

6. Respondent has acknowledged paternity of the minor, subject to these proceedings, and is listed as the legal and biological father on the minor's birth certificate.
7. Respondent has not attempted to contact or visit the minor subject to these proceedings, since TIME.
8. The minor has resided with Petitioner since TIME. Petitioner is the primary caretaker of the minor and was the primary caretaker of the minor when Petitioner and the minor were in COUNTRY. After Petitioner left COUNTRY, Petitioner's mother and father were the minor's primary caretakers.
9. Petitioner is not aware of any other case before this court or any other court to determine parental responsibilities.
10. Petitioner is a fit and proper person to have sole allocation of parental responsibilities of the minor child. Petitioner has acted in the best interest of the minor by providing the minor with food, shelter, clothing, economic support, and ensuring that he receives proper medical care and education.
11. Respondent is not fit to have allocation of parental responsibilities for the minor for the following reasons:
 - a. Respondent has neglected and abandoned the minor within the meaning of 750 ILCS 5/603.11(a), in that:
 - b. Respondent has failed to provide support for, and has never had contact with the minor since TIME.
 - c. Thus, Respondent has failed to provide the minor with care and supervision for the minor's entire life.

- d. Respondent was physically and emotionally abusive to Petitioner during their relationship.
 - e. Respondent has never provided economic support for the minor nor attempted to have any relationship with the minor.
12. The minor came to the United States in YEAR after several gangs threatened him and attempted to recruit him. His grandparents were becoming frail and he had no one else to reliably serve as his primary caretaker in COUNTRY.
13. It is not in the best interest of the minor to return to COUNTRY for the following reasons:
- a. The minor is living with his mother and has a close bond with her and a stable, safe environment in which to live in Illinois.
 - b. The minor received threats from gangs in COUNTRY and no reliable support system exists for him in COUNTRY.

WHEREFORE, Petitioner NAME respectfully requests that this Court enter an Order making the following findings of fact and granting Petitioner the following relief:

1. Grant Petitioner sole allocation of parental responsibilities, including education, health care, religion, and extracurricular activities of minor NAME.
2. Find that reunification of the minor with Respondent is not viable due to his neglect and abandonment of him pursuant to 750 ILCS 5/603.11(a).
3. Find that it is in the minor's best interest that Petitioner be designated the residential parent, and that it is not in the minor's best interest to return to COUNTRY where Respondent may reside.

4. That all remaining issues concerning parenting time and child support be reserved.
5. That Petitioner be granted such other relief as this Honorable Court may deem just and equitable.

Dated: _____

Respectfully submitted,

Attorney for Petitioner

CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he truly believes the same to be true.

Dated _____

Petitioner

Attorney Name
Contact Information