

**IN THE CIRCUIT COURT OF _____ COUNTY, ILLINOIS
COUNTY DEPARTMENT - PROBATE DIVISION**

Estate of
CHILD NAME,
Minor,

CASE NO.:

**PETITION FOR APPOINTMENT OF GUARDIAN OF MINOR AND MOTION FOR
SPECIAL FINDINGS**

Petitioner, NAME, states under penalties of perjury:

1. CHILD NAME, whose date of birth is DATE, and whose place of residence is ADDRESS, is a minor for the purposes of 755 ILCS 5/11-5.5 (e)(1). NAME is an unmarried person who is less than 21 years old and has consented to the appointment of a guardian after the age of 18.
2. CHILD NAME has no real estate, personal estate or anticipated gross annual income or other receipts.
3. The person having physical custody of the Minor is the Petitioner, NAME, who is related to the Minor as her sister.
4. The Minor has resided with the Petitioner since DATE, since the Minor arrived in the United States. Petitioner took custody of the Minor and has been caring for her since then.
Petitioner seeks a court-ordered guardianship to continue advocating and caring for her sister.
5. The names and addresses of the adult relatives of the Minor entitled to notice of these proceedings are set forth on Exhibit A of this Petition.
6. The Minor's father, NAME, has abused and abandoned the Minor pursuant to 755 ILCS 5/11-5.5(a). Before leaving the family home around 2011, the father used excessive corporal

punishment and intimidation against the Minor. The father has failed to provide meaningful financial and emotional support to the Minor, and has failed to maintain a reasonable degree of concern for the welfare of the Minor.

7. The Minor's mother, NAME, is afraid for the safety of the Minor if she were forced to return to COUNTRY. The Minor fled COUNTRY to seek safety from her abusive father and threats of harm by a local gang. The Minor's mother is in agreement to Petitioner's request for guardianship of the Minor.
8. CHILD NAME is in need of a guardian due to her minority pursuant to Section 5.5(e)(1) above. She is dependent upon this Court to make the requisite findings that will provide her with the opportunity to obtain stability and relief from her father's abuse and abandonment. A guardianship order will allow PETITIONER to continue to advocate for her sister to receive counseling and educational services, and provide her with the stability to continue to heal from the effects of her father's abuse and abandonment.
9. It would not be in the Minor's best interests to return to COUNTRY, since she fears she will be harmed by her father and by a local gang. The Minor's mother is unable to provide adequate protection to the Minor. Furthermore, the Minor would not have access to the medical care and education she is now receiving in the United States.
10. It is in the best interests of the Minor that the Petitioner be appointed as guardian of her person. The Petitioner is willing to continue caring for the Minor, and to continue providing the Minor with support in school, food to eat, and a sense of home.
11. The Minor is not involved in any other child custody proceeding pending before this or any other court or administrative body of Illinois or any other state.
12. Petitioner asks that this Court appoint her as the guardian of the person of the Minor and find that the Petitioner is qualified and willing to act in this capacity on the Minor's behalf.

13. Petitioner affirms and states that she has personal knowledge of the matters alleged in this Petition, except where information was obtained from sources other than the Petitioner.
14. Reasonable efforts were made to obtain all information relevant to the matters verified within.

Wherefore, the Petitioner respectfully requests that this Honorable Court enter an Order appointing the Petitioner as the Guardian of the person of the Minor, and making the following special findings:

- A. That the Minor's reunification with her father is not viable due to his abuse and abandonment pursuant to 755 ILCS 5/11-5.5(a), as described in more detail above;
- B. That it would not be in the Minor's best interests to return to COUNTRY, as doing so would place her at imminent risk of serious harm.
- C. Granting her any other relief as this Court deems appropriate

Respectfully Submitted,

Petitioner

Attorney

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Petitioner

Attorney for the Petitioner
Contact information
Atty No.: