

FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY  
IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI  
2020 NOV 13 PM 5:05

PHYLLIS MARIE CROWDER-KESTER

PETITIONER

VS

CAUSE NO. CV2016-422(W)

MATTHEW OLIVER REARDON

RESPONDANT

**RESPONDANT'S OBJECTION AND RESPONSE TO PETITIONER'S  
MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM,  
RESPONDANT'S MOTION FOR DISMISSAL OF ASSIGNMENT AND  
MOTION TO SHOW CAUSE**

COMES NOW your Respondent, Matthew Reardon, and files this his objection to Petitioner's motion for Appointment of Guardian Ad Litem and would show unto the Court the following just reasons for objection as follows:

- 1) On May 22, 2018, This Court entered an Agreed Order for Modification regarding child visitation for the parties' minor child. Said order outlined Respondent's visitation schedule with the minor child. Although Petitioner attached a copy to her petition, Respondent likewise attaches a copy to his objection and response as Exhibit A.
  
- 2) On August 26, 2020 the petitioner and her counsel prematurely fast filed a petition which they themselves knew to be an illegitimate, fraudulent, and perjurious petition in an outrageous attempt to harass, intimidate, and further attack the respondent further with lies and completely false allegations as has been the habit of petitioner and her council which is documented in great detail through evidence the respondent further requests to have a trial before this honorable court on. Petitioner recently was prosecuted by Olive Branch Police Department for filing a false police report of Rape on the respondent when

she knowingly chose to drive to Olive Branch, MS on or around November 25, 2018 to engage in a sexual encounter with the respondent which she provoked. Respondent once again had to had to temporarily surrender his own personal rights to privacy and personal freedoms when he voluntarily allowed his cell phone to be downloaded by Olive Branch Police Department for the purpose of proving his complete innocence along with voluntarily assisting prosecution in order for a deterring message to get sent to the petitioner and for the due course of justice to prevail due to the extreme life threatening seriousness of the petitioner's lies, false accusations, and false reporting of crimes. It was this reason that petitioner filed such petition in the first place and further explains why the original and sloppily thrown together petition was filed when it was to reopen this cause. Respondent further asserts that the original petition he is attaching has further "vanished" from Delta Computer Systems and court records which is very concerning to respondent and the respondent requests further verification and understanding by this court as to if this is acceptable or not. A copy of the events alleged from Olive Branch Police Department including the narrative given to the investigator by the petitioner is attached hereto as EXHIBIT B and a copy of the petition stamped and filed with this court on August 26, 2020 is attached as EXHIBIT C.

- 3) That on September 30, 2020, Phyllis Marie Crowder-Kester, Petitioner, filed with this Court a Petition for Modification and Other Relief stating that during periods of visitation with Matthew Oliver Reardon, Father, the minor child was not safely monitored due to the Defendant's abuse of alcohol and/or prescription or non-prescription drugs and was physically injured by the Defendant's current wife. That the

incident was reported to the State of Mississippi Child Protective Services and in the interim, the Plaintiff was advised to cease all visitation for the minor child with the Defendant. The Respondent had responded to said filing detailing out every abhorrent lie by the petitioner and further by her council to knowingly assert and continue asserting such baffling, blasphemous lies. Due to the complete bizarreness and seriousness of the allegations, respondent brought forth proof and has further publicly released recordings showing the petitioner is living out one of the largest lies known to the respondent regardless of the damage she is intentionally causing to not only Mississippi Child Protective Services, the respondent, and the respondent's wife, BUT most of all the damage and confusion she is intentionally bestowing upon the minor child. As such, the respondent feels that it would be completely negligent and further dangerous to allow the minor child to remain guarded by the petitioner whom is clearly mentally ill without so much as a care for the best interest of the minor child, the child's father, the time and resources wasted state agencies tasked with investigating allegations of crime *ACTUALLY OCCURING*, and this honorable court along with its docket. Respondent would further state to this court that he is not under the influence of any prescription or non-prescription drugs **NOR** alcohol and those close to respondent will attest to that. Respondent and his wife were at Le Bonheur Children's Hospital tending to their ailing newborn in which the minor child in this cause came to visit to see her sibling on visitation. In no way was the respondent in any type of environment where petitioner's claims could have been true. Clearly the rights and freedoms granted to Americans under the United States Constitution, which the respondent served in the US Marine Corps to uphold and defend, doesn't mean a hill of beans to the petitioner and her council unless it comes to their own rights being attacked the way they continue to

attack the respondent and his rights. The United States of America is and has been known as the land of the free and the home of the brave. The Respondent prays that the petitioner receive a stern wakeup call to the fact that one can't make blind and bizarre accusations on another expecting them to prove their innocence, and the respondent prays that this honorable court further convey that message to the petitioner as the malice choices and decisions by petitioner have amassed enormous amounts of grief along with a character assassination of the respondent and his spouse whom to this day the petitioner is still trying to falsely accuse despite Child Services closing out the case and all other cases opened with ill intentions by the petitioner.

- 4) The Respondent would further make this honorable court aware of the fact that he has completed every request upon him including a psychological evaluation by Dr Joe Ed Morris in Tupelo, MS in which respondent was deemed to be a caring and responsible father figure whom is mentally sound.
  
- 5) It is for these reasons along with quite possibly the biggest reason being financial hardship aggrieved on the respondent by the petitioner through child support obligations being grossly out of proportion and his having to consistently defend against the petitioner's lies that the respondent respectfully yet strongly objects to assignment of a Guardian Ad Litem. This ploy by the petitioner and her council represent nothing more than their clearly demonstrated plan since the beginning which is dictating outcomes while playing judge, jury, and executioner; and even worse doing all of that on the biggest batch of conjured up lies created to tear down another family.


6) Respondent respectfully would motion this court to DISMISS the plaintiff's motion to assign Guardian Ad Litem, and Respondent respectfully requests upon this honorable court a hearing/trial in order for the petitioner to show cause as to any of the assertions made along with allowing a custody hearing and child support assessment in light of all the evidence and a loving, caring father being stripped of his ability to father his minor child for over 9 months despite there being a standing visitation order and despite child support obligations being paid to petitioner every month like clockwork.

### **WHEREFORE PREMISES CONSIDERED,**

Respondent Matthew Reardon moves this honorable court to deny and dismiss petitioner's motion for appointment of Guardian Ad Litem. Respondent further requests that petitioner be held liable for her knowingly false sworn affidavits made under oath and penalty of perjury. Respondent feels that petitioner has continually been allowed to get away with such criminal and endangering behavior and a deterring message not clearly sent to her by the courts this time will further open the respondent and his family up to additional attacks by this individual. Respondent and his spouse would respectfully ask this court for permanent injunctive relief be applied and that it is most certainly warranted under Rule 65 MRCP in this particular situation against the petitioner and her attorney. The Respondent would request this court to assess the seriousness of these accusations in furtherance of criminal behavior through knowingly attacking the respondent based on lies and keeping his child from him, and assess sanctions it deems appropriate on the petitioner and her

council who clearly by now should have known better under Rule 11 MRCP as well as the Mississippi Litigation Accountability Act of 1988. Respondent would request the transfer of custody of the minor child and allowing the petitioner supervised visitation at the Sheriff's Department every other weekend which respondent would state he was not even afforded in this 9-month atrocity. If custody transfer is not granted, then respondent prays for a reduction in child support to a fitting amount. Respondent has exhausted over 20 hours to research and legal filings in having to defend against such monstrous accusations, so respondent further asks for this court to award respondent a monetary amount to recompensate for all time lost.

Respondent prays for such other relief either special or general to which he may be entitled under the circumstances.



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Matthew Reardon – Respondent – 11-13-2020

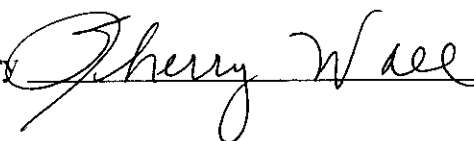
Notary  Date 11/13/2020

Exhibit A

FILED  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

2018 MAY 22 PM 4:10

MATTHEW OLIVER REARDON

PLAINTIFF

CAUSE NO.: CV2016-422W

PHYLLIS MARIE CROWDER *PA*

PLAINTIFF

**AGREED ORDER FOR MODIFICATION**

THIS CAUSE having come before the Court on the Motion To Modify Prior Order Of The Court and the Court having been advised that the Parties have reached an agreement in this cause and the Court finding that said agreement is in the best interest of the child of the parties and therefore the Court adopts the Agreed Order as order of the Court and therefore orders as follows:

IT IS THEREFORE ORDERED AND ADJUDGED that there has been a material change in circumstances in this cause and accordingly the Petitioner, Matthew Reardon, is ordered and allowed visitation with the minor child of the parties, namely, Lydia Elise Reardon, as follows:

1. Beginning January 1, 2018, Matthew Reardon shall have visitation with the said minor child every other week-end from 5:00 p.m. Friday afternoon until 5:00 p.m. Sunday afternoon at his residence in Water Valley, Mississippi.
2. The Parties, Matthew Reardon and Phyllis Crowder, mutually agree to meet at the Water Valley Police Department, or some other mutually agreed upon location outside of Lafayette County, Mississippi, for exchange of the child for visitation purposes.
  - A. Summer  
Matthew Reardon shall have visitation with the minor child for (4) four weeks during the summer to be exercised as agreed upon by Parties.

**B. Holidays**

<b><u>HOLIDAY</u></b>	<b><u>EVEN YEAR</u></b>	<b><u>ODD YEAR</u></b>
New Year's Day	Father	Mother
Easter Day	Mother	Father
Memorial Day	Father	Mother
July 4 <sup>th</sup> Day	Mother	Father
Labor Day	Father	Mother
Thanksgiving Day	Mother	Father

Father shall further have visitation on every even numbered year from December 25<sup>th</sup> at twelve o'clock (12:00) p.m. until December 31<sup>st</sup> at six o'clock (6:00) p.m.

On every even numbered year, Father shall enjoy visitation with the parties' minor child during Christmas holidays every odd numbered year from December 20<sup>th</sup> at six o'clock (6:00) p.m. until December 25<sup>th</sup> at 12:00 p.m.

For the Christmas holidays of December, 2017, the parties agree that Matthew Reardon shall have visitation as mutually agreed between the parties but no less than (4) four hours on Christmas Eve and/or (4) four hours Christmas Day and 3 other consecutive days during said holidays.

**C. Special Days**

**1. Father's Day**

That Father shall have visitation regardless of whose weekend it may fall on Father's Day from eight o'clock (8:00) a.m. until six o'clock (6:00) p.m.

**2. Mother's Day**

That Mother shall have visitation regardless of whose weekend it may fall on Mother's Day from eight o'clock (8:00) a.m. until six o'clock (6:00) p.m.

**3. Child's Birthday**

Each parent shall have one day of visitation with the minor child on or near her birthday, regardless of the visitation set out herein.

**D. Other**

Father shall have other reasonable visitation with the minor child as agreed upon by the parties.



3. That the restraining order entered by this Court on May 9, 2017, is hereby ~~cancelled~~ <sup>dismissed</sup> <sup>Revised</sup> as to Matthew Reardon and Phyllis Crowder and the above mentioned minor child of the parties.
4. All other matters and issues addressed and ordered by the Court shall remain in full force and effect.

SO ORDERED this the 22<sup>nd</sup> day of May, 2018

*Ronald W. ...*  
CHANCELLOR

**AGREED TO BY:**

*Matthew Reardon*  
MATTHEW REARDON

*William C. Stennett*  
WILLIAM C. STENNETT,  
Attorney for Matthew Reardon

*Phyllis Crowder*  
PHYLLIS CROWDER

**PRESENTED BY:**  
Stennett Law Firm  
William C. Stennett  
319 West Jefferson Street Suite A  
Post Office Box 7369  
Tupelo, Mississippi 38802  
Telephone: (662) 842-5051  
Facsimile: (662) 841-1941  
Email: williamcstennett@gmail.com



# Olive Branch Police Department

## Incident Report

10470 HWY 178 Olive Branch, MS 38654

Phone: (662) 892 - 9400 Fax: (662) 892 - 9404

Chief Of Police Don  
Gammage  
(US/Central)

ORI MS0170200	County DESOTO COUNTY	Venue OLIVE BRANCH	Report # 2019004743
Report Date / Time 02/13/2019 09:05 Hrs	Occurrence Date / Time 02/13/2019 09:05 Hrs		File Class FRC

Nature of Incident False Report Of Crime	Supplements Approved Report (3)
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Summary  
False Report of Rape

### Incident Location

Address 4250 Bethel Road	City Olive Branch	State Mississippi	ZIP 38654	Country United States of America
County: DESOTO COUNTY	Township of Occurrence		Clery Location	
Intersection 6093 Morgan Drive				
Latitude 34.922639	Longitude -89.792149	Beat	Sub-Beat	

### Incident Offenses

Supp # 0	Offense FRC - False Reporting Of Crime	Status Open/Pending	Status Date 02/13/2019 09:05 Hrs
Attempted / Completed Completed	Weapons Used		

Remarks:  
False Report of Rape

### Officers Involved

Role Reporting	Name Detective A. Holladay (#3395)	Agency Olive Branch Police Department	Supp # 0
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### Incident People

Roles Arrestee, Suspect / Offender	Supp # 0	
Name CROWDER, PHYLLIS MARIE (Primary Name)	Title	Date of Birth Redacted

Race White	Sex F	Age at Occurrence 29 Years Old	DL # Redacted
Height 506	Weight 190	Hair Brown Straight	Hair Length Long
Eye Color Brown	Built Medium	Facial Hair None	Skin Light
			Date of Info 11/29/2018

Arrest Date 01/25/2020	Arrest Type Warrant Arrest
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Roles Victim	Supp # 0	
Name Name Redacted	Title Redacted	Date of Birth Redacted

Race Unknown	Sex U	Age at Occurrence Unknown	DL # Redacted
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*Exhibit B*

Roles			Supp #		
Complainant			0		
Name			Title	Date of Birth	
HOLLADAY, ASHLEY I (Primary Name)				Redacted	
Race			Sex	Age at Occurrence	
White			F	37 Years Old	
DL #			Redacted		
Height	Weight	Hair		Hair Length	
				Skin	
Eye Color		Build		Facial Hair	
Hazel				Date of Info	
				08/05/2017	
Roles			Supp #		
Interviewed			0		
Name			Title	Date of Birth	
REARDON, MATTHEW OLIVER (Primary Name)				Redacted	
Race			Sex	Age at Occurrence	
White			M	31 Years Old	
DL #			Redacted		
Height	Weight	Hair		Hair Length	
509	140	Brown		Skin	
Eye Color		Build		Facial Hair	
		Slight		Date of Info	
				11/11/2018	

B

## Incident Narratives

Author: Patrol Sgt. A. Holladay #3395 Date Created: 02/13/2019 0922 Hrs Supp #: 0

## Original Narrative

On 11/29/2018 at approximately 1550, officers were dispatched to 4250 Bethel Rd (Olive Branch Methodist Hospital) in reference to a physical assault. Upon arrival officers spoke with Phyllis Crowder (MS DL: [REDACTED]) who appeared to be distraught. Crowder reported (R&I 2018038694) that on 11/25/2018 between the approximate hours of 0100-0345, her ex-boyfriend and father of her child, Matthew Reardon sexually assaulted her at his residence of 7677 Alexander Crossing Cir. Crowder stated in her report that Reardon grabbed her by her clothing while in the kitchen in an attempt to have sex with her, but she consistently told him to stop. Crowder stated Reardon then forcibly grabbed her by the hair, drug her to his bedroom, pushed her onto his bed, and inserted both his penis and a sex toy into her vagina without her consent. Crowder stated when Reardon fell asleep on the couch, she took photographs of the inside of the residence, took her daughter, left the residence, and went to her residence in Oxford, MS.

On 11/30/2018 at 1300, I, Det. Holladay, met with Crowder and her husband at OBPD. Crowder came to my office and we spoke regarding the incident. Crowder stated during the incident, she voluntarily removed her own clothing, and during the sexual assault she kept her hands above her head due to Reardon instructing her not to touch herself or him. Crowder stated during the incident, their four year old daughter came downstairs, and Crowder asked Reardon to close the door so their daughter would not see. Crowder stated Reardon got up and closed the bedroom door. Crowder admitted to performing oral sex on Reardon, "to get him back right." Crowder stated what she meant by that was she gave him oral sex until he was fully erect again. Crowder stated Reardon penetrated her vaginally again with his penis and a vibrator, and Reardon also penetrated her anally with a vibrator. Crowder stated this continued until Reardon ejaculated inside of her vagina. Crowder stated during the incident, Reardon asked repeatedly to record it, but Crowder stated she told him no. Crowder stated Reardon did not record the incident. Crowder stated after the incident she left Reardon's residence by herself, went to McDonald's, got something to eat, and returned to Reardon's residence. Crowder stated while she was in her vehicle, she had a phone conversation with her husband, but she did not tell him about the sexual assault that had just occurred. Crowder stated when she got back to Reardon's residence, she and Reardon sat in the living room while she ate. Crowder stated when Reardon fell asleep, she gathered her daughter's belongings, took pictures of the residence's living conditions, got her daughter, and they left Reardon's residence. Crowder stated the sexual interaction between she and Reardon was not consensual.

On 12/13/2018 at 1224, I read Miranda and Interviewed Reardon at OBPD. Reardon stated he and Crowder had text and planned all weekend for her to come to his residence for them to have sexual intercourse. Reardon stated Crowder did come to his residence, and they had consensual sex. Reardon then gave me printed out screenshots of text conversations between he and Crowder for the weekend in question. Reardon stated he would bring the phone to OBPD on 12/17/2018 for us to download it's contents.

On 12/18/2018 at 1216, Reardon brought his cell phone to OBPD, and I took possession of it. I obtained a search warrant for Reardon's cell phone. Reardon's cell phone was later downloaded. The downloaded information matched the printed texts Reardon had previously provided and supported Reardon's claims that this was a consensual sexual encounter. Based on the evidence, I found the allegation of rape to be a false report intentionally filed by Crowder.

Det. A. Holladay/3395

Signed: Patrol Sgt. A. Holladay #3395

Reviewed: Maj B. Cox #3167

B

# Supplement #1 Narrative

Author: Patrol Officer S. George #3312      Date Created: 01/25/2020 2131 Hrs      Supp #: 1

On January 25, 2020 at approximately 7:50 pm I met Lafayette County PD on HWY 7 near the Marshall County line to take custody of Phyllis Crowder for warrant # 31808 for False Reporting of Crime. Crowder was transported to OBPD, processed and later bonded out to No Limit Bail Bonds and given a court date of February 11, 2020 at 9:00 am. Crowder's bond was \$2,500.00.

Officer George 3312

Signed: Patrol Officer S. George #3312

Reviewed: Patrol Sgt. A. White #3398



Author: Admin Secretary N. Bailey #3337 Date Created: 01/27/2020 1211 Hrs Supp #: 2

## Supplement #2 Attachments

On the above date, I received attachment(s) for this incident from the person listed below. As an administrative action associated to this incident, I attached scanned copy of the document(s) to the Police Records Management System.

holding cell log  
property release

Signed: Admin Secretary N. Bailey #3337

Reviewed: Admin Secretary N. Bailey #3337

Exhibit C

IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI  
STATE OF MISSISSIPPI  
LAFAYETTE COUNTY

PHYLLIS MARIE CROWDER

PLAINTIFF

vs.

2020 AUG 26 AM 10:17

CAUSE NUMBER: CV-2016-422W

CHANCERY CLERK

MATTHEW OLIVER REARDON

DEFENDANT

BY: DC KC

PETITION FOR CITATION OF MODIFICATION AND OTHER RELIEF

COMES NOW the Plaintiff, Phyllis Marie Crowder, and files this her Petition for Modification and Other Relief against the Defendant, Matthew Oliver Reardon, and in support thereof would respectfully show unto the Court the following:

1.

This Court has personal and subject matter jurisdiction in this matter.

2.

That the Defendant, Matthew Oliver Reardon, is an adult resident citizen of Lafayette County, Mississippi, and may be served with process at his residence in Lafayette County, Mississippi, or wherever he may be found.

3.

That on August \_\_\_\_\_, This Court entered an Agreed Order of Modification regarding child visitation, a true and correct copy of which is attached hereto as Exhibit "A".

4.

That there has been a material change in circumstance that has adversely affected the minor child and therefore visitation with the Defendant has ceased. The Defendant abuses alcohol and/or other prescription or non-prescription drugs to the point that he no longer safely monitors the minor child while she is in the Defendant's care which has caused physical injury to the minor child at the hands of the Defendant's current wife at which point visitation with the Defendant ceased. The incident was reported to the State of Mississippi Child Protective Services and in the interim, the Plaintiff was advised to cease all visitation with the Defendant. The Plaintiff therefore requests the

Court and for a Guardian Ad Litem to be appointed for the minor child.

5.

Additionally the Plaintiff would show that the Defendant's behavior has become erratic both on social media and in person and the Plaintiff fears for the safety of the minor child for the Defendant to be exercising the current visitation in the midst of the pandemic.

6.


Plaintiff would show that Defendant Matthew Oliver Reardon should be required to pay to the Petitioner, Phyllis Marie Crowder, a reasonable sum as attorney's fees for having to bring forth this action and that all costs of Court should be taxed to Matthew Oliver Reardon.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff Phyllis Marie Crowder respectfully requests that the Court grant unto her the following relief:

1. That the Court find that there has been a material change in circumstances which have had an adverse effect on the minor child and that visitation with the Defendant cease.
2. That Phyllis Marie Crowder be awarded reasonable attorney's fees and costs suffered in bringing this matter; and,
3. That if mistaken for the relief prayed for and entitled to, then the Plaintiff prays for such other, further, general, specific or special relief to which she may be entitled.

RESPECTFULLY SUBMITTED, this the 25<sup>th</sup> day of August, 2020.

  
\_\_\_\_\_  
PHYLLIS MARIE CROWDER

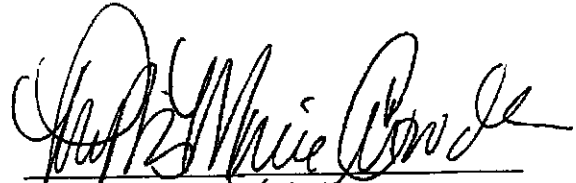
  
\_\_\_\_\_  
MONA T. PITTMAN, MSB # 9754  
Attorney for the Plaintiff  
P. O. Box 2958  
Oxford, Mississippi 38655  
Telephone: (662) 234-9346  
Facsimile: (662) 234-9748 (Facsimile)  
[mona@panola.com](mailto:mona@panola.com)



STATE OF MISSISSIPPI  
COUNTY OF LAFAYETTE

Personally appeared before me, the undersigned authority in and for the aforesaid County and State, the within named, Phyllis Marie Crowder, who, after being first duly sworn, states that the matters contained in the above and foregoing Petition for Citation of Contempt are true and correct as therein stated.

This the 25 day of August 2020.

  
Phyllis Marie Crowder

SWORN TO AND SUBSCRIBED BEFORE ME, this the 25 day of August 2020.

  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

6/15/2024

