

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – DOMESTIC RELATIONS DIVISION**

In re the Allocation of Parental Responsibilities of:)
NAME)
Petitioner,) No.
and) Cal.
NAME)
Respondent.)

**PETITION FOR ALLOCATION OF PARENTAL RESPONSIBILITIES AND REQUEST
FOR FACTUAL FINDINGS**

NOW COMES Petitioner NAME, by her undersigned attorneys, pursuant to 750 ILCS 5/600 et seq, and names NAME as Respondent, and in support of her Petition for Allocation of Parental Responsibilities and Request for Factual Findings states as follows:

1. Petitioner is AGE, is a resident of COUNTY, and has maintained her residence for more than 90 days prior to the filing of this Petition. Petitioner is the mother of the minor subject to these proceedings.
2. Respondent is approximately AGE, and upon information and belief, was last known to be a resident of LOCATION. Respondent is the father of the minor subject to these proceedings.
3. The minor subject to these proceedings is NAME born DATE in COUNTRY.
4. Petitioner and Respondent were involved in a sexual relationship that began in approximately YEAR. Their relationship lasted approximately TIME.
5. The parties have been separated since DATE.

6. Respondent has acknowledged paternity of the minor, subject to these proceedings, and is listed as the legal and biological father on the minor's birth certificate.
7. Respondent has not attempted to contact or visit the minor subject to these proceedings, since TIME.
8. The minor has resided with Petitioner since TIME. Petitioner is the primary caretaker of the minor and was the primary caretaker of the minor when Petitioner and the minor were in COUNTRY. After Petitioner left COUNTRY, Petitioner's mother and father were the minor's primary caretakers.
9. Petitioner is not aware of any other case before this court or any other court to determine parental responsibilities.
10. Petitioner is a fit and proper person to have sole allocation of parental responsibilities of the minor child. Petitioner has acted in the best interest of the minor by providing the minor with food, shelter, clothing, economic support, and ensuring that he receives proper medical care and education.
11. Respondent is not fit to have allocation of parental responsibilities for the minor for the following reasons:
 - a. Respondent has abused, neglected and abandoned the minor within the meaning of 750 ILCS 5/603.11(a), in that:
 - b. Respondent physically abused the Petitioner in the minor's presence.
 - c. Respondent has failed to provide care and supervision for the minor since TIME.
 - d. Respondent has never provided economic support for the minor nor attempted to have any relationship with the minor since TIME.

12. The minor came to the United States in YEAR after receiving threats from gang members. His grandparents were becoming frail and he had no one else to reliably serve as his primary caretaker in COUNTRY.

13. It is not in the best interest of the minor to return to COUNTRY for the following reasons:

- a. The minor is living with his mother and has a close bond with her and a stable, safe environment in which to live in Illinois.
- b. The minor received threats from gangs in COUNTRY and no reliable support system exists for him in COUNTRY.

WHEREFORE, Petitioner NAME respectfully requests that this Court enter an Order making the following findings of fact and granting Petitioner the following relief:

1. Grant Petitioner sole allocation of parental responsibilities, including education, health care, religion, and extracurricular activities of minor NAME.
2. Find that reunification of the minor with Respondent is not viable due to his abuse, neglect and abandonment of him pursuant to 750 ILCS 5/603.11(a).
3. Find that it is in the minor's best interest that Petitioner be designated the residential parent, and that it is not in the minor's best interest to return to COUNTRY where Respondent may reside.
4. That all remaining issues concerning parenting time and child support be reserved.
5. That Petitioner be granted such other relief as this Honorable Court may deem just and equitable.

Dated: _____

Respectfully submitted,

Attorney for Petitioner

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the 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 he truly believes the same to be true.

Dated _____

Petitioner

Attorney Name
Contact Information