

**DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO**

1777 6th Street, Boulder, CO 80302

In re the Marriage of:

**Petitioner:** RICHARD JOHN DORSEY

**Respondent:** LAUREN ALICIA DORSEY

**Case Number:** 2025DR000704 **Division:** 14

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**PETITIONER'S PRETRIAL STATEMENT (JDF 1129)**

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**I. REMAINING DISPUTED ISSUES**

The following issues remain unresolved and are submitted to the Court for determination:

1. Allocation of parental responsibilities and parenting time
2. Child support (including retroactive support from March 12, 2025)
3. Division of marital property and debts
4. Maintenance (retroactive from March 12, 2025)

**II. STATEMENT OF FACTS**

**A. Employment and Financial Arrangement**

At Respondent Lauren Alicia Dorsey's request, Petitioner left his employment to serve as the primary caregiver for the parties' minor children, Lucia (DOB March 4, 2020) and Rae (DOB March 9, 2022). Respondent, earning approximately \$135,000 gross per year, assumed sole responsibility for managing the household finances. While Respondent would periodically express concern about money problems to Petitioner, her conduct was inconsistent with those representations -- Respondent regularly received expensive purchases and continued personal spending at the same time she claimed financial hardship. Petitioner relied on Respondent's representations and was not given a full and accurate picture of the family's actual financial condition.

**B. Financial Misconduct and Concealment**

Throughout the marriage, Respondent engaged in a sustained pattern of financial misconduct:

**1. Unauthorized credit in Petitioner's name:** Respondent told Petitioner her own credit was maxed out and obtained credit cards in Petitioner's name without his consent. Respondent's continued accumulation of credit -- including accounts in Petitioner's name -- was part of the pattern of financial mismanagement that contributed to the Chapter 7 bankruptcy.

**2. Chapter 7 bankruptcy:** Discharge January 9, 2024. Respondent managed the bankruptcy without Petitioner's informed participation.

**3. Cash assistance and unemployment:** In approximately May/June 2020, Respondent filed for Colorado cash assistance and unemployment benefits. Boulder County approved cash assistance of \$531/month plus \$445/month in food assistance (approximately \$976/month total). Petitioner asked Respondent to stop receiving these benefits. Critically, Respondent failed to properly report the unemployment income to the cash assistance program as required by law. Boulder County subsequently pursued collection for the resulting overpayment, and Petitioner is currently subject to reduced EBT/SNAP benefits to repay it -- a direct ongoing financial harm to Petitioner and the minor children.

**4. Roof insurance proceeds:** Respondent received an insurance payment for roof damage to the marital home. Respondent used those funds without disclosure to Petitioner and did not apply the proceeds to complete the roof repairs. The roofing contractor was left with ordered materials and potential liability remains.

**5. Home sale proceeds:** The marital home at 10975 Birch Dr, Thornton, CO 80233 was sold on or about April 11, 2025 for \$475,000 (MLS# 2054756) while Respondent was in Hawaii. Respondent retained all net equity without disclosure to Petitioner. Petitioner is entitled to one-half of the net equity.

**6. Personal travel:** Two trips to Texas, one to Canada (2024); six weeks in India (October--December 2024); relocated to Hawaii on March 12, 2025.

### **C. Departure and Abandonment -- March 12, 2025**

On March 5, 2025, Respondent notified Petitioner in writing that she was relocating to Hawaii, providing her address as 12-7045 Wehelauniu St, Pahoa, HI 96778. Respondent flew out of Colorado on **March 12, 2025**, leaving both minor children in Petitioner's sole care. Prior to her departure, Respondent had her personal vehicle shipped to Hawaii.

### **D. Prior Abandonment -- India Trip**

On or about October 31, 2024, Respondent departed for India for over six weeks, during which she ceased providing food for the minor children. Petitioner sought employment

washing cars and applied for SNAP benefits to provide for the children.

#### **E. Financial Waste of Marital Assets**

Respondent ceased paying the mortgage on the marital home and listed it for short sale. On May 13, 2024, Respondent allowed Petitioner's 2015 Dodge Ram -- approximately \$20,000 in equity and Petitioner's sole reliable transportation -- to be repossessed due to missed payments, while Petitioner had no knowledge of the delinquency. Prior to her March 12, 2025 departure, and without notice, Respondent also caused the household electricity to be disconnected during freezing temperatures, leaving Petitioner and the minor children without heat or power.

#### **F. Petitioner's Financial Recovery**

Petitioner obtained employment in auto detailing and on June 14, 2025 established Phantom Auto LLC. Petitioner has been the sole financial and physical provider for the minor children since March 12, 2025.

#### **G. Child Safety and Neglect Concerns**

Petitioner has serious concerns regarding Respondent's ability to safely supervise the minor children:

- 1. Unsupervised children / adult content:** Respondent routinely left the minor children unsupervised while creating adult content in the home. Rae was found at a construction park over one mile from the home. Neighbor Jamie Scollard notified Respondent, who was unaware Rae had left.
- 2. Police contact:** An anonymous neighbor contacted law enforcement regarding children left unsupervised and unclothed outside. Law enforcement indicated the situation was recurring.
- 3. Frostbite incident (December 31, 2024):** Respondent called Petitioner saying she could not handle Rae. Rae had been left outside in below-freezing temperatures without gloves, with visible frostbite on her hands.
- 4. Sleep disruption:** Since Respondent's return to Colorado, both children report being kept awake at night while Respondent talks on the phone in the bed they share. The children return to Petitioner's care fatigued and dysregulated.

#### **H. Respondent's Housing Instability and Ties to Hawaii**

Since the sale of the marital home in April 2025, Respondent has not established stable, permanent housing in Colorado. Since returning to Colorado in approximately February 2026, Respondent has undergone multiple unexpected changes of residence with no explanation

provided to Petitioner:

- 1. Lee Hill Drive, Boulder:** Respondent initially indicated she would be residing at a two-bedroom condominium at the end of Lee Hill Drive, Boulder. Without explanation, Respondent's address changed.
- 2. 3570 33rd St #3, Boulder, CO 80301** -- subsequent Colorado address.
- 3. 1750 33rd St, Boulder, CO 80301** -- current address; Respondent and both minor children share a single bed at this location.
- 4. Longmont, CO** -- Respondent is actively searching for housing in Longmont, demonstrating she has not yet established a stable permanent residence.
- 5. Vehicle in Hawaii:** Respondent's personal vehicle -- a 2010 Mazda CX7, her separate non-marital property -- remains in Hawaii. Its continued presence there is consistent with Respondent maintaining an established life in Hawaii rather than having genuinely reestablished Colorado residency.

This pattern of multiple, unexplained address changes within weeks of returning to Colorado -- combined with no confirmed independent housing since the marital home sold in April 2025 and Respondent's vehicle remaining in Hawaii -- raises serious questions about whether Respondent has genuinely reestablished Colorado residency or intends to return to Hawaii after these proceedings conclude.

#### **I. Vehicle -- 2006 Scion tC**

Upon returning from Hawaii, Respondent convinced Petitioner to give her the marital 2006 Scion tC, claiming she had no vehicle in Colorado, while failing to disclose that her own 2010 Mazda CX7 (her separate non-marital property) remained in Hawaii.

### **III. PETITIONER'S PROPOSED PARENTING PLAN**

**Primary residential custody:** Petitioner (Monday through Friday)

**Respondent's parenting time:** Every other weekend

**Basis -- C.R.S. Section 14-10-124 Best Interests of the Child:**

- 1. Petitioner's involvement:** Sole physical caregiver and primary financial provider since March 12, 2025 (effectively since August 2024). Children have their own beds, consistent routine, and reliable school transportation.
- 2. Respondent's housing instability and Hawaii ties:** No stable independent residence in Colorado. Multiple unexplained address changes within weeks of returning, currently sharing a single bed with both children, still actively searching for permanent housing.

Personal vehicle remains in Hawaii. History of extended absences including full relocation to Hawaii for nearly a year.

**3. Pattern of neglect and financial harm:** Ceased buying food, disconnected utilities during a freeze, left children unsupervised, frostbite incident, financial misconduct resulting in Petitioner's reduced food assistance.

**4. Petitioner's stable environment:** Children are rested, regulated, and attending school consistently in Petitioner's care.

#### IV. PETITIONER'S POSITION ON OTHER DISPUTED ISSUES

##### A. Child Support -- Current and Retroactive

Petitioner requests child support pursuant to C.R.S. Section 14-10-115:

1. Respondent's gross income imputed at no less than **\$135,000/year**, consistent with AGI of \$153,681 (2023) and \$119,003 (2024).
2. Petitioner as primary residential parent (~260 overnights/year); Respondent every other weekend (~52 overnights/year).
3. Respondent maintains health insurance for children if available at reasonable cost.
4. Unreimbursed medical and dental expenses divided equally.

**Retroactive Child Support:** Petitioner requests retroactive support from **March 12, 2025** through the date of Permanent Orders. Respondent's total voluntary support during this period was only \$330.00:

| Date               | Amount          |
|--------------------|-----------------|
| May 21, 2025       | \$78.00         |
| May 21, 2025       | \$25.00         |
| September 11, 2025 | \$44.00         |
| November 7, 2025   | \$33.00         |
| February 10, 2026  | \$150.00        |
| <b>TOTAL PAID</b>  | <b>\$330.00</b> |

Estimated retroactive obligation: approximately \$1,500--\$2,000/month for ~12 months = **\$17,670--\$23,670** after the \$330 credit. Petitioner requests the Court calculate the precise amount and order payment.

##### B. Marital Debt

All remaining marital debt should be assigned to Respondent given her pattern of financial misconduct -- obtaining unauthorized credit in Petitioner's name, collecting ~\$976/month in government benefits while failing to properly report income (causing Petitioner's current EBT reduction), and converting marital assets to personal use.

### **C. EBT Overpayment Reimbursement**

As a result of Respondent's failure to properly report unemployment income to the cash assistance program, Boulder County is recovering an overpayment through Petitioner's reduced EBT benefits. The Court is requested to order Respondent to reimburse Petitioner for the full amount of EBT reductions imposed.

### **D. Maintenance -- Retroactive from March 12, 2025**

Pursuant to C.R.S. Section 14-10-114, Petitioner requests maintenance retroactive to **March 12, 2025**. Petitioner left his career at Respondent's request to serve as primary caregiver, creating a gross disparity in earning capacity. Respondent earned \$135,000+ gross/year; Petitioner is rebuilding through Phantom Auto LLC (est. June 14, 2025).

### **V. WITNESSES**

1. **Jamie Scollard** -- (720) 556-1628 | jamie.zurgot@gmail.com
2. **Ryan Scollard** -- (720) 936-0827 | bostonscollard@yahoo.com
3. **Julia Schuvie** -- (720) 394-4231 | juliaschuvie@comcast.net
4. **Richard John Dorsey** (Petitioner)

### **VI. EXHIBITS**

1. SNAP/EBT records including reduced benefit notice and Boulder County overpayment demand
2. Boulder County cash assistance approval records confirming \$531/month cash + \$445/month food (May/June 2020)
3. Phantom Auto LLC registration (June 14, 2025)
4. Property sale records -- 10975 Birch Dr, Thornton, CO 80233 (sold April 11, 2025, \$475,000, MLS# 2054756)
5. Roof insurance claim, payment records, and roofing contractor correspondence
6. Respondent's income documentation (AGI \$153,681 in 2023; \$119,003 in 2024)
7. Chapter 7 bankruptcy discharge records (January 9, 2024)

8. Truck repossession documentation -- 2015 Dodge Ram (May 13, 2024)
9. March 5, 2025 email from Respondent confirming Hawaii relocation (12-7045 Wehelauniu St, Paho, HI 96778)
10. Unemployment benefit records filed on Petitioner's behalf
11. Boulder County overpayment notice and EBT reduction documentation
12. Photograph(s) of Rae's hands showing frostbite (December 31, 2024)
13. Travel records (Texas x2, Canada, India, Hawaii)
14. Utility shutoff notice / records
15. Relevant communications between parties

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**CERTIFICATE OF SERVICE**

I certify that on \_\_\_\_\_, 2026, I served a copy of this Pretrial Statement on:

Lauren Alicia Dorsey  
1750 33rd Street, Boulder, CO 80301  
laurendorsey19@gmail.com

Method of service:  Hand delivery  U.S. Mail  Email  Other: \_\_\_\_\_

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

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*This document was prepared with assistance and does not constitute legal advice. Richard John Dorsey should review all content for accuracy before filing.*