

- The Defendant is not a resident of the State of Georgia, but I am a resident of _____ County, Georgia, and *[select one]*:
- The Defendant was formerly a resident of the State of Georgia and currently resides in the State of _____. The Defendant is subject to the personal jurisdiction of the Court under Georgia's Long Arm Statute, OCGA § 9-10-91(5).
- The Defendant has acknowledged service of process and consented to the jurisdiction and venue of this Court.

**3.
Service of Process**

[Select one]

- The Defendant is a resident of _____ County, Georgia, and may be personally served with a copy of this complaint at _____.
- The Defendant is a nonresident of the State of Georgia, but *[he/she]* may be personally served with a copy of this complaint at _____.

**4.
Date of Marriage**

The Plaintiff and Defendant were lawfully married on _____, _____ in _____.

**5.
Separation**

The parties separated on _____, _____, and since that date have continuously lived in a state of separation.

**6.
Grounds for Divorce**

The Plaintiff is entitled to a divorce from the Defendant upon the following statutory grounds *[Choose all that apply]*:

- Intermarriage by persons within the prohibited degrees of consanguinity and affinity
- Mental incapacity at time of marriage
- Impotency at time of marriage

- Force, menace, duress, or fraud in obtaining marriage
- Pregnancy of the wife by a man other than the husband, at the time of marriage, unknown to the husband
- Adultery in either of the parties after marriage
- Willful and continued desertion by either party for the term of one year
- The conviction of either party for an offense involving moral turpitude and under which he or she is sentenced to imprisonment in a penal institution for a term of two years or longer
- Habitual intoxication
- Cruel treatment, which shall consist of the willful infliction of pain, bodily or mental, upon the complaining party, such as reasonably justifies apprehension of danger to life, limb, or health
- Incurable mental illness
- Habitual drug addiction
- The marriage is irretrievably broken

7.

Settlement Agreement

[Select one]

- The Plaintiff and Defendant have not entered into a Settlement Agreement.
- The Plaintiff and Defendant have entered into a Settlement Agreement, which both parties want to be incorporated into the Final Judgment and Degree for Divorce. The Settlement Agreement has been signed by both parties in front of a notary public, and has been filed with the Court, together with this complaint.

8.

Minor Children

There are _____ minor children as issue of the marriage between the parties. The names and ages of the minor children are as follows:

<u>Full Name</u>	<u>Age</u>	<u>Gender</u>	<u>Lives With</u>
_____	_____	_____	_____

<u>Full Name</u>	<u>Age</u>	<u>Gender</u>	<u>Lives With</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**9.
Child Custody**

In accordance with the best interest of the minor children, the Plaintiff requests that *[Select one]*:

- The children should be in full custody of _____.
- The Plaintiff and Defendant should share joint legal custody, with _____ maintaining primary physical custody.
- Other - _____

**10.
Visitation**

In accordance with the best interest of the minor children, the Plaintiff requests that *[Select one]*:

- The _____ should be granted reasonable visitation.
- Visitation for the Defendant should be limited in the following manner, for the following reasons:

**11.
Children's Current Residence**

The minor children currently live at _____
_____ in _____ County, with the
following people: _____
_____.

The children have lived at this address since approximately _____.

**12.
Children's Past Residence**

During the past five years, the children have lived at the following addresses:

<u>Address</u>	<u>Dates at Address</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

**13.
People With Whom Children Have Lived**

During the past five years, the children have lived with the following people

<u>Name of Person</u>	<u>Person's Current Address</u>
_____	_____
_____	_____
_____	_____
_____	_____

14.

Other Court Cases about Children

[Select one]

- The Plaintiff has never participated as a party or a witness or in any other capacity in any other litigation concerning the custody or visitation with the minor children in this or any other state.
- The Plaintiff has participated in other litigation concerning the custody of the minor children in Georgia or another state. The court, case number and date of an order concerning custody or visitation under the other litigation are as follows:

15.

Other Proceedings That Could Affect Custody or Visitation in This Case

[Select one]

- The Plaintiff does not have any information of any proceeding that could affect this case, including proceedings for enforcement and proceedings relating to family violence, protective orders, termination of parental rights, and adoptions in this or any other state.
- The Plaintiff has information about proceedings that could affect this case, including proceedings for enforcement and proceedings relating to family violence, protective orders, termination of parental rights, and adoptions in this or any other state. The court, case number, and the nature of the proceedings are as follows:

16.

Others Claiming Custody or Visitation

- The Plaintiff does not know of any person, who is not a party to this case, who has physical custody of the children, or who claims to have custody or visitation rights with respect to the children.
- The Plaintiff knows of someone, who is not a party to this case who has physical custody of the children, or who claims to have custody or visitation rights with respect to the children. The names and present addresses of the person[s] are:

17.

Child Support

[Select one]

- The Defendant has income or is capable or earning sufficient money to support the aforementioned minor children. Based on the Defendant's gross income of \$ _____ per month, and the Georgia child support guidelines (OCGA § 19-6-15), the Defendant should pay an amount of support between \$ _____ and \$ _____.
- Based on the Plaintiff's gross income of \$ _____ per month, and the Georgia child support guidelines (OCGA § 19-6-15), the Plaintiff should pay an amount of support between \$ _____ and \$ _____.
- The issue of child support cannot be decided in this action because the Court does not have personal jurisdiction over the Defendant.

18.

Health Insurance for Children

[Select one]

- The Defendant should be ordered to maintain a policy for medical, dental, and hospitalization insurance for the minor children.
- The Plaintiff already provides health insurance for the children, and the Defendant should be required to reimburse the Plaintiff for a fair share of the cost each month.
- The Plaintiff is not asking for the Court to address this issue in this case.
- The issue of health insurance cannot be decided in this action because the Court does not have personal jurisdiction over the Defendant.

19.

Other Medical Expenses for Children

[Select one]

- The Defendant should be responsible for all expenses incurred for the children's medical, dental, and hospital care that is not covered by insurance.
- Both parties should share the cost of expenses incurred for the cost of expenses incurred for the children's medical, dental, and hospital care that is not covered by insurance.
- The Plaintiff is not asking for the Court to address this issue in this case.
- The issue of health care expenses cannot be decided in this action because the Court does not have personal jurisdiction over the Defendant.

20.

Life Insurance to Support Children

[Select one]

- The children depend on the Defendant for support, and therefore the Defendant should maintain a policy of insurance on the Defendant's life, with a face amount of \$ _____, for the benefit of the minor children. The Defendant should maintain the policy for so long as at least one of the children is a minor or is otherwise entitled to support.
- The Plaintiff is not asking for the Court to address this issue in this case.
- The issue of life insurance cannot be decided in this action because the Court does not have personal jurisdiction over the Defendant.

21.
Alimony

[Select one]

- The Plaintiff *[and minor children, if any]* *[is/are]* substantially *[or entirely]* dependent upon the Defendant for *[his / her / their]* support and maintenance and *[is/are]* entitled to receive temporary and permanent alimony and support from the Defendant.
- The parties have entered into a written agreement for the support and maintenance of the Plaintiff and minor children of the parties which are filed herein.
- The Plaintiff is not requesting alimony because *[he/she]* is not dependent upon the Defendant or is not entitled to alimony because of adultery or desertion.
- The issue of alimony cannot be decided in this action because the Court does not have personal jurisdiction over the Defendant.

22.
Division of Property

[Select one]

- The parties have already divided the marital property, and are both satisfied with the division.
- The parties do not have any property acquired during the marriage.
- The parties have acquired the following property during the marriage, and the Plaintiff requests the *[he/she]* retain *[Select all that apply]*:

Marital home located at _____.

Other real estate located at _____

Mobil home (model: _____, year: _____)

Pension (Plaintiff's, worth \$ _____; Defendant's, worth \$ _____)

Motor vehicles listed here:

Model/year: _____

Model/year: _____

Model/year: _____

Furniture:

Listed here: _____

Listed on separate paper attached to this Complaint.

Bank accounts [and/or] other investments:

Listed here: _____

Listed on separate paper attached to this Complaint.

Other Property:

Listed here: _____

Listed on separate paper attached to this Complaint.

23.
Division of Debt

[Select one]

- The parties do not have any outstanding joint or marital debts.
- The parties have the following outstanding joint or marital debts, and responsibility for paying them should be as listed below:

<u>Creditor</u>	<u>Balance</u>	<u>Who Should Pay</u>
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____
_____	\$ _____	_____

- Listed on separated paper attached to this Complaint.
- The issue of dividing joint and marital debts cannot be decided in this case because the Court does not have personal jurisdiction over the Defendant.

24.
Restoration of Former Name

The Plaintiff requests that the Court restore her former name to _____.

FOR THESE REASONS, THE PLAINTIFF REQUESTS THE FOLLOWING RELIEF:

[Select all that apply]

- That the Plaintiff be granted a total divorce from the Defendant.
- That the Settlement Agreement signed by the parties be incorporated into the final Judgment and Decree of Divorce.
- That the custody and visitation for the minor children be ordered according to Paragraphs 9 and 10.
- That child support, health insurance, medical expenses, and life insurance for the support of the children be ordered according to Paragraph 17, 18, 19, and 20.
- That the Defendant be ordered to pay the Plaintiff alimony according to Paragraph 21.

- That the party's marital property be divided according to Paragraph 22.
- That the party's joint or marital debts be divided according to Paragraph 23.
- That the Plaintiff's former name be resorted according to Paragraph 24.
- That a Rule Nisi be scheduled by the Court to decide on the relief the Plaintiff has requested.
- That the Court order any and all other relief that the Court finds appropriate.

Respectfully submitted,

Dated

Plaintiff, Pro Se

Name

Address

Phone Number