

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

SEPARATION AGREEMENT (JDF 1115)

Proposed by: Richard John Dorsey, Pro Se

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I. PARTIES AND MARRIAGE

Petitioner **Richard John Dorsey** and Respondent **Lauren Alicia Dorsey** were married on **November 18, 2019** in **Indian Rocks Beach, Florida**. The parties separated on or about **March 12, 2025**, when Respondent relocated to Hawaii, leaving the minor children in Petitioner's sole care.

The parties have two minor children:

1. **Lucia Dorsey**, born March 4, 2020
2. **Rae Dorsey**, born March 9, 2022

II. CHILDREN AND PARENTING

The parties agree that the best interests of the minor children are paramount. The allocation of parental responsibilities and parenting time shall be governed by the separately filed **Parenting Plan (JDF 1113)**, incorporated herein by reference.

III. MARITAL HOME

The marital home located at **10975 Birch Dr, Thornton, CO 80233** was sold on or about **April 11, 2025** for **\$475,000** (MLS# 2054756, listed by Ryan Gantt, Farmhouse Realty).

Petitioner is entitled to **one-half (1/2) of the net equity** from the sale, after deduction of the mortgage payoff balance, closing costs, and any agreed selling expenses. Respondent received and retained all sale proceeds. Respondent shall pay Petitioner his one-half share of net equity within 30 days of the entry of Permanent Orders.

If Respondent disputes the net equity amount, both parties shall provide full documentation of the mortgage payoff balance, closing statement (HUD-1), and all selling costs to the Court.

IV. VEHICLES

A. 2006 Scion tC (marital property) — Assigned to Respondent Lauren Alicia Dorsey. Respondent shall be solely responsible for all costs, insurance, and liabilities associated with this vehicle from the date of entry of Permanent Orders.

B. 1998 Dodge Truck — Petitioner's separate post-marital property. Assigned to Petitioner Richard John Dorsey.

C. 2010 Mazda CX7 — Respondent's separate, non-marital property, currently located in Hawaii. This vehicle is not subject to division. Assigned solely to Respondent Lauren Alicia Dorsey.

D. 2015 Dodge Ram — Repossessed by BMO Harris on May 13, 2024, due to Respondent's failure to make payments. Approximately \$20,000 in equity was lost. Petitioner had no knowledge of the payment delinquency. Petitioner is credited \$10,000 against Respondent for this loss.

V. IRS TAX DEBT

A. Tax Year 2024 — IRS balance of **\$9,441.03**, assessed solely against Respondent (Married Filing Separately). Respondent shall be solely responsible for this debt.

B. Tax Year 2023 — Joint IRS balance of approximately **\$538.95**. Petitioner requests this debt be assigned entirely to Respondent given Respondent's superior income and pattern of financial mismanagement.

C. Bounced IRS Payment — On April 23, 2025, a payment of **\$5,266** to the IRS was returned/bounced. Respondent is responsible for any resulting penalties, interest, or IRS collection actions.

D. IRS Installment Agreement — An installment agreement was established on June 14, 2025. Respondent shall be solely responsible for all payments under this agreement.

VI. MARITAL DEBT

All remaining marital debt shall be assigned to **Respondent** based on the following:

1. Respondent unilaterally managed all marital finances and incurred debts without Petitioner's knowledge or consent.
2. Respondent obtained credit in Petitioner's name without authorization.
3. Respondent filed Chapter 7 bankruptcy (discharge January 9, 2024) without Petitioner's informed participation.
4. Respondent collected approximately \$976/month in government assistance (cash + food) and failed to properly report unemployment income to the assistance program, causing an ongoing EBT overpayment recovery that currently reduces Petitioner's food assistance.

Respondent shall indemnify and hold Petitioner harmless from any marital debt assigned to her herein.

VII. CASH ASSISTANCE AND EBT OVERPAYMENT

In approximately May/June 2020, Respondent filed for Colorado cash assistance (\$531/month) and food assistance (\$445/month) totaling approximately \$976/month. Respondent failed to properly report unemployment income to the cash assistance program as required by law. Boulder County subsequently pursued collection for the resulting overpayment by reducing Petitioner's current EBT/SNAP benefits.

Respondent shall **reimburse Petitioner for the full amount** of EBT/SNAP benefit reductions imposed on Petitioner as a result of this overpayment, to be calculated and ordered by the Court.

VIII. ROOF INSURANCE PROCEEDS

During the marriage, Respondent received an insurance payment for roof damage to the marital home at 10975 Birch Dr. Respondent used those funds without disclosure to Petitioner and did not apply the proceeds to complete the roof repairs. A roofing contractor was left with ordered materials. Any outstanding debt or liability to the roofing contractor shall be assigned to Respondent.

IX. MAINTENANCE

Petitioner requests **spousal maintenance retroactive to March 12, 2025**, pursuant to C.R.S. Section 14-10-114, on the following basis:

1. Petitioner left his career at Respondent's request to serve as the primary caregiver for the minor children.
2. Respondent was the primary wage earner, earning approximately \$135,000 gross/year.
3. Petitioner is rebuilding his earning capacity through Phantom Auto LLC (established June 14, 2025).
4. The gross disparity in income and earning capacity warrants an award of maintenance.

Amount and duration to be determined by the Court pursuant to the statutory formula.

X. CHILD SUPPORT

A. Current Child Support — Respondent shall pay child support pursuant to the Colorado Child Support Guidelines (C.R.S. Section 14-10-115), based on:

1. Respondent's income imputed at no less than **\$135,000 gross/year** (AGI \$153,681 in 2023; \$119,003 in 2024 MFS).
2. Petitioner as primary residential parent (~260 overnights/year).
3. Respondent's parenting time: every other weekend (~52 overnights/year).

B. Retroactive Child Support — Petitioner requests retroactive child support from **March 12, 2025** through the date of Permanent Orders. Respondent's total voluntary support during this period was \$330.00 (five payments). The Court is requested to calculate and order the retroactive balance.

Estimated retroactive obligation: approximately \$1,500--\$2,000/month x ~12 months = **\$17,670--\$23,670** after the \$330 credit.

XI. PROPERTY DIVISION SUMMARY

Asset / Debt	Assigned To	Notes
Net equity — 10975 Birch Dr	50% each	Richard to receive his share from Lauren
2006 Scion tC	Respondent	Marital vehicle
1998 Dodge Truck	Petitioner	Separate property
2010 Mazda CX7	Respondent	Respondent's separate non-marital property
2015 Dodge Ram	N/A — repossessed	\$10k credit to Richard
IRS debt 2024 (\$9,441.03)	Respondent	MFS, solely hers
IRS debt 2023 (~\$538.95)	Respondent	Joint, assigned to Respondent

IRS bounced payment (\$5,266)	Respondent	April 23, 2025
All remaining marital debt	Respondent	Per Section VI
EBT overpayment recovery	Respondent to reimburse	Per Section VII
Roof insurance liability	Respondent	Per Section VIII

XII. BANKRUPTCY

Respondent filed Chapter 7 bankruptcy, discharged January 9, 2024. Respondent managed the bankruptcy process without Petitioner's informed participation. Respondent's accumulation of credit -- including accounts obtained in Petitioner's name -- contributed to the bankruptcy. Any post-discharge obligations or liabilities arising from the bankruptcy shall be the sole responsibility of Respondent.

XIII. DISCLOSURE

Each party represents that they have fully disclosed all marital assets, debts, and income to the best of their knowledge. Petitioner notes that Respondent has not fully disclosed:

1. The net proceeds from the sale of the marital home.
2. The status and value of her Hawaii property interests.
3. Full financial records related to her income and business activities.

The Court is requested to require full financial disclosure from Respondent prior to entry of Permanent Orders.

SIGNATURES

By signing below, each party acknowledges they have read this agreement, understand its terms, and agree to be bound by it.

Petitioner: _____ Date: _____

Richard John Dorsey

Respondent: _____ Date: _____

Lauren Alicia Dorsey

Approved by the Court: _____ Date: _____

Judge Timothy L. Johnson, Division 14, Boulder County District Court

JDF 1115 — This document was prepared with assistance and does not constitute legal advice. Richard John Dorsey should review all content for accuracy before filing.