

_____ : **IN THE COURT OF COMMON PLEAS**
Plaintiff :
VS. : **OF ERIE COUNTY, PENNSYLVANIA**
 _____ :
Defendant : **NO.**

COMPLAINT FOR (Circle One of the Following)

*(Primary Residence / Shared Custody / Partial Custody / Visitation /
 Modification of An Existing Order / Special Relief)*

1. The plaintiff is _____ residing at _____

2. The defendant is _____ residing at _____

3. The plaintiff seeks _____

<u>Name (of Child(ren))</u>	<u>Present Address (of Child(ren))</u>	<u>Birth Date (of Child(ren))</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

a) The child(ren) was / was not born out of wedlock.

b) The child(ren) is / are presently in the custody of _____ who resides at _____

c) During the past five (5) years, the child(ren) has/have resided with the following persons and at the following addresses:

<u>List the Persons</u>	<u>List the Addresses</u>	<u>Dates</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

- d) The mother of the child(ren) is _____, currently residing at _____.
- e) She is married, divorced or single.
- f) The father of the child(ren) is _____, currently residing at _____.
- g) He is married, divorced or single.

4. The relationship of the plaintiff to the child(ren) is that of _____. The plaintiff currently resides with the following persons:

<u>Name of Persons</u>	<u>Relationship to Plaintiff</u>
_____	_____
_____	_____
_____	_____

5. The relationship of the defendant to the child(ren) is that of _____. The defendant currently resides with the following persons:

<u>Name of Persons</u>	<u>Relationship to Defendant</u>
_____	_____
_____	_____
_____	_____

6. The plaintiff has / has not participated as a party or witness, or in another capacity, in other litigation (*court case*) concerning the custody of the child(ren) in this or another Court. The Court term and number and its relationship to this action is:

- a) The plaintiff has / has no information of a Custody proceeding concerning the child(ren) pending in a Court of this Commonwealth. The Court term and number and its relationship to this action is:

b) The plaintiff knows / does not know of a person, not a party to the proceedings, who has physical custody of the child(ren) or claims to have custody or visitation rights with respect to the child(ren). The name and address of such as person is:

7. The best interest and permanent welfare of the child(ren) will be served by granting the relief requested because: _____

8. Each parent whose parental rights to the child(ren) have not been terminated and the person who has physical custody of the child(ren) have been named as parties to this action. All other persons, named below, who are known to have or claim a right to custody or visitation with the child(ren) will be given notice of the pendency of this action and the right to intervene: _____

Wherefore, the plaintiff requests the Court to grant: _____

Plaintiff Date

I verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities.

Plaintiff Date