

District Court EL PASO County, Colorado Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903		
In Re The Marriage Of:		
Petitioner:	Vanessa R. Dolbow	
And		
Respondent:	Robert W. Johnson	
EL Paso County CSE Unit,	Third Party Intervenor	COURT USE ONLY
Attorney or Party Without Attorney (Name and Address): Robert Wayne Johnson, Pro Se 5721 Huerfano Drive Colorado Springs, Colorado 80923 Phone Number: (719) 597-3064		Case Number: 96DR1112 Division: N/CS Courtroom: IVD Case Number: 21-916020-00-7A
EXTRAORDINARY MOTION FOR CHANGE OF VENUE PURSUANT TO COLORADO RULES OF CIVIL PROCEDURE 98(c)(1) and 98(e)		

I, Robert Wayne Johnson, Respondent hereby requests that this Court change venue of the requested hearing of OBJECTION TO PROPOSED AMENDED ORDER, filed with the Court on March 2, 2010 to a neighboring county, and as grounds therefore, state the following:

1. The Petitioner resides at 1836 Brookdale Drive in El Paso County.
2. The Respondent resides at 5721 Huerfano Drive in El Paso County.
3. The Respondent filed an Objection To Proposed Amended Order on March 2, 2010, alleging a conflict of interest between El Paso County and Respondent.
4. Pursuant to Rules 98(c)(1) and 98(e), Petitioner and/or Co-Petitioner/Respondent are allowed to have the proceeding heard in a neighboring county.
5. The Petitioner requests the case be transferred for the following reasons:

X The Respondent requests the case be transferred for the following reasons:

(A) Respondent alleges that former prosecutor and former magistrate judge, John Paul Lyle presided over the hearing of January 13, 2010 without legal authority and with or without knowledge of other officers of the El Paso District Court. His attorney registration with the Colorado State Bar is 22147. Mr. Lyle's registered contact information is 380 Brandywine Dr., Colorado Springs, Colorado 80906; telephone number (719) 448-7700; email address john.paul.lyle.atty@live.com.

(B) The Law Firm of Belveal Eigel Rumans & Fredrickson, are alleged to have represented El Paso Child Support Enforcement Unit and El Paso County in a knowingly fraudulent hearing.

These attorneys have affixed their names to court documents through alleged conspiracy: Donald Belveal, Esq., Christina K. Eigel, Esq., Cara L. Nord, Esq., and Jessica K. Polini, Esq.

(C) The Law Office of Belveal Eigel Rumans & Fredrickson, are alleged to have knowingly and in conspiracy obtained a Nunc Pro Tunc to retroactively re-date the proposed Order arising from the hearing of January 13, 2009, wherein John Paul Lyle is alleged to have presided.

(D) The El Paso County Child Support Enforcement Unit and El Paso County provided the Petitioner's Affidavit of Arrears bearing the date of September 29, 2008. The Family Support Registry printout, considered to be a legal document, indicates that the Petitioner's case was transferred to the ACSES system on September 18, 2008. This is a 10 day gap.

The Affidavit is the legal instrument to effect child support enforcement action. Suspicions were raised in the Objection filed March 2, 2010, due to the numerous reasonable requests made by Respondent to obtain original documents. From October 10, 2008 through the present, no one with the El Paso County Child Support Enforcement Unit advised Respondent to make a written request, despite Respondent's vigorous opposition to administrative actions that have seized \$16, 904.80 to date, caused the suspension of his driving privileges, and resulted in liens on real and personal

property.

(E) The Law Firm of Belveal Eigel Rumans & Fredrickson, are alleged to have conspired with El Paso County Child Support Enforcement Unit and El Paso County to manipulate the worksheets used in the Colorado Child Support Guidelines to justify the seizures of financial assets. These attorneys have affixed their names to court documents through alleged conspiracy: Donald Belveal, Esq., Christina K. Eigel, Esq., Cara L. Nord, Esq., and Jessica K. Polini, Esq.

The foregoing reasons supported by the attached exhibits substantiate Respondent's request for a change in venue and demand for immediate relief. Exhibits include the cut-and-paste of the Colorado State Bar webpage showing the registered contact information of John Paul Lyle, the Family Support Registry printout showing date of transition to ACSES, Exhibits marked A-F, and the payment record of Respondent.

COMES NOW, Robert Wayne Johnson demanding relief **WITHOUT DELAY** as follows:

- (1) The restoration of his Colorado driving privileges by ordering El Paso County Child Support Enforcement Unit to within 24-hours submit a letter of compliance to the Colorado Department of Motor Vehicles as required by law by any means possible;
- (2) The return of \$16, 904.80;
- (3) The removal of any lien against real or personal property with proof thereof.
- (4) The removal of his name from the Family Support Registry and any and all related databases with proof thereof.
- (5) The correction of any and all negative information reported to any consumer credit reporting agency without delay with proof thereof.

Submitted this ____ of March by _____, Pro Se.

AFFIDAVIT OF SERVICE

I declare under oath that on March _____, 2010, a true and correct copy of the foregoing EXTRAORDINARY REQUEST FOR CHANGE IN VENUE was sent by facsimile, with an additional copy placed in the United States mail, postage prepaid, addressed to the following:

Vanessa R. Dolbow
1836 Brookdale Drive
Colorado Springs, CO 80918-3476

Law Offices of Belveal Eigel Rumans & Fredrickson, LLC
Donald Belveal, Esq.,
Christina K. Eigel, Esq.
Cara L. Nord, Esq.
Jessica K. Polini, Esq.
P.O. Box 1381
Colorado Springs, CO 80901-1381

By FAX: (719) 457-6340

I further declare under oath that on March _____, 2010, I provided the aforementioned exhibits containing information that to the best of my knowledge and belief is also true and correct. Any word processing error or omission present are inadvertent and in no way should be construed as an attempt to misrepresent facts.

Robert Wayne Johnson, Pro Se

Subscribed and affirmed, or sworn to before me in the County of _____, State of _____, this _____ day of _____, 20 _____.

My Commission Expires: _____

Notary Public Signature