

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
_____-CVD-_____ ()

_____,)
)
Plaintiff,)
)
v.)
)
_____,)
)
Defendant.)

COMPLAINT FOR CHILD CUSTODY
OR VISITATION AND/OR
CHILD SUPPORT

Plaintiff, complaining of defendant, alleges and says:

PARTIES, JURISDICTION AND VENUE

1. Plaintiff is a citizen and resident of _____.
(County and State)
2. Plaintiff's address is _____.
3. Plaintiff's Social Security Number is _____.
4. Defendant is a citizen and resident of _____.
(County and State)
5. Defendant's address is _____.
6. Defendant's Social Security Number is _____.
7. Defendant's relationship to child: _____.
(Mother, Father, etc.)

8. The name(s), age(s) and birth date(s) of the child or children at issue in this case is/are as follows:

9. Explain your standing to bring this civil action (e.g., I am the mother/father/other relative of the child/children):

10. That during the past five years (or since birth if the child is less than five years old), the (child) (children) have lived with:

Name of child _____, birthdate _____, birthplace _____.

PERIOD	ADDRESS	PERSON LIVED WITH	PRESENT ADDRESS
____ to present	_____	_____	_____
____ to _____	_____	_____	_____
____ to _____	_____	_____	_____

Name of child _____, birthdate _____, birthplace _____.

PERIOD	ADDRESS	PERSON LIVED WITH	PRESENT ADDRESS
____ to _____	_____	_____	_____
____ to _____	_____	_____	_____
____ to _____	_____	_____	_____

(If there are more than two children, insert additional sheets.)

11. That I (have) (have not) participated as a (party) (witness) (other capacity) in litigation concerning the custody of the minor child in (this) (another) State, viz.

_____ on _____, ____.
(if answer is affirmative, give details, stating capacity, name and address of court.)

12. That I (have) (do not have) information of any custody proceeding concerning a child mentioned above pending in a Court of this or any other State.

(If answer is affirmative, give details) _____

13. That I (know) (do not know) of a person who has physical custody of the child viz.

_____, or
(Name) (Address)

claims to have custody or visitation rights with respect to the child, viz.:

(Name)

(Address)

14. The District Court of Mecklenburg County has personal jurisdiction over the parties and subject matter jurisdiction (including jurisdiction under the Uniform Child Custody Jurisdiction Act) to decide the claim(s) and render a custody determination in this action.

15. Venue of this action is pro in Mecklenburg County, North Carolina.

CUSTODY OR VISITATION CLAIM

16. Plaintiff is a fit and proper person to have primary custody/visitation of the aforesaid minor child/children and an award of custody/visitation to her/him would best promote the interests and welfare of the aforesaid minor child/children.

CHILD SUPPORT CLAIMS

17. The aforesaid minor child/children is/are in need of support and maintenance for his/her/their health, education and welfare.

18. Defendant is an able-bodied man/woman regularly and gainfully employed, or capable of gainful employment, and is capable of providing support for the aforesaid minor child/children.

19. Plaintiff is entitled to have and recover child support from and of the defendant.

20. Attached hereto as Exhibit B, and incorporated by reference as if fully set forth herein, is Plaintiff's Affidavit of Financial Standing setting forth his/her needs and the needs of the child/children as required by the Local Rules of Court.

PRAYER FOR RELIEF

WHEREFORE, plaintiff prays the Court for relief as follows:

1. _____ That custody/visitation of the minor child/children be awarded to plaintiff.
2. _____ That defendant be ordered to pay reasonable child support.
3. _____ That defendant be taxed with the costs of this action.
4. _____ That plaintiff have and recover such other and further relief as the court may deem just and proper.

This ____ day of _____, _____.

(Signature of Plaintiff)

ADDRESS AND TELEPHONE NUMBER OF PLAINTIFF:

STATE OF NORTH CAROLINA)
)
COUNTY OF MECKLENBURG)

VERIFICATION

_____, being first duly sworn, deposes and says that he/she is the plaintiff in the foregoing action, that he/she has read the foregoing COMPLAINT and knows the contents thereof to be true of his/her own personal knowledge except for those matters and things alleged therein upon information and belief, and as to those matters and things, he/she believes same to be true.

Sworn to and subscribed before me
this ____ day of _____, _____.

Notary Public

My Commission expires _____