

Circuit Court for Montgomery County
Case No. C-15-FM-23-005389

UNREPORTED*
IN THE APPELLATE COURT
OF MARYLAND

No. 1029

September Term, 2024

GEORGE APPIAH SARFO

v.

DIANA ADDAE

Friedman,
Kehoe, S.,
Wright, Alexander, Jr.
(Senior Judge, Specially Assigned),

JJ.

Opinion by Friedman, J.

Filed: November 10, 2025

* This is an unreported opinion. This opinion may not be cited as precedent within the rule of stare decisis. It may be cited for its persuasive value only if the citation conforms to MD. RULE 1-104(a)(2)(B).

BACKGROUND

Sarfo and Addae are the unmarried parents of a child. In 2022, Addae and the child moved from Montgomery County, Maryland, to Ottawa, Canada. Pursuant to informal agreement, Sarfo paid Addae \$1,000 per month in child support. In 2023, Sarfo unilaterally reduced that to \$200 bi-weekly and suggested that he would stop paying altogether in the future. Addae filed an action for custody¹ and child support in the Circuit Court for Montgomery County. The circuit court ordered Sarfo to pay child support in the amount of \$3,068.00 monthly, determined arrearages (and a payment schedule for those arrearages), entered an earnings withholding order, and ordered Sarfo to pay Addae’s attorney’s fees in the amount of \$16,231.21. Sarfo noted this appeal.² Although Sarfo has identified ten “major issues” in this informal brief,³ we have condensed and reordered them to four: jurisdiction, child support, stay, and the award of attorney’s fees.⁴

¹ The Complaint for custody was dismissed, as is discussed below.

² Sarfo’s notice of appeal was likely late. Addae has not moved to dismiss the appeal on this basis, and we do not have the benefit of briefing on this issue. Regardless, because we affirm the lower court, dismissing Sarfo’s appeal as untimely would not change the result.

³ Informal briefing is permitted in cases in which at least one party is self-represented. A litigant who files an informal brief must adhere to the protocols set forth in the informal briefing administrative order. MD. R. 8-502(a)(9); Appellate Court of Maryland Administrative Order (Dec. 19, 2022), <https://perma.cc/FBE6-UDUD>. The informal briefing guidelines require that a brief set forth the issues on appeal, the party’s supporting arguments, and a statement of the facts. Guideline for Informal Briefs, at (b)(2) (June 23, 2023), <https://perma.cc/65UM-N5GA>. Sarfo’s brief, although thin, does not violate these requirements.

⁴ We have reproduced Sarfo’s ten claims here verbatim (including his idiosyncratic capitalization):

1. Trial Judge's abuse of discretion and power in awarding Attorney fees of [\$]16,000+ to appellee. The judge abused her discretion and disregarded Maryland and Federal Law. I, The appellant requested during Trial that everyone pays their attorney fees as per Federal/MD law. There was at least one error identified in the attorney fees attached, where a date of 2020 was used and billed, this case started in August 2023.
2. The Trial Judge wrongfully allocated a property in Ghana to me even though I had stated during trial that the property belonged to a board and is registered in a different person's name. Trial Judge didn't give me an order or power to go claim the property after claiming it was mine.
3. Trial Judge, Miscalculated the earnings of appellant, during the trial, the appellee stated my income was around \$14,440 but trial Judge Miscalculated it and raised it to \$23,000 without showing any proof.
4. Trial Judge, Ignored a pending Child Support Case (Case No[.] C-15-FM-23-004525[.] Which Precedes This case in calculating the Child Support Amount This is not in the best interest of the child.
5. The Trial Judge, Ignored the fact that those Jobs used to calculate the Child Support Amount were ending, and indeed ended whilst the trial was on-going. The Trial Court Was Notified of the Job Termination by the Employers, yet they ignored the notification and didn't adjust the calculated amount.
6. The Trial Judge Erred on the issue of Health Insurance for the Minor, I, the Appellant, stated that the Minor Child Already has Health Insurance but Trial Judge included health insurance costs into the child support sheet calculation and ignored it by saying, Appellant didn't mention how much it would cost to add Minor Child. There is no need to state costs if Minor Child Already has health insurance which is already in possession of the appellee.
7. The trial Judge refused to include Child Support paid to my Other Kids who are American Citizens. She mentioned there was no evidence in support of that and my oral statement is not enough. The trial Judge was bias and admitted my oral statements about my new business Byte College Without any Evidence but didn't admit my oral statements regarding my Existing Child Support Obligation to my other US Citizen Kids.

DISCUSSION

Before we begin, we think it is worthwhile to explain the method and function of appellate review. We review the decisions of the circuit court to ensure that its legal rulings were legally correct and its factual determinations were reasonable. We can't reevaluate credibility. We don't reweigh evidence. We don't review whether things were fair. And, even if the circuit court made a mistake, we won't reverse unless it actually harmed a party. With that in mind, we turn to the issues presented.

I. JURISDICTION

Originally, Addae's complaint was for custody and for child support. There are separate jurisdictional standards that govern these two aspects of the case. Jurisdiction in a child custody case is governed by the Maryland Uniform Child Custody Jurisdiction and

-
8. As per the case filings, an initial motion of child support was brought by appellee who resides in Canada with the Minor. Later, the appellee who never appeared in court with the minor filed an amended motion for child support and full physical custody and full legal custody. During the trial, I moved for the case to be dismissed because of their physical presence in Canada for over 2 years since they left the USA and their refusal to appear in court. The Trial Judge didn't dismiss the case but went ahead with the case and only dropped the motion for full physical custody and full legal custody.
 9. The Trial Judge, abused her discretion, and when I, the appellant filed for a motion to stay the Child Support order along with Wage Garnishment Orders, they were ignored even though the clerk of courts accepted the filings with no errors.
 10. Child Support Calculations Were Wrong, and the Income To Be Used In Calculated Amount even if Job losses were not considered should have been \$14,440 and not \$23,000 as wrongfully stated by the Trial Judge.

Enforcement Act (“UCCJEA”), Section 9.5-201 of the Family Law (“FL”) article of the Maryland Code, and with exceptions that don’t apply here, generally lies exclusively in the home state of the child. *See* FADER’S MARYLAND FAMILY LAW § 8-5 (Cynthia Callahan & Thomas C. Ries eds., 2021). By contrast, jurisdiction in a child support case is determined pursuant to the Maryland Uniform Interstate Family Support Act (“UIFSA”), FL § 10-304, and permits the courts of this state to exercise jurisdiction over nonresidents by personal service, by consent, by former or current residence, or by the act of conceiving the child. *Id.*; *Friedetzky v. Hsia*, 223 Md. App. 723 (2015) (comparing UCCJEA and UIFSA).

When Addae dismissed her complaint for custody, the case proceeded on the issue of child support only. In this appeal, Sarfo argues that the circuit court lacked jurisdiction to decide this case (**Argument #8**). When considering child support only, there can be no doubt that the court had jurisdiction under UIFSA over Sarfo, a resident of Maryland. It is also clear that the circuit court had jurisdiction over Addae and the child by their consent.⁵ As such, we see no error here.

II. CHILD SUPPORT

In Maryland, the amount of money that a noncustodial parent must pay to the custodial parent in child support is determined by use of the child support guidelines found in FL § 12-202. Using those guidelines, the circuit court calculated that Sarfo would be required to pay Addae \$3,068 per month. Sarfo has identified four things that he thinks

⁵ If, at some point in the future, either of the parties wish to contest custody, that party can file a case in the appropriate jurisdiction at that time.

were wrong with the circuit court’s inputs that resulted in an erroneous child support award. We have combined and reordered these arguments, but will go through each.

A. Property in Ghana

Sarfo argues (**Argument #2**) that he doesn’t own the Venice View Beach Resort in Ghana—he says that he testified that it “belonged to a board and is registered in a different person’s name”—and that the circuit court erred in determining that he is the owner. This argument cannot succeed for two reasons. First, the judge wasn’t required to believe the testimony and could reasonably believe that the “board” and the “other person” were merely fronts erected to shield the true ownership from the court’s consideration. Second, although the court counted this property as belonging to Sarfo, it did not determine that he derived any income from his ownership and therefore excluded it from the computation of Sarfo’s income. We don’t think that the circuit court erred, but even if it did, that error was harmless.

B. Sarfo’s Income

Sarfo notes that Addae testified to her belief that Sarfo’s income was around \$14,440 but that the circuit court increased that to “\$23,000 without showing any proof.” (**Arguments #3, #10**). In fact, despite Sarfo’s failure to participate in discovery, the circuit court found that Sarfo earns income from three sources in the following amounts:

<u>Source</u>	<u>Annual</u>	<u>Monthly</u>
Nava PBC	\$147,225.00	\$12,267.00
FilterEasy	\$95,082.00	\$7,925.00
<u>Byte College</u>	<u>\$2,000.00</u>	<u>\$166.00</u>
Total	\$244,307.00	\$20,358.00

We begin by pointing out that the circuit court believed that Sarfo earns considerably more than this, pointing to several unexplained deposits to his bank accounts. Despite this, however, the circuit court did not attribute (as it might have) a higher income to Sarfo, but used the amount proven at trial—\$20,358 (not \$23,000)—in calculating his child support obligation.

Sarfo also complains that the circuit court failed to credit his testimony that Sarfo’s jobs, listed above, were coming to an end (**Argument #5**). There are, as Addae notes, two answers to this question. *First*, the circuit court, as the finder of fact, is entitled to credit all, some, or none of any witness’s testimony. *Omayaka v. Omayaka*, 417 Md. 643, 659 (2011). If it did not believe Sarfo’s testimony that the jobs were ending, it didn’t have to reduce his income for the child support calculation. *Second*, if, in fact, Sarfo’s income does change in the future, he is entitled to seek a modification of child support. FL § 12-104. We see no error here.

C. Other Child Support Obligations

The amount that a parent is paying for child support for other children is deducted from that parent’s income. FL §§ 12-201(c)(2), 12-204(a)(2)(ii). Sarfo argues that the

circuit court failed to deduct his other child support payments from his income. Here, the circuit court took judicial notice and credited Sarfo with paying \$1,200 per month in Case #169830FL. In this appeal, however, Sarfo contends that the circuit court erred by not crediting him with the payment of child support for other children, including two children living with their maternal grandmothers in Ghana (**Argument #7**) and a third child who was the subject of other litigation in the circuit court (**Argument #4**). The simple answer here is that the circuit court did not receive documentation to support those assertions and did not believe Sarfo's testimony that he is actually making payments to support these children.⁶

D. Health Insurance

The circuit court credited Addae with paying \$41 per month for the minor child's health insurance. Sarfo argues that this credit is duplicative because he testified that he, too, pays for the child's health insurance (**Argument #6**). To be clear, Sarfo isn't disputing that Addae pays for health insurance. Rather, he is asserting that he too pays for insurance. There was no evidence in the record of this appeal that Sarfo makes such payments, that he provided documentation to support that he makes such payments, or that he objected to

⁶ As a part of his argument, Sarfo notes the apparent inconsistency of the circuit court accepting his oral testimony regarding the amount of his income from Byte College without supporting documentation but declining to accept his oral testimony without supporting documentation regarding his child support payments. The simple answer is that the circuit judge, as finder of fact, is entitled to accept all, some, or none of a witness's testimony. *Omayaka*, 417 Md. at 659. Moreover, as must be apparent, it is eminently reasonable to attribute a higher degree of credibility to statements that *cost* the witness than to those that *benefit* that witness. In any event, there is no error here.

not being credited for such payments. On the state of the record before this Court, we see no basis for a ruling other than the one made by the circuit court. It is affirmed.

III. STAY

Sarfo also argues (**Argument #9**) that the circuit court abused its discretion by “ignor[ing]” his motion to stay the child support order and wage garnishment order “even though the clerk of courts accepted the filing with no errors.” It is not plain to us precisely what Sarfo expects here. There is no merit to the suggestion that the circuit court “ignored” the motion. It considered it and explicitly denied it on the record. There is also no merit to the idea that the action of the clerk in accepting a pleading somehow binds the circuit court’s decision in any way. And finally, the standard for issuance of a stay requires an applicant to demonstrate the likelihood of success on the merits, the balance of harm, irreparable injury, and the public interest. MD. R. 15-504(a). All Sarfo argued in support of his stay request was a vague request that these orders be stayed “pending ... the outcome of the Hague international child abduction case.” That was an insufficient showing, and the circuit court did not abuse its discretion in declining to issue such a stay.⁷

IV. ATTORNEY’S FEES

The circuit court ordered Sarfo to pay Addae’s attorney’s fees in the amount of \$16,231.21. Sarfo objects to this award as violating “Maryland and Federal Law,” which, he asserts (**Argument #1**), requires “that everyone pays their attorney fees.” While it is

⁷ We note that the child support payment awarded is for the benefit of the child. There can be no doubt that this child needs support even during the pendency of any other legal proceedings.

certainly true that in general civil litigation, Maryland follows the so-called American Rule, which requires that parties pay their own attorney's fees, the Maryland General Assembly has modified this rule in child support cases. FL § 12-103(a). The legislature has also provided courts with a list of mandatory considerations to make such an award. FL § 12-103(b), (c). We have reviewed the hearing transcript, and it is clear to us that the circuit court judge knew and carefully followed the law. Moreover, Sarfo's only complaint (besides his erroneous belief that the American Rule governs this case) is his discovery of an alleged typographical error in a date in Addae's lawyer's billing statement. We don't think this minor typographical error—if proven—has any bearing on the fees assessed. We affirm this aspect of the circuit court's order.⁸

**JUDGMENT OF THE CIRCUIT COURT
FOR MONTGOMERY COUNTY
AFFIRMED. REMANDED TO THAT
COURT FOR FURTHER PROCEEDINGS
NOT INCONSISTENT WITH FOOTNOTE
8 OF THIS OPINION. COSTS ASSESSED
TO APPELLANT, GEORGE APPIAH
SARFO.**

⁸ Addae has also asked this Court to award additional attorney's fees for work performed in opposing Sarfo's numerous post-award motions in the circuit court and in this appeal. After this case was submitted, the circuit court denied Addae's motion for fees incurred in opposing some of Sarfo's post-award motions. The rest of the fees are sought by Addae, for the first time, in her brief to this Court. In a child custody case such as this one, the decision of whether to award these attorney's fees requires an in-depth factual inquiry. FL § 12-103(b). The circuit court, rather than our Court, is in the best position to make that fact-based determination. Accordingly, we remand the case to the circuit court for the limited purpose of considering whether to award post-award attorney's fees and, if so, in what amount. *See Friolo v. Frankel*, 438 Md. 304, 329 (2014) (remanding for computation of appellate attorney's fees).