

District Court EL PASO County, Colorado Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903		COURT USE ONLY
In Re The Marriage Of:		
Petitioner: Vanessa R. Dolbow And Respondent: Robert W. Johnson EL Paso County CSE Unit, Third Party Intervenor		
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
VERIFIED MOTION TO MODIFY CHILD SUPPORT PURSUANT TO §14-10-122, C.R.S.		

Note to Responding Party: If you disagree with this Motion, the Colorado Rules of Civil Procedure allow you to file a written response with the Court which must be filed within 15 days of the date this Motion was served on you or mailed to you.

The Petitioner Respondent states the following for the purpose of modifying child support.

1. Information about Petitioner:

Current Mailing Address: 1836 Brookdale Drive
 City & Zip: Colorado Springs, Colorado 80918

2. Information about Respondent:

Current mailing address: 5721 Huerfano Drive
 City & Zip: Colorado Springs, Colorado 80923
 Home Phone #: 719-597-3064

3. The parties have 1 minor child(ren):

Full Name of Child	Present Address	Sex	Date of Birth
Marcus A.	1836 Brookdale Drive, Colorado Springs, Colorado	M	08/01/1991

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4. Under the current Support Order, the Petitioner has [Irrelevant] overnights per year with the children and the Respondent has [Irrelevant] overnights per year with the children.
5. Under the current child support order, the Petitioner's Respondent's child support obligation is \$ 438.80 and is paid weekly bi-weekly twice a month monthly Other: _____.
6. (Check only if applicable.) The current support order does not contain a provision regarding medical insurance (medial, dental, and/or vision) coverage.
7. A change in the current Support Order is appropriate because of the following change(s) in circumstance(s). Please check the appropriate box. Day Care costs Change in Income
Change in Parenting Time Change in Residence Emancipation of a Child
Medical insurance coverage Other: Extraordinary continuation of original modification request

Describe why you are requesting the modification.

On September 21, 2009, I requested a modification to the original order because of continuing changes in circumstances due to the ongoing interference of El Paso County Child Enforcement (CSE) Unit – the County's Department of Human Service's privately-contracted collector of unpaid court-ordered child support and unpaid State child-related debt primarily consisting of TANF payments – in the resolution of child support due, but withheld, because of such interference.

However, Ms. Dolbow failed to respond in writing within 15 days as required. When the motion went before District Magistrate John Paul Lyle for sua-sponte judicial review, District Magistrate issued the DELAY PREVENTION ORDER dated November 24, 2009, [EXHIBIT A] to bring about diligent prosecution of my modification request. On January 13, 2010, District Magistrate presided over the hearing of testimony. At the hearing, both Ms. Dolbow and I appeared without counsel, while attorney Christina Eigel, representing the law firm of Belveal Eigel Rumans & Fredrickson appeared as the legal representative of El Paso County CSE Unit, "CSE" being the abbreviated name of EL Paso County Child Support Enforcement and one of the registered trade names of Policy Studies Inc., a privately-held for-profit corporation licensed by and registered with the Colorado Secretary of State Business Division. [EXHIBIT B]

As a result of the hearing, attorney Christina Eigel is alleged to have prepared the proposed Order dated January 13, 2010, entering said date Nunc Pro Tunc [EXHIBIT C] for corrupt purposes. In furtherance of this allegation, I offer the dated worksheets again as evidence of this unexplained retroactive re-dating of the proposed Order as submitted as Exhibits A-F in the EXTRAORDINARY MOTION FOR CHANGE OF VENUE filed March 4, 2010, and as prepared by the Law Firm of Belveal Eigel Rumans & Fredrickson, LLC on January 26, 2010.

Despite existing circumstances concerning the allegations made in the EXTRAORDINARY MOTION FOR CHANGE OF VENUE and the blatantly false worksheets prepared by the Law Firm of Belveal Eigel Rumans & Fredrickson, LLC for partial Year 2005 and Years 2006 and 2007, I request to impute child support based

upon the same income information used to establish the proposed award on Worksheets A for October 6, 2009 through December 31, 2009 [EXHIBIT D] and Commencing January 1, 2010 [EXHIBIT E], stipulating that the last payment of child support be effective through August 31, 2010, the end of the month our son reaches age 19, the legal age of emancipation in Colorado. I am submitting and attaching two electronically calculated child support worksheets created from the Forms list on the Website at www.courts.state.co.us. The Forms attest to the calculations of the Law Firm of Belveal Eigel Rumans & Frederickson, LLC in its determination of the proposed child support award for those same periods based on the same income information it used. The difference of \$.08 for the months of October 6, 2009 through December 31, 2009, is immaterial. The difference of \$.10 for the months commencing January 1, 2010, is also immaterial.

The purpose of filing this VERIFIED MOTION TO MODIFY CHILD SUPPORT is to obtain an answer to my original request for modification on September 21, 2009, and to encourage the thorough investigation of the extraordinary events that have occurred to date and are perceived by me to be ongoing.

I maintain that Policy Studies Inc., doing business as El Paso County Child Support Enforcement Unit, has caused undue and unnecessary financial hardships on me but, more importantly, may have compromised the good character of Ms. Dolbow, the beloved mother of my only son. I maintain that its divisive tactics may cause irreparable damage to our parenting relationship and my relationship as a father to my son. I pray that my son has not and will not perceive my defenses to the actions of Policy Studies Inc. in any way as my intent to hurt and punish his mother. I maintain that my son is entitled to enjoy the love he holds for her and - for me - and to enjoy the love we both share for him together without state-sponsored interference with the same. These facts being published, in part, to the Court on January 13, 2010, by letter. [EXHIBIT F]

Since monies in excess of child support obligations have been collected and credited to the Family Support Registry account of Ms. Dolbow, child support is considered by me to be paid and all "unnecessary" arrearages are satisfied. And as non-TANF recipients, there is no State debt to satisfy. I assert that I have provided sufficient evidence through the EXTRAORDINARY MOTION FOR CHANGE OF VENUE to support that I had consistently paid child support as ordered beginning in October 1997 through July 2005 when through private mutual agreement made in the best interest of our son, my son moved in with me - and did only end when my son returned to his mother's sole physical care in December 2007. I further assert that the proceeds from the unauthorized sale of two ATVs provided \$2,500 cash toward, then, past due child support, which cured in excess of five months of unpaid child support from the beginning of Year 2008. I also exercise the privilege of applying the amount I paid for the ATVs for an additional \$2,000 toward child support due thereafter as I sought to resolve child support enforcement issues with Policy Studies Inc., doing business as El Paso County Child Support Enforcement Unit, beginning with my first official meeting with a CSE "caseworker" on October 10, 2008. [EXHIBITS G - H]

I pray the Court acts with appropriate discretion and chooses to either hear this VERIFIED MOTION TO MODIFY CHILD SUPPORT or to accept it as entered without a hearing, provided that Ms. Dolbow is personally in agreement with the facts and terms outlined in this Motion. Since Policy Studies Inc., doing

business as El Paso County Child Support Unit, has no attorney-client relationship with Ms. Dolbow, as expressed in its application for service [EXHIBIT I] and Ms. Dolbow has elected self-representation to date, I ask that she exercise her right to protect her own interests by being prepared to dispute any part of this request, with or without an attorney present, should a hearing be convened, as she so chooses. I extend my hand in cordiality to her and pray that Ms. Dolbow will not be subjected to alleged continued outside pressure by Policy Studies Inc. through its El Paso County office or through any law firm hired to protect the financial interests of Policy Studies Inc. in its capacity as a private human services outsourcing service provider, i.e. "collection agency," to local and state governmental units across the United States. [EXHIBIT J]

I ask the Court's continued forbearance as I work to resolve issues with Policy Studies Inc. and, hopefully, restore the good parenting relationship that existed between me and Ms. Dolbow prior to the alleged divisive and corrupt interference of Policy Studies Inc. and its legal representative, the Law Firm of Belveal Eigel Rumans & Fredrickson, LLC, in our, otherwise, private legally-protected family relationship. In this regard and despite Ms. Dolbow's ill-conceived notion and rash action to sell my personal property without my consent to collect child support due to her as the custodial parent in 2008, I believe Ms. Dolbow and I would have continued to work privately in the best interest of our son, there being no other reason for me to believe differently. I therefore forgive Ms. Dolbow for the taking of my property and for any and all activities that have directly or indirectly contributed to the current situation between me and Policy Studies Inc.

I further allege that Policy Studies Inc. has worked very carefully to blend its relationship with the Colorado Department of Human Services to deceive applicants by leading them to believe they are engaged with the County of El Paso, a governmental unit and "not-for-profit" entity. This deception being accomplished by the deliberately crafted "CSE" website at www.childsupport.state.co.us designed by a Policy Studies Inc. "subsidiary" under Policy Studies Inc.'s private contract with the Colorado Department of Human Services. The careful "planting" of the "CDHS" logo on the home page and "selected" web pages is one of several overt deception devices. This deception is intended to "borrow" from the powers ascribed to THE GOVERNMENT by THE PEOPLE and to give Policy Studies Inc. the presumed authority to deal in heavy-handed ways with the people THE GOVERNMENT is required to protect from such abuses. As Policy Studies Inc. is aware, poverty and educational attainment go hand-in-hand. The lack of notice to consumers of its services and to persons – primarily fathers - pursued by them violates federal and state consumer protection laws and fair debt collection practices. These and all foregoing matters to be addressed with Policy Studies Inc. in the very near future.

Respectfully submitted the _____ day of March, 2010, _____

Robert Wayne Johnson, Pro Se

- 8. The new child support obligation that I am requesting is is not more than a 10% change from the current child support order. The proposed child support obligation should be \$ SEE attached W/Ss and No. 7 to be paid weekly bi-weekly twice a month monthly Other: SEE attached W/Ss and No. 7.
- 9. I have completed two child support worksheets that show what the new child support obligation should be. The child support worksheets are is not attached to this Motion.
- 10. I have not attached current Sworn Financial Statements to this Motion relying on evidence submitted in the hearing of January 13, 2010, and my sworn statements filed with the Court on March 2 and March 4, 2010 through the OBJECTION TO PROPOSED AMENDED ORDER and the EXTRAORDINARY MOTION FOR CHANGE OF VENUE, respectively.
- 11. Is either party currently receiving public assistance? Yes No, not to the best of my knowledge and belief.
- 12. Is either party receiving child support enforcement services. Yes No If Yes, identify El Paso County Colorado.
- 13. Does either parent live in another state? Yes No If Yes, identify _____ (name of person) and _____ (City and State) they are currently living in.
- 14. (Check only if applicable.) I request a change in the current tax exemption because of the reallocation of the costs of raising the dependent children, pursuant to §14-10-115(12), C.R.S.

I respectfully request that this Court enter an Order modifying the Petitioner's Respondent's child support obligation as described above.

VERIFICATION AND ACKNOWLEDGMENT

First, I swear/affirm under oath that I have read the foregoing Motion and that the statements set forth therein are true and correct to the best of my knowledge. This ___ day of March, 2010.

Second, I swear/affirm this ___ day of March, 2010, that Number 5 E of the OBJECTION TO PROPOSED AMENDED ORDER filed March 2, 2010, contains an unintended "fact-checking" error that does not alter in any way the purpose of entering the fact. Correctly stated, the last sentence should read: "This is an 11 day gap."

 Robert Wayne Johnson, Pro Se
 5721 Huerfano Drive
 Colorado Springs, Colorado 80923
 (719) 597-3064

Subscribed and affirmed, or sworn to before me in the County of _____, State of _____, this _____ day of March, 2010.

My Commission Expires: _____

 Notary Public/Deputy Clerk

CERTIFICATE OF SERVICE

I certify that on ____ day of March, 2010, a true and accurate copy of the **Verified Motion to Modify Child Support** was served on the other party by:

Hand Delivery to Ms. Rita Dolbow at 1836 Brookdale Drive, Colorado Springs, Colorado 80918

By placing it in the United States mail, postage prepaid and addressed to the following:

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

- AND -

Policy Studies Inc.
Jon C. Bourne
1515 Wynkoop Street
4th Floor
Denver, Colorado 80202

Robert Wayne Johnson, Pro Se

Subscribed and affirmed, or sworn to before me in the County of _____, State of _____, this _____ day of March, 2010.

My Commission Expires: _____

Notary Public/Deputy Clerk