

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):		Case Number: 96DR1112
Robert Wayne Johnson, Pro Se 5721 Huerfano Drive Colorado Springs, Colorado 80923		Division: N/CS
Phone Number: (719) 597-3064		Courtroom:
		IVD Case Number: 21-916020-00-7A
OBJECTION TO PROPOSED AMENDED ORDER		

COME NOW, Robert Wayne Johnson, Pro Se, to object to the entry of the proposed amended order as moved by EL Paso County CSE Unit, Third Party Intervenor, and request a hearing by the Court pursuant to C.R.S. § 24-4-105.

Heretofore, EL Paso County CSE Unit, the abbreviated trade name of Policy Studies Inc., is referred to as Third Party Intervenor – PSI. Said for-profit company is licensed by the Colorado Secretary of State Business Division to operate a commercial business under the laws of this State using various trade names, including El Paso County Child Support Enforcement Unit.

I allege that Third Party Intervenor – PSI intends to assess interest on the arrears added together by the amended proposed Order of February 18, 2010, at a future date with or without direction from Petitioner.

I further allege the existence of a potential conflict of interest resulting from the contractual relationship that exists between Third Party Intervenor – PSI, El Paso County, and the Colorado Department of Human Services. This perceived conflict may or may not have already prejudiced the handling of my case. I pray this not to be true.

THIS OBJECTION TO PROPOSED AMENDED ORDER is based on the following reasons:

1. Third Party Intervenor – PSI in its capacity as a private human services government outsourcing contractor to the State of Colorado and EL Paso County has refused to provide documentary evidence for purposes of inspection to validate the legitimacy and accuracy of child support arrearages upon which the proposed Order and amended Order are based.
2. I have been unable to provide adequate defense to the child support enforcement actions of Third Party Intervenor - PSI due to its rejection of reasonable requests to inspect the documents in its possession, specifically those through which it was authorized to carry out administrative and judicial actions against me.
3. I intend to file a MOTION TO COMPEL under C.R.C.P. 16.2 upon notice of the hearing of the Objection to move Third Party Intervenor – PSI to timely produce for inspection and copying the following documents:
 - a. The original application package in its entirety, including but not limited to the dated Income and Expense Affidavit and Affidavit of Arrears.
 - b. Any and all records of my meeting with Third Party Intervenor – PSI caseworker on October 10, 2008, for the purpose of discussing the letter dated October 2, 2008, bearing the address of El Paso County Child Support Enforc[ement], 30 East Pikes P[ea]k Ave., Suite 203, Colorado Springs, CO 80903, and the name Jonica L. Brunner, Legal Technician/Paralegal.

Third Party Intervenor – PCI may assist the Court and its processes by accommodating the discovery request voluntarily by contacting me by phone or mail to arrange for the inspection and copying of the originals of the requested documents.

4. I assert the retroactive modification that occurred as a result of the hearing on January 13, 2010, for the years 2005 through 2007, provides reasonable proof that other omissions or errors of fact may exist.
5. I contend that should Third Party Intervenor – PSI act without due diligence, or with contempt for my request to produce documents, that I may be unable on the date of the hearing of the Objection to examine the documents produced by Third Party Intervenor - PSI in a manner sufficient to reach a satisfactory conclusion that said records are legitimate, accurate, and complete, in the time set aside for the hearing. I pray the Court's forbearance in this matter.
6. I contend that Third Party Intervenor – PSI has preserved claims to interest on the amendment to the proposed Order from January 13, 2010 which states: "Wherefore, the El Paso County CSE Unit moves the Court to approve the attached Amended Order which

includes the arrears balance owed by Respondent and reserves Petitioner's right to seek interest due on the support arrears." Said preservation of claims to interest subjects me to potential unknown financial responsibility.

WHEREFORE, on the basis of reasonable objection regarding issues of discovery and my right to the information used by Third Party Intervenor - PSI to seize personal assets and enact other administrative actions that are punitive in nature and affect my civil liberties, I ask this _____ Day of March, 2010, that the Court grants a hearing of the Objection.

Respectfully Submitted,

Robert Wayne Johnson, Pro Se

AFFIDAVIT OF SERVICE

I declare under oath that on March _____, 2010, a true and correct copy of the foregoing OBJECTION TO PROPOSED AMENDED ORDER 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.,
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P.O. Box 1381
Colorado Springs, CO 80901-1381

By FAX: (719) 457-6340

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