

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