increasing Robert's parenting time
- Therapeutic recommendations consistently favored more father involvement
- Connor's report understates this professional consensus, appearing to favor Christine's decisions
- Fails to address why professional recommendations were disregarded

Connor's report inadequately addresses Dr. Brown's recommended plan, presenting an incomplete evaluation that overlooks the children's interests and Robert's parental role. Christine's disregard for the professional recommendations should have raised more concerns.

## Ignored: Alan Schneider's Reports vs Connor's Representation

**Overview:** Alan Schneider's reports document eight months of supervised visits between Robert and Adrian, showing positive, nurturing interactions and solid father-son bonding. Schneider consistently highlights successful, incident-free visits demonstrating emotional connection and Robert's positive parenting. However, Connor's report needs to adequately weigh these observations, favoring brief interactions reported by professionals who spent far less time with Adrian.

### Key Issues:

#### Long-Term vs Brief Observations:

- **Schneider's Reports:** Eight months of documented positive interactions and incident-free visits, providing reliable, comprehensive evidence of the father-son relationship(Alan Schneider Supervis...).
- **Connor's Report:** Relies heavily on conclusions from professionals who spent limited time with Adrian, leading to a skewed portrayal.

#### Positive Parenting Evidence:

- **Schneider's Reports:** Shows consistent father-son bonding through activities like basketball, ping-pong, and thoughtful conversations, demonstrating Robert's emotional availability.
- **Connor's Report:** Downplays these positive interactions, portraying the relationship as strained based on hearsay and isolated incidents.

#### Testimony Weight:

- **Schneider's Reports:** Provides detailed documentation of successful visits and improvement in Adrian's emotional state during visits.
- **Connor's Report:** Prioritizes sporadic, less comprehensive evaluations over Schneider's long-term observations of the father-son dynamic.

#### Parental Fitness Assessment:

- **Schneider's Reports:** Documents Robert's consistent sobriety, emotional engagement, and responsible parenting over eight months.
- **Connor's Report:** Minimizes Robert's efforts and ignores key observations that counterclaims of unfitness, favoring Christine's narrative.

Connor's report needs to adequately reflect the extensive, positive evidence provided by Schneider, who spent more time with Robert and Adrian than any other professional. By downplaying these observations in favor of less comprehensive assessments, Connor presents a biased portrayal that undermines Robert's demonstrated positive influence on Adrian.

## Ignored: Parenting Plan Rejection History Document

### Rejection of Agreed-Upon Parenting Plans:

- Christine consistently undermined plans set by professionals like Debbie Bayer and Dr. Brown, reversing course when plans suggested shared custody. These rejections appear designed to limit Robert's access(Parenting Plan Rejection...).

### Therapist Shopping and Control:

- When progress was made that didn't align with Christine's narrative, she changed therapists or rejected plans. After working with Debbie Bayer and agreeing on key points, she later rejected the plan, citing vague legal strategies(Parenting Plan Rejection...).

### Impact on Children:

- Christine's actions harmed the children, eroding their relationship with their father and causing emotional stress. Despite Adrian and Max's desires, she blocked opportunities for bonding(Parenting Plan Rejection...).

### Assessment of Connor's Report:

- **Connor's Treatment of Therapist Shopping:** Connor **does not give sufficient weight** to this pattern of therapist shopping and rejection of professional advice. Despite clear evidence, he **fails to critically engage** with Christine's strategy of selecting professionals based on their alignment with her narrative.
- **Failure to Address the Pattern:** Connor's report doesn't assess how these rejections undercut the children's stability. Instead, he frames Christine's actions as protective, **overlooking the manipulations** caused by her refusal to cooperate.
- **Bias in Favor of Christine's Narrative:** Connor's report favors her safety explanations by not acknowledging Christine's **therapist shopping** and **unilateral decisions**. This oversight underrepresents the damage to the children's emotional health and Robert's relationship with them. The document shows Christine's **pattern of therapist shopping** whenever professional advice challenges her control. Connor's report **fails to address this manipulation**, creating a biased portrayal that overlooks harm to the children. This demonstrates Christine's unwillingness to co-parent and needs a more balanced assessment.



## Ignored: Parental Alienation and Gatekeeping in Connor's Report

**Overview:** The **Gatekeeping Final for Connor** document shows systematic **parental alienation** by Christine, detailing behaviors that undermine Robert's role and harm the children. While the document provides evidence of blocking access, unilateral decisions, manipulation, and disregard for professional advice, **Connor's report fails to adequately address** these gatekeeping behaviors, instead supporting Christine's "protection" narrative.

### Key Issues:

#### Systematic Alienation Ignored:

- **Gatekeeping Document:** Shows severe restrictions on father-child contact (only 90 minutes with Adrian over several weeks).
- **Connor's Report:** Fails to address the impact of these restrictions on parent-child relationships.

#### Manipulation of Children:

- **Gatekeeping Document:** Christine falsely accused Robert of alcohol abuse, damaging children's trust.
- **Connor's Report:** Frames Christine's behavior as protective, ignoring the emotional harm to children.

#### Disregard for Professional Advice:

- **Gatekeeping Document:** Christine delayed reunification therapy and made unilateral medical decisions.
- **Connor's Report:** Dismisses the importance of professional guidance and its impact on children.

#### Biased Portrayal:

- **Gatekeeping Document:** Shows apparent alienation through legal restrictions and unilateral decisions.
- **Connor's Report:** Mischaracterizes alienation tactics as protective behavior.

Connor's report downplays critical examples of **parental alienation**, minimizing the emotional harm to the children and their right to a relationship with their father. This biased evaluation of Christine's behaviors produces a distorted report that undermines the children's well-being.

## Ignored: Unwillingness to Co-Parent and Health Care Issues

**Overview:** The **Gatekeeping with Graph** document shows Christine's refusal to co-parent through withholding health care information and caregiver details. A graph illustrates Robert's parenting time reduction despite verified sobriety and supervision. Connor's report **fails to account for this pattern**, instead framing Christine's actions as protective.

### Key Issues:

#### Refusal to Co-Parent:

- **Gatekeeping Document:** Christine withholds critical information about caregivers during emergencies like Max's ER visit, breaching co-parenting responsibilities.
- **Connor's Report:** Presents these refusals as protective rather than deliberate obstruction.

#### Health Care Issues:

- **Gatekeeping Document:** Christine makes unilateral medical decisions, like removing Max's ADHD medication without consulting Robert or doctors.
- **Connor's Report:** Minimizes this medical neglect and its impact on parental rights.

#### Diminishing Parenting Time:

- **Gatekeeping Document:** The graph shows reduced access despite Robert's sobriety and supervision, indicating manipulation.
- **Connor's Report:** Overlooks the inverse relationship between Robert's positive behavior and diminishing access.

#### Biased Framing:

- **Gatekeeping Document:** Shows a clear pattern of limiting Robert's involvement.
- **Connor's Report:** Sides with Christine's protective narrative, undermining report fairness.

Connor's report ignores evidence of Christine's gatekeeping and manipulation. By framing unilateral actions as protective, it presents a biased view that harms the children's relationship with their father.

## Ignored: Sudden Shift in Adrian's Relationship with Robert

**Overview:** The Sudden Shift in Adrian's Texts with Dad document reveals an abrupt change in Adrian's behavior toward Robert, coinciding with Christine's alienating behaviors. The evidence shows a robust father-son bond deteriorating suddenly without conflict, with Adrian's communication mirroring Christine's attitudes. Connor's report must adequately address this significant change, compromising his assessment's accuracy.

### Key Issues:

#### Sudden Emotional Distance:

- **Shift Document:** Shows warm, daily communications until March 2024, characterized by affectionate jokes and emotional support, followed by unexplained distant, detached responses(Sudden Shift in ADs Tex...).
- **Connor's Report:** Ignores this sudden change's significance, failing to analyze potential external influences on Adrian's behavior.

#### Mirroring Christine's Language:

- **Shift Document:** Adrian's texts begin using Christine's specific phrases like "DV" and "rent commentary," previously absent from his vocabulary, suggesting apparent influence(Sudden Shift in ADs Tex...).
- **Connor's Report:** Fails to investigate Christine's influence on Adrian's communication style and emotional withdrawal from Robert.

#### Impact on Adrian's Well-being:

- **Shift Document:** This shows Adrian's distress from being caught between parents, with professional recommendations for reunification therapy being ignored.
- **Connor's Report:** Underplays the emotional impact of this alienation and the importance of Robert's presence in Adrian's life.

#### Parental Alienation Evidence:

- **Shift Document:** Demonstrates clear alienation pattern, with Christine's behaviors directly linked to Adrian's sudden withdrawal from his father(Sudden Shift in ADs Tex...).
- **Connor's Report:** Misses critical connection between Christine's actions and Adrian's changing relationship with Robert.

Connor's report ignores this documented shift in Adrian's relationship with Robert, failing to recognize clear signs of parental alienation. This oversight results in a biased evaluation that doesn't protect Adrian's best interests or address the emotional harm being caused.

## Ignored: Adrian's Predictable Mental Health Decline

**Overview:** Adrian's Predictable Decline document shows Robert's repeated warnings about Adrian's emotional health, which Christine and Connor ignored. It traces Adrian's mental health deterioration, culminating in self-harm thoughts that Robert had predicted. Despite Robert's consistent concerns about Adrian's anxiety and withdrawal, his warnings were dismissed, a critical oversight in Connor's assessment.

### Key Issues:

#### Documented Decline:

- **Decline Document:** Robert detailed Adrian's withdrawal, frustration, and eventual self-harm thoughts through emails and professional communications(Adrian Predictable Dec...).
- **Connor's Report:** Fails to recognize the severity of Adrian's decline or connect it to Christine's gatekeeping, missing crucial evidence of alienation's impact.

#### Ignored Professional Advice:

- **Decline Document:** Multiple professionals recommended steps for Adrian's emotional support, which Christine repeatedly ignored, worsening his distress(Adrian Predictable Dec...).
- **Connor's Report:** Overlooks the failure to implement professional recommendations and its contribution to Adrian's decline.

#### Alienation Impact:

- **Decline Document:** Links Adrian's withdrawal directly to Christine's alienation efforts, showing how his attitude began mirroring Christine's, leading to emotional instability(Adrian Predictable Dec...).
- **Connor's Report:** Downplays parental alienation signs, misrepresenting factors in Adrian's emotional distress.

#### Intervention Needs:

- **Decline Document:** Robert stressed the urgent need for reunification therapy and increased contact, consistently blocked by Christine(Adrians Predictable Dec...).
- **Connor's Report:** Fails to emphasize intervention urgency or reunification importance for Adrian's well-being.

Connor's report ignores documented evidence of Adrian's decline and Christine's role in blocking necessary interventions. This oversight creates a biased evaluation that fails to address Adrian's critical emotional needs.

## Ignored: Parental Alienation Behaviors and Health Care Issues

**Overview:** The **Parental Alienation Behavior** document shows Christine's refusal to co-parent through withholding health information and disrupting Robert's parenting time despite his sobriety. These actions constitute **parental alienation**, yet Connor's report **fails to address** these issues, downplaying their impact on the children.

### Key Issues:

#### Refusal to Co-Parent:

- **Document:** Christine withholds health updates and caregiver information, isolating Robert from decisions (e.g., blocking caregiver identity during Adrian's late pickup).
- **Connor's Report:** Ignores how withholding information compromises Robert's parental role.

#### Limited Parenting Time:

- **Document:** This shows an **inverse relationship** between Robert's positive parenting and reduced access (90 minutes over four weeks) despite sobriety.
- **Connor's Report:** Presents reduction as protective, ignoring psychological harm to children.

#### Disregard for Professional Advice:

- **Document:** Christine ignores medical recommendations, removing Max from medication without consultation.
- **Connor's Report:** Fails to address how this behavior undermines children's care.

#### Legal Manipulation:

- **Document:** Christine uses legal channels to obstruct communication and delay parenting plans.
- **Connor's Report:** Overlooks how legal manipulation harms children's stability.

Connor's report ignores the severity of Christine's alienation behaviors. This biased evaluation damages the children's relationship with their father and overlooks risks to their well-being.

## Ignored: Transition from Loving Engagement to Alienation

**Overview:** The Loving Engagement to Alienation document shows Robert's strong relationship with Adrian and Max before Christine's alienating behaviors began. It demonstrates Robert's consistent presence and emotional bonds with his children, followed by a sudden shift coinciding with Christine's actions. Connor's evaluation fails to recognize this crucial transition, favoring a narrative that portrays Christine as protective.

### Key Issues:

#### Strong Pre-Separation Bond:

- **Document:** Shows Robert deeply involved in his sons' lives through July 2023, coaching sports, attending school events, and creating family memories(Loving Engagement to Al...).
- **Connor's Report:** Minimizes this pre-separation relationship, focusing instead on post-separation issues without proper context.

#### Post-Separation Behavioral Shift:

- **Document:** Details sharp change in children's attitudes after Christine's separation, with both suddenly distancing themselves despite no prior conflicts(Loving Engagement to Al...).
- **Connor's Report:** Fails to address the timing and nature of this behavioral shift or link it to Christine's actions.

#### Children Mirroring Christine:

- **Document:** Adrian and Max adopt Christine's narrative of "DV" and distrust, using language never present before separation(Loving Engagement to Al...).
- **Connor's Report:** Ignores how children's attitudes matched Christine's, missing clear signs of parental alienation.

#### Emotional Impact:

- **Document:** Shows ongoing emotional harm to both children, especially Adrian's withdrawal from his previously close relationship with his father(Loving Engagement to Al...).
- **Connor's Report:** Understates the emotional damage caused by cutting Robert out of their lives, prioritizing Christine's narrative.

Connor's report ignores crucial evidence of a loving pre-separation relationship and the subsequent alienation-driven behavioral changes. This oversight results in a biased evaluation that fails to address the long-term harm to the children's well-being.