

JDF 1407	<input checked="" type="checkbox"/> <b>Motion</b> <input type="checkbox"/> <b>Stipulation</b> to Relocate Children
<b>A. Court:</b> <input checked="" type="checkbox"/> District <input type="checkbox"/> Juvenile Colorado County: <u>Adams</u> <span style="float: right;">CO 80601</span> Mailing Address: <u>1100 Judicial Cntr. Dr. Brighton</u>	<i>This box is for court use only.</i>
<b>B. Parties to the Case:</b> Petitioner: <u>Richard Dorsey</u> & Respondent: <u>Lauren Dorsey</u> <small>(or Co-petitioner)</small>	
<b>C. Filed by:</b> Name: <u>Richard Dorsey</u> Mailing Address: <u>600 Bigbee High Rd.</u> Phone: <u>863-450-8370</u> <span style="float: right;">Ward, CO 80481</span> Email: <u>dorseydriver01@gmail.com</u>	<b>D. Case Details:</b> Number: <u>25DR649</u> Division: <u>B</u> Courtroom: _____

**Note to Responding Party:** If you disagree with this Motion, you must file a written response (JDF 1315) with within 21 days of the service date found in Section 14 below.

The  Petitioner     Respondent (or co-petitioner)     Both parties

requests that the permanent residence of the child(ren) to be changed pursuant to C.R.S. § 14-10-129(1)(a)(II). This would substantially change the geographical ties between the child(ren) and the other party. I/We also request a change to the Parenting Plan and Support Orders as needed.

1. The  Petitioner     Co-Petitioner/Respondent requests to relocate the child(ren) to:  
 (city) Pahoa (State) HI, on (date) 08/01/2025.
2. **Information about Petitioner:**    Date of Birth: 08/26/1975  
 Current Mailing Address: 600 Bigbee High Rd.  
 City, State & Zip: Ward, CO 80481  
 Phone Number: 863-450-8370    Email: dorseydriver01@gmail.com
3. **Information about Respondent (or co-Petitioner):**    Date of Birth: 02/08/1990  
 Current Mailing Address: 15-2660 Pahoa Village Rd. Ste 203-238  
 City, State & Zip: Pahoa, HI 96778  
 Phone Number: 808-333-9273    Email: Laurendorsey19@gmail.com
4. The parties have 2 minor child(ren):

Full Name of Child	Present Address	Sex	Date of Birth
<u>Lucia Dorsey</u>	<u>760 Bigbee High Rd. Ward CO 80481</u>	<u>F</u>	<u>03/04/20</u>
<u>Rare Dorsey</u>		<u>F</u>	<u>03/09/22</u>

5. The last <sup>N/A</sup> Parenting Plan/Order regarding the residence of the minor child(ren) was entered on \_\_\_\_\_ (date) and is attached.

6. Under the terms of the last Parenting Plan/Order, the Petitioner has \_\_\_\_\_ overnights per year with the child(ren) and the Co-Petitioner/Respondent has \_\_\_\_\_ overnights per year with the child(ren).

7. I/We have filed a motion to modify the Parenting Plan/Order within the last two years?  Yes  No If Yes, please identify the outcome of that motion:  Ordered by Court  Denied by the Court.

8. I  have  have not notified the other party in writing of my request to relocate the child(ren).

9. I  have  have not provided a revised Parenting Plan to address the issues presented with the relocation.

10. Restrictions currently exist in the current Parenting Plan/Order regarding relocation of the child(ren)'s residence?  Yes  No If Yes, please identify:

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11. The relocation or change of residence is in the best interests of the child(ren) because:

They currently live on a hoarded property with unsafe materials, unsecured firearms and experience long, harsh winter conditions. The cold/dry climate worsens both children's health conditions (immune responses to viruses, eczema/skin rashes). With their father's history of working alongside drug dealers and his financial instability history - their home situation is unpredictable. In Hawaii, there is a public

12. Required Notice of Prior Protection/Restraining Orders.

(cont. on next page)

Have any Temporary or Permanent Protection/Restraining Orders to prevent domestic abuse or any Criminal Protection/Restraining Orders or Emergency Protection Orders been issued against either party within two years prior to the filing of this petition?  No  Yes If your answer was Yes, complete the following:

The Protection/Restraining Order was  Temporary  Permanent and issued against \_\_\_\_\_, in the County of \_\_\_\_\_, State of \_\_\_\_\_, in case number \_\_\_\_\_.

What was the subject matter of the Civil Protection/Restraining Order or Emergency Protection Order?

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(1.) Charter school offering homeschooling support, nature and arts based education and social interaction. The tropical climate with clean air and a year-round food growing conditions allow for optimum health and an active outdoor lifestyle.

13.  **Check only if applicable.** Due to this request to relocate the minor child(ren) and to modify the Parenting Plan, I/we request that child support also be modified.
- Under the current child support order, the  Petitioner's  Co-Petitioner's/Respondent's child support obligation is \$ \_\_\_\_\_ and is paid:  
 weekly  bi-weekly  twice a month  monthly  Other: \_\_\_\_\_
- The new child support obligation requested  is  is not more than a 10% change from the current child support order.
- I/We have completed a child support worksheet that shows what the new child support obligation should be. The child support worksheet is attached to this Motion.
- I/We have attached current Sworn Financial Statements.

14. **Certificate of Service**

Note Skip this section if both parties sign and file together (*stipulation*).

I certify that on (enter date) June 24, 2025, I gave a copy of this document to the other parties by: (select at least one)

- Colorado Courts E-Filing. [www.jbits.courts.state.co.us/efiling](http://www.jbits.courts.state.co.us/efiling)
- Email or Fax to: dorseydriver01@gmail.com
- Regular Mail, addressed to: (name, full address)  Hand Delivery, to: (name, place)

- 1) \_\_\_\_\_
- 2) \_\_\_\_\_
- 3) \_\_\_\_\_

15. **Signatures**

**Petitioner**

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Lawyer Signature: \_\_\_\_\_  
(If any)

Date: \_\_\_\_\_

**Respondent (or co-petitioner)**

Print Name: Lauren Dorsey

Signature: Lauren Dorsey

Date: \_\_\_\_\_

Lawyer Signature: \_\_\_\_\_  
(If any)

Date: \_\_\_\_\_