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**Jun 30 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Family Court

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Family Court Case No. 2023-DR-32-00229

Appellate Case No. 2023-000959

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Megan Cronin

Petitioner,

v.

William Cronin,

Respondent.

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**PETITIONER'S REPLY TO RESPONDENT'S RETURN TO MOTION TO  
SUPPRESS RECORDED COMMUNICATIONS AND RESPONDENT'S  
MOTION TO DISMISS AND FOR A FINDING OF SPOLIATION AND  
SANCTIONS**

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The Respondent has filed a Return to the Motion to Suppress Electronic Communications filed by the Petitioner. The Respondent also asked for certain temporary relief for a finding of spoliation and a Motion to Dismiss. The Petitioner is informed and believes that the issue of "temporary relief", for a "finding of spoliation" and a Motion to Dismiss is not properly before this Court and prays that same be remanded to the Family Court for a determination.

However, if this Court deems it is appropriate to address those issues in this forum, then the Petitioner alleges as follows:

1. As to the issue of awarding the Respondent sole custody of the parties' minor children, the Petitioner again alleges that this matter should be remanded to the Family Court for a determination. This is particularly true given that the Temporary Order which is currently in effect virtually awards the parties joint legal custody and an equal sharing of time between the parties.

2. Associated with the cross motion filed by the Respondent is a request for a reasonable and liberal visitation schedule, child support, contribution of uncovered and uninsured health care expenses, certain restraining orders, and an order awarding Respondent sole use and possession of the former marital residence, together with the related relief associated with the former marital residence. Respondent also requests an award of temporary attorney's fees and costs.

3. The Petitioner alleges that all of the relief requested by the Respondent is not appropriate for this Court to address but rather should be addressed at the remand of this matter to the Family Court when that occurs.

4. The Petitioner further alleges that the other "temporary relief" requested by the Respondent likewise is appropriate to be brought before the Family Court of the Eleventh Judicial Circuit and not this Court.

5. The Respondent also moves for a motion for a finding of spoliation for the Petitioner's alleged destruction or disposal of her former cell phone and other electronic devices following the issuance of a spoliation letter on February 20, 2023. Please see the Affidavit of the Petitioner attached hereto as Exhibit "A".

6. While the Respondent may seek certain sanctions for the actions taken by the Petitioner or Petitioner's counsel in not preserving certain electronic devices, those sanctions are wide and must be reasonable as to the facts of the case. Given that in this matter the Petitioner herself had no knowledge of a spoliation letter being sent to her attorneys, the Petitioner would allege that sanctions are inappropriate and, further, that the Respondent had already downloaded and produced in discovery certain text/messages which the Respondent alleges proves his allegations of infidelity. It must be further noted that the Petitioner in fact delivered to the Respondent's IT expert those electronic devices in her possession when she became aware that she should do so.

7. As to the interception of the electronic communications between the Petitioner and third parties, attached hereto as Exhibit "B" is a Supplemental Affidavit of the Petitioner's retained expert, Steven Marc Abrams, J.D, M.S., setting out that the interception in fact took place at the time that the iMessages were sent to the device utilized by the Petitioner and to the companion device

which the Respondent used to track the communications between the Petitioner and other individuals, including, but not limited to, her retained counsel.

8. As set out in Mr. Abrams' Supplemental Affidavit, this reality is in compliance with those cases set forth in his Affidavit including, but not limited to, the case of *Fulmer v. Buckhannon* which was recently decided by this Court.

Respectfully submitted,



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**AFFIDAVIT OF PETITIONER IN SUPPORT OF  
REPLY TO RESPONDENT'S RETURN TO MOTION  
TO SUPPRESS ELECTRONIC COMMUNICATIONS AND FOR  
A FINDING OF SPOLIATION AND SANCTIONS**

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My name is Megan Cronin. William and I were married on July 23, 2011. I am a speech-language pathologist and feeding specialist and own my own business, Inspire Speech and Feeding. We have two amazing children, A.C. and L.C., who are unfortunately at the center of William's deception and persistence to force high-conflict litigation.

The MacBook Air was purchased in November 2021 as a gift for me to use in the running of my business. In fact, we also purchased a MacBook Air for Robin Vassey, who helps me in the billing and financial operations of the business. Both of these laptops were written off as business expenses for Inspire Speech and Feeding. The MacBook Air was never intended for family use in the home. In fact, the information stored on this

device was protected by HIPAA, which I treat with utmost seriousness. Therefore, **if William was casually using my computer, it would have been without my knowledge as this violates client protected health information.** I used my fingerprint to open the MacBook Air. The laptop could also be accessed through a pin code, a pin code that I created and not a code created "a decade ago" by William. This code did not match the garage door code or William's iPhone. However, I naively used the same code for my devices and debit cards (numbers corresponding to birthdays) which is likely why it was not difficult for William to know this information. However, **knowing a pin code surely does not equate to me giving permission for William to go through my personal devices.**

**I never gave William permission to use my laptop without my knowledge or in the absence of my presence.** This computer traveled with me to and from work. I kept it in my backpack while at home. If I used the computer while in the home and happened to step away, leaving the device closed and locked, this was surely **not an invitation for William to freely search the device.** I did not willfully sync iMessages between devices. To my knowledge, this syncing happens automatically between Apple devices. Again, **many of my iMessages were between me and patients; I would not willingly give open access to such conversations as they are protected by law.** The laptop in question was not used by our minor children. The children used an old iPad or William's iPad to play games/watch shows as well as the upstairs television. Why would they need to watch shows on my work computer?

**William knows that I have certainly objected to him searching through my devices** as this was the center of arguments that we had many times. This was not a

random occurrence but a pattern of behavior. On more than one occasion, **I caught William going through my cell phone while I left it plugged in to charge on the nightstand. On one of these occasions my phone was dead, and William intentionally powered on the phone to intercept text messages.**

I did not frequently use the laptop with William. On occasion, he sat next to me as I completed payroll, and I would ask him to crosscheck numbers on his cell phone's calculator. To be clear, he was not sitting in front of my computer but beside me. He never once showed me my business' bank account on my laptop nor any other device. William sought financial control and refused to give me account login information though I asked him on numerous occasions. His financial deception is further shown in the months post separation as he made false claims in an affidavit to the Court, since expertly proven to be false by my CPA. The Court will find those numbers to be a substantial error and not a mere "typo." William had nothing to do with the creation or maintenance of my business' website. In fact, I created my website before the purchase of the MacBook Air. On occasion I asked William's advice in responding to emails to my contractors as I am a non-confrontational person. Did I use my laptop in William's presence? Yes. Did I leave him with my laptop unattended? Absolutely not.

William claims that he is "not a tech savvy person" yet also claims that he assisted in the finances, payroll, and website for my business - these are contradictory statements. He knew exactly what he was doing with my laptop and always has. His account of January 1<sup>st</sup> is not accurate. He claims that he wanted to search for restaurants - I ask, why did he need to use my computer to do this? We never used my laptop or his for this purpose as we have iPhones. He had an iPhone in his pocket or hand yet needed to use

my computer to search for restaurants? This does not make sense. When I arrived home on January 1<sup>st</sup> at which point William confronted me with this accusation of an affair, I specifically asked why he went through my computer. In fact, I knew something was off the moment I walked in the door because **I saw my laptop open on the table and knew that I had not left it there. William said to me that "he just had a feeling," and for that reason he opened, unlocked and read text messages, which update in real time, without my knowledge or permission.** Furthermore, iMessages do not "pop up automatically" when you open the computer. **He had to specifically click on iMessages.** He claims that he only saw messages from December but that is impossible to know. And because this is a pattern of behavior, it is most likely not the first time he attempted to intercept my messages in this way. Regardless of what William saw on January 1st, his intention was to monitor and intercept texts based on his "feeling." I know this because **I've had suspicion for years that William was monitoring me.** In fact, during an argument, he openly admitted to monitoring me through the home app in which he tracked what time the doors and/or garage doors opened and shut (my coming and going). I also had suspicion he was tracking my vehicle through the Lexus app which is why I had this feature removed after the separation and also why I discarded my previous devices.

William did, in fact, know that I had an attorney as I told him so on the night of February 1<sup>st</sup> after he mockingly asked, "Who advised you?" William and his attorney continue to harass in effort to push their false claim that William's CDV charge was a "set-up" by my father and I. Not only is this victim blaming, which is in line with William's blaming behavior, but an absurd accusation. I don't even know how one would go about

this. His attorney has all IMessages between me and my father, none of which outline any such plan. Furthermore, I in no way have the power to control William's actions. He made the choice to behave the way he did. And rather than take responsibility for this, William is choosing to tell an elaborate tale in an effort *to deflect from his own poor behavior and choices*. The following is an accurate depiction of January 1st-February 1st.

On the night of January 1st, William left. After an argument following **William's admission of searching my personal laptop in my absence**, he left our home and went to stay with his mother. He didn't even tell me that he was leaving; I later realized when searching for him. At the time, our children were staying with my parents. The next day, he texted and called my parents without my knowledge in an attempt to manipulate them to take part in his plan to separate the children from me. They had already planned to bring the children home, but William asked them to meet him in Newberry. My mother called me immediately as she found his behavior odd and concerning.

William returned to stay in our home later that week but we merely coexisted. He made few attempts to speak with me, and when he did it was from a place of superiority. He claimed that he scheduled an appointment with a counselor, but weeks went by and I was never given a time or place. At times I would speak to him, and he blatantly ignored me. Speaking had to be on his terms. During one of William's "talks" he said the following to me - "You don't know what you're getting yourself into sweetheart." "This is going to blow up in your face." "You can't just steal kids." "My kids aren't leaving this house." "I don't know how you think the law works, but you can't take the kids with you. That's kidnapping." "What do you think a judge will say? You are the one who wants to leave, not me. I'm trying to give you advice because it seems to me you're flying by the seat of

your pants." These comments were made in response to me saying that we should consider separation. William began to punish me, purposefully isolating me from our children. On several occasions he took our children to his mother's house to stay the night; I was not allowed to go. He told me to stay home and think. One of these nights was the final straw for me, when William put our children in the car, left them outside in the driveway, found me crying in the bathroom and proceeded to force sexual activity on me against my will. Afterwards, he left me there anyway, alone and upset. It took time and counseling for me to speak about this because it feels humiliating. For me, that was the night that solidified my decision to push forward with separation no matter how difficult it may be. I had no idea just how bad things were going to get.

On February 1, 2023 William was arrested for domestic violence second degree. Events leading up to this night began the week of January 22, 2023 when I made arrangements to separate. William left for a business trip to Dallas that Tuesday at which point I met with an attorney and made appropriate living and financial accommodations as I was advised to do so. While William was out of town I made multiple attempts to speak with him, outlining in text messages that I was moving forward with arrangements to separate and that I was available if he would like to discuss. I made it clear that it was not my intention to hurt him and that I wanted to work together in order to handle things in the best way possible for our children. He was unresponsive and said he was busy. He did not call. He made no attempt to speak with me or to seek reconciliation. In my eyes, no response was a response. Upon his return the following week, he acted surprised and discombobulated as if I had told him nothing over the past week. William arrived home at 2:00 AM on February 1st. He did not bother to tell me that his flight had been delayed. My

father was with me, and the children were in bed. I did not want to uproot my children without first speaking with them, and it was my desire for William and I to agree on a 50-50 schedule and talk with the children together. William was obviously tired when he arrived home; he just looked at me and condescendingly asked if I was going to leave so he could go to bed. I told William that we needed to speak the following day as I was not going to be without my children. William continued to show his dismissiveness and lack of concern as he instead went to Charlotte to work, despite my request and having arrived home at 2:00 AM. Later that day I picked up L.C. from afterschool and then went back to pick up A.C. from gymnastics. William finally arrived home around 6:30 PM. Both children were already home. William purposefully set up the situation to be an unideal environment for the conversation at hand. I thought he would stay home from work and meet me somewhere to talk without the children being present. It was never my intention to even be in that situation on the night of February 1st. My father was present as he did not trust William given his behavior up to that point. The children were upstairs. William begrudgingly said to me, "So do you want to talk?" He told me to go into A.C.'s room. William stood with his arms crossed, glaring at me, and condescendingly saying, "So tell me what happened this week." "I see money missing from our account. I can't see your business account anymore." When I told him that I was advised to do these things he mockingly asked "Who advised you? Your parents?" When I told him that none of those things should be the topic of our current conversation as we needed to discuss our children and co-parenting, he immediately became verbally aggressive. My father entered the hallway to check on me and told William not to bully me. To this William yelled at my father, "Mike you better get out of here." And to me William responded, "There is nothing

to discuss." "You're not taking the kids Megan. That's against the law." "You don't have a right to take them. I won't let you." At this point I could sense his heightened hostility, and I made the decision to remove my children from the situation. I went upstairs and asked the children to come with me; they followed me down the stairs toward the door entering the garage. When William saw this, he became enraged. In the chaos, William was shoving into us and proceeded to purposefully shove my father in the chest causing him to lose his balance and nearly fall. William physically pulled the children away from me. My children were hysterical, looking up through tears and with pure fear. William yelled at my father to put the children's backpacks down. He then ripped them from my father's shoulder. The bag of groceries that my father was holding split and scattered across the floor. William took the children away from me to the other side of the house and locked them in the bathroom. He physically blocked me from any attempt to get them. During this time, he had physically pushed my father out of our home and locked the door. The children and I were locked inside helpless to William's erratic behavior. For my safety, I left the home and William locked me out. Sobbing, I began banging on the door as I knew that I needed to take my children. He finally cracked the side door open, still telling me to leave, but I was able to push my way inside. He allowed me to see my children who were sobbing as they cried, "Please don't go mommy." I assured them that I would be back. William also assaulted my father that night, a 58-year-old man of much smaller stature. When William saw my father through the window of the side door attempting to check on us, he yelled, "Mike you better get out of here!" "You want in?" William started pulling on the door seemingly forgetting that he had locked it. He then ran outside screaming, "You don't know me mother fucker!" I did not see the fight in the

driveway but witnessed William coming back into the home with his shirt sleeve ripped; he was fuming. My father reported that William lunged at him, and William's shirt sleeve was ripped as my father reacted in self-defense. He also kicked William in the groin, which is likely the only thing that backed him down. Eventually my father and I were forced to leave. In the car, sobbing and inconsolable, my father got my cousin, an officer in Laurens County, on the phone. She phoned her lead officer, Blake Duncan, and together they advised me to call 911. They can both attest that I had no idea what to do in this situation. I wanted my children. I asked if the police could help me retrieve A.C. and L.C. from the home. Officer Duncant stated that the events of that night sounded very serious and potentially "DV." I asked what DV meant as I had no clue. I told them that I did not want to get William in trouble, I just wanted my children. They pleaded with me to hang up the phone and call 911; finally, I did. The 911 call and police report are available for review. Multiple officers arrived on the scene and questioned each of us separately. I was very emotional which I'm sure is evident in body cam footage. I said only what happened and did not exaggerate William's actions in any way. And this is exactly why the prosecutor's office dismissed the case. Why would I do this if my goal was to set William up?

Following this event and separation, I was obviously in a state of heightened emotion and worry. **I did not want William to track my whereabouts or the whereabouts of our children. I did not feel safe. I was scared. Our children were traumatized**, especially A.C. I knew that my previous iPhone was a part of Patty Cronin's family plan, giving them free access to monitor my calls and texts. I also knew that it would be feasible for William to track the location of my devices through FindMy

services. **I attempted to turn off all location features which resulted in the iPhone malfunctioning and an accidental lock on my computer.** I tried calling Verizon, but they would not release my phone number as I was not an account manager. I had a Spectrum representative reach out to Patty to no avail. If there was no intention to monitor me, why not release my phone line? Best Buy Geek Squad was also unable to help me with the MacBook Air issues. Out of frustration and desperation I made the decision to discard those devices and purchase new ones. It was an expense that I certainly did not need at the time, but it made me feel safer. I have documentation showing my purchase of the new iPhone well before the date of Ms. Jones' spoliation letter or request for devices. Furthermore, to this day, **I have yet to receive either of these documents.** Unfortunately, I feel that my best interest was neglected under previous legal representation. This is why I have retained a new attorney, Mr. Richard Whiting. **His sharing of these documents is the first I've laid eyes on them.** I received only a subpoena for my business records via certified mail. I now understand that Ms. Jones sent communications to my former attorneys including a spoliation letter and request for specific devices. However, **these communications were not forwarded to me.** I have shared all communications with Mr. Whiting. I am also willing to have this proven through a forensic expert's search of my emails. **The only document I received regarding litigation was a copy of the Temporary Order which I received a month later.** **There were also no phone calls relaying such information** because I have emails which I sent to the attorney's office begging for a phone call; most of my emails went without response. I am not a deceptive person. Had I known about Ms. Jones' notices I

would not have discarded those devices. I implore the Court to see that I have been in the dark and am making every effort to rectify this.

**I did, in fact, voice my concern for William searching my devices and monitoring me** to my previous attorney. However, I was not advised that there was anything to be done. Ms. Jones claims that I had no objection to William searching my device, and **that is simply not true.** I just didn't have the appropriate representation to handle the issue until now. **I also voiced concern for violation of HIPAA** with my previous attorney which went without response. I specifically spoke with Chris Watkins who assured me appropriate channels would be taken before handing over information to William's attorney. **No precautions were taken. There was no order of any kind in place to protect the rights of the numerous families I serve.**

Patty Cronin's affidavit is completely false. In fact, William has been hospitalized for the past week so I find it hard to believe either he or Patty had the time to write these affidavits. **Patty never came over to our home to spend time with us as a family. This is a bold lie.** If Patty watched the children in our home, it was while William and I were away, and she left almost immediately upon our arrival. All family gatherings were held at Patty's home. In fact, I mentioned to William several times how I found it odd that **Patty never wanted to spend time with us in our home. This makes the entirety of her affidavit false. She never witnessed the whole family using my laptop. She certainly never witnessed it being left alone and open. And she absolutely never witnessed William and I working on anything together on the laptop.** Even with regard to payroll, that was always completed late at night and **Patty was not present. Patty never witnessed our children watching Disney movies on the**

**laptop.** Again, why would they be watching on my work laptop instead of the television? If the children wanted to watch separate shows, either A.C. or L.C. used the iPad. And as already stated, **Patty was not in our home to witness any such events.** This is attested to in the affidavits of my family members.

Respectfully submitted,

  
Megan Cronin

Sworn to and subscribed before me this

30 day of June, 2023

  
Notary Public for South Carolina

My commission expires 05/01/33

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**SUPPLEMENTAL AFFIDAVIT OF STEVEN M. ABRAMS, J.D., M.S. IN  
SUPPORT OF MOTION TO SUPPRESS ELECTRONIC COMMUNICATIONS**

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My name is Steven M. Abrams, I am over eighteen years of age and reside in Charleston County, South Carolina. I am a licensed Attorney and Counselor at Law, in good standing, in South Carolina, Washington, DC, and New York. I am a member of the South Carolina Bar, The Washington DC Bar, The New York State Bar Association, and the New York State Academy of Trial Lawyers. This affidavit is supplemental to my affidavit filed previously in this matter before the South Carolina Court of Appeals.

My opinions expressed in this supplemental affidavit are based upon my reading of the Affidavit of Respondent, William Cronin, my telephone interviews of Petitioner, Megan Cronin, and my three decades of training and experience in the field of digital forensics, computer science, and cyber privacy law.

**Respondent admits to logging into the MacBook and to reading Petitioner's private electronic communications.**

In his affidavit, Respondent states that he logged into the MacBook and read Petitioner's private iMessage communications. The screenshots from the MacBook attached hereto confirm that Respondent not only read Petitioner's private iMessage communications, but also that he made copies of these communications, and used them in the marital litigation. These screenshots were not provided to the court by Respondent.

There is a factual dispute between Petitioner's position that she purchased the MacBook exclusively for use in her therapy business, and Respondent's claim that it was a "family" computer. Given Petitioner's fiduciary and legal obligations to protect the HIPAA protected information from her patients on the MacBook, her contention that she safeguarded the MacBook and did not share it or her password with her husband seems likely to be true. If true, Petitioner would have had a reasonable expectation of privacy in her private iMessage

communications when they were read, copied, and used without her consent by Respondent.

### **My observations and opinions**

iMessages are packetized electronic communications. Apple provides code on its communications servers to allow users to simultaneously direct iMessage traffic to their iPhones and additional Apple devices, including iWatches, iPads, and MacBooks. In *U.S. v. Councilman*, 418 F.3d 67 (1st Cir. 2005), *United States v. Szymuszkiewicz*, 622 F.3d 701 (7th Cir. 2010), and the cases which have followed since, including the recent case of *Fulmer v. Buckhannon* (2022) which was decided by the South Carolina Court of Appeals, the understanding of what constitutes an "interception" has been interpreted in the world of packetized electronic communications to include those communications that are forwarded by a rule on the communications server from temporary electronic storage to two receiving devices, and read on one of those devices by an unauthorized person. The requirement that an interception occur contemporaneously is now understood to be satisfied at the server when the two copies of the electronic communications are transmitted from temporary electronic storage by the server. There is no requirement with this interpretation of the wiretap statutes that the two copies of the message be read by the intended and unintended recipients exactly simultaneously. The interception occurs at the server, not at the receiving devices. In this case, Petitioner having seen the screenshots provided

in Respondent's answers to discovery in the underlying Family Court action (copies attached hereto as Exhibit "A"), identified them as her private electronic communications that were read, copied and used by Respondent without her knowledge or consent on the same day, or nearly so, as they were sent to or by her. Therefore, under wiretap law as it is now understood both federally and in South Carolina, Respondent's admissions in his affidavit and the screenshots taken by Respondent of Petitioner's private electronic communications constitute an admission and proof of an interception by Respondent of Petitioner's private electronic communications.

Respectfully submitted,



Steven Marc Abrams, J.D., M.S.

Sworn to and subscribed before me this

28<sup>th</sup> day of June, 2023

Amanda A. Maierle

Notary Public for South Carolina

My commission expires March 18, 2024

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Respondent.

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**PROOF OF SERVICE**

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I certify that I have served the foregoing Petitioner's Reply to Respondent's Return to Motion to Suppress Electronic Communications via email only on June 30, 2023 to the following addresses:


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June 30, 2023

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**Jun 30 2023**  
**SC Court of Appeals**

June 30, 2023

**VIA EMAIL ONLY**

The Honorable Jenny Abbot Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: Megan Cronin v. William Cronin  
Appellate Case No. 2023-000959

Dear Ms. Kitchings:

Enclosed for filing please find the Petitioner's Reply to Respondent's Return to Motion to Suppress Electronic Communications in the above captioned matter.

If anything else is needed, please do not hesitate to contact my office.

With kindest regards, I am,

Very truly yours,

  
Richard G. Whiting

/klh  
enclosure

cc: Ashby L. Jones, Esquire (via email only)  
Andrew Farley, Esquire (via email only)  
Sabine Boulware, Esquire (via email only)  
N. ElizaBeth D. Branham, Esquire (via email only)  
Honorable Huntley S. Crouch (via email only)