

STATE OF WYOMING)
) ss
COUNTY OF _____)

IN THE DISTRICT COURT
_____ JUDICIAL DISTRICT

Plaintiff: _____,)
(Print name of person filing))
)
vs.)
)
Defendant: _____)
(Spouse) (Print name)

Civil Action Case No. _____

**COMPLAINT FOR DIVORCE
(with Children)**

PLAINTIFF, for his/her complaint against the Defendant states and alleges as follows:

1. The Plaintiff Defendant lives in the county where this *Complaint* is being filed and the Plaintiff Defendant has lived in the State of Wyoming for at least 60 days immediately prior to the filing of this *Complaint*; **OR**
 The marriage took place in Wyoming, the Plaintiff Defendant lives in the county where this *Complaint* is being filed, and the Plaintiff Defendant has lived in Wyoming from the marriage date to the filing of this *Complaint*. W.S. §20-2-104 and 20-2-107(a)

2. Plaintiff and Defendant were married to each other on _____ in _____
(Date of Marriage)

(City, County and State where marriage took place)

3. The Plaintiff and Defendant separated on _____
(Date of Separation)

4. Irreconcilable differences exist in the marriage and Plaintiff is the aggrieved party in this case and should be granted a divorce from the Defendant.

5. The Defendant and I are the natural or adoptive parents of the following minor child(ren):
Child's initials: _____
Child's year of birth: _____
Present address: _____

Child's residence for the past 5 years:

Dates (From/To)	Address (city and state) where child lived	Name and current address of person(s) child lived with
____/____/____ /present*		
____/____		
____/____		
____/____		
____/____		
____/____		

Attach a separate sheet if necessary

Child's initials: _____

Child's year of birth: _____

Present address: _____

Child's residence for the past 5 years:

Dates (From/To)	Address (city and state) where child lived	Name and current address of person(s) child lived with
____/____/____ /present*		
____/____		
____/____		
____/____		
____/____		
____/____		

Attach a separate sheet if necessary

Child's initials: _____

Child's year of birth: _____

Present address: _____

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Dates (From/To)	Address (city and state) where child lived	Name and current address of person(s) child lived with
_____/present*		
_____/____		
_____/____		
_____/____		
_____/____		
_____/____		

Attach a separate sheet if necessary

Child's initials: _____

Child's year of birth: _____

Present address: _____

Child's residence for the past 5 years:

Dates (From/To)	Address (city and state) where child lived	Name and current address of person(s) child lived with
_____/present*		
_____/____		
_____/____		
_____/____		
_____/____		
_____/____		

Attach a separate sheet if necessary

6. That the child(ren) named in this *Complaint for Divorce* have have not been in the State of Wyoming for a period of six (6) months or more immediately before filing this *Complaint*. (If not, seek the advice of a lawyer before filing.)

7. I have not participated as a party or a witness or in any other capacity in any other court case concerning the custody of the minor child(ren) and no other court proceedings concerning the minor child(ren) (including proceedings for enforcement, domestic violence protective orders, termination of parental rights or adoptions) are currently pending in the State of Wyoming or in any other state; OR

I have participated as a party or witness or in another capacity in another court proceeding concerning the custody, allocation of decision-making, or visitation/parenting time of the child(ren) listed in this *Complaint for Divorce* as follows: (Please be specific and include the case number, court, state and nature of case, date of child-custody determination, if any, and the initials of the child(ren) involved) _____

8. I know of no person not a party to these proceedings who has physical custody of the minor child(ren) or who claims to have custody or visitation rights with respect to the minor child(ren); OR

The following people are not parties in this matter, but have physical custody of the child(ren) or claim rights of parental responsibilities, legal custody or physical custody, or visitation/parenting time with the child(ren): _____
(List Names and Addresses)

9. To the best of Plaintiff's knowledge,
 Neither party is pregnant, **OR**
 The Plaintiff Defendant is pregnant [If pregnant, consult an attorney. Your divorce may not be able to be final until after the baby is born.]; and
The baby is due on or about _____ (date), (and, check one space below):
 The Plaintiff and Defendant are the biological parents of the child, OR
 Plaintiff is not the biological parent of the child, OR
 Defendant is not the biological parent of the child.

10. Plaintiff OR Defendant is a fit and proper person to have the primary care, custody and control over the minor child(ren) subject to the other parent's right of reasonable visitation; OR

Both parties are fit and proper persons to share custody and control over the minor child(ren).

11. Plaintiff OR Defendant is capable of paying child support.
12. The Court should order that Plaintiff OR Defendant OR Both Parents provide medical insurance for the minor child(ren) if it can be obtained at a reasonable cost with benefits available to the minor child(ren) and that Plaintiff OR Defendant OR Both Parents be liable to pay any medical expenses, including any deductible or co-pay, not covered by insurance coverage.
13. The parties have accumulated certain property and debts during the course of their marriage, which should be equitably divided by the Court.
14. The Court should award Plaintiff OR Defendant spousal support/alimony in a reasonable amount to be determined by the Court based on the Plaintiff's Defendant's need and the Plaintiff's Defendant's ability to pay as follows: _____
 _____ (use additional paper if necessary); **OR**
- Neither party shall be awarded spousal support/alimony.
15. The Plaintiff's Defendant's previous name may be restored if he or she desires.

WHEREFORE, the Plaintiff respectfully requests that the Court:

1. Grant the Plaintiff a divorce from the Defendant and dissolve the marriage;
2. Award:
 - a. The parties joint legal custody and Plaintiff or Defendant to have physical custody; **OR**
 - b. The parties joint legal and joint physical custody; **OR**
 - c. Plaintiff or Defendant to have sole legal and physical custody; **OR**
 - d. Other (Please describe desired legal and physical custody arrangement in detail) _____

 _____;
3. Order that the Plaintiff OR Defendant pay child support in an amount determined by the Court using the Wyoming Child Support Guidelines;
4. Order that the Plaintiff OR Defendant, OR Both parents provide medical support for the minor child(ren);
5. Order a just and equitable division of the marital property and debts;
6. Order that:
 - No party is entitled to spousal support; OR
 - Reasonable spousal support should be paid by Plaintiff, OR Defendant as the circumstances and facts may require;

7. Order that the Plaintiff Defendant resume his or her previous name at the conclusion of this lawsuit if he or she wishes; and
8. Order such other and further relief as the Court deems just and equitable.

STATE OF WYOMING)
) ss.
 COUNTY OF _____)

The Plaintiff, _____, under the penalty of perjury, verifies that she/he has read the *Complaint for Divorce*, knows the contents thereof, and that the statements in the *Complaint for Divorce* are true to the best of her/his own knowledge.

DATED this ____ day of _____, 20____.

 Signature
 Printed Name: _____
 Address: _____
 Phone Number: _____

Subscribed and sworn to before me this ____ day of _____, 20____.
 Witness my hand and official seal.

 Notarial Officer

My Commission Expires:

-----Fill in, if applicable-----
 Pursuant to Rule 102(a)(1)(B) of the Wyoming Uniform Rules of District Court, the following attorney has participated in the preparation of this pleading but said attorney is NOT deemed to have entered an appearance in this matter:

 Attorney's Name
 Attorney's Address/Telephone:

