

District Court, Whoville County, Colorado 100 Whoville County Parkway Golden, CO 90210	COURT USE ONLY
THE PEOPLE OF THE STATE OF COLORADO In the Interest of Child: DOYEN TRUMP CHARMING Petitioner: WHOVILLE COUNTY DIVISION OF CHILDREN, YOUTH AND FAMILIES Respondents: CINDER ELLA CHARMING, RICK CHARMING, PHILLIP KING and JOHN DOE.	
Turtle Dove, Atty. Reg. #1000000 Whoville County Attorney By: Sticky Notes, Atty. Reg. #100001 100 Whoville County Parkway Whoville, CO 90210 Phone (303) 867-5309	
Case Number: 16JV000 Div.: 10 Ctrm.: 4C	
VERIFIED PETITION FOR DEPENDENCY AND NEGLECT	

The People of the State of Colorado, through the Whoville County Division of Children, Youth and Families, acting under C.R.S. §19-3-501, *et seq.*, allege:

1. The following child resides in or was found in Jefferson County, Colorado:

NAME	SEX	BIRTH DATE	AGE	RESIDES AT
Doyen Trump Charming	Male	1/26/2016	9 days	1 Kings Road, Whoville, CO 80401

2. a) The respondents are:

NAME	ADDRESS	RELATIONSHIP TO CHILD
Cinder Ella Charming	1 Kings Road, Whoville, CO 90210	Mother of Doyen Trump Charming
Rick Charming	Current address unknown	Presumed Father of Doyen Trump Charming
Phillip King	1 Kings Road, Whoville, CO 90210	Alleged Father of Doyen Trump Charming

3. The child is dependent and/or neglected because:

- a. The child lacks proper parental care through the actions or omissions of the parent, guardian, or legal custodian.
 - b. The child's environment is injurious to his welfare.
 - c. The child tests positive at birth for either a schedule-I controlled substance, as defined in C.R.S. §18-18-203, or a schedule-II controlled substance, as defined in C.R.S. §18-18-204, unless the child tests positive for a schedule-II controlled substance as a result of the mother's lawful intake of such substance as prescribed.
4. The facts, based on information and belief, which bring the child within the Court's jurisdiction are:
- a. The child, Doyen Trump Charming (age 9 days), resided in or was found in Whoville County, Colorado and jurisdiction is proper.
 - b. On January 26, 2016, the Whoville County Division of Children, Youth and Families received a report of concern regarding Doyen, indicating his mother, Ms. Cinder Ella Charming had been transported to the hospital to give birth while in custody at the Whoville County Jail and would be transported back to jail following her discharge from the hospital. The report further stated that Ms. Charming admitted to using opiates and Marijuana during her pregnancy.
 - c. On January 27, 2016, Mr. Rick Charming was at the hospital but was asked to leave by security when Mr. Phillip King arrived at the hospital. The intake worker was not able to speak to Mr. Charming about his drug use. Mr. King participated in an interview and stated he is the father of Doyen and has been trying to help Ms. Charming escape the violent relationship with Mr. Charming. Mr. King denied any drug use but did admit to possessing his Red Card for shoulder pain associated with sword practice as a child.
 - d. On January 28, 2016, Mr. Charming and Mr. King were both escorted from the hospital by security due to an altercation in the hospital room. Mr. Charming alleged assaulted Ms. Charming while she was holding Doyen. Mr. King intervened and the two men started a physical fight in the hospital room. Security contacted the police. Mr. King was arrested for assault and taken to jail, Whoville County case 16CR291 and was later released on bond. Mr. Charming fled the scene after fighting with hospital security and prior to the arrival of the police.
 - e. It is reported that Ms. Charming has a history of depression, anxiety, hallucinations and a previous diagnosis of personality disorder. She has been prescribed Zydene for myalgia associated with lead poisoning as a teenager from constantly wearing lead crystal slippers. Ms. Charming has her red card for Marijuana use to help control seizures associated with her lead poisoning.

- f. On January 28, 2016, Doyen's meconium tests came back negative for substances.
 - g. On January 30, 2016, Ms. Charming was discharged from the hospital and transported back to Whoville county jail.
 - h. Mr. King has a criminal history which includes assault charges in 12CR3001, animal cruelty 12CR3002 and felony escape charges 13CR002.
 - i. Ms. Charming is currently being held pending resolution of 16CR201 for driving under the influence, leaving the scene of an accident, felony manslaughter and reckless driving.
 - j. Mr. Charming has a criminal history which includes felony drug charges in 16CR101, traffic charges in 15T1052, drug charges in 15CR1844, driving under the influence in 14T12460, drug charges in 10CR656, disorderly conduct and resisting arrest charges in 09CR657, vehicular eluding in 08T659. There is currently an active warrant for Mr. Charming's arrest in 16CR289 arrest for assault, interfering with an officer, and destruction of property. His whereabouts are unknown.
 - k. Mr. Charming has a history depression, anxiety and a previous diagnosis of conduct disorder.
 - l. Mr. Phillip has no previous history of mental health issues.
5. Petitioner has no knowledge that suggests any child involved in this proceeding meets the statutory definition of "Indian Child." Inquiries will be made at the initial hearing, and continuing inquiries will be made as circumstances require.

Petitioner requests that the Court adjudicate the subject child to be dependent and neglected, and that it enter such orders as are appropriate and provided by law.

NOTICES REQUIRED BY C.R.S. §19-3-502(3)

- a) Termination of the parent-child legal relationship is a possible remedy available if this petition alleging that the child is dependent or neglected is sustained. A separate hearing must be held before such termination is ordered. Termination of the parent-child legal relationship means that the child who is the subject of this petition would be eligible for adoption.
- b) If the child is placed out of the home for a period of twelve months or longer, the Court shall hold a permanency hearing within said twelve months to determine a permanent placement for the child.

- c) The review of any decree of placement of a child subsequent to the there-month review required by C.R.S. §19-1-115(4)(a), may be conducted as an administrative review by the Department of Human Services, as appropriate. If you are a party to the action, you have a right to object to an administrative review, and if you object, the review shall be conducted by the Court.

Dated February 4, 2016.

TURTLE DOVE, #1000000
JEFFERSON COUNTY ATTORNEY

By: _____
Sticky Notes, #100001
Assistant County Attorney

VERIFICATION

I am an employee of the Petitioner. I have read the foregoing Verified Petition for Dependency and Neglect and, to the best of my information and belief, the contents are true.

Sticky Notes, #100001
100 Whoville County Parkway
Whoville, CO 90210
Assistant County Attorney

Subscribed and sworn to before me on _____, 2016

Notary Public

My commission expires: _____